



April 26, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Implementation of AB 617, Community Air Protection

Dear Members of the California Air Resources Board,

On behalf of the Coalition for Clean Air (CCA), we thank you for the opportunity to comment on the California Air Resources Board's (CARB) initial implementation of AB 617.

AB 617 has the potential to be a truly transformational tool for California's most environmentally-burdened communities. While California has seen significant statewide and regional air quality improvements over the decades, many communities continue to be plagued by pollution. These communities, which primarily consist of low income families and people of color, suffer significant health and quality of life impacts as a result of this pollution. Through AB 617, California has an opportunity to address these longstanding local issues through improved state and local regulation, enforcement and investment.

CCA has participated in many of the CARB and air district-hosted workshops, community forums, teleconferences and stakeholder meetings throughout the state. During these meetings, it's become clear that, despite having many common elements, the local causes of air pollution can vary greatly from location to location. It has also become clear there is significant community interest in improving local air quality and addressing longstanding local environmental problems. As such, the strategies charged with reducing emissions in these areas must be responsive to local conditions and community needs.

Our comments are as follows:

- 1. Actual emissions reductions should be prioritized over mitigation; "paper compliance" should be avoided entirely.** The purpose of AB 617 is to reduce the amount of criteria pollutants and toxic air contaminants, especially in disadvantaged communities. While realigning transportation corridors and installing barriers and filters may result in reducing a community's exposure to air pollution (and should be considered as part of the broader strategy), such methods do not actually reduce emissions. Rather, more stringent enforcement, health-protective regulatory standards like indirect source rules, the installation of the best available retrofit pollution control technology (BARCT) at stationary sources, and investments in transformational community projects will yield significant emissions reductions, leading to improved air quality. Meanwhile, "paper compliance" through offsets, credits, and other mechanisms which neither reduce emissions nor lessen exposure to air

pollution in the community itself are not consistent with the intent of AB 617 and should not be part of community emissions reduction programs, the state strategy, or BARCT implementation. Lastly, community emissions reduction programs must avoid causing any unintended harms.

- 2. The definition of communities must remain focused on local needs and take into account common sources of pollution.** One of the most important discussions during the local community meetings was the definition of “community”. If this definition is too narrow, community emissions reduction programs may exclude neighborhoods that should be included. If this definition is too broad, these emissions reduction programs will take a regional rather than local approach and be inconsistent with the spirit of AB 617. As such, it may be helpful to define the scope of community emissions reduction programs around common sources of pollution. Identifying common sources of pollution, such as ports, refineries, freeways, railyards, or geographical sources (e.g. the Salton Sea), as well as factors that worsen or concentrate pollution (such as valleys, wind patterns and mountain ranges) will help identify the most severely impacted areas. Additionally, CalEnviroScreen and studies like the Multiple Air Toxics Exposure Study (MATES) IV will help identify severely burdened communities.
- 3. Health impacts should be included in identifying priority communities.** Throughout the various community meetings, residents expressed a strong desire to see health impacts included in CARB and the air districts’ considerations. While it is difficult to directly correlate many health outcomes to air pollution exposure, some health events, such as asthma hospitalizations, are solidly linked with air pollution. Identifying which areas have high numbers of asthma attacks and other relevant health conditions may be helpful in identifying the communities most adversely impacted by common sources of pollution. The process of identifying priority communities should also make use of census tract-level data on emissions, proximity to sources, and socio-economic factors.
- 4. Community emission reduction plans should be allowed to proceed even if monitoring is not yet in place.** While we strongly support the widespread deployment of additional air monitors – and making the monitoring data available on line in real time whenever possible - - many communities already have enough information about the sources of local pollution to enable them to go forward with badly needed actions to reduce emissions. For example, stopping metals shops from being located near homes would prevent the heavy-metal pollution that afflicts some communities.
- 5. Community emission reduction plans should have individual air quality goals.** Each plan should have specific quantitative emission targets for pollutants like particulate matter and toxic air contaminants. CARB has decades of experience with quantitative emission targets that it can put to use now at the community level. The levels of pollutants in areas with better air quality can serve as benchmarks.

6. **Community engagement and ownership is vital to AB 617's success.** As a program focused on improving community air quality, AB 617 efforts need to earn community support. CARB and air district staff has put forth a commendable effort to solicit community feedback during the first steps of AB 617 implementation. Both CARB and the air districts must continue to create the opportunity for community engagement and leadership in the implementation of emission reduction plans. Similarly, community steering committees must primarily be composed of residents, community based organizations and local civic leaders. Lastly, we recommend a role for community air sensor programs such as CCA's CLEAR Network or the IVAN Air Network.

7. **Community Air Protection initiatives should build on and complement existing efforts with an integrated approach to reducing cumulative impacts in communities.** Many ongoing efforts included in the State Implementation Plan, Sustainable Freight Action Plan, SB 32 Scoping Plan, and Short-Lived Climate Pollutants Strategy will help to reduce emissions of local air pollutants, and AB 617 must never be used as a reason to stop or slow those efforts. Instead, the community air protection program should add a layer of emission-reducing activities to those already in place or included in the plans of CARB and the air districts.

8. **Coordinating existing programs and incentives must be included as part of community emissions reduction programs.** Coordinating incentive funding programs, such as the California Clean Vehicle Rebate Project (CVRP), Clean Cars 4 All, the Carl Moyer Program, charging infrastructure, weatherization and other programs must be included as part of AB 617 efforts. Making these programs more accessible to residents (especially low-income households) and businesses would increase their effectiveness in reducing emissions. Additionally, targeting programs to areas that need them the most, such as those with large number of high emitter profile vehicles, older housing or areas with large numbers of trucks, would further enhance their effectiveness.

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

Sincerely,



Bill Magavern
Policy Director



Chris Chavez
Deputy Policy Director