



July 23, 2018

Chair Mary Nichols and Board Members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Nichols and the members of the California Air Resources Board,

On behalf of the Coalition for Clean Air (CCA), thank you for the opportunity to comment on the California Air Resources Board's (CARB) AB 617 Community Air Protection Program Draft Blueprint.

Our April 23, 2018 letter to CARB included eight recommendations for successful implementation of AB 617. We believe the draft Blueprint as currently written meets many of these recommendations. For example, Appendix B of the Blueprint includes consideration of asthma hospitalization rates when identifying, assessing and selecting communities. In addition, Appendix E outlines the role of community sensor programs, such as CCA's CLEAR Network or the IVAN Air Network. The Blueprint also includes mechanisms that can potentially satisfy our recommendations on how to engage the community during implementation, as well as incorporating and leveraging existing programs, incentives and pollution reduction efforts. The success of these mechanisms, however, ultimately depends on how CARB and the air districts implement AB 617. CCA will continue to be part of that process, and will push for full, effective implementation that empowers communities.

One recommendation in our April letter, however, was not discussed in the Blueprint document. We also have new recommendations to help further refine and improve the draft Blueprint. Specifically:

- 1. Actual emissions reductions should be prioritized; "paper compliance" and accounting should be avoided.** CCA supports the development and use of metrics measuring direct air pollutant emissions and the reductions of those emissions. CCA opposes reliance upon emission factors to estimate emissions. Wherever possible, CARB should rely upon continuous emission monitoring using certified data collection methods that capture emissions from standard operations, startups, shutdowns, and malfunctions.
- 2. The community selection process must be driven by the communities themselves.** To truly engage with the community, the community must be empowered at each step of the process. While the air districts held public forums and workshops (many of which CCA participated in) on identifying the communities for first year AB 617 implementation, the final nominations were made through a top-down process. This top-down decision-making process disempowers communities and discourages active public participation. For example,

it is important to note that, when the South Coast Air Quality Management District adopted their prioritized communities list earlier this month, not a single community member testified during public comment. Holding meetings and forming work groups does not ensure meaningful public participation or a “community-driven process.” CARB and local air districts should adopt the practice of deferring to the recommendations of community groups and members unless there is a substantial overriding reason to reach a different conclusion. For future years, CCA strongly recommends following the model created by the San Joaquin Valley’s AB 617 Environmental Justice Steering Committee for community identification and prioritization. Those 13 organizations methodically and scientifically identified which San Joaquin Valley communities with the greatest air quality needs. Adapting this process for the future will go beyond mere compliance and truly empower the community in the selection process.

3. **CARB and the air districts should assist the community in directly participating in AB 617 implementation.** CCA recommends that CARB educate community members about the complexities of air quality regulation in California and offer guidance on how to engage effectively in AB 617 implementation and other decision-making processes. Providing copies of CARB’s 2003 *Public Participation Guidebook* to interested parties would be a good start. It would also be a good idea to ask CARB’s AB 617 Consultation Group to review and recommend updates to the guidebook.
4. **The Blueprint should include “measurable targets” and direct tracking of emissions reductions.** CCA supports the proposal to identify measurable targets in the draft Blueprint. We believe that CARB should put more emphasis on direct tracking and measurements of actual emission reductions. This will not be simple or easy. CARB and local air districts should commit to monitoring a wide variety of air pollutants and tracking whether emissions have been reduced in prioritized communities. Both ambient and facility-specific monitoring will be required to achieve this goal.
5. **The Blueprint should also include anticipated adoption dates of regulatory measures.** In the final Blueprint, CCA recommends that CARB identify the anticipated adoption dates of the regulatory measures identified. While we recognize that circumstances beyond CARB’s control can delay rulemaking, providing those dates will give the public an important timeline for when they may expect CARB to make important decisions that will lead to significant air quality improvements in their communities.
6. **The Blueprint should also consider regional transportation plans and land use.** Regarding land use resources and tools, CCA recommends revising the Blueprint to include specific information about the legal authority and responsibilities of CARB and the local air districts in the transportation planning process. If priority community mobile source air pollutant issues are to be addressed effectively, CARB and the local air districts must engage more directly and forcefully in the development and approval of regional transportation plans and sustainable community strategies. We encourage CARB to include an engagement plan for regional transportation planning organizations in the final Blueprint.

Thank you for your consideration of these comments. CCA remains committed to the successful ongoing implementation of AB 617, and will continue to engage with CARB, the air districts and local elected and civic leaders regarding these important programs. We look forward to working in partnership with CARB, the local air districts, and the communities that stand to benefit from this effort.

Sincerely,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern  
Policy Director

A handwritten signature in cursive script that reads "Christopher Chavez".

Chris Chavez  
Deputy Policy Director