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February 11, 2022

The Honorable Gavin Newsom
Governor, State of California
1021 O Street, 9th Floor
Sacramento, CA 95814

The Honorable Toni Atkins
President Pro Tempore of the California State Senate
1021 O Street, Suite 8518
Sacramento, CA 95814

The Honorable Anthony Rendon
Speaker of the California State Assembly
1021 O Street, Suite 8330
Sacramento, CA 95814

Re: 2022-23 Funding Priorities – Air Quality and Public Health

Dear Governor Newsom, President Pro Tempore Atkins, and Speaker Rendon:

On behalf of the California Air Pollution Control Officers Association (CAPCOA), I am writing to express support for air quality funding provided in the proposed state budget and encourage further investment to protect public health at greater levels. We appreciate the significant investments in air quality programs to date, which have and will continue to result in significant socioeconomic and public health gains, especially in disproportionately affected communities. However, California is facing enormous challenges meeting health-based air quality attainment standards and in reducing air pollution and toxics in disproportionately affected communities, so it is critical that air quality and public health be further prioritized for funding; in light of the enormous budget surplus, there is an opportunity to improve public health now by investing further in air pollution reduction.

Carl Moyer/AB 923 Incentive Programs Reauthorization & AB 8 Clean Air Programs Funding Extension

We strongly supported the 2021-22 budget proposal extending clean air program funding reauthorized in 2013 by AB 8 (Perea and Skinner) and of course are disappointed the extension did not pass last year. These programs, which include the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer program) and AB 923 local incentives program, are critical to meeting California's clean air goals. In cooperation with CARB, air districts administer the highly successful Carl Moyer program, which provides incentives to private businesses and public agencies to voluntarily clean up older, dirtier vehicles and mobile off-road engines. Since its inception in 1998, the Carl Moyer program has enabled the replacement, scrapping or repower of over 68,000 engines resulting in reduction of more than 194,000 tons of Nitrogen Oxides and Reactive Organic Gases, which contribute to smog formation and reduction of over 7,100 tons of particulate matter much of which is diesel exhaust – an air toxic¹. The local AB 923 incentives program provides funding for school bus replacements, agricultural equipment, light duty vehicle scrapping programs and Carl Moyer qualifying projects. Reauthorizing these two programs, which are efficient, effective, and primarily locally operated and address local conditions and priorities, is essential to meeting California's clean air goals which include attaining both health-based National (federal) and California (state) Ambient Air Quality Standards. Although modest non-legislative changes are needed to modernize the Carl Moyer program guidelines to account for the near-zero and zero emission technologies now available, the program is still a necessary tool in achieving cleaner air throughout California. In order to allow for programs to continue seamlessly, help inform State Implementation Plan development and provide business certainty, we strongly urge you to reauthorize these important clean air programs this legislative year.

Wildfire Response and Mitigation

As you know, prescribed fire is a highly effective tool in reducing wildfire risk. Recognizing this, SB 1260 (Jackson; Chapter 624, Statutes of 2018) created a program to expand prescribed burns, including increased monitoring, public outreach, and other related work. The program, which was funded in the 2021-22 budget at \$2M, is implemented jointly between air districts, CAPCOA, CARB, CalFire and our other partners is providing critical public health and safety benefits statewide. CAPCOA strongly supports the proposed budget funding of \$2M each year for 2022-23 and 2023-24 for continuance of this program, which is helping to meet the goal of treating one million acres of vegetation annually beginning 2025 as identified in the U.S. Forest Service and California Memorandum of Understanding.

As wildfire events become more common and severe, emergency response is an area that is requiring significantly more attention. However, due to lack of funding for this activity and restrictions on how local funding can be used, air districts are limited in their ability to provide the necessary resources and assistance to do the job. A new budget appropriation would assist

¹ 2019 CARB Carl Moyer Program Statistics Report

air districts in protecting the public from wildfire smoke impacts. This funding would allow air districts to purchase additional monitors, as well as home filtration devices for disadvantaged and low income communities to create "clean air rooms" during smoke impact events. Finally, this funding would provide air districts the ability to develop a California-based smoke outreach program which would include training smoke outreach coordinators with expertise in air quality monitoring, smoke modeling, pollutant health thresholds and smoke risk mitigation. We would welcome the opportunity to work with you on this important issue.

Assembly Bill 617 Community Air Protection Program Funding

The air districts have been and continue to work diligently with communities to implement this worthy community-focused program that will improve the lives of people disproportionately impacted by severe air pollution. We are grateful for the proposed \$50M for air district implementation; however, this is the same amount that has been provided annually since FY 2018 – 2019 when there were only 10 communities in the program and funding was already insufficient. Despite this, communities are added every year such that it now includes 17 but at the same time funding has not been increased a single dollar, resulting in increasingly less resources for each community in the program. This dichotomy exacerbates the significant challenges we face in program implementation.

