Comment Letter #56

Air Quality Management Plan Team
South Coast Air Quality Management District

June 20, 2022

Dear Air Quality Management Plan Team:

Thank you for this opportunity to comment on the Draft EIR Air Quality Management Plan. We are impressed with the scope of this document. However, we request that the AQMP include more robust land use strategies and active emissions management plans in order to reach attainment of federal air quality standards and to prepare for a future of climate crisis.

The AQMP states that in order to "attain 2015 ozone standards, NO_x emissions need to be reduced to 62.8 tons per day by 2037." The AQMP further recognizes the impossibility of this goal given current emissions, and emphasizes important but technical solutions, as well as black box solutions, to this problem. Key AQMP suggestions include widespread electrification, as well as a reliance on the EPA to tackle the challenge of mobile transport, such as ships, heavy-duty trucks, and trains.

Part of our argument rests upon data collection, modeling, and visualization that have been generated via a collaboration between the Robert Redford Conservancy and Radical Research, LLC. The resultant Warehouse CITY (communitY Cumulative Impact Tool) dashboard is a tool developed to help visualize and quantify the development of warehouses in Southern California. The data is based on County data within the SCAQMD boundary. The project interactively charts warehouse growth through time and allows users to localize regional emissions based on truck trips associated with warehouses. Users can view the entire region or zoom into local areas in order to view cumulative impacts of air pollutants.

Our argument is also informed by work with environmental justice and community partners, whose ground-level view continues to inform our vision.

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Finally, our comment is informed by our ongoing work within land conservation groups, including Sierra Club and other statewide organizations involved in 30x30, which is focused on nature-based solutions to climate change and pollution remediation.

Emissions Reductions Strategy

The beginning of the AQMP states unequivocally that "[t]he only way to achieve the required NOx reductions is through extensive use of zero emission technologies across all stationary and mobile sources." While important, this is demonstrably false, and embeds an implicit assumption of emissions activity growth. There are always two pieces of any emissions reduction strategy when calculating an emissions inventory:

1. Cleaner technology (i.e., emissions rate)
2. Emissions activity (i.e., emissions growth management measures)

Intrinsically, emissions can be reduced by reducing the rate of emissions per activity or by reducing the activity generating the activity, or any combination. The AQMP does an admirable job of advocating for cleaner zero emissions technologies, which reduce the emissions rate. The incentives and emissions reductions from the introduction of these programs will be substantial and will achieve substantial emissions reductions over the course of the AQMP.

However, zero emissions technologies are only half of the puzzle, and electrification is a downstream solution. In this AQMP, programs that aim to reduce emissions *activity* do not appear to be part of any of the proposed solutions for some industrial emissions. In fact, all emissions inventories in the main body of the report are without any context of the growth in emissions activity for individual emissions source categories. Along with its partner agency SCAG, the SCAQMD needs to address the growth in emissions activity for key sources that will otherwise undermine this AQMP.

Emissions activity that grow faster than population

The AQMD does not explicitly discuss its data projecting that individual emissions sectors will grow faster than the rate of population growth in the basin. Most importantly, diesel VMT is projected to grow by 55% over the course of the AQMP, a rate that exceeds population growth by a factor of 5 and gasoline VMT by a factor of 20. We found the diesel VMT data in Appendix III, Tables D-1 through D-15, and have shown the growth of diesel VMT relative to gasoline vehicle VMT and population growth in **Figure 1.** Our analysis has found that in the past 5 years, heavy-duty and medium-duty diesel VMT grew by almost 20%, almost completely offsetting the cleaner vehicles being introduced into the fleet through cleaner vehicle incentive programs and vehicle turnover, which decreased NOx emissions by 28% per VMT. **The growth in diesel VMT is fueled by the growth in warehouse construction in the Inland Empire.**

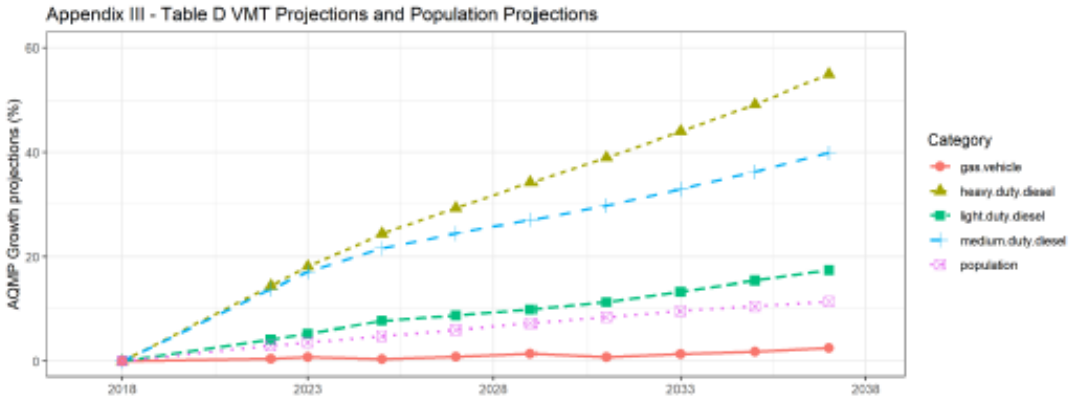


Figure 1 - Chart projecting annual growth rates in vehicle VMT from AQMP Appendix III Tables D-1 through D-15 and population estimates from the executive summary.

