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Comments Re: BAAQMD Permitting Rules

Golden Gate University School of Law

GOLDEN GATE UNIVERSITY
SCHOOL OF LAW
ENVIRONMENTAL LAW AND JUSTICE CLINIC

West Oakland Environmental Indicators Project
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COMMUNITIES FOR A BETTER ENVIRONMENT
established 1978

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By Email

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Mr. Finkle:

Thank you for the opportunity to submit these comments on potential amendments to the Bay Area Air Quality Management District's (the District) permitting rules. These comments are submitted by the Environmental Law and Justice Clinic at Golden Gate University School of Law on behalf of the West Oakland Environmental Indicators Project and Communities for a Better Environment. We appreciate the District's willingness to consider revisions to its permitting rules. However, as discussed during the May 12 workshop, the District's Concept Paper fails to propose changes to the permitting rules that are sufficient to protect overburdened communities. We highlight areas where the rules should be revised below.

I. The District's Permitting Rules Should Be Revised to Address Cumulative Impacts in the Permitting Process.

The District should revise its rules to address cumulative impacts on overburdened communities in the permitting process. The District's Concept Paper recognizes that cumulative impacts are a significant concern for Bay Area communities. Many Bay Area communities such as Bayview/Hunters Point, Richmond, East Oakland, and West Oakland are severely overburdened by pollution. These and other Bay Area communities rank among the most pollution-burdened in the state according to the California Communities Environmental Health Screening Tool 3.0. A recent study confirmed that there are great disparities in air pollutant exposure, pollution-attributable health risks, and pollution-attributable disease burden in the San Francisco Bay Area. *See* Southerland, et al., *Assessing the Distribution of Air Pollution Health Risks within Cities: A Neighborhood-Scale Analysis Leveraging High-Resolution Data Sets in the Bay Area, California*, ENVIRONMENTAL HEALTH PERSPECTIVES, Vol. 129 No. 3 (March 31, 2021).[1] The District itself has already done substantial work to, among other things, identify

[1] Available at https://ehp.niehs.nih.gov/doi/10.1289/EHP7679.

communities most adversely impacted by air pollution through its Community Air Risk Evaluation (CARE) program.

Nevertheless, the District declines to incorporate cumulative impacts analysis in the permitting process. *See* Concept Paper, App. B at 1. The District's reasons for refusing to do so are not compelling. The District contends that its CEQA thresholds of significance are an adequate substitute for cumulative impacts analysis. Throughout the Concept Paper, the District suggests that its CEQA thresholds are sufficient "to protect public health" and ensure that an "analysis of cumulative impacts" is conducted for projects. *See, e.g.,* Concept Paper at 13. The District overlooks the fact that CEQA is not designed to protect public health from air pollution. Rather, CEQA's purpose is to identify and mitigate significant environmental impacts when feasible. CEQA is not primarily designed to improve local air quality and to drive technological innovations in ways the Clean Air Act is. Nor does CEQA necessarily ensure that disadvantaged communities are protected from concentrations of polluting sources in their neighborhoods. Unlike land use agencies, the District has the authority to directly reduce air pollution from stationary sources and is charged with protecting public health.

As the District acknowledges, public authorities across the country are incorporating environmental justice considerations into decisions to approve pollution sources that may have a disproportionately negative impact on overburdened communities. *See, e.g.,* Concept Paper, App. A at 11-12. The Environmental Justice Act in New Jersey (EJ Act) is a good example. *See* New Jersey Public Law 2020, Chapter 92. The EJ Act requires applicants to submit environmental justice impact statements. *Id.* at C.13:1D-158. The government must deny a permit for a new facility or source when it would, "together with other environmental or public health stressors affecting the overburdened community, cause or contribute to adverse cumulative environmental or public health stressors in the overburdened community that are higher than those borne by other communities" unless the facility addresses a compelling public interest in the community. *Id.* The EJ Act defines "overburdened community" as a census block group in which: (1) at least 35 percent of the households qualify as low-income households; (2) at least 40 percent of the residents identify as minority or as members of a State recognized tribal community; or (3) at least 40 percent of the households have limited English proficiency. *Id.* at C.13:1D-158.