Further, we note incentives have been reduced from \$260M in last year's budget to \$180M, which is an over 30% cut to a program that is already underfunded. Many communities are at the most significant phase of this program, which is implementation of measures that communities have requested. Sufficient, continuous implementation and incentive funding are critical to ensuring program success. Without sufficient funding, air districts will not have the necessary resources to implement community emission reduction programs, which will ultimately result in failure to meet the emission reduction goals of this program and commitments to these disproportionately impacted communities. Funding is needed to ensure critical functions can be performed such as community outreach, monitoring, engineering, modeling, emissions inventory, analysis, developing community emission reduction plans, identification and implementation of emission reduction measures, rule development, and other activities that support AB 617 implementation. Without sufficient resources, the work being done by communities and air districts to clean up air pollution will be compromised and creates a scenario in which communities must compete with one another for limited funds.

In addition to the work associated with the implementation and ongoing support for the currently identified 17 communities, there is also a significant amount of work required under AB 617 that falls on the shoulders of all air districts across California. This includes the expedited development and implementation of Best Available Retrofit Control Technology rules and regulations, extensive expansion of the Criteria and Toxic Contaminant emission inventory, and extensive community engagement with disadvantaged communities. Many of the air districts who implement this effort experienced significant cuts in the amount of funding available which results in staff time and resources being diverted from other priorities like attaining the federal and state ambient air quality standards. This is only one example

highlighting the need to provide additional funding to support district efforts for all regions of the state.

Finally, it is imperative to identify a continuous stream of funding to sustain this effort in future years. Each of the community air monitoring and emission reduction plans contain commitments that last several years. Securing funding for future years helps plan for resources and staff for these actions.

Agricultural Diesel Replacement and Upgrades

The Agricultural Replacement Measures for Emission Reductions (FARMER) program provides funding through local air districts to reduce emissions from agricultural harvesting equipment, heavy-duty trucks, agricultural pump engines, tractors and other equipment used in agricultural and forestry operations. Incentives for purchasing the cleanest available vehicles and equipment are crucial to achieving emission reductions of criteria air pollutants, toxic air contaminants and greenhouse gases from the agricultural and forestry sectors necessary to meet health-based federal and state air quality standards in nonattainment areas and fulfill California's climate change goals. We are very appreciative of the \$212.582M the FARMER program received in the 2021-22 budget and \$150M in funding proposed for 2022-23; we respectfully request increasing funding for the program, which will enable districts to expeditiously and significantly reduce harmful air pollutant emissions from the agricultural sector.

Woodsmoke Reduction Programs

CARB data shows that without significant reductions in emissions from residential wood combustion, it is forecast to be the largest individual human made or anthropogenic source of black carbon in 2030, accounting for a quarter of anthropogenic black carbon emissions. Residents throughout California will benefit from a well-funded voluntary incentive program to replace inefficient and uncertified wood heating devices with cleaner certified heating devices. Replacing uncertified devices can cost-effectively provide quantifiable reductions of greenhouse gases and short-lived climate pollutants, as well as PM2.5, which has serious negative health effects, providing long-term climate and localized public health benefits.

For many parts of California, wood heating devices provide either a primary source of home heating or are used to supplement other types of home heating. Based on 2013 census data, there are approximately 217,000 residences in California that use wood heating as their primary source of heat, and an estimated additional 3.6 million residences that use wood heating to supplement other sources of heat. CARB's Short-Lived Climate Pollution Strategy has set a reduction goal for black carbon from wood heating requiring change-out or removal of over 300,000 uncertified wood heating devices. We are pleased the 2021-22 budget included \$5M for the Woodsmoke Reduction Program. These programs are typically oversubscribed, and demand far exceeds available funds. Unfortunately, this year's proposed budget does not include funding for this program therefore we request it be added to the final budget. Providing incentives for woodsmoke reduction is a wise investment that will help California meet its climate and public health goals.

The Honorable Gavin Newsom
The Honorable Toni Atkins
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CAPCOA is committed to reducing air pollution in California and ensuring that every one of the state's 40 million residents can breathe clean, healthful air. We would welcome the opportunity to meet with you to share our concerns. Should you have any questions, please do not hesitate to contact me at (805) 961-8853, or our Legislative Advocate, Brendan Twohig at (916) 492-9363.

Sincerely,



Aeron Arlin Genet
President

Cc: The Honorable Toni Atkins, President Pro Tempore, California State Senate
The Honorable Anthony Rendon, Speaker of the California State Assembly
The Honorable Nancy Skinner, Chair, Senate Committee on Budget and Fiscal Review
The Honorable Phil Ting, Chair, Assembly Committee on Budget
The Honorable Bob Wieckowski, Chair, Senate Budget Subcommittee No. 2 on Resources, Environmental Protection and Energy
The Honorable Richard Bloom, Chair, Assembly Budget Subcommittee No. 3 on Climate Crisis, Resources, Energy, and Transportation
Jared Blumenfeld, Secretary for Environmental Protection
Liane M. Randolph, Chair, California Air Resources Board
Christine Hironaka, Deputy Cabinet Secretary, Office of Governor Newsom
Lauren Sanchez, Senior Climate Advisor, Office of Governor Newsom
Matt Almy, Program Budget Manager, Natural Resources, Environment and Capital Outlay