An analysis of EMFAC 2021 v1.0.2 SCAQMD specific activity and emissions rates demonstrated that multiple other off road emissions subcategories had activity growth that exceeded population growth rates. These subcategories include Ocean Going Vessels, Locomotives, and a large number of off-road subcategories that are related to goods movement and construction (cargo handling equipment, airport ground support, construction, and portable equipment).

The AQMP should consider population-level growth scenarios for Goods Movement and construction emissions sectors. For example, if diesel VMT tracked population growth (~11%) in the air basin instead of growing by ~55%, NOx emissions in 2037 would be 33.0 tons per day, rather than the projected 44.5. Given a total budget of 63 tons per day, savings of 11.4 per day of NOx is extremely significant. Since diesel trucks are the largest source of NO_x emissions and inhalation cancer risk (MATES V; http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v), the air quality and climate co-benefits of reduced emissions activity growth are substantial.

The AQMP currently only provides two scenarios in Chapter 3 - Growth and No-Growth (p 3-29 & 3-30). **We request an additional scenario to quantify NO_x and diesel PM reductions when goods movement activity growth is limited to an intermediate level that would align goods movement growth with the underlying population growth of the region**:

- Population limited growth rates - If emissions activity growth is limited to the population growth rate of ~11% by 2037, how much additional NO_x reductions are achieved for these off-road and Diesel VMT categories that exceed population growth rates (e.g., as shown in Table 3-5 for existing two scenarios)?

Issues of Equity

Currently, the AQMP does not justify the "exceptional" growth in activity rates of any goods movement related emissions sectors. We believe this is problematic for two reasons. First, there is the issue of **equity in emissions reductions sectors**. Commuters and stationary sources should not be required to shoulder more emissions activity reductions (and costs) than the goods movement sectors that are allowed to grow at many multiples of the rate of population growth. Secondly, there are **clear environmental justice inequities** in the spatial emissions activity patterns of the goods movement industry, with diesel VMT and ports disproportionately impacting socioeconomically disadvantaged communities. Allowing the goods movement sector emissions activity to grow at rates multiple times the rate of population growth disproportionately harms EJ communities, the Inland counties, and undermines the emissions reductions resulting from technologically based control measures.

CEQA has the cumulative impacts rule (15130(b)), where all past, present, and future projects have to be considered; or a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document that describes or evaluates conditions related to the cumulative effect. **We request that the AQMD and SCAG work to include new warehouse construction as an explicit land-use category to be included in this AQMP and in future RTP.** Warehouse land-use is inducing the activity growth of the goods movement sector. Limiting warehouse land-use growth to the rate of population would help to provide more equity among industries for emissions reductions and avoid disproportional EJ impacts.

Related Additional Comments

- AQMD needs to explicitly address how a growth rate of 55% in diesel VMT relative to 11% population growth is consistent with the AQMP in both the executive summary and in Chapter 3 on future emissions, specifically with the statement on p. 1-22 "The magnitude of emission reductions needed also means that no single emissions category can be left uncontrolled, including sources subject to federal authority." Not addressing emissions activity associated with warehouses and the goods moment is leaving many emissions categories "uncontrolled" as a matter of regional transportation policy.
- AQMD should explicitly list gasoline vehicle VMT and diesel vehicle VMT as separate categories in Table 3-3, as these are from different sectors and combining them gives a misleading indication of the very different activity growth trajectories (2.5% vs. 55%).
- AQMD needs to explicitly list activity growth rates of all off-road emissions subcategories that significantly exceed population growth (e.g., ocean-going vessels, locomotives, cargo-handling equipment, airport support equipment, construction equipment, industrial equipment such as forklifts and material handling equipment)
- AQMD should provide figures or tables of activity growth rates for all categories that significantly exceed population growth rates in Chapter 3.

- AQMD should provide figures or tables of annualized activity growth rates corresponding to the top 10 emissions sectors for 2037 NO_x in Chapter 4, with a discussion about why the 5 largest emitting sectors grow at rates exceeding population growth.
- AQMD should identify where emissions population limited activity growth rate scenarios could reduce reliance on black box control measures in Chapter 4 and discuss why these are not less expensive and more achievable over the next fifteen years of the AQMP.

