

Reema Bzeih

See attached

July 23, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Public Comment on Community Air Protection Program Annual Progress Update

To the California Air Resources Board,

Pacific Environment appreciates the opportunity to comment on the California Air Resources Board's update on the Community Air Protection Program (AB 617). We recognize that AB 617 has fundamentally changed how California partners with communities that bear a disproportionate burden of air pollution- especially in California's port communities, where residents continue to live alongside some of the state's largest sources of pollution.

The AB 617 communities surrounding the Ports of Los Angeles and Long Beach (Wilmington, Carson, and West Long Beach), the Port of Oakland (West Oakland), and the Port of San Diego (Portside Environmental Justice Communities) have developed Community Emission Reduction Plans (CERP's), participated in steering committees, identified local priorities, and worked collaboratively with the state's air districts and CARB.

These communities have invested significant time, expertise, and trust in this process, and they deserve to see measurable improvements in air quality and public health.

Pacific Environment recognizes that AB 617 transitioned from a planning program to an implementation program, as community air monitoring networks are operating, the implementation of Community Emission Reduction Plans (CERP's) are underway, and local air districts have improved transparency through implementation dashboards and annual reporting. However, residents living near California's ports continue to experience elevated exposure to diesel particulate matter, nitrogen oxides, and other harmful pollutants. The lifetime cancer risk from toxic air pollution in Wilmington is 98% higher than the rest of the Los Angeles basin. West Oakland residents have a shortened life expectancy by 6.6 years compared to the rest of Alameda County. And portside neighborhood Barrio Logan in San Diego County has a rate of asthma-related hospital visits higher than 92.9% of census tracts throughout the state, with about 81 visits per 19,000 people. Pollutants from ocean-going

vessels, harbor craft, and cargo-handling equipment remain among the most significant contributors to health disparities in port-adjacent neighborhoods.

As CARB continues implementing Blueprint 2.0, we encourage the Board to strengthen the program in several ways:

First, implementation should be evaluated based on measurable reductions in emissions and community exposure, not just when individual actions have been completed. As the

earliest AB 617 communities move beyond their initial implementation periods, success should be determined via measurements of cleaner air and reduced health risks. **Second, CARB should continue integrating AB 617 implementation with the state's broader clean freight and maritime strategies.** Many of the priorities identified by port communities—including shore power, zero-emission drayage trucks, cargo-handling equipment, harbor craft, and reductions in emissions from ocean-going vessels—depend on coordinated action across multiple CARB programs. Aligning these investments and regulatory efforts with CERP's will help ensure that communities receive the air quality benefits they have advocated for. **Third, CARB should continue providing clear, transparent reporting on implementation progress within each port community.**

Public reporting should identify completed measures, remaining actions, emissions reductions achieved, funding invested, and barriers to implementation. Accountability is essential for maintaining public trust and ensuring that community priorities remain central as the program evolves. **Lastly, as the earliest AB 617 communities transition beyond their original implementation timelines, CARB should ensure that meaningful community engagement continues.** Steering committees are instrumental in shaping local priorities and should remain active partners in implementation, evaluation, and future investments. The relationships built through AB 617 should not end when an implementation period concludes.

California's ports are critical to the state's economy, but the communities surrounding them have experienced a disproportionate share of the detrimental environmental and public health impacts associated with shipping. AB 617 provides an opportunity not only to reduce emissions but also to demonstrate how community-driven air quality programs can produce lasting improvements in environmental justice.

Thank you for your consideration of these comments.

Sincerely,

Reema Bzeih

State Climate Policy Manager

Pacific Environment