

Hi Cristina. Thank you for the clarification on the process. In addition to the on-time comment from Betsy Ronsse that I emailed earlier this morning, attached please find another on-time comment received from Comite Civico Del Valle, Inc. (Luis Olmeda) for uploading to the docket.

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Thanks,

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COMITE CIVICO DEL VALLE, INC.
INFORMED PEOPLE BUILD HEALTHY COMMUNITIES
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July 23, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Draft Community Air Protection Blueprint Comments, Comite Civico del Valle

The California Air Resources Board (CARB) Draft Community Air Protection Blueprint (Blueprint) outlines new actions that are to be implemented under the Community Air Protection Program (CAPP) as part of a “new community-focused framework”, a precedent that Comite Civico del Valle (CCV) commends CARB on establishing for statewide initiatives. As the leader in Community Air Monitoring Networks (CAMN), CCV strongly advocates that civically-engaged participation will produce the development and identification of lucrative emissions reduction programs beneficial to disadvantaged communities.

CAPP’s multifaceted implementational approach for selected communities; new regulations, focused incentive investments, and local land use authoritative engagement, is an invaluable first step towards reducing emissions and exposure to air pollution in the state of California while simultaneously developing an enforcement plan to ensure effectiveness. The key to success in reducing emissions and air pollution exposure rests on the effectiveness of projects and the achievement of tangible results focused on reducing criteria or toxic pollutants and addressing public health disparities embedded in disadvantaged communities. This is where CAPP needs to administer its CAMN component to complement any metrics that track the effectiveness projects.

Without defined measurable metrics to be reported by the air districts there’s an uneasiness at how progress can be defined, there needs to be an expeditious implementation in tracking progress, local air districts will need to be held accountable by CARB and include the identification of mobile sources if those are the only immediate threat to sensitive receptors or community. Actions CARB should use to ensure air districts deliver, on tracking metrics and measured progress, should include at a minimum CARB oversight over future planning.

Section VIII¹ lists the requirements for community emissions reduction programs that air pollution control districts must prepare for their community plans. What is and should remain in plans, with impetus, is the inclusion of new actions. Whether these new actions include stricter regulation, enforcement, or some form of incentives should be determined by the specific situation within a community and what approach results in more verifiable progress.

¹ California Air Resources Board “Draft Community Air Protection Blueprint”, Section VIII. Requirements For Community Emissions Reduction Programs, June 7, 2018, available at: https://ww2.arb.ca.gov/sites/default/files/2018-06/draft_community_air_protection_blueprint.pdf



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Language in the Blueprint states that at least 70 percent of the available \$250 million would go to benefit disadvantaged communities, approximately upwards of \$170 million, but history has shown that this will likely not be the case if funds will be appropriated by communities that are already rich in resources instead of those lacking, in resources and opportunities, to help their residents. Cal-Enviro should only serve as an informational tool, and each community will conduct their own data gathering of hazards to pinpoint pollution sources. There needs to be a remedy to situations such as this, and appropriation of funds to areas that require the most attention is paramount in progressing towards emissions reductions and with respect to public health disparities in environmental justice communities.

A new mandate that the Blueprint plans to implement through AB 617 is “Compiling resources on health data to enhance the consideration of public health in local decision-making process”, an action that should have been implemented long before this legislation since air quality is a problem that persists in local and state projects. New intentions by ARB to provide comment letters on proposed projects throughout the state on the importance of air quality considerations should also be a priority that should have been addressed before the statewide strategies were developed for AB 617; this is another lack of foresight on the states framework knowing that each prioritized community will have different emissions sources.

With respect to air monitoring, it is our position that our air monitoring program, IVAN Air, can serve as the model for the state of California. This innovative design can be implemented as a statewide strategy throughout the various communities disproportionately affected by respiratory disease, specifically in those where there is no current air monitoring program in place. Through implementation of this model, CARB can save funds and time by expediting our air monitoring program as outlined by the Blueprint as well as promote a statewide strategy among air districts to satisfy AB 617 objectives.

In conclusion, CCV appreciates the opportunity presented by CARB, and staff, to allow us to participate and submit our comments to promote a better, cleaner California and partake in advocating alongside other environmental justice leaders and communities.

Luis Olmedo

A handwritten signature in black ink, appearing to read "Luis Olmedo".

Executive Director
Comite Civico del Valle, Inc.