



Strengthening the Voice of Business

**BizFed Central Valley
Member Alliance**

African American
Farmers of California
Associated Builders and
Contractors
Building Industry
Association - Visalia
California Association of
Mutual Water Companies
California Independent
Petroleum Association
Downtown Visalians
Employers Group
Fresno County Farm
Bureau
Fresno Metro Black
chamber
Hong Kong Trade
Development Council
Independent Oil
Producers Agency
Kern Citizens for Energy
National Association of
Royalty Owners - CA
Chapter
Nisei Farmers League
Pacific Merchants
Shipping Association
Tulare County
Association of Realtors

April 16, 20018

Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Community Air Protection Program Framework AB 617

Dear Mr. Corey:

Thank you for the opportunity to comment on the preliminary outline for the proposed AB 617 Community Air Protection Program.

We are writing on behalf of BizFed Central Valley, a federation of businesses and top business associations representing 20,000 employers and more than 400,000 employees in the five counties from Kern to Madera. Our coalition represents diverse industry sectors including business services, construction, energy, farming, trade, goods movement, health, and manufacturing. On behalf of our members we would like to offer some feedback for consideration regarding the Community Air Protection Program framework developed by ARB.

First, ARB's explicit emphasis on zero-emission technologies in achieving AB 617 goals, negates consideration of other low-emission technologies that could be a better fit for various regions in California, which are highly diverse.

ARB's insistence on zero-emission reduces choice and innovation and limits the ability for communities to find the best, most economically viable path to reduced emissions.

And we are concerned that a regulatory body, funded and supported by California tax payer money would explicitly endorse one form of technology over another.

We ask that ARB remain technology-neutral in implementing AB 617.

Central Valley industries, and residents rely on goods movement in order to sustain their economic vitality, a state-mandated program should consider what is cost-effective and realistic to all regions in the state, in particular those regions such as the Central Valley, which bears the greatest pollution burdens in the state.

A large portion of jobs in California's Central Valley rely on energy production and the goods movement industry. Interstate 5 and Highway 99 are our main corridors and encompass nearly every city between Sacramento and Los Angeles. Our cities and population are far removed from a zero-emissions reality and the region currently does not have the funding or infrastructure that exist in wealthier parts of the state.

We also believe the identification and selection of communities for participation in the program should be based on comprehensive air quality data and an extensive evaluation of all emissions sources. The regulatory processes should be transparent and based on sound science with adequate peer review – including business and industry operators who understand the technical application of reaching air quality goals. The intention should be to improve air quality and public health in a manner that considers the Central Valley's economic resources and sustainment means.

Finally, in regards to enforcement, this responsibility and authority should be vested with the Air Resources Board and with local air districts. These entities have the expertise and resources to accurately identify violations. We think they are properly suited to oversee AB 617's intended air monitoring and program goals.

Thank you for taking our comments into consideration.

If you have any questions please contact Lois Henry, BizFed CV's Advocacy Director at (661) 204-3635 or lois.henry@bizfed.org

Sincerely,



Joe Ashley
2018 Chair
California Resources Corp.

Darrius Assemi
2018 Advocacy Co-Chair
Granville Homes



Steve Nelsen
2018 Advocacy Co-Chair
Downtown Visalians

Cc: San Joaquin Valley Air Pollution District