



**Physicians for Social Responsibility
San Francisco Bay Area Chapter**

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To: Dr. David Edwards, California Air Resources Board
From: San Francisco Bay Area Physicians for Social Responsibility
Re: Proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting.

Date: June 20, 2018

Submitted via Email to: CTR-Report@arb.ca.gov

Dear Dr. Edwards,

Thank you for the opportunity to comment on the proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting.

San Francisco Bay Area Physicians for Social Responsibility (SF Bay Area PSR) is a non-profit education and advocacy organization with approximately 2,500 members. Our organization combines the power of community activism with the knowledge and credibility of physicians and other health professionals to promote public policies that support human health. Guided by our membership's expertise in medicine and public health, SF Bay Area PSR works to protect human life and the environment from the threats of nuclear war and other weapons of mass destruction, global environmental degradation, climate change, the epidemic of gun violence, and other social injustices in our society today.

Physicians and other health care providers are frequently on the front lines in communities across California facing health threats due to air pollution. Our members see children with asthma, elderly individuals with cardiovascular disease, and adults with bronchitis, emphysema, and chronic obstructive lung disease on a daily basis. We also recognize that air pollutants can put our patients at increased risk for stroke, cancer, and adverse birth outcomes, among other health effects. The scientific evidence on these connections is overwhelming, and requires us to speak out as health practitioners to protect our patients.

SF Bay Area PSR enthusiastically supports the CARB proposal to improve the California emissions reporting system for air pollutants, including both criteria air pollutants and all toxic air contaminants. In particular, we strongly support the public's right-to-know what is emitted into the air in their communities. We look forward to modernization and integration of the data, and presentation of the data in more user-friendly forms. We also applaud steps that you are taking to enhance quality assurance, and to promote

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standardization in the reporting system, as that is something that we implement in our own practices, and we expect no less from our air quality agencies.

We are, however, concerned that the facilities subject to reporting may exclude smaller pollution sources in local communities. Although large polluters such as refineries and power plants are important, small polluters such as chrome platers, auto body shops, large drycleaners, and sites with diesel generators, can pose significant health risks to people in nearby schools, health care facilities, and homes. In fact, these smaller facilities are often located in closer proximity to people, thereby magnifying their potential for health impacts. The vague definition of an “elevated” prioritization score is therefore problematic.

We urge CARB to ensure that there is clarity and consistency across California as to which facilities need to report. We recognize that it may not be feasible to bring thousands of smaller facilities into the system all at one time, so we urge CARB to ensure that your data management process and mapping tool is designed up-front to include thousands of facilities with full location information. CARB should then develop a schedule to ensure that the smaller facilities report their location information for public posting right away, and then begin full emissions reporting within a reasonably expeditious timeframe.

Our members require information on local pollution sources in the communities where they see patients. Without detailed and comprehensive information, we are unable to fully inform our patients, and we may also be unable to act to protect our most vulnerable patients from significant local health threats.

Thank you for your work on this important issue.

Sincerely,



Robert M. Gould, M.D.

President, San Francisco Bay Area Physicians for Social Responsibility