The District should adopt a permitting approach similar to the EJ Act. The permitting process should determine whether a facility or source located in a CARE community poses a health risk to the community. In doing so, the District should consider the cumulative impact of polluting facilities in the area over time; the District should also incorporate an equity checklist[2]

[2] *See* Oakland Climate Action, *Equity Checklist for the Priority Conservation Areas Section Process*, available at http://oaklandclimateaction.org/wp-content/uploads/2015/06/Equity-Checklist_6_19_15.pdf.

and health impacts assessment[3] in its permitting process as part of the cumulative impact analysis. Cumulative impacts analysis must include evaluating the risk from other polluting facilities in the community. This analysis should also include every source at each facility, so that the analysis captures the risk on a facility-wide basis. For example, when facilities add new sources or modify sources that increase pollution, the risk of the facility as a whole should be evaluated. Such risk analysis could leverage, and build off of, the facility Health Risk Assessments conducted under Regulation 11, Rule 18. Where there is a reasonable possibility that a proposed source will cause unacceptable risks, the permit should be denied or the source should be required to eliminate the risks. The rules should require public notice and a public comment period for any facility that proposes to increase air emissions in a CARE community.

II. The District's Permitting Rules Should Be Amended to Comply with the California Environmental Quality Act.

The District's permitting rules do not comply with the California Environmental Quality Act. The rules exempt nearly all of the District's permitting decisions from CEQA review on the ground that permit approvals are ministerial—as opposed to discretionary—decisions. *See* Rule 2-1, Section 311; Concept Paper 12-13. However, the District's decisions to grant permits to facilities—particularly facilities located in overburdened low income and communities of color—involve significant discretion and judgment concerning air pollution controls. The California Supreme Court's recent decision in *Protecting Our Water & Env't Res. v. Cty. of Stanislaus* (2020) 10 Cal. 5th 479, confirms that permitting decisions allow agencies to determine appropriate mitigation of environmental impacts cannot be categorically classified as ministerial. Thus, the District's permitting decisions, with few exceptions, are discretionary actions subject to CEQA.

CEQA requires an environmental impact report (EIR) when a public agency proposes to approve a project that may have a significant effect on the environment. *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) 47 Cal. 3d 376, 390. Through the EIR process, CEQA compels government first to identify the environmental effects of the project, and then to mitigate those adverse effects with feasible mitigation measures or alternatives. *Sierra Club v. State Bd. of Forestry* (1994) 7 Cal. 4th 1215, 1233.

CEQA applies to agency decisions on projects that are discretionary. Pub. Res. Code § 21080(a); 14 Cal. Code Regs. §15002(i). A discretionary project requires the decisionmaker to exercise judgment or deliberation in determining whether to approve the project. 14 Cal. Code Regs § 15357. A decision to approve a project is discretionary when the approval process allows the government to shape the project in any way that could respond to environmental concerns—for example, by requiring modifications or pollution control measures. *Protecting Our Water &*

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[3] *See, e.g.,* Pew, *HIAs and Other Resources to Advance Health-Informed Decisions: A toolkit to promote healthier communities through cross-sector collaboration* (April 2018), available at https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2015/hia-map?sortBy=relevance&sortOrder=asc&page=1.

Env't Res. v. Cty. of Stanislaus (2020) 10 Cal. 5th 479, 493-94 (citing *Friends of Westwood, Inc. v. City of Los Angeles* (1987) 191 Cal.App.3d 259, 267).

Discretionary projects are distinguished from ministerial projects, for which the law requires an agency to act "in a set way without allowing the agency to use its own judgment . . . ." 14 Cal. Code Regs. § 15002(i)(1). Ministerial projects involve "little or no personal judgment by the public official as to the wisdom or manner of carrying out the project. The public official merely applies the law to the facts as presented but uses no special discretion or judgment in reaching a decision." *Id.* § 15369; *Sierra Club v County of Sonoma* (2017) 11 Cal.App.5th 11, 22.

