



July 13, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814
Submitted electronically

Re: Community Air Protection Program Annual Progress Update

Dear Staff and Board Members,

Thank you for the opportunity to provide comments on the annual progress update for the Community Air Protection Program established by Assembly Bill 617 in 2017.

The undersigned organizations are all members of the Central Valley Air Quality Coalition (CVAQ), a coalition led by Valley-based environmental justice organizations fighting to restore clean air to the San Joaquin Valley. Our groups have been participating in the implementation of the Community Air Protection Program since it began, and have taken leadership roles in the Community Emissions Reduction Plan (CERP) and Local Community Emissions Reduction Plan (L-CERP) work in Arvin/Lamont, Delano, Terra Bella, Los Banos, Lost Hills, Madera, McFarland, Shafter, South Central Fresno, Stanislaus County, and South Stockton. Over the past several years, we have worked with CARB and San Joaquin Valley Air District staff to achieve some important improvements in our communities, especially with the community innovation that has brought new mitigations, protections, enforcement efforts, and emissions reductions to our neighborhoods. We are also proud of the collaborative work our members have done to design and implement the L-CERP process.

That said, there is still much remaining work to achieve healthy air in these overburdened communities. With that common goal in mind, we have the following comments:

- Enforcement of CERPs: We would like CARB in future Blueprint updates to address how air districts will be held accountable for taking the actions and achieving the goals outlined in the district-approved CERPs.
- Accountability for Funding: Several CSCs have asked for accountability and transparency in how air districts spend resources related to this program, ensuring alignment with community priorities. CARB should establish clear guidance on what the money can (and cannot) be used for, as well as reporting requirements for how the money is spent.
- Transitioning CERP Communities: Now that some communities are past or reaching the fifth year of their implementation process, there is uncertainty about how to evaluate when implementation “ends” - and what happens after. We recognize that these communities have deeply entrenched problems that may require ongoing attention. CARB needs to establish a clear process where air district staff and CSC members concur on completion, and by which CARB assesses whether the agency agrees with that conclusion. We want the final decision to be approved at a CARB public meeting to ensure an opportunity for community engagement and transparency. Furthermore, CARB should establish protections to prevent rollback of progress in communities that complete the program. We also recommend that air quality monitoring continue after the CERP process concludes, to maintain the existing investment in better, more localized data, and to ensure that CARB and the Air District are able to identify and correct emissions increases in the future.
- Next Steps for L-CERPs: We applaud CARB for supporting the L-CERP process, and appreciate the incredible amount of community engagement that contributes to those plans. The L-CERP process should continue to be strengthened through expanded community air monitoring efforts, which are essential for identifying localized pollution hotspots, tracking progress over time, and ensuring transparency in air quality data for affected communities. These monitoring efforts support timely, local, data-driven decision-making and allow community-identified priorities to be translated into enforceable actions through L-CERP strategies. This includes aligning L-CERP strategies with Air District planning and enforcement activities, as well as available incentive programs, integrating community-driven solutions into air quality management systems. Once an L-CERP is completed, there should be ongoing engagement with those CSC members to explore investments, enforcement activities, and/or policy changes that could address the concerns identified in the L-CERP. CARB and the Air District should prioritize L-CERPs and other continuously nominated communities when selecting new communities for the CERP process.
- Selection of New Communities: CARB needs to provide clear guidance on how the agency will assess available resources and determine when there are sufficient resources to expand the program to include new communities. For example, in some CERP communities the Valley Air District has reduced meetings to quarterly and mainly

focused on progress updates, thereby reducing their engagement with CSCs. Therefore, staff time and other resources dedicated to those CSCs are reduced. Would those available resources potentially be sufficient to bring new communities into the CERP process?

- Future Funding: We have deep concerns over the recent changes to the Cap-and-Invest program that will significantly reduce revenue for the Greenhouse Gas Reduction Fund. Community Air Grant projects, such as community air monitoring and L-CERP development and implementation, represent some of the highest-value investments in the program; building long-term data infrastructure, strengthening regulatory accountability, directly informing targeted emissions reduction strategies, and empowering residents to participate meaningfully in decisions that affect their health. Cutting funding to these high-value, low-cost efforts would be a significant step backward. We want to see the promises made to our most impacted communities upheld. The work in these communities must continue, additional communities should be allowed entry into this program, and lessons learned locally must be scaled up to maximize air quality improvements. We urge CARB to reconsider these changes to the Cap-and-Invest program, to figure out a way to keep California's commitments to reduce emissions in overburdened communities, and to advance the progress led by these local innovations.

Thank you for your time and consideration of our comments. If you have any questions, please do not hesitate to contact Dr. Catherine Garoupa at catherine@calcleanair.org.

Sincerely,

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