



April 25, 2018

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

Re: Community Air Protection Program

Dear Mr. Corey:

I write to you on behalf of the East Bay Leadership Council (EBLC), regarding your efforts to develop the Community Air Protection Program under Assembly Bill 617. The EBLC requests that you consider the following input as part of the process laid out in the Air Resources Board's Community Air Protection Program Framework Concept Paper, most notably the Process and Criteria for 2018 Community Selections document.

With the nation's most stringent air quality regulations, California already has identified and acted upon large stationary sources of toxic emissions, capturing the most cost-effective reductions. Any additional emission reductions at the local level must be much more granular, requiring new approaches, and possibly including incentives, to bring sharper focus on all the sources that contribute to local air quality issues.

While we support the overall intent of the AB 617 Community Monitoring System, the outcome should be to improve air quality and public health in ways that safeguard the region's economic future, particularly in disadvantaged communities. To ensure success, it is vital that the process apply science-based air quality evaluations, as well as objective, data-driven identification of communities with the greatest cumulative air pollution burden. Credible, reliable outcomes depend on setting aside subjective, anecdotal assessments and information lacking sound scientific support.

More information, data, and analysis will be needed at the community level to identify all local sources and their contribution to local emission levels. ARB will need to determine if air quality in some communities is based on factors that are beyond the control of individual sources, like weather, terrain, population density, and natural sources. We also believe ARB should use air quality, rather than less reliable public health indicators, to designate specific communities for emission reduction programs and to track program performance over time.

In addressing air pollution at the community level, any actions should be carefully evaluated based on feasibility and ensuring maximum air quality benefits for the widest population as cost effectively as possible. Implementation must safeguard jobs and economic opportunity in local communities, particularly in already disadvantaged areas. As this program moves forward, emission reduction efforts should be technology-neutral, focusing on bringing the best solution at hand to meet specific community needs. The goal should be to achieve the greatest emissions reductions for the most people, not to promote some technologies over others based on preconceptions or expectations that could prove unrealistic.

We are encouraged that the ARB process acknowledges the likely development of new information and technological advancements by allowing for ongoing adjustments that might

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improve the program as it evolves. This flexibility is crucial. A monitoring system should be developed and implemented to identify and address needed program adjustments and, ultimately, remove communities upon successful achievement of air quality goals.

Finally, we support the community stakeholder engagement aspect of this process. However, all regulatory actions must be based on the best available information, with enforcement by the Air Resources Board and with local air districts. The plan should also avoid layering on local ordinances or adding requirements that are not consistent with air district regulations or intent of AB 617.

Sincerely,

A handwritten signature in blue ink that reads "Kristin Connelly". The signature is written in a cursive, flowing style.

Kristin Connelly
President & CEO