Permitting decisions that allow an agency to deny or modify a project to address environmental impacts are discretionary decisions subject to CEQA. The California Supreme Court recently held that a county's classification of all decisions on well construction permits as ministerial was unlawful. *See Protecting Our Water,* 10 Cal. 5th 479. The Court found that the county had discretion to apply objective legal standards for wells (such as "adequate" distances between wells) to individualized factual circumstances. *Id.* at 496. For instance, the county had the authority to require a different well location or deny the permit. *Id.* at 498. Thus, the court held that the county's well permitting decisions could not be uniformly classified as ministerial. *Id.*

Here, the District's permitting rules exempt nearly all permit approvals from CEQA review as ministerial. Specifically, the rules provide that "permits prepared in accordance with District's Permit Handbook and BACT/TBACT Workbook are deemed ministerial under CEQA, and therefore agency decisions to approve permit applications for those ministerial permits are exempted from CEQA analysis." Concept Paper 12-13; Rule 2-1, Section 311. While the rules state that CEQA applicability is determined on a "case-by-case basis" (Rule 2-1, Section 314), in practice the Air District applies these rules to exempt all, or nearly all, permits from CEQA review. Our review of the Governor's Office of Planning and Research's CEQA database (https://ceqanet.opr.ca.gov) indicates that the District has not done a CEQA review of a permit approval in at least the past fifteen years. In contrast, other California air districts routinely analyze permitting decisions that have the potential to cause significant air pollution impacts under CEQA.[4]

The District's rules exempting permitting decisions from CEQA are unlawful. The Air District's decisions to issue permits to facilities are discretionary. The District has broad authority to use its judgment to deny or modify permits to address air quality impacts. Under the permitting rules, the District "may impose any permit condition that [it] deems reasonably necessary to insure compliance with federal or California law or District regulations." Rule 2-1,

[4] *See, e.g.,* San Joaquin Valley Air Pollution Control District website, CEQA Notices, http://www.valleyair.org/notices/Docs/2020/06-13-20_(NOI)/Packet.pdf.

Section 403. The District's ability to impose tailored permit conditions is readily apparent in practice, as District staff make broad assessments about whether, for example, the applicant's "modeling analysis demonstrates that the proposed source emissions will not interfere with the attainment or maintenance of [regional air quality standards]." Permit Handbook at 11. These judgments are precisely the type of independent deliberations about whether to deny or modify projects entailed in discretionary actions. *See Protecting Our Water,* 10 Cal. 5th at 496-98; *see also Friends of Westwood* (1987) 191 Cal.App.3d 259 (issuance of a building permit for a construction project was discretionary because the city could require project modifications to address environmental impacts). Thus, the District should eliminate Rule 2-1, Section 311's exemption for CEQA review of permitting decisions.

III. The District's Permitting Rules Should Be Revised to Regulate Particulate Matter More Protectively.

Particle pollution is a major concern for the Bay Area's overburdened communities. The District acknowledges that "[h]ealth studies indicate that fine particulate matter (PM) is the air pollutant that poses the greatest health risk to Bay Area residents."[5] However, the Concept Paper is unclear about what, if anything, the District is proposing to do to revise the permitting rules to more adequately protect public health from exposures to PM2.5 and PM10.

The District's Advisory Council on Particulate Matter recently recommended treating PM2.5 as a toxic air contaminant. *Advisory Council Particulate Matter Reduction Strategy Report* (December 16, 2020) at 9. The Advisory Council has also implored the District to address PM pollution in impacted communities by, among other things: (1) conducting "community-level exposure and health impact assessments with local engagement for all highly-impacted communities;" (2) considering "cumulative community PM impacts in permitting processes;" and (3) establishing more "protective . . . PM2.5 concentration targets consistent with findings based on scientific evidence (e.g., an annual average of as low as 8 μg/m3)." *Id.* For many years, Bay Area communities have been making these and other similar recommendations. In addition, as community advocates have suggested, the cumulative impacts analysis for permitting should include an equity checklist to ensure that equity is a paramount consideration throughout permitting.

Nevertheless, the District has failed to adopt these science-based and health protective recommendations. The Concept Paper likewise does not commit to revising the rules to address PM2.5's toxic health impacts or lowering PM2.5 concentration targets. The District does not even mention PM2.5 in the Concept Paper's discussion of reducing cancer risk in overburdened communities. *See* Concept Paper at 15-22. As a result, the Concept Paper's statements concerning Bay Area cancer risks (pp. 5-9) are inaccurate because the District has not treated

[5] Particulate Matter (PM) and PM Planning: Frequently Asked Questions, available at https://www.baaqmd.gov/~/media/files/planning-and-research/plans/pm-planning/pm-frequently-asked-questions.pdf.

