



July 23<sup>rd</sup>, 2018  
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California Air Resources Board  
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The Environmental Defense Fund (EDF) respectfully submits these comments regarding the Draft Community Air Protection Blueprint released on June 7, 2018.

EDF appreciates the California Air Resources Board's (CARB) effort in drafting a thoughtful and comprehensive Community Air Protection Blueprint. The blueprint makes clear CARB's efforts to prioritize reducing air pollution and protecting the health of some of California's most underserved and overburdened communities. Recognizing that the blueprint is still a work in progress, EDF offers various suggestions to improve future drafts.

With AB 617's goal of reducing air pollution in California's most at-risk communities, it is vitally important that communities are involved every step of the way. EDF recognizes CARB's noticeable efforts to make the process inclusive and transparent so far, and we encourage CARB to set a high standard for community engagement by each local air district. Codifying the spirit of AB 617 within the blueprint while maintaining community-led engagement is key. Continuing to carry out a robust stakeholder engagement process will be essential throughout the development and implementation of the bill. EDF specifically encourages CARB to ensure that rollout of AB 617 is both equitable and consistent across communities and regions. To this end, EDF urges CARB to work closely with all jurisdictions to secure the success of the program state-wide.

While the blueprint pushes the envelope on numerous issues, greater specificity in a few important areas is still needed. EDF urges CARB to provide more clarity in the following sections in order to ensure success of the program across the state.

### **Greater clarity on specific metrics helps ensure program success**

EDF recommends that CARB provide more specific examples of both air quality objectives and measurable targets. We recognize that, in the spirit of AB 617, community-driven action is at

the forefront of the blueprint's objectives. However, we believe that, while CARB provides specific direction for community steering committees and air districts to work collaboratively, the blueprint does not provide adequate examples of goals and objectives that should be met through the program. We realize that the list provided in the blueprint will not be – and should not be— exhaustive. Nonetheless, EDF encourages CARB to consider providing a more in-depth list of the objectives and targets the program aims to achieve.

- ***Air Quality Objectives (pg. 14)***: The blueprint begins to list certain air quality objectives that the emissions reductions programs can strive for – reduced fine particle levels and decreased exposure to harmful pollutants to improve health. However, there is not enough detail provided in the “Air Quality Objectives” section to adequately convey the importance of setting and meeting these goals. More detail, like that found in the “Implementation Strategies” section (pg. 15), would provide more clarity for community steering groups. EDF implores CARB to provide a more comprehensive list of air quality objectives – at least on par with the detail provided for implementation strategies – and to illustrate certain metrics that can be used to track such objectives. Additionally, separating objectives between those that aim to achieve *emissions reductions* versus those that are meant to achieve *exposure reduction* would provide more clarity. CARB should then provide more detail on objectives that would fall into each of these categories.
- ***Measurable Targets (pg. 15)***: Likewise, the “Measurable Targets” section provides some examples but does not go far enough in outlining targets for mobile and stationary polluting sources. As the blueprint reads now, mobile sources are given priority in the implementation process, while there is a considerable lack of focus on stationary sources. Recognizing the impact of stationary sources on local communities and including implementation plans for both stationary and mobile sources equally is a necessary amendment to the blueprint. EDF suggests that CARB generate separate measurable targets and objectives for stationary and mobile sources. For example, working with local agencies to make continuous monitoring a permanent requirement for stationary sources, like oil and gas extraction sites, should be a concrete target. Creating separate targets for mobile and stationary sources will allow CARB to develop a more comprehensive list that community steering groups can subsequently adopt.

### **Third-party verification will ensure credible data is reported and used**

Currently, there is no mention in the blueprint of a mechanism by which data being collected is vetted and verified by a non-biased, independent, third party. Due to this omission, it is unclear which agency or entity will verify data being reported by the operators. A non-biased third party must be retained to ensure that data being collected is accurate and trusted by the community. Leaving this important task to the air district officers, or worse, allowing for self-reporting by the operators themselves will lead to unreliable information. We believe that

third-party verification is a necessity as it provides reliable, credible and actionable data for emissions reductions.

### **Greater transparency on funding mechanisms for outgrowth programs is needed**

The blueprint expands on some of the funding mechanisms for AB 617 implementation including the use of grants through the Community Air Grants Program, incentive funding for small business and clean technology development & deployment, as well as state budget allocations in the next two years. However, it is unclear how funding will be allocated for outgrowth programs of AB 617, such as the proposed regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting. EDF understands the sizable expense that carrying out a comprehensive program such as AB 617 incurs, however, it is important for CARB to explain how funding for rules and regulations that arise out of AB 617 will be allocated. This transparency is important in order to ensure that money will not be diverted away from the core communities meant to be served by AB 617, and that there is a detailed plan in place for how to fund the various programs that will complement AB 617 and lead to greater emission reductions.

Thank you for the opportunity to comment on this blueprint. We believe that the blueprint shows considerable concern for communities and applaud CARB on the attentiveness of the draft. Meanwhile, we look forward to continued engagement with CARB and anticipate future drafts to address the above concerns and build off of the comprehensive framework already presented.

Sincerely,

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