April 23, 2020

Regarding today’s board item for “Health Evaluation of Air Quality and Climate Regulations and Programs”, CARB approved a resolution and directed its staff to, among other things, pursue the following actions with input from the public:

“Develop new quantitative and qualitative approaches to evaluate the health benefits of CARBs air quality and climate actions and programs...”“Explore and develop new methods for evaluating health impact in disadvantaged communities that account for incensed vulnerability and exposure to sources of pollution that impact communities...” and to “Investigate approaches to expanding health analysis to include a range of additional health outcomes linked to pollution exposure”.

The presentation today specifically referenced The Scoping Plan, Mobile Source Strategy, and the Short-Lived Climate Pollutant Reduction Strategy. However, these efforts should also be incorporated into the AB 617 Blueprint.

The Blueprint provides guidance to air districts in their implementation of AB 617. Currently the Blueprint directs districts to provide baseline public health factors that affect selected communities. It also directs that CERPs will be designed to focus on “heath-based air quality objectives” for reducing emissions and exposure from local sources, by calling for measurable targets.

The guidance leaves to the districts how to implement these directives (and they are not requirements because the Blueprint carries no oversight authority). The problem with this policy is that there is a lack of, or uncertainty around, health-based metrics for tracking; and air districts have refused to pursue basic studies to help establish any, under the 617 Program. Therefore, without a baseline, districts can claim they are unable to measure the success of such objectives.

CARBs new commitment to develop these approaches and explore new methods to evaluate health impacts, should be laser focused on the AB 617 program in order to support SPECIFIC and QUANTIFIABLE health based air quality objectives; targets and goals that can be tracked, from a baseline, to ensure measuring the success of such objectives. If there is no baseline health metrics in 617 communities, CARB should develop methods to include these in CERPs. Only then will we be able to truly realize the promise of community air protection.