PM2.5 as a toxic pollutant despite overwhelming scientific evidence about PM2.5's carcinogenicity.

The permitting rules should be revised to protect overburdened communities from particulate pollution. At a minimum, the District should adopt the Advisory Council's and communities' recommendations above.

IV. The District's Permitting Rules Should Be Revised to Ensure Meaningful Notice to Affected Residents.

The permitting rules should be revised to ensure that robust efforts are made to provide notice to community members potentially affected by proposed sources and modifications to sources that increase emissions. The District's current notice practices are insufficient. For instance, permit application documents are not available on the District's website. In addition, the District does not notify the public about proposed permits unless the facility is located within 1,000 feet of a school. *See* Concept Paper at 22. These failures to conduct basic public outreach regarding permitting decisions affecting vulnerable communities are unacceptable.

The District's notice procedures fall far short of other California Air District public notice efforts. For example, the San Joaquin Valley Air Pollution Control District sends public notifications of its proposed permitting decisions by email to interested parties along with links to the relevant permitting documents on its website and allows for a public comment period. The San Joaquin Valley Air Pollution Control District's notices include authorities to construct and CEQA documents. By contrast, the District only provides public notice of permitting applications for new or modified source of toxic air contaminants located within 1,000 feet of a school site, as required by state law. *See* Concept Paper at 22. Moreover, the District's website does not provide access to the relevant documents for permit applications. The District's notice practices are inadequate.

The District says that it is considering providing enhanced public notice based on a lower cancer risk threshold and when the proposed facility is located in an overburdened community. Concept Paper at 22. These proposals should be adopted immediately. The District should, at a minimum, revise the permitting rules to require that the public is notified of all proposed permitting decisions by email and provide the permitting documents on its website. The rules should also be revised to require the District to conduct a public meeting about proposed permits in overburdened communities if requested by the affected community. Finally, District funds should be allocated to community groups and individuals in overburdened communities to enable interested parties to participate in District permitting proceedings. This is important because community members often lack resources sufficient to enable them to engage in the agency proceedings that affect them. We ask the District to implement these recommendations promptly.

V. The District Should Enhance Public Access to Permitting Records.

The permitting rules should be revised to require the District to improve public access to permitting records. This is particularly important given the serious concerns that have been raised about the District's record retention practices. *See, e.g.,* CBS SF Bay Area, *Whistleblowers Claim Bay Area Air Quality Management District Improperly Disposed Of Records* (May 12, 2019). Again, unlike other California Air Districts, the District's website does not provide access to permitting documents other than Title V facilities (and even those Title V facility documents are incomplete). The rules should be amended to address the District's failure to provide access to permitting documents and failure to retain relevant documents.

For decades, community members have expressed their frustration with the District's recordkeeping and resistance to providing public access to documents. The District is frequently unable to locate permits for facilities, including major toxic polluters in overburdened communities such as Gallagher and Burk and the AB & I Foundry in East Oakland. In addition, the District's responses to simple Public Records Act requests for permitting documents are significantly delayed and often incomplete. This is in stark contrast to other California air districts that typically provide responsive records expeditiously. In fact, the District still appears to lack a centralized records system, which means the records department is often unable to respond timely to requests. *See* ELJC, *Concrete Production and the Regulatory Role of the Bay Area Air Quality Management District* (May 25, 2017) at 7.[6] The District's website should also provide access to emissions inventories for all facilities, not just major sources and toxic sources.

In sum, the District's rules should be revised to correct the District's deficient records practices. The rules should require that: (1) all permitting documents (including applications, engineering evaluations, email correspondence with the facility, and accompanying data and reports) be posted on the District's website; (2) the District retain all permitting records for operating facilities indefinitely; (3) emissions inventories be provided on the District's website for all facilities; and (4) the District promptly provide permitting records to the public upon request. In addition, the rules should state that for any facility or source for which the District cannot locate the permit, the facility must undergo permitting anew.

VI. The Rules Should Be Revised to Require the District to Take Timely and Meaningful Enforcement Actions Against Facilities That Violate Permit Requirements.

The District's rules should be revised to ensure that the District takes enforcement actions against facilities that do not comply with permitting requirements. The District's enforcement efforts as to facilities that do not comply with permitting requirements, such as failing to obtain authorities to construct polluting facilities, are often insufficient. The Environmental Law and

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[6] Available at https://digitalcommons.law.ggu.edu/cgi/viewcontent.cgi?article=1030&context=eljc.

