

MR. BARRETT: Good afternoon. My name is Will

2 Barrett with America Lung Association of California.

3 We really appreciate the opportunity to provide
4 comments today and appreciate the outreach efforts that
5 have brought everyone here today. We feel that's
6 important.

7 Just have five quick points I'd like to share.

8 We feel strong enforcement is the key to
9 achieving the public health and improvements promised by
10 CARB regulations. California has the worst air quality in
11 the county. And dirty air causes public health
12 emergencies every day. Robust consistent enforcement
13 process is critical to promote immediate compliance and,
14 where there are violations, to bring violators into
15 compliance as quickly as possible. Reducing premature
16 deaths, illnesses, and hospitalizations all depends on
17 this strong procedure.

18 We're concerned about the strong enforcement
19 through all the program areas, but we've been particularly
20 concerned about the need to strengthen the Enforcement
21 Program to ensure that the recently adopted diesel
22 regulations are complied with. And we feel strong
23 enforcement presence at the ports is really important due
24 to the high levels of air toxics in the ports.

25 We feel that strong enforcement in environmental

1 justice areas should be a key goal of CARB's Enforcement
2 Program. And we believe it's CARB's duty to protect
3 public health. Particularly concerned about vulnerable
4 communities already overburdened by smog and other air
5 toxics.

6 The American Lung Association and other public
7 health organizations strongly support CARB's efforts to
8 maintain the fullest possible enforcement authority in
9 discretion in order to deter violations, and we would
10 oppose any weakening or changes to the program.

11 CARB currently considers many factors in
12 enforcing the law, including the type of violations and
13 the local harm, among other factors. But CARB's authority
14 should not be watered down by requiring enforcement based
15 on a level of violations. We're concerned this type of
16 requirement leads to less monitoring and enforcement of
17 certain categories of smaller violations that still have
18 very real health and air quality impacts.

19 Finally, the administrative requirements issue,
20 we believe that these can have very real impacts on
21 pollution control efforts and cannot generally be
22 considered minor. Administrative violations must not be
23 overlooked based on the lack of environmental impact.

24 Following the administrative requirement is part
25 of the program. And failure to comply with the

1 administrative requirements will make detection of
2 emission violations much more difficult.

3 We plan on providing further written comments,
4 but really appreciate the efforts for bringing us here
5 today and taking our comments. Thank you.