



December 16, 2016

Via Electronic Filing on ARB Website

Richard Corey, Executive Officer
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the 2030 Target Scoping Plan Draft (“Discussion Draft”)

Dear Mr. Corey:

We would like to thank you for the opportunity to comment on the 2030 Target Scoping Plan Discussion Draft (“Discussion Draft”). The undersigned environmental organizations work alongside the most disadvantaged communities affected by air pollution and climate change throughout the San Joaquin Valley. Because low-income communities of color bear the most severe consequences of air pollution and climate change, it is imperative that we create sustainable solutions to protect these underserved communities and create a healthy environment for all residents of California.

As the Air Resource Board prepares for public workshops and begins finalizing the 2030 Target Scoping Plan, we would like to continue to work with staff to ensure the development of equitable policies and programs. We offer the following recommendations in an effort to strengthen the current draft and ensure that programs and policies benefit communities that are most in need.

I. Partnership with Environmental Justice Organizations

We would like to thank the Air Resource Board (ARB) for hosting public workshops throughout the state and for allowing stakeholders and the public the opportunity to engage in the process. We offer the following recommendations to strengthen public outreach and collaboration with environmental justice organizations. To ensure effective public participation during stakeholder workshops, ARB should partner with local organizations who have trusting relationships with community residents. Additionally, translation services should be provided and all written materials made available in multiple languages. Similarly, the workshops should include a plan to provide food and childcare during such meetings, as the lack of both make it difficult for working parents to participate in the process.

II. Stricter Penalties and Regulations for Polluting Industries

Current regulations do not act as an effective deterrent for serial violators of air pollution regulations. The 2030 Target Scoping Plan should incorporate policies that increase penalties for polluting industries and facilities. Low-income communities of color bare unequal exposure to environmental factors and suffer from severe health impacts due to unsafe living conditions. We recommend that the 2030 Target Plan develop and impose stricter regulations on industries who continue to harm the well-being of communities.

Furthermore, we believe the 2030 Target Scoping Plan does not thoroughly and adequately address the harmful impacts of polluting industries in communities. According to a study referenced by the comments submitted by The Center on Race, Poverty and the Environment (CRPE), Cap and Trade disproportionately affect low-income communities of color who are also unable to see the benefits of direct regulations and emission reductions.

III. Energy Efficient Programs in Low-Income Communities

Low-income households spend a higher percentage of their income in energy expenses regardless of their effort to conserve energy. Many low-income communities rely on high energy cost appliances because they cannot afford to purchase more energy efficient household products. Furthermore, renters in low-income communities (depending on their lease agreement) rely on their landlord to provide energy efficient appliances. Oftentimes, landlords do not take the necessary steps to improve a unit's energy efficiency or help lower utility cost for tenants. We recommend that the 2030 Scoping Plan incorporate policies and programs that incentivize landlords to provide energy efficient upgrades for affordable housing units in low-income communities, which includes rural, urban, and mobile-home communities. Not only will these incentives help conserve energy, they will also reduce energy cost and help landlords offset the price of energy efficient appliances.

Many mobile home parks lack a metering system and pay whatever rate they are told to do so by the landowner. Most parks also do not have single meters per unit but rather a master meter, so tenants do not know exactly how much energy they are using and paying for. Furthermore, many mobile home communities tend to be older and have outdated appliances, such as coolers and heating systems. We recommend that funding and programs be directed to these communities to upgrade their older, polluting appliances as well as an educational component to strengthen residents' understanding of energy conservation. Lastly, it is essential for funding to be used to support community solar for low-income customers including rural, mobile-home communities.

IV. Transportation Investment and Sustainable Policies for Rural Communities

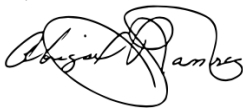
Low-income rural communities have aging and inadequate transportation infrastructure and minimal public-transit access. A lack of adequate state and local funding has inhibited growth in many communities and has resulted in deteriorating infrastructure. Additionally, public transit services do not reach isolated rural areas, requiring most residents to rely on vehicles to travel long distances to work. Resources must be allocated for maintenance and programs that allow a reduction in vehicle miles traveled in rural disadvantaged communities. Furthermore, ARB should prioritize local, state, and federal funding to fund transportation infrastructure projects such as vanpool/vanshare programs in areas with limited transit services.

Lastly, while we support electric vehicle initiatives and clean vehicle technologies, we believe a "one size fits all" approach to rural communities is ineffective; a rural strategy must create programs and policies that are more responsive to rural, less populated communities with distinct infrastructure and transit needs.

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Thank you for your consideration of these comments. We look forward to continuing working with you to ensure that the needs of disadvantaged communities are considered when finalizing the 2030 Scoping Plan. Should you have any questions, please contact Abigail Ramirez at aramirez@leadershipcounsel.org or (415) 374-6020.

Respectfully,



Abigail Ramirez
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