Justice Clinic's reporting on the District's inadequate oversight of concrete facilities in the Bay Area highlights some of these insufficiencies. *See* ELJC, Concrete Production and the Regulatory Role of the Bay Area Air Quality Management District (May 2020).[7]

For example, when facilities are caught operating without a permit, the District often fails to enforce the rule requiring such facilities to submit a complete application within 90 days. Rather, the District allows the applicant multiple opportunities to cure information gaps. *Id.* at 10. The District's practice has created endless loops of back-and-forth between the District and applicants that result in no permits being issued for years. *Id.* at 8-11. In the meantime, the companies continue to operate and pollute without appropriate emission limits. *Id.* Similarly, the District often substantially delays taking enforcement actions. Even when the District does take enforcement action against facilities for permit violations, it typically settles for nominal penalties. *Id.* at 12. These enforcement practices are deficient.

Accordingly, the District's rules should be revised to enhance enforcement efforts. For example, any permit application submitted for an unpermitted source that is not complete after 90 days should be canceled, preventing the source from operating. Likewise, permits to operate should be revoked immediately when permitting errors occur. For instance, on several occasions the AB & I facility in East Oakland appears to have provided inaccurate information to the District during initial source permitting as well as during subsequent modifications to sources, resulting in permitting errors that were not discovered until years later. The rules should confirm that permits to operate will be revoked in such circumstances.

Furthermore, the rules should prohibit the District from settling significant permitting violations for nominal penalties. The rules should ensure that the District's settlements include appropriate penalties that reflect the seriousness and duration of the violation, as well as measures to mandate compliance with permit limits and to mitigate the effects of the facility's past violations. In addition, the District should establish a mitigation fund derived from the payment of penalties in civil and criminal matters, directed towards the impacted surrounding community. As in the District's April 2001 settlement with Mirant Potrero, LLC, this mitigation fund could be earmarked for clean air projects to offset the harmful impact of excess emissions caused by violations. The District should promptly make these recommended revisions to its rules.

VII. The District Should Conduct a Review of its Health Risk Assessment Guidelines.

The District proposes to update its Health Risk Assessment (HRA) Guidelines to incorporate the 2015 OEHHA guidelines for gasoline dispensing facilities. Concept Paper at 23. However, given that these guidelines form the foundation of the District's toxic risk analysis, a more extensive evaluation of the District's HRA Guidelines is warranted to ensure that community risk is accurately calculated. For example, the District should solicit community

[7] Available at https://digitalcommons.law.ggu.edu/cgi/viewcontent.cgi?article=1033&context=eljc.

feedback on appropriate residential, worker, and sensitive receptor locations for HRAs conducted in CARE communities. At a minimum, this should incorporate community feedback collected through public comment in response to facility HRAs under Rule 11-18.

VIII. The District Should Eliminate Permitting Exemptions for Sources That Create a Public Health Burden.

The District should revise its rules to eliminate permitting exemptions for sources that negatively impact CARE communities. The District's current rules exempt numerous sources that emit significant amounts of particulate matter and other pollutants. *See* Rule 2-1, Section 115. These permitting exemptions facilitate the release of harmful toxins into already burdened communities by allowing unregulated, often unabated sources, to continue operation. For example, the District's rules exempt concrete facilities that process up to 5,000 tons of materials per year. *Id.* Section 115.1, subd. (1.2). Under this exemption, Argent Materials Inc. in East Oakland has been allowed to continue its concrete crushing operations despite emitting over thirty-three pounds of PM10 into Oakland's air every day. *See* Argent Materials Application 29851 for Stockpiles (June 2019).

Exemptions for sources such as Argent Materials that emit significant amounts of particulate matter, especially in overburdened communities, should be eliminated unless the District demonstrates with certainty that the sources do not harm public health. Evaluating and permitting previously exempt sources that affect public health is in line with the District's own recommendation for "lowering the allowable project cancer risk to less than the current value of 10 in a million at permitting projects in overburdened communities." *See* Concept Paper at 17. For example, AB & I Foundry's pipe casting operation (Sources S-53, S-54, S-55, S-56, and S-57) is responsible for 80% of the cancer risk to residents, students, and employees of East Oakland. *See* Table 2 of Draft HRA for AB & I.

