



June 10, 2022

The Honorable Benjamin Allen
Chair, Senate Environmental Quality Committee
1021 O Street, Suite 6610
Sacramento, CA 95814

**RE: AB 2550 (Arambula): San Joaquin Valley Air Pollution Control District – OPPOSE
As Amended April 28, 2022
Set for Hearing June 15, 2022 – Senate Environmental Quality Committee**

Dear Senator Allen:

On behalf of the California State Association of Counties, Urban Counties of California (UCC), and Rural County Representatives of California (RCRC), collectively representing all 58 counties in the state, we write to respectfully oppose AB 2550 (Arambula). AB 2550 would remove local control and responsibility to regulate stationary sources of air pollution and transfer this responsibility to the California Air Resources Board (CARB), even though CARB already has the authority to oversee local air quality management activities.

California is a geographically and economically diverse state and removing local control would obstruct efforts to tailor air pollution control to unique regional and local needs. As the San Joaquin Valley Air Pollution Control District (District) stated in their letter dated April 18, 2022, “the San Joaquin Valley faces one of the most significant air quality challenges in the country due to its unique topography, climate, geography, and the presence of two major transportation corridors, creating a significant public health challenge for Valley residents.” While the District faces many challenges, it currently works closely with CARB and the changes proposed by AB 2550 will not improve this relationship nor expedite the achievement of clean air for Valley residents.

Air districts have the expertise and primary regulatory authority to regulate stationary sources of emissions, but they do not develop these plans unchecked. Current law requires air quality plans to be developed jointly between CARB and local air districts and are subject to extensive public review at both the state and local levels. The plans must take in to account public comment before being submitted to the United States Environmental Protection Agency which conducts its own public review. These local, state, and federal partners have worked together

successfully to dramatically reduce air pollution and improve air quality in communities across California. Should a district fail to uphold their responsibilities in these joint activities, CARB has the ability to step in and take over the district's role. However, CARB has never been required to invoke this authority.

We understand the intention of AB 2550 is to improve the lives of San Joaquin Valley residents, however, we firmly believe that maintaining local control is the best way to do this. It is critical that local agencies and districts have the flexibility to develop regulations that take into account specific local and regional needs. It is for these reasons that we oppose AB 2550.

Sincerely,



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Honorable Members and Consultants, Senate Environmental Quality Committee
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