



March 25, 2021

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814  
VIA EMAIL  
cotb@arb.ca.gov

cc: Sonya Collier, Staff Air Pollution Specialist,  
Sarah Pittiglio, Air Resources Supervisor  
research@arb.ca.gov

**RE:** 2021-2024 Triennial Strategic Research Plan

To the California Air Resources Board,

The California Environmental Justice Alliance (“CEJA”) is a statewide alliance of grassroots community-based organizations across California working together to advance environmental justice in state policy. Our member organizations work directly with low-income communities and communities of color in some of the most polluted and socioeconomically burdened areas of our state. Several of our member organizations participate in CARB’s AB 617 Community Air Protection Program. CEJA offers this comment on the draft 2021-2024 Triennial Strategic Research Plan (“Research Plan”), which should be informed by and further observations from CARB’s community-based work, such as the Community Air Protection Program.

Importantly, as detailed in CARB’s 2017 Climate Change Scoping Plan,

CARB’s research agenda is core to achieving [environmental justice]. To ensure that the research done by CARB responds to environmental justice concerns and has the greatest potential to improve air quality and public health in disadvantaged communities, CARB *will engage community groups early in the development of its research agenda and the projects that flow out from that agenda.*<sup>1</sup>

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<sup>1</sup> CARB 2017 Climate Change Scoping Plan at 97, available at [https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf)

Similarly, as part of last year's Commitment to Racial Equity and Social Justice, CARB has committed to

identify and implement best practices for community engagement, especially in communities suffering environmental injustice and racial discrimination, and to apply these practices throughout all of CARB's activities.<sup>2</sup>

However, despite this clear mandate and direction, CARB has failed to adequately engage environmental justice communities in either the development or deployment of its research priorities. The draft Research Plan does not detail how CARB will meet these guiding principles to address environmental justice. This is particularly important given deficiencies of the Community Air Protection Program.

While the AB 617 Program has increased deliberation of air pollution concerns in sixteen communities, the resource-intensive convenings and overall implementation over the last three years have largely failed to produce material protections. Rather, the participatory process of the Community Air Protection Program has had community members spend hundreds of hours engaging in meetings and working on plans. CARB has unfortunately designed the resulting plans to be mostly unenforceable; and thus, the plans may have little impact. Given the urgent need to protect public health from dangerous pollution, the Research Plan should build on CARB's efforts in the AB 617 process, and focus on furthering direct pollution reduction mandates through a streamlined and sector-based approach that extends the benefits of air quality improvements to all environmental justice communities equitably. The Research Plan must meaningfully prioritize the health and well-being of communities, especially when CARB has already solicited relevant information to do so.

CEJA therefore requests that CARB's Research Plan prioritize the identification of sectors to achieve direct emission reductions that AB 617 communities have already identified, and then determine the best pollution control mechanisms for reducing emissions in these communities. Furthermore, CEJA requests that CARB follow its own guiding principles and engage environmental justice communities through non-extractive community-based research practices that support and build the capacities of local community members, foster dialogue on research practices and goals, and encourage accessible review of CARB's research that is intended to meet these goals.

Sincerely,

/s/

Neena Mohan  
*Climate Justice Program Associate*  
Roger Lin  
*Climate & Air Counsel*  
On behalf of CEJA

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<sup>2</sup> CARB Resolution 20-33 (October 2020) available at <https://ww3.arb.ca.gov/board/res/2020/res20-33.pdf>