Accordingly, the District should revise its rules exempting numerous sources that cause significant health impacts in overburdened communities. *See* Rule 2-1, Section 122. Permit exemptions that are contrary to scientific evidence of public health burdens should be eliminated. We urge the District to review and update its permitting exemptions every five years in response to scientific evidence of public health impacts. For these reasons, the permitting exemptions in the rules must be eliminated when they negatively impact overburdened communities.

IX. The District Should Impose a Moratorium on Permitting Applications in CARE Communities Until the Permitting Rules Are Revised.

The District should place a moratorium on permitting applications for sources that propose to increase emissions in CARE communities. The moratorium should be in place until the District revises its permitting rules to address community recommendations including, at a

minimum, that the District incorporate cumulative impacts analysis, an equity checklist,[8] and health impacts assessments[9] into the permitting process in CARE communities.

The District says that a moratorium is "not currently a regulatory option." Concept Paper, App. B at 2. We disagree. The District does not support its vague "regulatory option" claim with any legal authority. In fact, the District has ample authority to refuse to grant permit applications that would negatively impact community health. The District is authorized to prevent and abate air pollution that causes "discomfort or health risks to . . . a significant number of persons or class of persons." Health & Safety Code § 40001(b). Thus, the District can impose a moratorium to curtail the acute health risks posed by air pollution in overburdened Bay Area communities.

The District also asserts that a moratorium is unnecessary because it "has identified potential changes to Rule 2-5 that would be responsive to community advocates' calls to consider the fact that people live nearby large industrial facilities, and that large industrial facilities that harm community health should not be allowed to increase risk in the community via Air District-permitted projects." The District fails to identify these "potential changes" to the permitting rules.

The District's refusal to impose a moratorium based on unidentified "potential changes" is disingenuous. Community members and the PM Advisory Council have been imploring the District to make meaningful changes to the permitting rules for a very long time. The District has not conducted a public education campaign on permitting for each of the nine Bay Area counties or CARE communities. Although the District has held workshops for business and industry on permitting, it has not done so for CARE communities.

The District's failure to provide education and technical assistance to CARE communities—as it has done for business and industry—is unfair and contrary to California law. The District's permitting program must be executed in "a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state." Pub. Res. Code § 71110; *see also id.* § 71111-71115; Government Code § 11135. "[E]nvironmental justice is not merely a box to be checked." *Friends of Buckingham v. State Air Pollution Control Bd.* (4th Cir. 2020) 947 F.3d 68, 92. As particularly relevant here, environmental justice under California law requires the District to "engag[e] and provid[e] technical assistance to populations and communities most impacted by

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[8] *See, e.g.,* Oakland Climate Action, *Equity Checklist for the Priority Conservation Areas Section Process*, available at http://oaklandclimateaction.org/wp-content/uploads/2015/06/Equity-Checklist_6_19_15.pdf.

[9] *See, e.g.,* Pew, *HIAs and Other Resources to Advance Health-Informed Decisions: A toolkit to promote healthier communities through cross-sector collaboration* (April 2018), available at https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2015/hia-map?sortBy=relevance&sortOrder=asc&page=1.

pollution to promote their meaningful participation in all phases of the environmental and land use decisionmaking process." Gov't Code § 65040.12(e)(2)(C).

The CARE communities most affected by the District's permitting decisions should be provided with education, training, and technical assistance to allow them to meaningfully participate in the permitting process. Without education and resources, the communities most harmed by air pollution cannot collaborate with the District to improve local air quality through the permitting process. Therefore, we ask the District to immediately place a moratorium on permitting new or modified sources that increase pollution in CARE communities until the permitting rules are revised. The moratorium should be in place until the District adopts, at a minimum, a cumulative impacts analysis that includes an equity checklist and a health impact assessment based on enhanced monitoring of local pollution levels.

We urge the District to adopt the recommendations set forth above. Should you wish to discuss our concerns further, please do not hesitate to contact us.

Respectfully,

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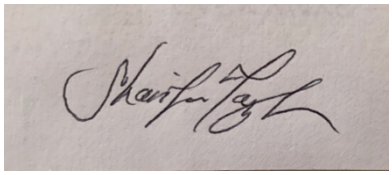

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