April 13, 2021

Mr. Richard Corey

Executive Officer

California Air Resources Board

1001 I Street

Sacramento, California 95814

Dear Executive Officer Corey:

On behalf of California Safe Schools, a children’s environmental health and environmental justice coalition, and the undersigned, we are writing to comment on rules about air toxics in California, specifically amendments to the Criteria and Toxics Reporting rule and to the guidance for the “Hot Spots” program.  Please consider the comments below for both dockets.

For more than two decades, California Safe Schools has actively worked with communities, school districts and regulatory agencies on the impacts of air toxics. We know that these chemical compounds can cause serious environmental health impacts, even at very low doses.

Tragically, many air toxics are persistent in our communities and accumulate over time in our bodies and environment. Communities of color and environmental justice communities unfairly endure a disproportionate burden and result in people suffering from diseases. It is imperative we address these disparities now.

Worse, they have an effect on the most vulnerable - children at the early stages of development. We cannot continue to allow toxic contaminants to inflict harm.

We need to immediately address all of the air toxics that are released into our air and identify all of the places that are releasing emissions, especially pollutants like PFAS. Currently, we don’t know about all of the places that are releasing emissions into the community. We need to be able to identify them. ndustries should be required to report all of the chemicals that they are discharging so we can make sure that harmful discharges are reduced. We cannot allow pollutants like PFAS, called “forever chemicals” because they never break down, to be brought into our communities. PFA’s are linked to cancer and other heath effects.

 We support the efforts of CARB to develop better information. However**,** the timeframe that has been proposed to find out whatpollutants are being released is too long.  Every draft of this rule extends the deadlines for compliance with reporting. We need to get the information and then immediately start reducing emissions and removing toxic pollutants that cause cancer and other problems that leave our communities at risk.

Saying that pollutants don’t matter because agencies have not set health values yet is not truthful or scientific.  All of the pollutants listed should be reported.  Removing toxic pollutants that cause cancer and other problems because a health value is not set yet leaves our communities at risk. These should all be included in the reporting so the public is fully informed.

CARB has stated that it is going to address disproportionate impacts and environmental justice.  But then CARB has taken out the language in the rule about considering effects from multiple facilities. That will continue the disproportionate impacts. We consider effects of the impacts from multiple facilities for criteria pollutants. We need to do this for toxics as well.

In an era where cancer, asthma, hormonal, neurological and birth defect are epidemic, now is the time to swiftly act to ensure our current and future generations are protected.

Kindest regards,

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Executive Director

California Safe Schools

Los Angeles, CA

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Sherman Oaks, CA

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