SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

Comments on ARB Proposed Community Air Protection Funds 2019 Guidelines

To Be Heard at May 23-24 ARB Board Meeting:

19-5-4: Public Meeting to Consider Proposed Community Air Protection Funds 2019 Guidelines

The San Diego County Air Pollution Control District (District) appreciates the opportunity to comment on CARB’s Proposed Community Air Protection Funds 2019 Guidelines. The District wants to acknowledge CARB’s extraordinary effort with implementing Assembly Bill 617, and we are committed to its success. With this, we have one specific comment and some general comments about the guidance document.

**Specific comment:**

**Chapter3, B (Air District Grant Awards), (1), (A)**

**Consider precedent set by the Legislature with the specified allocation of funds in the first year. The three largest air districts have over 90 percent of disadvantaged community populations in California.**

We don’t think the precedent for allocating funds should be the inequitable allocation provided in the first year of AB 617 implementation. We say this because the distribution of 95% of the funds to the three largest air districts was too much and resulted in the short-changing the remaining 32 air districts who are still in need of sufficient funding if they are to fulfill the mandates of AB 617. Commendably, the second year funding process to-date has been more collaborative and will result in a more equitable distribution of funds to the air districts.

In the final analysis, however, funding requirements for each air district will vary from year to year, so (A) should be stricken because of its inflexibility and such a method would perpetuate the unfair, Year 1 distribution of AB 617 funds, which harms vulnerable disadvantaged communities.

If, on the other hand, section (A) remains in place for future guidelines, it should be amended to specify that the allocation for the second year distribution of funds is the precedent for future distributions of funds. The new “A” should read as follows:

*“Consider using the precedent set by the second year of AB 617 allocations. Six air districts, the BAAQMD, SMAQMD, SJVAPCD, SCAQMD, SDAPCD, ICAPCD, have 95% of the disadvantaged community populations in California*.”

**General Comments:**

Each of the disadvantaged communities in the State have unique issues and, as such, funding priorities will be different for each of them. The language of Senate Bill 856 (2018) allows for the funding of emissions reduction projects for mobile sources, stationary sources, and community projects. With this, we have concerns with CARB’s proposed listed stationary source and community project in the guidelines, because they will be a poor fit for some communities that don’t have these specific operations or community issues.

While the criteria for chrome plating stationary source emission reduction projects listed in the guideline may only be an example of how to develop criteria for other stationary source projects, we don’t feel it is the proper way to develop such guidelines. We say this because there are many types of stationary source operations that would require an analysis. Time is of the essence as there is a need for immediate emission reductions, and there are funding deadlines that must be met. We feel a better method would be to have a cost effectiveness threshold value for stationary source projects and one for community projects. This way incentive projects could be funded promptly and not have to wait for an individual analysis to be completed if one were lacking. The cost effectiveness threshold would give ARB and the State Legislature assurance the funding is being utilized properly.

We don’t know if current or future stationary source or community incentive projects are going to be limited to communities identified by ARB as an “emission reduction community” or those who have submitted an official Community Emission Reduction Plan (CERP). We don’t think such a limitation should occur as it would prohibit the expenditure of funds in all disadvantaged communities who would benefit from mobile, stationary, and community emission reduction projects. We feel these emission reduction projects are important for all disadvantaged communities not just ones identified by ARB. Those communities as identified in CH&SC 39711 should be eligible for this year’s and future years emission reduction incentive funding.

Because air pollution knows no boundaries, there should be no limitation in the guidelines for incentive-based projects that are located outside of the disadvantaged communities when it is shown such projects will provide a benefit to said communities.

Thank you for allowing us to comment.