

July 23, 2018

Dear CARB,

I am writing to this agency as a citizen. (Let me be clear: I am on vacation today.)

At this time, I have no specific comment on CARB's Community Air Protection Blueprint for developing the strategy plan for AB 617 requirements by October 1, 2018.

I do have general comments on the CARB data ultimately generated from AB 617 – perhaps someone within CARB will consider these:

1. Although the planned benefits of zero-emission vehicles are important for the future, of immediate importance for the current population, in my opinion, should be a strategy to minimize the environmental impacts from decades of catalytic converters, especially impacts possibly found in the less affluent communities targeted by AB 617.
2. Reporting trends of inaccurate results will do nothing positive for the communities targeted by AB 617, in my opinion.
3. For AB 617, at a minimum CARB should analyze for high-risk TACs most probable to California using appropriate analytical methods, and in a similar manner to the 1989 Toxic Hot Spots evaluation – again, in my opinion.
4. With over 30 million vehicles – cars, trucks, motorcycles – registered in the State with various catalytic converters, CARB appears to have the attitude that these devices, regardless of the manufacturer, are without flaws or potential failure spots, and are implausibly resistant to all damage including normal wear-and-tear when exposed to prolonged 1500 degrees Fahrenheit operating conditions. In my opinion, CARB should review the real-world functioning of these devices; even a modest 1% failure rate found for these devices, in my opinion, may indicate significant environmental consequences of neurological damaging pollutants to the communities targeted by AB 617.

Since these comments may be ignored by CARB, PM air samples collected by an agency outside California, from urban locations similar enough for viable comparison to the selected regions of AB 617, will be tested by a State-certified private lab using CARB public methods along with appropriate alternate methods; this test data will be compared to CARB data released to the public. This data comparison, and related information, including but not limited to findings from government agencies tasked to investigate misconduct affecting public health, will be disseminated to my elected representatives via counsel.

Preferably, I do hope CARB takes advantage of the opportunity of AB 617 to do the right thing towards improving public health.

Thank you,

Betsy Ronsse
Citizen