

CARB Triennial Research Plan

Board Hearing March 25, 2021

Comments from Amy D Kyle, PhD MPH

The California Air Resources Board has released a draft of its Triennial Research Plan for review in March 2021. These are comments on the plan and a request to the Board.

A current priority for CARB and the state is to redress disproportionate impacts on communities. In particular, air toxics are distributed to disadvantaged communities through long term structural policies such as those related to finance and housing, including those known as “redlining.” They are also distributed to disadvantaged communities through the siting of larger facilities with high emissions and policies excluding certain categories of emissions from review. Addressing air toxics is fundamental to eliminating structural racism within institutions.

The AB 617 program was created in part to address these issues. A great deal of time and money has been put into this program, and considerable effort is required from those of the communities that have been designated. However, results for emission reductions are limited, and the process remains extremely intensive.

The Board has recognized the importance of developing more effective approaches. One important topic is community scale assessment. This has been largely missing from the approach to non-diesel air toxics, as the efforts have focused either at the regional scale or at the facility level. The Board directed the staff to develop methods to address this topic and others in its November resolution adopting the Criteria and Toxics Reporting (CTR) rule and amendments to guidance for the 2588 “hot spots” program (resolution 20-30). There was additional direction to look at other data and assessment issues as well. The staff is to report back to the Board in the fall of 2021.

The Research Strategy does not address these topics. It has some “adjacent” projects that address related issues. Work on “Health Assessment” would address better estimation of

health benefits and monetization of these benefits. This is primarily identified to be used in the context of climate regulations. However, this is built upon use of existing data sources for emissions of toxics that are flawed and would further institutionalize inadequate processes. This is not a fundamental solution, even as it may allow for additional support for the climate regulations.

Similarly, the strategy includes some additional research related to exposures and health effects in communities. These are good projects. However, they do not seem to be related to the data streams actually available for assessment, characterization, and action. Perhaps that will emerge later.

I would ask that the Board direct the staff to consider research needs as part of its development of a strategy to address cumulative impacts on environmental justice communities as related to non-diesel air toxics and leave space to allow projects to be funded.

Thank you for your consideration.

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