

April 20, 2018

Mr. Richard Corey

Executive Officer

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Dear Mr. Corey,

Kern Economic Development Corporation (Kern EDC) appreciates the opportunity to comment on the California Air Resources Board’s plans for implementing a Community Air Protection Program under Assembly Bill 617.

Kern EDC represents a coalition of business and government leaders dedicated to ensuring a diverse and strong economic climate for Kern County. Kern EDC provides comprehensive business development assistance to companies considering the County for corporate relocation or expansion.

While Kern County has made significant progress in reducing unemployment to 9.6 percent from 11.5 percent just a year ago, this figure is still more than twice the state and national averages. The new air quality program intensifies existing air quality regulations that are already considered the strictest in the nation. While we all want to continue to improve air quality, we ask for CARB’s consideration of the related economic and job impacts in our communities, particularly diverse populations and disadvantaged areas that are struggling to achieve greater opportunity and prosperity.

Our region knows firsthand that CARB already has made the most cost-effective air quality improvements with large stationary source regulations, including many in our region. The additional emission reductions envisioned in the AB 617 Community Air Protection Program require new approaches, including incentives and much closer attention to all the sources that contribute to local air quality issues.

Choosing the communities to participate in the program should be rigorous, applying comprehensive air quality data. More information, data and analysis will be needed to identify all sources and how much each of them contributes proportionately to overall air quality issues. A variety of factors that cannot be controlled by local communities – like unique geography, wind and weather patterns and even natural emission sources should also be factored in. These are very relevant to Kern County, which lies at the end of the San Joaquin Valley abutted by mountains that bottlenecks many emissions from other areas and sources.

Furthermore, it is critical for this program to be fully transparent, adaptable to new information and advancing technology, and based on sound science with adequate peer review – including business and industry operators. Fact-based evaluations of the actual sources and intensity of air pollution at the community level requires scientifically sound measurements to determine the most heavily-impacted communities, setting aside unsupported speculation, anecdotal information and opinion in making its evaluations.

Kern EDC supports a high level of community engagement and would be pleased to participate in this process. However, regulatory and enforcement decisions ultimately should be vested with CARB in concert with the Valley Air District, which have the expertise and resources to accurately identify violations.

Thank you for your time and consideration of this highly important matter.

Sincerely,



Richard D. Chapman

President & CEO