



October 23, 2020

David Edwards,  
Assistant Division Chief  
Air Quality Planning and Science Division  
California Air Resources Board

**Via Electronic Mail**

Re: *Questions and Concerns Regarding the Proposed Amendments to the Emissions Inventory Criteria & Guidelines and Air Toxics "Hot Spots" Program*

Dear Mr. David Edwards:

We write on behalf of the California Environmental Justice Alliance (CEJA) to express concerns regarding the Proposed Amendments to the Emission Inventory Criteria and Guidelines (EITG) for the Air Toxics "Hot Spots" Program and Proposed Amendments to the Criteria and Toxics Reporting Regulation (CTR), which we understand are being considered together due to overlapping issues.

CEJA represents environmental justice and disadvantaged communities throughout California. Underserved communities we work with are breathing some of the most polluted air in California and the country, and are bearing the severe health, social, and economic costs associated with that pollution. Most recently, the 2020 State of the Air Report by the American Lung Association found that California has the six most polluted cities in the country for ozone, the five most polluted cities in the country for year round particle pollution, and five of the top seven polluted cities for short-term particle pollution.<sup>1</sup>

We recognize the importance of transparent, accessible information about the sources of pollution impacting our communities. Our review of publicly available material has raised questions of whether air districts across California are consistently reporting their toxics and criteria pollutant-emitting sources. It appears that some air districts may not be reporting all of their toxics and criteria pollutant-emitting sources. We are also concerned that there may be delay at some air districts, and that this could result in slowing the availability of transparent

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<sup>1</sup> <https://www.stateoftheair.org/key-findings/>

information. This delay could ultimately harm communities breathing some of the worst air in the country. We are requesting additional information due to these concerns related to the air district's reporting of sources and pollution.

We specifically request the following information categories to illuminate the potential issues we've seen:

- How many permitted facilities has each air district reported? Are there variations between air districts? Is this due to reporting differences or differences in the density of sources?
- How does the air districts' reporting compare across the state? Do some air districts provide more information than others? Have there been delays in reporting?
- Have any accommodations been made to air districts in relation to reporting of facilities and toxic and criteria air pollutants?
- What are different air districts doing to collect data in a clear and transparent way?
- How publicly and readily accessible is the information reported across air districts? What is being done to expeditiously compile data into an interactive public-facing tool for the public to search and access data across the state?

We urge CARB to ensure that each air district meets consistent, clear, and transparent requirements so that the inventory will include high quality data on toxics and criteria pollution from the many sources in each area of the state.

Thank you for your time and consideration of this comment. If you have any questions, please contact CEJA's Climate Justice Program Associate, Neena Mohan, at [neena@caleja.org](mailto:neena@caleja.org).

Sincerely,

Neena Mohan, Climate Justice Program Associate  
On behalf of CEJA

cc: Kurt Karperos, CARB  
Richard Corey, CARB