Goods movement and warehouse induced growth in goods movement emissions activity

Underlying the growth in Diesel VMT, locomotives, ocean-going vessels, and offroad equipment is the growth in warehouse land-use, 90% of which has occured in the Inland counties over the last decade. Warehouse growth induces growth in Diesel VMT and the other components of the goods movement industry (ocean-going vessels, locomotives, airports, cargo-handling equipment, and construction equipment). Warehouse space growth in the SCAQMD is growing at a rate of more than 5 times population growth. This explicitly tracks with growth in the logistics sector.

The AQMD's unwillingness to address logistics growth misses a key opportunity that will allow us to move toward regional attainment of federal air quality standards, thriving ecosystems, and healthier communities.

Regulatory Gray Area

We greatly value the pivotal role that the AQMD has played in bettering air quality in the Southern California region throughout the decades. **We believe that the AQMP is a critical document for the AQMD to claim its proper role in addressing the cumulative impact of the goods movement industry on air quality.**

While we recognize the limits of AQMD authority, we urge you to explore further incorporation of both cumulative impact and land use and transportation elements due to the historic and ongoing relationship between truck traffic and logistics-based land uses, such as warehouses, seaports, airports, intermodal transfer facilities, and freight yards.

We urge you to reconsider the framing AQMP statement that the AQMD's "primary authority is over stationary sources which account for less than 20 percent of NO_x emissions." While we agree the "overwhelming majority of NO_x emissions are from heavy-duty trucks, ships and other State and federally regulated mobile sources," we disagree that these must be beyond the South Coast AQMD's purview.

As with dry cleaners, factories, or the port, for example, it is not the building or infrastructure itself that poses a problem, but rather the use of the building or area and the types of activities

hosted therein. The same principle applies to warehouses: the buildings themselves may be green, but the activity the buildings generate makes them into a toxic source point. This fairly simple logic should be explored in terms of changing the designation and regulatory authority of the AQMP for individual warehouses and warehouse clusters.

In other words, this is not a black and white issue. It is a regulatory gray area that leaves room for planning, action, analysis, incentives, communication, collaboration, and research related to addressing what is perhaps the AQMD's biggest challenge to meeting attainment standards. To continue to separate linkages between goods movement infrastructure, HDDT VMT, and air quality from AQMD's and SCAG's role is an omission of significant proportions that needs to be rectified within the AQMP.

We understand that this approach might be seen as infringing on local land use autonomy through planning commissions and city councils. However, current and projected air quality impacts, combined with the impending climate crisis, mandate approaches that recognize the interconnectedness of systems rather than a continued isolation between systems currently in play.

In order for the AQMD to be the most effective agency it can be in creating a healthy airshed and prioritizing the needs of EJ communities, addressing logistics growth within the AQMP and/or RTP is critical.

We found the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* highly informative. However, we note that this document was written in 2005 prior to the explosion of warehouse construction. We request that the issue of land use and transportation planning be revisited in order to account for exponential warehouse growth, the growth of logistics operations as a whole, and the changing climate.

Specific Recommendations for Warehouses and Regulatory Authority

1) A robust control measure focused on land use and transportation planning should be included within the AQMP on the basis of cumulative impact;
2) Areas with disproportionate existing development (e.g., >30,000,000 sq. ft. of warehouse space within 3 miles) should require additional permitting requirements including health risk assessments and/or full electric vehicle requirements.This control measure should conduct backup calculations with CEQA analyses/EIRs for new projects;
3) Goods Movement land-uses–especially warehouses–should be included as a specific focus area within the AQMP;
4) The AQMP should propose the development of a Land Use and Transportation Planning Division within the AQMD, or at least should include a feasibility study of such a formation within the AQMP;
5) The AQMP should advocate for more authority related to CEQA land use and transportation planning based on cumulative impact analyses;

6) The AQMP should minimize reference to "black box" solutions and technical strategies, nature-based solutions to climate change and pollution remediation should be considered. With the state-wide and national focus on 30x30, the potential of land-based ecosystems services, such as natural carbon sinks, prime farmland, and trees, contribute to pollution remediation and a healthy airshed. Such analyses could be part of the role of a land use and transportation division within the AQMD;
7) Create a pathway for AQMD's CEQA analysis so AQMD staff can analyze the tools and conclusions of environmental consultants hired by developers; publish all review comment letters on the AQMD website for existing and proposed projects to ensure transparency; Such analyses could be part of the role of a land use and transportation division within the AQMD;
8) Consider land-use planning incentives to subsidize "downzoning" of industrial and warehouse zoned parcels to open-space, community food production, and park/recreation spaces.
9) Add a section to the AQMP that addresses the co-benefits of the AQMP in addressing AB 32 and climate change, specifically addressing goods movement activity growth
10) Consider the cost-benefit calculations of avoided NO_x emissions growth by reducing diesel VMT and warehouse permitting. What is the 'cost per ton' of NO_x emissions saved by reducing warehouse growth to the rate of population growth?
11) We ask that the AQMD demonstrate the spatial variation in emissions reductions as a result of currently planned policies in the Environmental Justice section. We believe the increased truck VMT will disproportionately fall in Inland Counties that are already overburdened with truck trips per capita.

