

Paul Philley

19-5-4

May 23, 2019

California Air Resources Board
California Environmental Protection Agency
1001 I Street
Sacramento California 95814

RE: Sacramento Metropolitan Air Quality Management District recommendations for the Community Air Protection Incentives 2019 Guidelines

Dear Members of the Board:

With the passage of Assembly Bill 617 (AB 617) and the creation of the Community Air Protection Program, stakeholders across the state have been diligently working to reduce exposure in communities most impacted by air pollution. California Air Resources Board (CARB) staff, local air districts, community groups, community members, environmental organizations, and regulated industries have come together to develop a new community-focused action framework for community protection. A key part of that framework are the Community Air Protection Incentives 2019 Guidelines (CAP Guidelines), which will govern the expenditure of the CAPP incentives funding appropriated for 2018-19; they will determine if implemented programs in impacted areas will be responsive to the specific circumstances and needs of the community.

It is imperative that the CAP Guidelines have maximum flexibility to allow for projects that will align with community-identified priorities. Currently the guidelines limit pilot programs to communities with Emission Reduction Programs (CERP). We recommend that all communities identified by the air districts be eligible for pilot projects.

The current CAP Guidelines only offer attractive funding amounts to select categories such as school buses, electric vehicle chargers, and locomotives. While these projects are good uses of CAPP funding, we believe other projects in impacted communities should be funded. Community groups and local government often lack diesel vehicles for scrap and need a higher cost effective threshold to deploy advanced vehicle technology into the neighborhoods where they are needed the most. Recognizing this, the Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) developed local programs to fill this need. For example, the Sacramento Emergency Clean Air Transportation (SECAT) program has proven to be successful throughout the Sacramento region in advancing electrification of medium- and heavy-duty vehicles. In addition, equity light-duty programs like Our Community CarShare bring zero-emission mobility solutions for areas with limited transportation options, reduce vehicle emissions, support electric light-duty vehicle deployment, and support community capacity building. The pilot projects can bring more of these clean air solutions to our region.

In addition to requesting additional flexibility for mobile sources, we ask that you consider flexibility for stationary sources. Chapter 4 of the proposed guidelines allows Community Air Protection Program funding to support hexavalent chromium controls in plating facilities. The CARB identified South Sacramento – Florin community does not have chrome-plating facilities, but would benefit from stationary source incentive funds focused on Internal Combustion Engines (ICE), boilers, and auto body coating facilities. Our discussions with the legislature suggested a strong interest in a diversity of stationary source projects. Thus, the Sac Metro Air District supports our partner air districts and requests CARB expand the funding criteria to

include other potential stationary source emission technologies. This additional flexibility will increase the potential to realize emission reductions in all selected communities.

The successful implementation of the Community Air Protection Program will be realized through a robust partnership between many state and local stakeholders, with the community at the center. In solidarity, our partners in the community are co-signing this letter in support of the Sac Metro Air District recommendations.

With California being the largest and most diverse state in our nation, special consideration needs to be given to the CAPP Guidelines to ensure that programs deployed in each community are responsive to that community's priorities. The requested changes to the CAP Guidelines are consistent with ARB deliberations last September, when specifically some ARB board members spoke about the need for emission reductions in all communities, whether they were explicitly designated for a CERP or not. We hope the board implements guidelines that will allow for flexibility in implementing pilot projects, allowing us to reduce impacts from a range of stationary sources and integrate existing, successful local projects such as SECAT and CarShare.

Sincerely,



SACRAMENTO METROPOLITAN



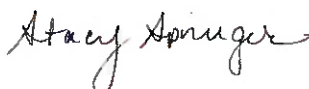
Alberto Ayala, Ph.D., M.S.E.
Executive Director/Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District



Bill Knowlton
Executive Director, Mack Road Partnership



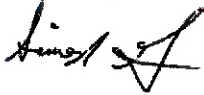
Patricia Shelby
Vice Chair, South Sacramento-Florin Steering Committee



Stacy Springer
Chief Executive Officer, Breathe California Sacramento Region



Nathan Ulsh
Executive Director, The Franklin Neighborhood Development Corporation



Simeon Gant
Executive Director, Green Tech Education and Employment



Bill Mueller
Chief Executive Officer, Valley Vision



Luis Sanchez
Chief Executive Officer, Community Resource Project, Inc.

