

August 31, 2018

Submitted via email to ctr-report@arb.ca.gov

Dave Edwards
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: AB 617 Draft Regulation comments

Dear Mr. Edwards:

Below please find KCCHE's comments to provide input on the proposed implementation of AB 617. Our organization represents underprivileged communities, farms, dairies, nut and cotton processors and more. The proposed regulation for criteria pollutant and toxic air contaminant emissions reporting will affect our members and we are submitting these comments to request changes to the draft regulations.

AB 617 is a redundant law. Our representative to the SJVUAPCD Citizens Advisory Committee pointed out the waste and inefficiency of a monitoring system which runs separately from the monitoring of the SJVUAPCD. The CAC already has an off shoot called the Environmental Justice Advisory Group (EJAG), which aligns with the stated goals of AB 617.

You are reinventing a wheel which already works very well. The only explanation for AB 617 is it will sell politically or it is an effort to circumvent the regional air boards. Either goal is wasteful of tax payer dollars and redundant. Reporting does not clean the air!

If there are better ways to monitor the criteria pollutants and toxic air contaminant emissions, those tools should be given to the SJVUAPCD not put into the hands of unqualified residents. We are afraid these the results can't be scientifically quantified or qualified into actual, provable peer reviewable outcomes.

The fact that most of us in the Central Valley make our livings in some form from agriculture is important to remember. This category includes most of the people you say you are trying to help. This brings up our biggest concern: pesticides were not discussed in the formulation of AB 617 and yet it now seems to be the intent of CARB to include pesticide use under AB 617 by requiring separate paperwork over and above the pesticide use reports submitted to the County Ag Commissioners. These reports are thorough and more added paperwork achieves nothing.

Enforcement personnel already exist at SJVUAPCD. They do a very good job. For the state to add redundant enforcement and then bring in local agents to enforce separately is inefficient, double jeopardy for the facility, and looks like a power grab by the state to undermine local districts' control.

To summarize: our members realize that AB 617 is law. Our goal is to make it work in such a way that it does not expand into areas not represented in the law's development. We feel that is an over reach by the state and deceptive to the public. We feel the SJVUAPCD has done a great job of pinpointing and eliminating toxic hot spots and pollution creators. The state should use their existing, local district expertise in monitoring and evaluating data as a way not to squander tax payer dollars on duplication of effort. Likewise, enforcement should be made by the qualified staff at the local air district.

It is time the State of California took tax payer money seriously and used a little common sense in spending it.

Sincerely,



Alene Taylor
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Kings County Citizens of a Healthy Environment
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AT:kg