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May 17, 2023

RE: SB 674 - Air pollution: refineries: community air monitoring systems: fence-line monitoring systems.

To Dr. Aragon,

On behalf of the California Conference of Local Health Officers (CCLHO), representing the appointed physician health officers of California's 61 city and county jurisdictions, we would like to express our recommendation to **SUPPORT SB 674.**

California is home to nineteen refineries. The nineteen refineries in the state are clustered in three regions, each of which is regulated by a different air district. Each of these three air districts has established a rule implementing the requirements of AB 1647, though the rules and processes differ between all three. According to the American Lung Association's State of the Air 2022 Report Card, all nineteen of those refineries are in counties with a failing grade for PM pollution, and eighteen of the nineteen are in counties with failing grades for ozone pollution as well. This bill makes a number of changes to the refinery fence-line air monitoring program established by AB 1647 (Muratsuchi, Chapter 589, Statutes of 2017). SB 674 would - SB 674 will address and remedy many flaws from past legislation by requiring refineries, as part of their fence-line monitoring obligations, to:

1. conduct third-party audits of their monitoring systems;
2. identify the root cause of excess emissions and perform corrective action;
3. ensure proper facility coverage;
4. provide adequate public notification when emission thresholds are exceeded;
5. make data from the fence-line monitors readily available to the public.

For these reasons, CCLHO recommends a SUPPORT position for SB 674.

CCLHO was established in statute in 1947 to advise the California Department of Public Health (CDPH), other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature, and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

Sincerely,

Anissa Davis, MD, MPH
President, California Conference of Local Health Officers