Restricting warehouse growth to population growth rates is the cheapest and most effective emissions control measure to reduce NO_x emissions.

Currently, land use and transportation planning are determined to be a "not significant" portion of the AQMP. However, Emission Growth Management is part of the five broad categories that "addresses emission reductions from new or redevelopment projects by working with developers and local land use agencies on actions that mitigate emissions from affected projects." We request more information about this category.

Because of the climate crisis, adding a section that addresses the co-benefits of the AQMP in addressing AB 32 and climate change would help expand the AQMD's orientation toward this category. Disproportionate impacts of existing pollution and GHG emissions based on land use and transportation will contribute to disproportionate exposure among communities already hardest hit by air quality issues. We suggest working closely with community and environmental justice organizations to develop a land use and transportation planning control measure.

Warehouses as Environmental Justice Hot Spots

We argue that the AQMP should outline a pathway for warehouses to be reclassified as Environmental Justice Hot Spots.

In Chapter 2 of the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, there is a recommendation that the AQMD "be consulted to obtain facility-specific emissions information and accepted assessment methods for determining relative exposure and health risk of proposed projects" (p 7). Such projects are listed from CARB's Air Quality and Land Use Handbook from 2005 and include

- High traffic freeways and roads
- Distribution centers
- Rail yards
- Ports
- Refineries
- Chrome plating facilities
- Perchlorethylene dry cleaners
- Large gasoline stations

We argue that warehouses (and/or warehouse clusters) need to be listed as a specific category of consideration in addition to other logistics elements. While distribution centers are a specific type of warehouse, warehouses as a generic category are broader and should be named and included within AQMD documents. Not to do so will skew data collection and analysis regarding cumulative impacts into the future due to the way that parcels are labeled in county assessor data. This is one of several places in Chapter 2 where warehouses as a specific category are not considered. Despite the green status of some warehouse buildings, and the ISR ruling passed by AQMD that aims for further electrification, warehouses should be explicitly considered and listed among toxic facilities. This is because they (1) attract diesel trucks and trains and (2) are spatially clustered in high density developments.

In Ch 2 on p 12, regarding Mapping Sources of Toxic Air Contaminants, **we urge the inclusion of warehouses on the list of toxic "hot spot" emitters**. Currently the list includes many types of facilities particularly focused on sites that emit 10 or more tons of toxins per year, all of which are considered on an individual basis for inclusion in the list. The AQMP currently excludes warehouses from the list of stationary sources:

> "The South Coast AQMD has primary authority to reduce local emissions by adopting control regulations for stationary sources. Stationary sources include point sources, such as power plants and refineries, and selected area sources, such as gas stations, dry cleaners, and paints and coatings. The South Coast AQMD also has limited authority to address mobile sources through incentive programs and implementation of indirect source and transportation control measures (e.g., employee ridesharing rules). Mobile source emissions such as cars, trucks, trains, and off-road vehicles and equipment are instead regulated primarily by State and federal authorities. Ships and airplanes are regulated by international authorities."

Page 1-16 of the AQMP indicates that Warehouses/Distribution Centers: Rule 2305 (Warehouse Indirect Source Rule) was adopted in May 2021 to reduce NOx and diesel emissions associated with warehousing activities, with estimated NOx reductions of 1.5 to 3 tons per day by 2031." We know that many things are happening behind the scenes at the AQMD that are not necessarily recorded in the AQMP, and we were curious about the pending item also listed on page 1-16 entitled "New and Re-Development." We hope that this pending item may include industrial development and request clarity on this category.

The AQMP should outline a pathway to either expand the definition of stationary sources to include warehouses or include warehouses explicitly in the AQMP as a cumulative impact category that requires additional oversight in the CEQA process for both NO_x and diesel PM emissions.

We also urge you to include incentives for cities that halt, minimize, or site appropriately industrial development.

Currently, none of the three bodies responsible for air quality in California (AQMD, CARB, EPA) can address actual warehouse growth because of the way that their roles are currently defined. Collaborations with other agencies and advocacy for more regulatory authority would enable the AQMD to tackle this persistent and growing source of air pollutants within the region.

