

April 25, 2018

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

RE: Community Air Protection Program (AB 617)

Dear Mr. Corey:

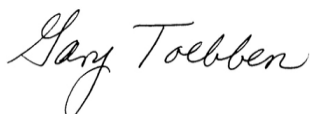
On behalf of the Los Angeles Area Chamber of Commerce, which represents more than 1,650 organizations and 650,000 employees in the region, I am writing to express our support of the California Air Resources Board's effort to develop the Community Air Protection Program under AB 617. We appreciate the opportunity share our comments on CARB's Air Protection Program Framework Concept Paper, especially the Process and Criteria for 2018 Community Selections document. We want to ensure the approach is effective, evidence-based, and targeted to do the most good.

The Chamber believes it is critically importance to protect and preserve our environment and natural resources. Federal, state and local air emission regulations in California, particularly in our region, already are the strictest world. The most cost-effective reductions have been made by identifying and addressing the large stationary sources of toxic emissions. Achieving further reductions at the local level as envisioned in AB 617 may prove to be more challenging, costly, problematic, and time consuming. CARB should continue to prioritize proven strategies for effectively reducing emissions.

Addressing local air quality requires additional technical and policy tools for successful implementation. AB 617's regulatory scheme overlooks these critical challenges. New, reliable and local data is needed to identify possible emission sources and determine their contributions to the community's overall emission levels. Weather patterns, terrain, population and housing density, possible natural sources and other factors beyond the control of individual local sources also must be considered and evaluated. These challenges make AB 617's mechanism for additional emission reductions unfeasible.

We are pleased that this is a flexible, inclusive process and we support a monitoring system that identifies and assesses ongoing program adjustments, while graduating communities that achieve air quality goals. We know that we can promote a strong economy for all while also protecting our environment. This is best done through sound science and objective data to deliver the greatest emissions reductions for the most people possible. While we believe in engaging a wide range of input on this program, any regulatory or enforcement actions must remain the purview of CARB in concert with our Air Quality Management District. Thank you for considering our thoughts on this important process. If you have any questions, please contact Kendal Asuncion, Public Policy Manager at kasuncion@lachamber.com or 213.580.7518.

Sincerely,



Gary Toebben
President & CEO