



**West Oakland  
Environmental  
Indicators Project**  
*know which way the wind blows*

November 8, 2021

**Chair Liane M. Randolph  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814**

**Re: Comments on CARB's update on the Climate Heat Impact Response Program (CHIRP)**

Dear Chair Randolph and Members of the Board:

On behalf of the undersigned environmental justice organizations, we submit these comments regarding CARB's Climate Heat Impact Response Program (CHIRP). Governor Newsom's July 30, 2021 Emergency Proclamation to reduce demand on the electrical grid during extreme heat events constitutes another short-sighted response to problems caused by legacies of short-sightedness. Our fossil-fueled, polluting energy system has led to both the air pollution and climate crises now battering California's frontline communities, ecosystems, and most recently, our electricity grid. Low-income communities and BIPC communities of color already face the brunt of the impacts from our continuing failure to tackle both these crises.

The Governor's proposed "solution" to these past failures is falling disproportionately on the backs of the same communities already battling intolerable levels of air pollution. In West Oakland, where diesel particulate matter levels remain persistently high, asthma rates, cancer deaths, heart disease, and life expectancy are all far worse than the county average.<sup>1</sup> Across the San Joaquin County, climate-fueled wildfire smoke is worsening the air in communities already dealing with the worst particulate matter pollution in the country.<sup>2</sup>

Now, by incentivizing the use of pollution-intensive diesel back-up generators, fossil fuel power plants, and diesel ship engines, the Emergency Proclamation will treat environmental justice communities as a sacrifice zone for the State's failure to plan for the crises it has worsened. We

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<sup>1</sup> BAAQMD, *Owning Our Air – West Oakland Community Action Plan* (Oct. 2019) at 2-7, <https://www.baaqmd.gov/community-health/community-health-protection-program/west-oakland-community-action-plan>.

<sup>2</sup> Cresencio Rodriguez-Delgado, "You Can't Just Hold Your Breath – Toxic Smoke, Fueled by Wildfires, Chokes California" (Oct. 13, 2021) <https://www.pbs.org/newshour/nation/toxic-smoke-dust-batters-parched-california-like-you-are-eating-pollution>.

want to be abundantly clear that our community members do not want the continued negative climate and health impacts that accompany the propagation of fossil fuel technology, equipment, and infrastructure. The ongoing use of such Emergency Proclamations to address California's power emergencies are a band-aid that must be strictly limited going forward.

Though it represents another limited stopgap, we expect CARB to work vigorously to halt this pattern of environmental injustice by immediately taking steps toward full air pollution mitigation through CHIRP. We are entering the brief window of the year where we can expect relief from extreme heat events in California, and CARB and other agencies must leverage their full resources to proactively manage future extreme heat events without increasing air pollution in our already over-polluted communities. At the same time, the State must invest any mitigation funds from the program into projects that conserve energy while improving the health, resilience, and energy security of low-income communities and communities of color. Our initial recommendations include CARB funding for the following monitoring and community-driven clean energy projects:

- **Require careful, detailed tracking and analysis of the pollution emitted by these sources.** Meaningful mitigation can only occur if CARB and the public understand the location, type, and magnitude of the emissions, and it is fully within CARB's authority to require disclosure of this critical information. CARB must also analyze and disclose this data to communities so that they can understand the impacts and make informed decisions about mitigation options.
- Invest in **Community Resilience Centers** in places like West Oakland, the San Joaquin Valley, the Inland Empire, and other frontline communities throughout the State where residents can access emergency response services including clean back-up power, cooling, food and medicine distribution and storage, and internet access.
- Accelerate deployment of **Clean Microgrids** that rely on zero-emission power supply, both in disadvantaged communities and, for example, near Port complexes like the Port of Oakland to allow for continued use of shore power.
- Expand **Demand Response** programs by offering smart appliances, home weatherization, and program participation to more households and businesses so that Flex Alerts can effectively lower peak demand. This work should build off of the California Public Utilities Commission's recent Proposed Decision in Phase 2 of its Emergency Reliability proceeding, R.20-11-003.
- Accelerate energy conservation measures that double as resilient home energy and cooling measures through expansion of the **Low-Income Weatherization Program** and other programs that enable access to efficiency upgrades and efficient, electric appliances that improve indoor air quality (like induction stoves) and provide cooling (like heat pumps).
- Build **Resilient Schools** as hubs of clean, dispatchable energy by equipping them with on-site solar and storage, EV charging, and fleets of vehicle-to-grid enabled zero-emission school buses.

- Establish **urban greening** programs and **indoor air filtration** systems that help with neighborhood-scale cooling and air pollution control.

In each of these and other programs, it is crucial that CARB continue to prioritize outreach to and input from communities most impacted by the resulting pollution, and community-based organizations. Moving forward, the State must partner with environmental justice communities to craft a serious plan for how it will create an energy system that will both avert and withstand the worsening climate catastrophe, and prioritize the resilience and health of those most historically harmed by the crises borne from our extractive, polluting energy system.

Thank you for your consideration of these comments. We look forward to working with the CARB staff and Board to lift up the voices of community members and tackle the clean energy transition.

Sincerely,

Sasan Saadat and Michelle Ghafar  
Earthjustice

Ms. Margaret Gordon and Brian Beveridge  
West Oakland Environmental Indicators Project