

Comments on Draft Roadmap to Reduce Air Toxics

ww2.arb.ca.gov/public-comments/public-comments-draft-roadmap-reduce-air-toxics

Paul Burke, Ventura County, naacp@yrr.info

The draft [Roadmap](#) so far **omits and needs to add:**

1. **Enforcement & penalties.** Penalties are not mentioned at all. Enforcement is mentioned only 5 times, 3 times as a responsibility of regional air districts & twice for the Dept. of Pesticide Reg. Other items which are also regional responsibilities are more fully addressed. Enforcement and penalties need more detail in the roadmap.

Both the regulated community and other community members need to know the range of enforcement actions which will be available, criteria for applying each, and appeal processes when enforcement happens and when it doesn't happen. Polluters and their non-polluting competitors and neighbors are not one happy family, where nudges are adequate. Robust enforcement plans (if they are known to be carried out) deter violations in the first place, and protect non-polluting competitors and citizens of the state.

A roadmap to better enforcement and fair use of penalties can include:

- A. Criteria for each type of action available to districts and CARB.
 - B. Procedures for the public to seek changes in decisions.
 - C. A plan for a dashboard by region and county of all administrative, prosecutorial and court decisions, as they happen. This includes tracking the initial decision to take action, and steps and results of those actions.
 - D. Followup reporting of emissions after each violation and each enforcement action.
 - E. After-action reports, including when a prosecutor or court declines to act, to discuss what better evidence can be developed next time to succeed or to avoid the need to prosecute.
2. **Airborne microplastics** besides tire & brake wear, such as from manufacturing and recycling plastics, farm-applied plastics, and land-applied sewage sludge. Washing synthetic cloth releases millions of microplastics and 95% are captured in sewage sludge (biosolids). Most sludge is land-applied, so the microplastics blow in the wind. (Geyer et al. 2022. "Quantity and fate of synthetic microfiber emissions from apparel washing in California and strategies for their reduction" [sciencedirect.com/science/article/pii/S0269749122000495?via%3Dihub](https://www.sciencedirect.com/science/article/pii/S0269749122000495?via%3Dihub))
 3. **Landfill** emissions.
 4. **Indoor** air, including gas stoves and heaters, cleaners, materials, fragrances, etc. Toxics matter both indoors, and after they pass outdoors.

The draft Roadmap does cover, and **needs to continue to cover:**

1. Monitoring (word occurs 67 times)
2. Oil & gas, including diesel
3. Pesticides
4. Autobody & metal working businesses
5. Wildfires
6. Brake & tire wear