



April 26, 2018

Mr. Richard Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: COMMUNITY AIR PROTECTION PROGRAM

Dear Mr. Corey,

The Orange County Business Council (OCBC) shares the California Air Resources Board's (CARB) goal of making our air even cleaner in the future. Existing air emissions regulations in California are the strictest in the world, and we have already addressed the stationary source emissions representing the most cost-effective reductions. **OCBC appreciates the opportunity to comment on development of the Community Air Protection Program under AB 617**, as the community-level reductions have great potential to disrupt economic growth and prosperity, especially in disadvantaged communities.

CARB should apply incentive-based approaches and develop new methods and technologies to manage the wide range of additional sources at the community level that could affect air quality. Reliably determining the extent possible emission sources contribute to community emission levels requires sound science, data, and evaluation free of unsubstantiated, anecdotal speculation. Many contributing factors are beyond the control of local community sources.

Identifying the communities most impacted by cumulative air pollution would also work toward achieving the greatest emissions reductions, without promoting some technologies over others based on expectations that could prove unrealistic in the long term. Any required enforcement and regulatory actions must be taken only by CARB in concert with the South Coast Air Quality Management District.

OCBC believes that these far-reaching regulatory processes must have flexibility and adaptability. Our region has seen tremendous improvements in air quality, but not without significant economic impact. Achieving cleaner air is possible through careful science-based actions that contemplate economic consequences. **OCBC respectfully requests that CARB exercises caution in the implementation of AB 617.**

Sincerely,

A handwritten signature in blue ink that reads "Alicia Berhow".

Alicia Berhow
Vice President of Government Affairs