

May 23, 2008

**Air Resources Board**

Chuck Shulock, Edith Chang,  
Kevin Kennedy, Dean Simeroth  
By Email

**Re: Recommendations on AB 32 Scoping Plan on Corn Ethanol Refineries, Electricity Generation, and Oil Refineries from Environmental Justice Organizations**

Dear Sirs/Madam,

This joint set of recommendations for the Scoping Plan for corn ethanol refineries, electricity-generating power plants, and oil refineries comes from environmental justice organizations representing low-income communities and communities of color from around California. These communities are living fence-line to industry and therefore are disproportionately affected by the pollution—pollution contributing to global warming—and are suffering health impacts. Health impacts encompass respiratory illnesses including asthma and shortness of breath, elevated levels of cancer, eye, nose and throat irritation, nausea, headaches, skin rashes and skin conditions, reproductive harm, neurotoxicity, and hormone disruption. With communities also being directly affected by global warming, we have an urgent and important responsibility to implement AB 32 while weighing-in benefits like reducing co-pollutants and toxic air contaminants and opportunities for expanding public participation in decision-making and moving towards the long-term goal of diminishing our dependence on fossil fuels.

We are deeply concerned about the current actions by the oil and corn ethanol refineries and fossil-fueled electricity-generating power plants to expand, modify and create new infrastructure. These developments will continue California's dependence on fossil fuels and undermine AB 32 goals. Furthermore, a cap and trade scheme will exacerbate disproportionate burdens of pollution on low-income communities of color. These fail to answer the question, "How will we reduce global warming and the devastation it brings?"

The approach we are ardently urging ARB to adopt include a moratorium on new sources, using direct control regulations to achieve reductions through energy efficiency, conservation and utilizing alternative energy. **Our detailed recommendations for readily available and specific solutions are attached in three parts by sector—Attachment A - Corn Ethanol Refineries, Attachment B - Electricity Generation, and Attachment C – Oil Refineries (plus two reports cited in Attachment C comments).** We look forward to hearing back from ARB and working together to making these a part of our solutions in the Scoping Plan.

Sincerely;

Tom Frantz, President

**Association of Irritated Residents (AIR)**

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cc.

**Air Resources Board**

John Courtis, Tim Dunn,

Lucille van Ommering, Cheri Davis

**Environmental Justice Advisory Committee**

Co-chairs Angela Johnson Meszaros, Jane Williams

**Five Attachments:** Attachment A - Corn Ethanol Refineries, Attachment B - Electricity Generation, and Attachment C – Oil Refineries, plus two attached reports cited in Attachment C – (Brandt and Farrell, and Flaring Prevention)