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EXECUTIVE DIRECTOR
Alberto Ayala

January 26, 2023

Steven Cliff, Ph.D., Executive Officer
California Air Resources Board
1001 I Street, Sacramento, CA 95814

Subject: Community Emission Reduction Plan for AB 617 South Sacramento-Florin Community

Dear Steven Cliff:

We are encouraged to hear the California legislature has appropriated to the California Air Resources Board (CARB) additional implementation funding for air districts to develop new Community Emission Reduction Plans (CERP). The Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) believes this type of one-time commitment, followed by long-term funding for the program, can enable all formally identified AB 617 communities, including South Sacramento-Florin, to transition from a Community Air Monitoring Plan (CAMP) community to a CERP community and fulfill the intent of AB617. We remain very motivated to move our community forward with the state's help.

On October 28, 2022, the Sac Metro Air District submitted its Year 5 AB 617 recommendation for three additional communities to be formally selected by CARB for the AB 617 Community Air Protection (CAP) Program. While this recommendation was based primarily on the needs of other communities in our region, it is equally important for CARB to ensure that the South Sacramento-Florin Community (Community) is not left behind in the CERP process.

Since the inception of the program, the Sac Metro Air District has partnered with the Community to develop and implement a CAMP to help characterize the air pollution burden in the local area. This spring, the third and most comprehensive phase of air monitoring in the plan will commence. The monitoring will be in place for at least a year to ensure seasonal variability is captured. With this crucial information, the Sac Metro Air District and the Community will be fully equipped with a completed CAMP to identify next steps and inform the development of targeted emission reduction strategies for a CERP.

Underscoring the importance of timing and our limited resources, the Sac Metro District and the Community are interested in options that work for us. We have appreciated the support the state has shown for the implementation of AB 617 and, specifically, the CAMP for South Sacramento-Florin. The next and last phase of air monitoring will occur over the next year, including the necessary community engagement work to analyze and interpret findings. Thus, the Community and our agency anticipate being ready to transition to a CERP in the 2025 timeframe. Therefore, we hope CARB can accommodate our constraints and support the Community in planning a viable transition to a CERP community, empowered by the evidence from the CAMP.

The Sac Metro Air District has long held a commitment to the principles of AB 617. For this reason, we are constantly looking for opportunities to align existing local air quality programs with the goals of the CAP mandate. We are actively leveraging programs under our authority in new ways to promptly help our Community and address its concerns about air pollution. We are doing as much as we can and have identified several local CERP actions including:

- Implementing a new EJ-centered Supplemental Environmental Project program, which provides new funding through the local violation settlement process for projects proposed by local stakeholders for improving public health and air quality consistent with AB 617 in some of the most marginalized neighborhoods in our region.
- Creating a new Unidentified Source Inspection Program inclusive of an intense, multi-year process to identify and ensure businesses operating in the Community have all necessary air quality permits and are operating in compliance with all federal, state, and local regulatory requirements.
- Developing new mapping functionalities in a tool for communities to locate, identify, and assess the density of permitted facilities within a given census tract.
- Increasing community awareness and education activities about air pollution impacts during wildfire events by way of implementation of AB 661 – Wildfire Smoke Air Pollution Emergency Plan.
- Initiating a new participatory CAP incentive project selection process that includes working with the Community Steering Committee members to identify and prioritize all CAP incentive programs during grant solicitation. This process targets and selects emissions reduction projects of the most importance to the Community. Examples of projects include incentives for EV charging infrastructure, electric semi-trucks for fleet use, electric-vehicle school buses, and electric lawn and garden equipment.
- Leading the CAPCOA's cutting-edge efforts on revamping the California Emission Estimator Model (CalEEMod) to make it inclusive of the latest evidence on new EJ and climate change indicators. CalEEMod is now the expected tool for local planners throughout the state to use to evaluate land use decisions. This effort included participation of community-based organizations, health systems, builders, planners, and government representatives.
- Creating a new partnership with Sacramento Regional Transit, Sacramento Municipal Utility District, and Sacramento Area Council of Governments to re-envision our region's collective actions through an AB 617 lens and prioritize policies, investments, and advocacy in underserved communities. The first success story of this new effort is the "Sacramento Region Zero Carbon Transportation Initiatives," an integrated ZEV deployment strategy for the region identifying priorities in 1) transit fleet conversion and refueling infrastructure, 2) goods movement and medium and heavy-duty fleet transition, 3) charging and transportation options for under-resourced communities, and 4) workforce development.

While the actions above are illustrative of the commitment this agency has made to the Community in the spirit of AB 617, we recognize these actions are only a part of what could be accomplished with formal designation and state support for a CERP. Thus, the Sac Metro Air District is eager to continue the partnership with CARB, the Community, local agencies and jurisdictions, and organizations to embark on a formal CERP development process at the first opportunity. Let's work together to ensure South Sacramento-Florin gets the necessary state support for a CERP. With an actionable commitment of funding and adequate timing for planning, the Community and the Sac Metro Air District would be provided with the best chance for success. And South Sacramento-Florin, as one of the most marginalized communities in the greater Sacramento region, can finally imagine a better air quality outcome and be a direct beneficiary of the state's transition to a decarbonized future. If you have any questions, please don't hesitate to contact Janice Lam Snyder, staff lead of our AB 617 program, at (916) 491-0929 or JLam@airquality.org.

Sincerely,



Alberto Ayala, Ph.D., M.S.E.
Executive Director and Air Pollution Control Officer

cc via email:

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Vice Mayor, District 6, City of Sacramento

Patrick Kennedy
Vice-Chair, Sacramento Metropolitan Air Quality Management District,
Supervisor, District 2, Sacramento County

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Stephanie Williams, Co-Lead of the South Sacramento-Florin Air Quality Steering Committee

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