



June 20, 2024

The Honorable Juan Carrillo
Chair, Assembly Local Government Committee
1020 N Street, Room 157
Sacramento, CA 95814

**RE: Senate Bill 1193 (Menjivar) – OPPOSE UNLESS AMENDED
As Amended June 19, 2024**

Dear Chair Carrillo:

On behalf of Rural County Representatives of California (RCRC), we respectfully oppose unless amended, Senate Bill 1193 (Menjivar). RCRC is an association of forty rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each member county.

Many of our initial concerns with this legislation were addressed in the Assembly Transportation Committee. We greatly appreciate the work of the Transportation Committee Chair and her staff to ensure that this legislation does not create a conflict between federal and state laws, which would have put California airport operators in the unenviable position of having to decide which laws to follow, and which with not to comply. Under the previous version of this bill, an airport authority that would not comply with federal grant conditions would have been subject to the loss of federal grant funds, which are essential to airports to stay operable, as well as a \$5000 a day civil penalty.¹ Similarly, violation of state laws by airport authorities leaves them at risk for costly litigation.

While the amendments made by the Transportation Committee address the conflict of laws through 2030, as currently amended the bill still risks placing airports in untenable position in 2031, namely if, for unforeseen or unanticipated reasons, the aviation and fuels industries have not developed a safe and widely commercially available 100 octane unleaded alternative to the current low-leaded standard. Were that scenario to occur, this bill would impose a ban on the sale of a fuel type that currently fuels the entirety of the piston engine fleet in California, as well as piston rotor crafts. Such a ban prior to the availability of a safety certified and commercially available alternative would

¹ U.S. House of Representatives Committee on Transportation and Infrastructure, FAA Reauthorization Act of 2024 Final Section-by-Section analysis (H.R. 3935), p. 50

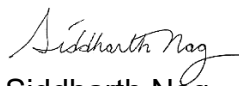
impair much of the state’s small aircraft fleet, and shutter general aviation airports—especially rural general aviation airports that sustain commerce and emergency response in their communities.

We ask that this committee consider further amendment to the bill, specifically a one-year pause that would preclude the bill’s fuel ban in the case where: (1) the Federal Aviation Administration Administrator has not designated an unleaded replacement fuel for the current 100 octane low-lead standard, or (2) the fuels industry has not successfully advanced a replacement fuel under the Piston Aviation Fuels Initiative (PAVI), also overseen by FAA. We ask that this amendment allow the ban to be paused for a year if neither of these pathways for the successful testing, proving, and manufacture of a replacement standard has yet to be achieved. We ask that the one-year pause renew annually until the replacement standard has been identified per the above-mentioned conditions, which conform with the current federal process for providing for replacement fuels.

While we greatly hope that the current FAA-industry collaborative, EAGLE², is able to successfully identify a replacement standard on or before 2030, we believe these additional amendments are prudent to ensure that our state’s general aviation airports remain in operation, should the unforeseen occur.

For these reasons, RCRC must oppose unless amended, SB 1193 (Menjivar). Please do not hesitate to contact me at (916) 447-4806 or snag@rcrcnet.org if you have questions or would like to discuss further.

Sincerely,



Siddharth Nag
Policy Advocate

cc: The Honorable Caroline Menjivar, Member of the California State Senate
Members of the Assembly Local Government Committee
Angela Mapp, Chief Consultant, Assembly Local Government Committee
William Weber, Consultant, Assembly Republican Caucus

² FAA “Eliminate Aviation Gasoline Lead Emissions (EAGLE).” Found at www.faa.gov/unleaded