We know that you are already working on CEQA cumulative impacts and want to request that AQMP include a cumulative impact model. **The AQMP should move beyond the analysis of individual sites into a cumulative model in which hot spot emitters are regionally as well as individually calculated.** Our research shows that the cumulative impact of all warehouses within SCAQMD boundaries has a major polluter footprint directly linked to cancer and other health risks as well as GHG emissions. We need to adopt quantitative measures for the whole regional basin. **Due to the existing move toward cumulative impacts, the logic of including warehouses and truck traffic in tandem is strengthened.**

Current warehouse growth has averaged over 50,000,000 square feet of floor space per year for the last five years, with regional patterns disproportionately impacting San Bernardino and Riverside Counties for at least 25 years. For the last ten years, more than 90% of warehouse square footage has been built in the Inland counties, which are already more severely impacted by regional pollution impacts of ozone and PM. Los Angeles and Orange County have more than 12 million residents compared to the 4.7 million of Riverside and San Bernardino, but a disproportionate amount of the regional impacts of warehouse development currently fall on the IE counties. The goods movement industry growth is largely sourced to the poorer counties and communities in the SCAQMD. This has exacerbated existing environmental justice issues and is in violation of the principles of AB 617.

Warehouse growth spurs extra train, plane, truck, and shopping impacts as part of the goods movement industry. Most particularly, warehouses generate extra truck trips. In our data set, truck trips and emissions demonstrate a statistically significant correlation with warehouse

growth. Assuming 0.67 truck trips per thousand square feet of warehouse space, we estimate that over 30,000 extra truck trips are being generated per year by the growth in warehouse space, almost all of which pass through the inland counties and clogged freeways.

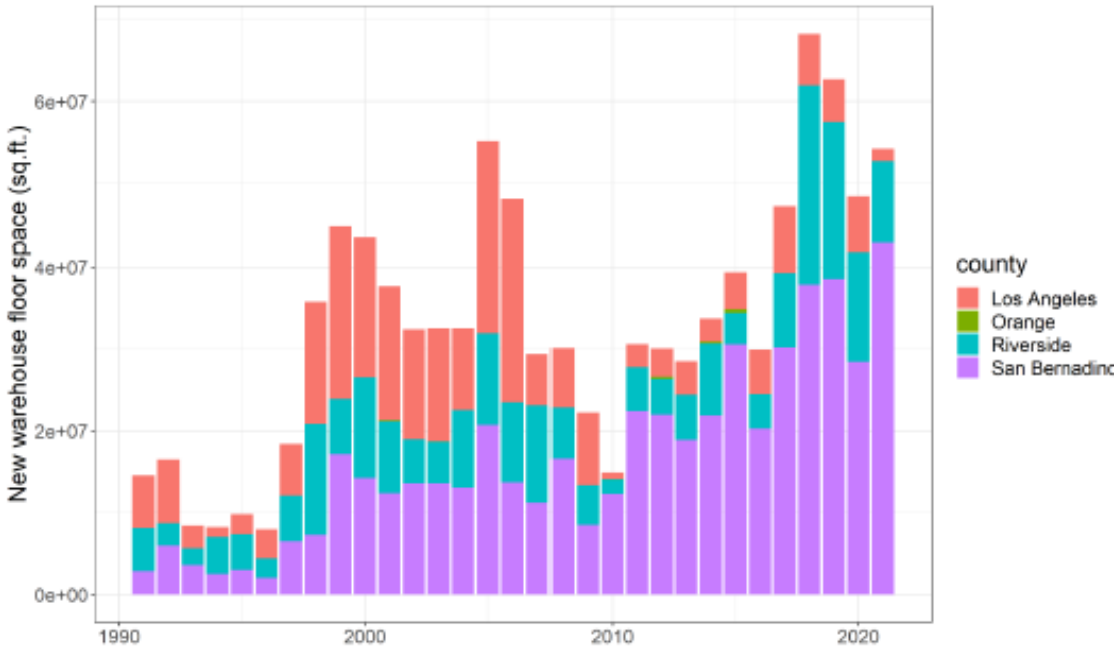
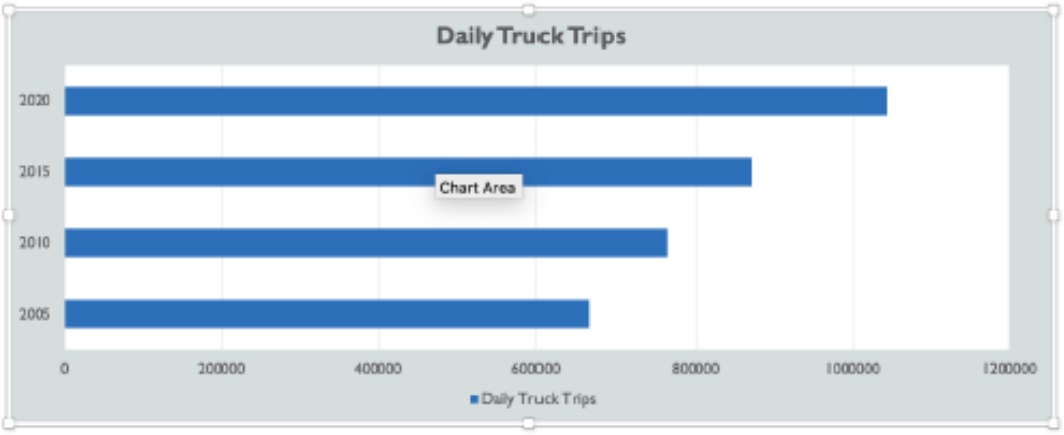


Figure 2. Warehouse building floor space added by year for the four counties of the SCAQMD based on county assessor database information.

