



California Special
Districts Association
Districts Stronger Together

Written Record Only
19-12-4

December 12, 2019

Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: **Concerns Regarding Board Agenda Item 19-12-4: Proposed Advanced Clean Truck (ACT) Regulation**

Dear Chair Nichols and Members of the Board,

The California Special Districts Association (CSDA) has concerns regarding the proposed Advanced Clean Truck (ACT) regulation scheduled for discussion on the California Air Resources Board's December 12, 2019 agenda.

CSDA represents over 1,000 special districts and affiliate organizations throughout the state. These districts provide millions of Californians with essential local services – such as fire protection, sanitary, resource conservation, parks and recreation, utility, water – and maintain fleets with medium duty trucks/heavy duty pick-ups that enable them to provide the critical services their constituents rely on.

Currently, the potential cost impacts of the ACT to special districts is unknown. CSDA has concerns on the unforeseen impact to district budgets and operations, as well as the potential for needed inventory to become limited due to potential reduction in manufacturing offerings as a result of the requirements as currently proposed.

Special districts' ability to raise revenues is limited and is directly tied to either the rate payor and/or to property taxes. As such, increased cost burdens to operations may result in increased costs for delivery of services or reduced service levels. Specifically, CSDA is concerned potential impacts of the ACT to district budgets could directly lead to a reduction in critical services provided by districts to their community.

We thank you for your consideration.

Sincerely,

Alyssa Silhi,
Legislative Representative

California Special Districts Association

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