



September 12, 2023

## **ASSEMBLY FLOOR ALERT**

### **Assembly Bill 985 (Arambula) – Request a NO Vote As Amended July 6, 2023 – OPPOSED**

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On behalf of the California State Association of Counties (CSAC), the Urban Counties of California (UCC), and the Rural County Representatives of California (RCRC), which collectively represent all 58 counties in the state, we write to respectfully oppose Assembly Bill 985 (Arambula), which would add a strain to the limited resources on the existing emission reductions credit (ERC) program.

While the District faces many challenges, it currently works closely with the state, specifically, the California Air Resources Board (CARB) and United States Environmental Protection Agency (EPA). This partnership has led to some of the country's most stringent emissions rules and a 90 percent reduction in stationary source emissions. Every proposed ERC is made available for review and comment by CARB, EPA, and the public prior to being issued. This exhaustive process was designed to ensure that the ERC program is successfully contributing to the District's clean air goals, best serves residents, and will not cause a health risk to surrounding communities. It is exceedingly difficult and expensive for businesses to reduce emissions beyond rule requirements to generate ERCs.

In addition, the District will need millions of dollars in additional annual and ongoing costs to come in to compliance with AB 985's requirements, and the bill contains no methods for cost recovery or reimbursement. These costs will hamper the District's ability to continue the important work they are already doing to curb emissions. CARB has also estimated that it will need at least 20 new positions to implement AB 985, on top of millions of dollars of their own annual and ongoing costs. These are funds that could be used to enhance programs that are already working for Valley residents, and all Californians.

We share the goal of improving the environment and public health for San Joaquin Valley residents, however, we firmly believe that the state must cooperate and coordinate with local government to determine the portfolio of solutions that will best utilize existing resources. It is critical that local agencies and districts have the flexibility to develop regulations that take into account specific local and regional needs. For these reasons, we oppose AB 985. If you have any questions and/or concerns about our positions, please do not hesitate to contact Ada Waelder, [awaelder@counties.org](mailto:awaelder@counties.org), Jean Kinney Hurst, [jkh@hbeadvocacy.com](mailto:jkh@hbeadvocacy.com) or Staci Heaton, [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

cc: The Honorable Joaquin Arambula, California State Assembly