Spatially, these patterns in warehouse siting are immediately evident from assessor database information on warehouses in the four SCAQMD counties.

Chapter 2 of the *Guideline* notes that mature communities, such as South Los Angeles, will likely have less control in terms of siting polluting facilities near sensitive receptors–a fact that is repeated several times throughout the document. Our data demonstrate that most warehouse growth within the last twenty years has taken place in areas where this is not the case. In the Inland Empire, open land has encouraged warehouse development within immature communities and has nonetheless failed to avoid the siting of industrial facilities near sensitive receptors such as schools, retirement communities, parks, and housing. New language needs to be developed in order to acknowledge the pivotal role that warehouses are now playing in attracting truck traffic that leads to nonattainment now and in the future. The data we have included in this comment demonstrate this pattern clearly through time.

How do warehouses play out spatially in terms of emissions and non-attainment?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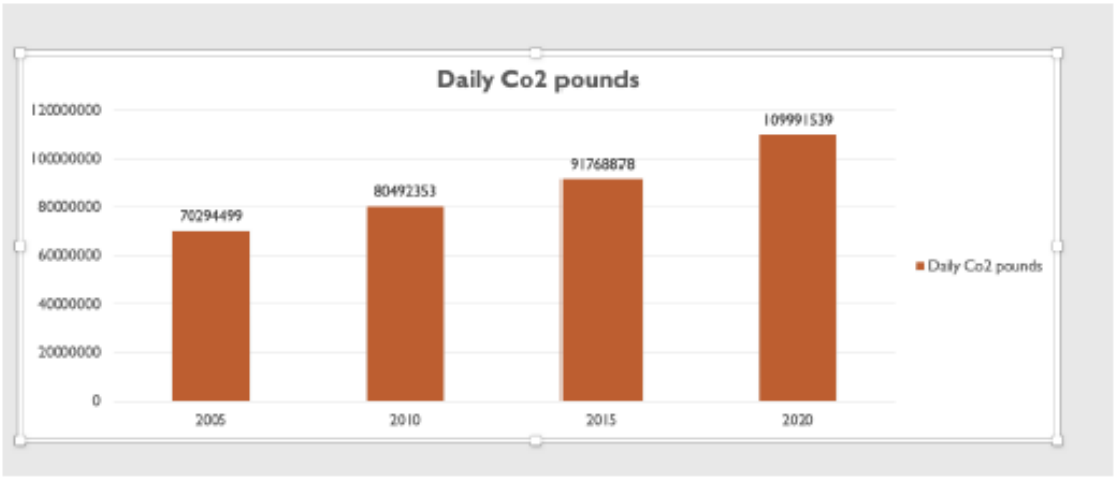
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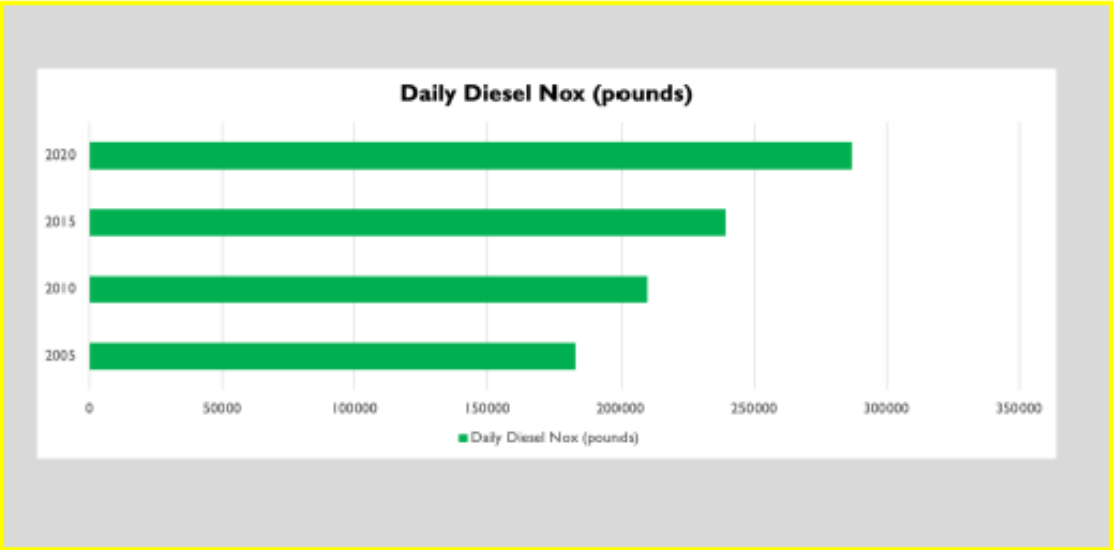

