



December 18, 2020



Dr. John Balmes, Chair  
 Air Resources Board AB 617 Consultation Group  
 1001 I Street  
 Sacramento, California 95814

**Subject: Community Business Coalition Comments on AB 617 Blueprint Update Process**

Dear Dr. Balmes:

The undersigned groups appreciate your ongoing leadership of the Air Resources Board’s (ARB) AB 617 Consultation Group, and the recent efforts of the Consultation Group to develop recommendations to ARB for updating the Community Air Protection Blueprint (Blueprint). This work is important. We share the same sense of urgency many people feel. For us, the urgency is also around making sure we take the right approach. That’s why we’re writing to you today.

We are deeply concerned about the views that seem to be held by some Community representatives that business representatives either should not play a role in AB 617 implementation or should only be allowed to participate to the extent that they agree with the recommendations of other

Community representatives. We thank you in advance for considering the information and point of view shared in this letter. Our intent is to help inform the Blueprint recommendations the Consultation Group is now considering that will:

- Minimize conflicts with statutory requirements
- Promote inclusion and improve stakeholder collaboration in the development of effective community-based air quality programs
- Advance future success of the Community Air Protection Program

AB 617 specifically requires that ARB prepare a statewide strategy to reduce criteria pollutants and toxic air contaminants in designated communities in consultation with state agencies, “environmental justice organizations, affected industry, and other interested stakeholders” (Health and Safety Code section 44391.2). Many of our organizations - made up of dedicated and conscientious scientists, engineers and passionate problem-solvers - have dedicated considerable time and resources to the development of the original Blueprint and to AB 617 implementation. This includes enthusiastic participation on Community Steering Committees (CSCs). We are committed to the AB617 process in working side-by-side with our peers to accomplish our shared goals of the program. Our members bring unique technical expertise and extensive knowledge of emissions sources to CSCs – inputs that are necessary to define the unique air quality challenges facing each community and develop effective monitoring and emissions reduction strategies. Efforts that reject these perspectives would not only conflict with the statutory language but would also increase the likelihood of spending limited ARB and air district funding toward measures that may not achieve the desired air quality improvements in AB 617 communities.

From an organizational perspective, these views ignore the well-researched and established fact that **teams are more successful when they include diverse perspectives**. As one [Harvard Business Review article](#) states, “Tackling new challenges requires a balance between applying what we know and discovering what we don’t know that might be useful. It also requires individual application of specialized expertise and the ability to step back and look at the bigger picture.” There is inherent danger of groupthink and bias when teams are not sufficiently diverse. Diversity of perspectives is arguably one of the most important success factors of this effort.

Also, it’s important to remember, our organizations represent facility employees - each with families, children and loved ones of their own - that work and live in AB 617 communities. They too have a vested interest in the well-being of their communities, and by extension, the success of this program.

We have reviewed the draft “People’s Blueprint” document and found many areas of potential agreement between Community representatives and business groups.

- We agree that the 2018 Blueprint did not pay sufficient attention to “preparation and readiness” for the AB 617 implementation process and that this area is an opportunity for improvement.
- We agree that training for all participants is important. Among other areas of focus, training should address specific statutory requirements defining stakeholder roles, responsibilities, procedures and standards for measuring program success.

- We agree that all stakeholders would benefit from instruction in translating the results of scientific research and in communicating the air quality and public health implications of those results. In this context, it is important to address community perceptions of the sources driving air pollution burdens with information identifying the extent to which air pollutants are emitted from those sources in amounts that contribute meaningfully to the cumulative air pollution burden in the community.
- We agree that the Blueprint must provide for ARB oversight of the program planning process. ARB has an important role to ensure the requirements of AB 617 are fulfilled..
- We agree that methods for dispute resolution involving neutral third parties should be explored. Any dispute resolution process should begin with a determination that the issue can be resolved under ARB or air district authority and within the ambit of the AB 617 program.
- We agree that experts and representatives of “other organizations” should be consulted in community-level program implementation, particularly in the design of monitoring and emissions reduction programs and in developing metrics to measure program progress.
- We agree that “a baseline needs to be established for each of the areas addressed by proposed actions or solutions.” The current Blueprint includes a “Technical Foundation” section in Appendix C. The requirements in this section should be part of the baseline for developing any community-level program.
- We agree that “technical analyses should be designed to contribute to the development of the plan and be focused on the needs of each program and the types of data available.” More specifically, technical analyses should identify and assess the individual sources impacting community air quality, including an estimate of the relative contribution of each to elevated exposures.

These recommendations provide a foundation for a more constructive dialogue that can help to resolve areas of disagreement.

We ask that the Consultation Group work to orient further discussions on the Blueprint update toward greater stakeholder inclusion, collaboration, and consensus-building, consistent with the intent and requirements of the statute. This approach will strengthen stakeholder confidence in the AB 617 implementation process. It *will* lead to better outcomes in, and for, AB 617 communities.

**Now is the time for inclusive problem-solving. When we limit who can contribute, we will limit what we can solve.**

Thank you for considering our comments. We look forward to participating in ARB's upcoming public engagement process for the AB 617 Blueprint update.

Sincerely,

African-American Farmers of California  
Association of Builders and Contractors, Central California  
Association of Builders and Contractors, Southern California  
BizFed Central Valley  
California Asphalt Pavement Association  
California Chamber of Commerce  
California Cotton Ginners and Growers Association  
California Independent Petroleum Association  
California Manufacturing & Technology Association  
California Metals Coalition  
Carson Dominguez Employers Alliance  
Central Valley Energy Coalition  
Coastal Energy Alliance  
Construction Industry Air Quality Coalition  
Council of Business and Industry West Contra Costa County  
Future Ports  
Harbor Association of Industry & Commerce  
Industrial Association of Contra Costa County  
Inland Empire Economic Partnership  
International Warehouse Logistics Association  
Kern Citizens for Energy  
Kern County Taxpayers Association  
Long Beach Chamber of Commerce  
Los Angeles Area Chamber of Commerce  
Los Angeles County Business Federation (BizFed)  
Nisei Farmers League  
Orange County Business Council  
San Gabriel Valley Economic Partnership  
South Bay Association of Chambers of Commerce  
Valley Industry & Commerce Association  
Western Agricultural Processors Association  
Western Independent Refiners Association  
Western States Petroleum Association  
Wilmington Chamber of Commerce

cc: Members of the ARB Consultation Group  
Richard Corey – ARB Executive Officer  
Vernon Hughes – ARB