



COUNCIL OF INDUSTRIES
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/sent by email/

April 24, 2018

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

Re: Community Air Protection Program

Dear Mr. Corey:

On behalf of the Council of Industries of West Contra Costa County (COI), I would like to express our support regarding the general intent of AB 617's community monitoring program. It is very important that AB 617 be implemented in an efficient and appropriate manner, as it will affect our region's communities and the industries, businesses and economic development that makes our region a great place to live and work.

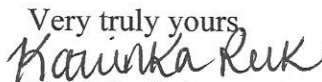
While we support the overall intent of AB 617, the outcome should be to improve air quality and public health in ways that safeguard the region's economic future, particularly in disadvantaged communities. We therefore submit the following recommendations:

- Program design should be transparent, based on sound science and have adequate peer review. This should include the participation of businesses who understand the technical application of reaching air quality goals.
- Potential solutions should be flexible to account for long-term technological advancement (i.e., technology neutral) and be based on a thorough understanding of community-level emissions. Any additional information and analyses needed should use appropriate methods to identify relevant sources and their community-level air quality impact. Additionally, any assessment should take into account changes in air quality caused by the season, weather, terrain, population density, and various other factors.
- The creation of new local ordinances should be avoided to prevent potential job losses and impacts to development and economic productivity in affected communities and regions.
- It is important for the long-term success of AB 617 that there is strong community engagement with a focus on residents, government leaders and businesses located in

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those communities. The agency should coordinate with cities, business agencies (i.e., Chamber of Commerce, trade organizations such as the COI, East Bay Leadership Council, Industrial Association of Contra Costa County, California Manufacturer and Technology Association, etc.) and community resident groups (i.e., Richmond neighborhood councils) to enhance communication and increase participation in upcoming public meetings.

Thank you for providing an opportunity to offer our comments on this important process.

Very truly yours,

Katrinka Ruk
Executive Director