With over 1.6 billion square feet of warehouse space, the SCAQMD region hosts an estimated 58 square miles of land currently dedicated to warehouses. This number is an undercount and does not include the related square footage of outdoor storage yards, airports, intermodal transfer facilities, or freight yards that are also part of the logistics land use cluster. Municipalities are continuing the growth of warehouses unchecked within what is being called a "land rush" that is particularly focused on the Inland Empire. While some cities, such as Colton and Pomona, have recently adopted moratoriums, these are temporary. Unless political will changes within municipalities, there is no way to hold these cities accountable for their decision-making that is detrimental to the airshed.

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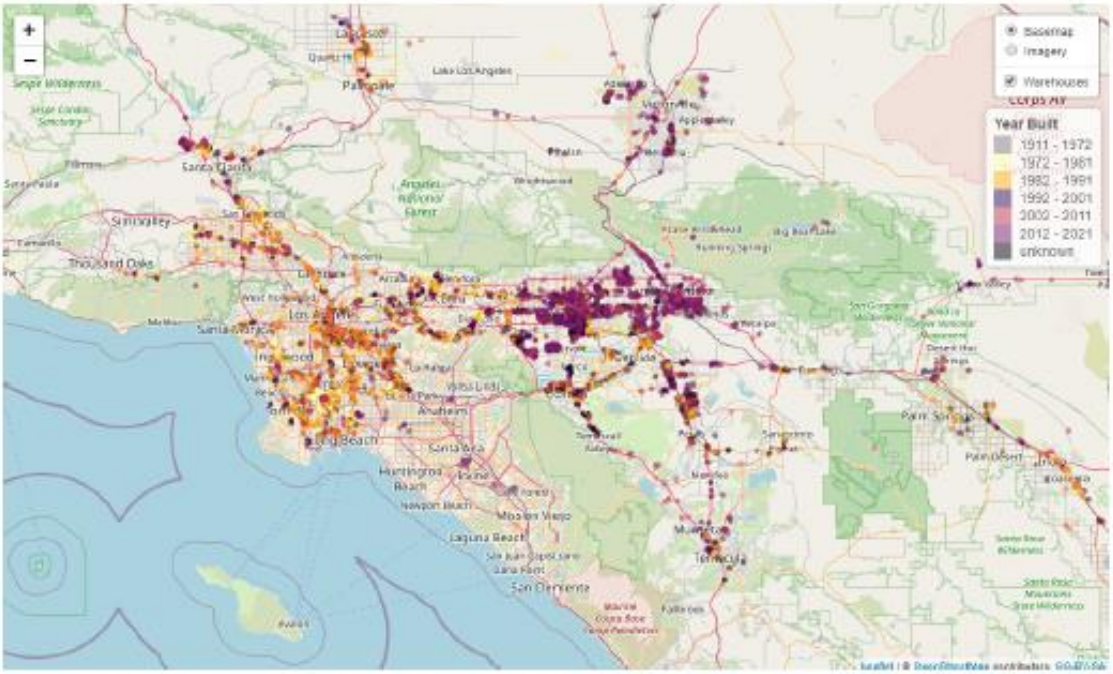

Figure 3. Map of warehouses indicating decade in which a warehouse was built. Individual parcels in the inland counties include 'light industry' classified parcels due to the strong prevalence of warehouses to be misclassified. The spatial pattern in warehouse growth in the past 20 years is clearly inland with very little development in the coastal counties.

Defects in CEQA are permitting explosive growth in a heavily polluting industry that could be considered within the direct purview of the AQMD. The AQMP should advocate for regional coordination of land-use permitting through cumulative impact authority.

Additional Potential Pathways

Since the "stick" is missing structurally and the AQMD lacks teeth beyond consultation regarding its ability to control local land use, we suggest that the AQMP explore the formation of a **Land Use and Transportation Planning Division within the AQMD**.

a) Explore viable policy pathways and incentives that could amplify SCAQMD opinions if not authority within land use decision-making;
b) Monitor and comment upon NOPs, DEIRs, EIRs, general plan amendments and updates, rezoning, and other features of the planning process; AQMD needs to be a consistent, neutral commenting agency for land use and transportation plans. Right now, not taking advantage of this role is allowing the Air Quality Management Plan to be undermined by decisions other agencies and municipalities are making.

