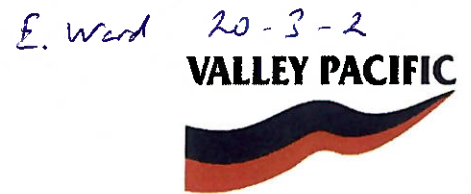


California Air Resources Board
1001 I Street
Sacramento, CA 95814



Chairman Nichols and Members of the Board:

February 11, 2020

Thank you for the opportunity to serve as a business representative and member of the South-Central Fresno Community Steering Committee. I found my experience both valuable and humbling.

The SJVAPCD staff did an exceptional job facilitating the many different concerns, ideas and community proposals presented in over 15 meetings. All CERP proposals and community concerns were presented, discussed and evaluated by the Steering Committee. After review of the best existing current emission data, the Steering Committee determined where new air data monitors should be placed. After open public discussion the Steering Committee approved the agreed upon CERP proposals. Understanding community emissions based on the placement of air monitors will provide us the best opportunity to reduce emissions in a logical and measurable way.

Business represents a unique and significant player in the reduction of toxic air emissions. AB2588, enacted in 1987, really launched businesses investment to improve air quality in our communities. The SJVAPCD credits the overall reductions from 1987 to present day as 86%. That means the remaining last 14% will likely be difficult to achieve. With the focus on community impacts, AB 617 presents us new opportunities. When ideas can freely and respectfully flow, solutions follow closely behind.

In the beginning, the Steering Committee heard a significant amount of misinformation in our discussions. For example, it was believed that business had not paid its fair share regarding emissions accounting. Since 1987 San Joaquin Valley businesses have invested \$40 billion in emission reductions and accepted \$2.8 billion in local air district incentives. Stationary sources have borne a significant load of emission reduction. Subsequent testing/study tell us that transportation corridors are where most of toxic air emissions are found today.

Some members of the Steering Committee were additionally members of various coalitions. There were discussions that industrial permitting and CEQA compliance were voluntary, thus resulting in the air quality we have today. Industry understands and recognizes the importance of compliance with these rules. We know that laws and regulations are almost always written to correct bottom feeders. In 2018 CARB levied \$17.5 million in enforcement fines and 2018 the SJVAPCD levied \$ 5.5 million in enforcement fines. Business profitability and success depends on compliance. Most businesses understand that obeying the law and being a good neighbor are an essential part of their sustainability and success.

Business compliance does not end with CARB or the local air district. We answer to regulators for transportation, water, safety, fire, and taxes, on a local, state, and federal basis. It demands a significant amount of time and attention daily to be compliant. Local community members did not know of the multiple regulatory demands on business.

There was never a broad understanding of the scope of the committee or the limited jurisdiction it had. Demands were made to have a seat at industrial permitting, CEQA, land use and to make enforcement decisions. The passion was laudable. Decisions of this nature, however, tend to be complicated and require expertise that community members and environmental justice advocates would need to acquire.

For the last 30 years business has been the primary implementor of air reduction strategies. Business has been your environmental partner to reduce air emissions in the South-Central Fresno community. As we look to develop new strategies to continue to reduce toxic emissions, business will be in the forefront of that process.

Respectfully Submitted,
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