April 14, 2021

Liane M. Randolph

Chair, California Air Resources Board

1001 I Street, Sacramento, CA 95814

P.O. Box 2815, Sacramento, CA 95812

**RE: PSR-LA Comments on CARB’s proposed “Criteria and Toxics Reporting” (ctr2020) and AB 2588 “Hot Spots” (hotspots2020) amendments.**

To the Chair and members of the Board,

Physicians for Social Responsibility-Los Angeles (PSR-LA) works with organizations and community advocates dedicated to improving air quality and public health by supporting implementing policies that address climate change and achieve environmental justice for the communities of California. We are therefore writing to provide our comments on both of the California Air Resources Board’s proposed amendments for *“Criteria and Toxics Reporting”* and the “*AB 2588 Air Toxics ‘Hot Spots’ Program”*.

We think it is necessary for CARB to provide granular community level air pollution data on all possible sources. This is the type of data we are finding is necessary to develop effective emission reductions strategies. It has been our experience while collecting air monitoring, data and conducting ground truthing of these sources provided key community data and often reveal glaring data gaps. These gaps negatively impact our ability to address the cumulative burden of air pollution that is disproportionately impacting communities of color and environmental justice communities. We need to have complete, consistent, accurate, and a transparent emissions inventory of criteria air pollutants and toxic air contaminants, so communities will be better informed to engage in the development solutions that reduce pollution burden.

Additionally, we think it is equally important to report on where we have missing and insufficient data especially given the gaps in health data related to many toxic air contaminants. These gaps in health and safety data are often seen as proof of safety.

**CARB must move faster to provide reporting. The timeline for facilities to report cannot go on for years.** The polluters should not be issued permits if they cannot tell us what and how much they are releasing into our neighborhoods. The deadlines for compliance with reporting requirements are too long. This will also bring accountability and transparency to the program and the agency given it is decades long overdue to change the reporting rules and update the list of air toxics emissions.

We suggest changing the rule to include all pollutants emissions, especially if we do not have health values for them. We must do a robust hazard assessment and identify all pollutants that are toxic. CARB should base its decisions and actions on science. Saying that pollutants don’t matter because agencies have not set health values yet is not truthful or scientific and perpetuates harm to human health.

CARB must restore the provisions to consider impacts of multiple facilities where relevant.The new draft of the rules removes the language about considering the impacts of multiple facilities that affect the same area. This was important to communities and should be put back in the rule. CARB cannot say that it is going to address disproportionate impacts and environmental justice and not address cumulative impacts of multiple facilities. We do not understand how CARB can be serious about enforcing environmental justice and not consider effects from multiple facilities.

Physicians for Social Responsibility has long advocated for stronger health and environmental justice measures at the Board. We hope that the Board takes these comments into consideration and thus take the necessary steps to ensure that the communities, which CARB serves, have the data, resources, and tools suitable for the successful implementation of AB 617 projects that have a centered focus on tangible reductions to pollution burden to achieve environmental justice and a just transition.

Thank you,



Martha Dina Arguello,

Executive Director

Physicians for Social Responsibility-Los Angeles