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July 23, 2018

California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

SUBMITTED ELECTRONICALLY

RE: California Air Resources Board's Draft Community Air Protection Blueprint

Chair Nichols and Members of the Board:

Thank you for the opportunity to comment on the California Air Resources Board's (CARB) Draft Community Air Protection Blueprint (Blueprint), released on June 7, 2018.

Bay Planning Coalition (BPC) is a nonprofit, member organization that advocates for sustainable commerce, industry, infrastructure, recreation and the natural environment connected to the San Francisco Bay and its watershed. Together with our nearly 150 member organizations, we work diligently to ensure that land on the Bay is used wisely and developed in economically and environmentally sound ways.

BPC supports the overall goal of AB 617 to identify and design programs which provide remedies for communities disproportionately impacted by air emissions. However, we have several recommendations for improvements to the Blueprint that we believe are critical to ensuring the successful implementation of the AB 617 program. Specifically:

- **The community selection process should be standardized and data-driven.** We recommend that CARB revise its proposed community selection criteria to ensure that community nominations are based on disproportionate air quality impact and that only the most heavily burdened communities are selected in a given geographic region.
- **Zero emissions strategies should not be chosen by default over more feasible alternatives.** There is a bias in the draft Blueprint toward zero emissions strategies, which compromises the potential use of more cost-effective and immediately feasible near-zero emissions technologies; some of which would ultimately match or outperform zero emissions strategies in the targeted communities. Other factors that should be considered are technical and engineering feasibility and reasonable implementation periods. A greater focus on these issues will maximize emissions reductions and program benefits for selected communities and help avoid unnecessary economic impacts.

- **The Community Steering Committees should represent a broad range of community voices.** In particular, businesses operating in the Community Steering Committee process; particularly as they are likely to be subject to any new emissions reduction requirements. Not including representatives from the business community puts any strategies and efforts developed within the committees at risk and could hinder successful AB 617 implementation.

The Blueprint's guidance on formation of Community Steering Committees currently recommends that the committee include members "who live, work or own businesses within the community" (Appendix C, p. 7), but does not specifically require or recommend including business stakeholders. Including the regulated businesses who will be asked to directly implement the emissions reductions is particularly important to ensuring that air quality objectives and proposed reduction plan elements are achievable, effective, and fair.

- **CARB should create a formal mechanism for making periodic adjustments to AB 617 program requirements.** Lessons learned from the first round of community monitoring and emissions reduction programs will undoubtedly reveal the need for changes in state and local air district implementation strategies. An iterative process based on data gathered during the program's initial implementation will be critical to the success and sustainability of the overall program.
- **All efforts should be made to clarify guidance in the Blueprint as much as possible so that it is applied consistently across all air districts.** There remain places in the Blueprint and its included guidance that we believe leave too much open to interpretation by the local air districts. To give a specific example, the Blueprint speaks in general terms about the need for validation and verification of community monitoring data, but does not provide any specifics about how this will occur or what standards must be met.

Thank you for considering our comments. Please feel free to reach out to me with any questions or to discuss these recommendations further.

Sincerely,



John A. Coleman
Chief Executive Officer