

From: [Bill Magavern](#)
To: [ARB Clerk of the Board](#)
Subject: Coalition for Clean Air comments on the amendments to the Criteria and Toxics Reporting rule and to the guidance for the "Hot Spots" program
Date: Wednesday, April 14, 2021 10:56:47 AM

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I just submitted these to the docket and got a message saying that the url was rejected.

Coalition for Clean Air submits these comments on the amendments to the Criteria and Toxics Reporting rule and to the guidance for the "Hot Spots" program. Please consider these comments for both dockets.

We supported the adoption of these rules by the Board as necessary to fulfill CARB's statutory mandates to protect Californians from toxic air contaminants. Low-income communities of color are disproportionately burdened by air toxics, which inflict illness and premature death on many Californians.

Unfortunately, some of the provisions in the amendments proposed after the Board decision would weaken the rules and diminish protections for our communities.

1) Consideration of the impacts of multiple facilities in a given area has been removed, and should be restored. Residents, especially in disadvantaged communities, are often exposed to toxic emissions from multiple facilities, and these impacts need to be considered to understand the health threats; AB 617 explicitly requires consideration of the cumulative impacts of air pollution.

2) The proposal would omit reporting of toxins for which no health value has been assigned. We ask that all toxic emissions be reported. Even if they have no health values currently, the information will be helpful for residents to understand what is being emitted in their communities.

3) The proposal would delay some reporting deadlines until many years from now. Communities should not have to wait until 2026 and 2028 to get information on local emissions.

Thank you for considering our views.

Respectfully Submitted,

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