letterhead_fund-header

July 23, 2018

California Air Resources Board

1001 I Street

Sacramento, CA

To the Community Air Protection Program,

These comments are provided on the draft Community Air Protection Blueprint.

Generally, the Blueprint provides a useful framework for the development and implementation of the Community Air Protection program. There are, however, areas not addressed in the Blueprint, which should be to help achieve program goals. These are described below.

**VIII. Requirements for community emissions reduction programs**

Regarding "Implementation Strategies:"

* In addition to "new rules and regulations..." we strongly recommend: identifying existing regulations, and developing and acting on enforcement strategies. For example, for communities that are located close to oil and gas facilities ensure enforcement of the CARB's Oil and Gas Methane Regulation. CARB acknowledges that "Oil and gas systems are responsible for approximately 15 percent of methane emission in California." As other health and environmentally-harming emissions are associated with methane emission, reducing these emissions will also reduce others.
* As the Blueprint states that: "Most importantly, underpinning AB 617 is the understanding that community residents must be active partners in envisioning, developing, and implementing actions..." we strongly recommend that strategies are developed and implemented that ensure community residents are active in assisting with enforcement actions and are supported in doing so.
* Not sure whether the following can be added to the Blueprint. Clearly, however, the actions of regional air districts will be a critical component of AB 617, but some regional air districts are more cooperative than others. CARB must use its authority when necessary to ensure that regional air districts are acting in the best interests of the disadvantaged communities. This includes improved transparency and accessibility. For example, for remote participation in hearing and meetings, some air districts require participants to be physically present at specified locations. This makes it difficult for individuals not close to those locations.

**Appendix D - Statewide actions**

There are two issue areas noticeably absent:

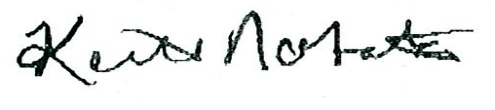
* We strongly recommend adding a section: "For communities heavily impacted by oil and gas systems", and including enforcement of the Oil and Gas Methane Regulation, and other relevant regulations.
* We strongly recommend adding a section: "For communities heavily impacted by agricultural activities (especially pesticide use), and including enforcement of existing regulations and development of new regulations if necessary.

**Appendix F - Statewide strategies, tools, and resources**

* We stronglyrecommend adding a section in "Emission reduction strategies," regarding oil and gas systems, stating that "this strategy will serve to lower emissions from oil and gas systems.

Thank you for the opportunity to provide comments.

Sincerely,



Keith Nakatani

Oil and Gas Program Manager