Linkages between Energy and Climate Change

Include warehouse clusters and natural and working lands within the Energy and Climate Change element and expand that element. We appreciate attention to climate change and energy co-benefits and policies, listed as "ECC-01: Co-Benefits from Existing and Future Greenhouse Gas Programs, Policies, and Incentives; • ECC-02: Co-Benefits from Existing and Future Residential and Commercial Building Energy Efficiency Measures; and • ECC-03: Additional Enhancements in Reducing Existing Residential Building Energy Use." We request the inclusion of two additional measures 1) reducing emissions growth, particularly of industrial development and 2) the importance of natural and working lands..

1) Limiting emissions growth of logistics based industrial development to rates of population growth will reduce projected GHGs as well as pollutants. Our cumulative impact tool shows that the current rate of GHG emissions associated with warehouses is ~114,195,156 pounds of CO_2 per day. This equals ~20,840,616 tons of CO_2 per year. According to current standards, the social cost of carbon is $51 per ton. This calculation was developed to provide guidance for federal clean air policy. This number is based on older mathematical models and there is wide agreement that it is a radical underestimation of carbon's true cost. Utilizing the $51 standard, the annual cost of carbon stemming from warehouse infrastructure already exceeds one billion dollars (or $1,062,871,414) per year. This number will grow by 3.8% per year if warehouse VMT follows current growth projections. It is essential that AQMP consider the co-benefits of right sizing logistics infrastructure to reduce both carbon and pollutant detriments.
2) A second request regarding carbon involves natural and working lands, a category that is not included in the AQMP but that is included in the Bay Area Air Quality Management District's 2017 Clean Air Plan. The BAAQMD's plan includes provisions for carbon sequestration in open lands as well as urban tree planting. We note the omission of regenerative agriculture in that category and urge you to create control measures for open and working lands, including agriculture, that are appropriate to the South Coast region. Right now, agriculture is categorized as creating dust and pollution through offroad traffic. We urge you to note that sustainable agriculture, desert, forests, wetlands, and other open and working lands can create carbon negative/carbon sink scenarios as well as contributing to pollution remediation. This will be particularly important as wildfire events increase, contributing to large-scale carbon emissions and air pollutants.

Due to the severity of the climate crisis, we do not have time for offsets that allow emitters to continue to expand harmful infrastructure. Our data show how critical CCE co-benefits can be for our region. We urge a more holistic accounting of these within the AQMP.

Additional Comments

Expand MATES to include cumulative hot spots, such as traffic corridors and warehouse zones, to more properly link the visualization of harm to these emitters. We recognize the

power and innovation of the MATES tool, and urge the inclusion of a tab that includes cancer belts. As powerful as the tool is right now, the cancer impact is diluted within MATES visualization. We recommend creating a tab with clear information about the spatial nature of cancer belts and diesel death zones as related to transportation corridors and logistics-based land uses.

Include reproductive health detriments in the Health Consequences portion of the AQMP. "The air pollution levels in the region exceed both National and California Ambient Air Quality Standards for both these air pollutants. The health impacts associated with the high levels of air pollution cause respiratory and cardiovascular disease, exacerbate asthma, and can lead to premature death." This list, as well as the chart on ES-2, should include reproductive health issues.

Create incentives and awards/consequences and/or checks and balances for local municipalities regarding land use and transportation planning. The AQMD could create a series of air quality awards and incentives that would entice municipalities to become part of voluntary, incentivized participation in climate-smart, regional resilience land use and transportation planning for a healthy airshed. These incentives are currently limited to electrification within the AQMP and should be expanded. Broadening this focus could involve trainings and collaboration with other statewide or federal agencies, so that in order to qualify for certain kinds of funding, municipalities will get a higher rating or meet certain criteria in order to be eligible. While just one example, this type of approach might ensure a holistic accounting of the sometimes conflicting roles that cities are playing.

If there is a way to create an AQMD stick, **developing both incentives and punitive measures would provide an important balance**–even if these measures lack direct consequences. For example, the AQMD could publish an annual report of municipal rankings for air quality cumulative impacts and exposure detriments, GHGs and pollutant emissions, cancer and other health measures, and so on. In other words, there are creative ways that need to be explored in terms of how to get cities on board with a stronger AQMD role in land use and transportation decision making that directly impacts the airshed and that could ultimately increase the AQMD's ability to attain federal air quality standards.

Conclusion

Thank you for this opportunity to comment upon the AQMP Draft EIR. We appreciate the amount of work represented in this document and appreciate the additional labor it will take to address our comments. Given our analysis above, we urge the AQMP to take a **whole systems approach** in order to solve air quality problems in the region. Not to do so is akin to attempting to treat diabetes or high cholesterol without taking into account the diet of an individual. Only by recognizing the intimate ties between multiple factors can we begin to move toward attainment of federal air quality standards.

Signed,

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