

Chambers of Commerce

Alhambra
Arcadia
Azusa
Bell Gardens
Beverly Hills
Burbank
CalAsian
Central City Association
Century City
Culver City
El Monte/South El Monte
Filipino American SEC
Glendale
Glendora
Greater Lakewood
Greater Los Angeles African American
Harbor City / Harbor Gateway
Hollywood
Inglewood Airport Area
Irwindale
La Canada Flintridge
LAX Coastal Area
Long Beach Area
Los Angeles Area
Los Angeles Junior
Los Angeles Latino
Los Angeles Metropolitan Hispanic
Malibu
Pacific Palisades
Pasadena
Pomona
Redondo Beach
Regional Black - San Fernando Valley
Regional Hispanic
Regional San Gabriel Valley
Rosemead
San Pedro Peninsula
Santa Monica
Santa Monica Junior
South Bay Association
Toluca Lake
Torrance Area
United Chambers San Fernando Valley
Universal City North Hollywood
United States-Mexico
Vernon
Vietnamese American
West Hollywood
West Los Angeles
Westside Council
West Valley/Warner Center
Wilmington

Trade Associations

AIA Los Angeles
American Beverage Association
Antelope Valley Board of Trade
Apartment Association, California Southern Cities
Apartment Association of Greater Los Angeles
Arcadia Association of Realtors
Asian American Business Women Association
Asian American Economic Development Enterprise
Asian Business Association
Association of Industrial and Commercial Producers
Beverly Hills / Greater LA Association of Realtors
Building Industry Association, LA / Ventura Counties
Building Owners & Managers Association, Greater LA
Burbank Association of Realtors
California Apartment Association, Los Angeles
California Business Roundtable
California Cannabis Industry Association
California Construction Industry and Materials Association
California Contract Cities Association
California Fashion Association
California Grocers Association
California Hotel & Lodging Association
California Independent Bankers
California Independent Petroleum Association
California Life Sciences Association
California Metals Coalition
California Restaurant Association
California Small Business Alliance
California Trucking Association
CALinnovates
Carson Dominguez Employers Alliance
Citrus Valley Association of Realtors
Coalition for a Prosperous America
Community Associations Institute, Los Angeles
Construction Industry Air and Water Quality Coalitions
Consumer Healthcare Products Association
Council on Trade and Investment for Filipino Americans
Downey Association of Realtors
Downtown Long Beach Associates
Employers Group
Engineering Contractor's Association
Entrepreneurs Organization, Los Angeles
F.A.S.T. - Fixing Angeles Stuck in Traffic
FilmLA
FuturePorts
FWD.us
Glendale Association of Realtors
Greater Los Angeles New Car Dealers Association
Harbor Association of Industry and Commerce
Harbor Trucking Association
Hospital Association of Southern California
Hotel Association of Los Angeles
Industry Manufacturers Council
International Warehouse Logistics Association
Japan Business Association of Southern California
Leadership for Urban Renewal Network
League of California Cities
Los Angeles Black MBA Association
Los Angeles Cleantech Incubator
Los Angeles County Bicycle Coalition
Los Angeles County Waste Management Association
Los Angeles Urban League
Los Angeles World Affairs Council
Maple Business Council
Motion Picture Association of America
MoveLA
NAIOP Southern California Chapter
National Alliance for Jobs and Innovation
National Association of Women Business Owners, LA
Pacific Merchant Shipping Association
Pasadena-Foothills Association of Realtors
Recording Industry Association of America
Rotary Club of Los Angeles
San Gabriel Valley Civic Alliance
San Gabriel Valley Economic Partnership
Santa Clarita Valley Economic Development Corp.
Society of Hispanic Professional Engineers - Los Angeles
South Asian Business Alliance Network
South Bay Association of Realtors
Southern California Golf Association
Southern California Grantmakers Association
Southern California Minority Supplier Development Council, Inc.
Southland Regional Association of Realtors
Towns Hall Los Angeles
Tri-Counties Association of Realtors
U.S. Green Building Council-LA
Valley Economic Alliance
Valley Economic Development Center
Valley Industry & Commerce Association
Valley International Trade Association
We Care for Humanity
West San Gabriel Valley Association
Western Manufactured Housing Association
Western States Petroleum Association
Young Professionals in Energy - LA Chapter
Youth Business Alliance

Business Improvement Districts

Gateway to LA
South Park Stakeholders Group
Warner Center Association
Westwood Village Improvement Association

April 20, 2016

Honorable Kevin de Leon
President pro Tempore, California State Senate
State Capitol
Sacramento, California 95814

Re: SB 1387 – OPPOSE

Dear Senator de Leon:

On behalf of the Los Angeles County Businesses Federation (BizFed) - a grassroots alliance of more than 150 top business groups representing 275,000 employers with 3 million employees throughout Los Angeles County - we are writing to express our strong opposition to SB 1387.

BizFed has been deeply involved in the South Coast AQMD's rulemaking process over the years. BizFed participated in development of the 2012 Air Quality Management Plan, and is also participating in the development of the 2016 AQMP.

Our opposition to SB 1387 is informed by this historical experience, as well as by our extensive, direct participation in the three-year long process leading up to the December 4, 2015 amendments to RECLAIM, and input from our members.

We must oppose this bill because:

- **SB 1387 undermines local control over air quality regulatory policy and transfers key regional authority to Sacramento.** Regional air quality management districts were established to assign responsibility for crafting regulations to ensure compliance with state and federal air quality laws and rules based upon conditions and circumstances unique to those regions. As such, air district boards were intentionally comprised primarily of elected officials such as mayors, city council members and county supervisors, as well as gubernatorial and legislative appointees. SB 1387 would effectively "stack" the South Coast Air Quality Management District board with hand-picked political appointees representing a single constituency and unanswerable to the public.
- **SB 1387 undermines the public process.** Why even bother to have local or regional boards? Why bother to invite and receive public testimony? And why bother to have stakeholder involvement in the rule-making process? Why bother to have a public process, when in the end, Sacramento will have the power to control six votes, i.e., the three current appointee seats and the proposed addition of three more appointee seats.
- **SB 1387 jeopardizes market-based incentive programs.** Under current law, market-based incentive programs are required to achieve reductions equivalent to command and control programs while

maintaining or enhancing California's economy. SB 1387 removes those economic benefits and protections, and establishes emissions reduction levels greater than those that could be achieved under command and control measures. The resulting increases in compliance costs, delays and disputes will have the unintended consequence of actually impeding the attainment of requisite air quality standards in Southern California.

SB 1387 is not necessary and this is an intrusion of state government that will weaken local control and the public process.

The SCAQMD Board has a long history of decision making that yields landmark emissions reductions and significant corresponding improvements in public health over the years. The recent amendments to the RECLAIM program continue that outstanding record. SCAQMD stated in their December 5, 2015 press release, "The action taken by SCAQMD's Governing Board...is the largest single pollution cut adopted by the agency in recent years. Since the adoption of RECLAIM in 1993, there has been a 71 percent decrease in emissions, new technology for pollution controls, better monitoring and reporting, and a high level of compliance in achieving facility emissions caps."

For these reasons, BizFed must respectfully oppose SB 1387.

Thank you for your consideration.

Sincerely,



Gilbert F. Ivey
BizFed Chair
Former CAO,
Metropolitan Water District



David Fleming
BizFed Founding Chair



Tracy Rafter
BizFed Founding CEO
IMPOWER, Inc.

Cc: Senate Environmental Quality Committee