

## Comment 1 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.

First Name: Peter

Last Name: Joyce

Email Address: pjoyce@valuerecovery.net

Affiliation:

Subject: Methyl Bromide Emissions in SCAQMD

Comment:

Hundreds of thousands of pounds of methyl bromide are vented in the LA port area and in the surrounding neighborhoods when tractor trailers are fumigated. NONE of these have any type of emissions controls and yet California lists fumigation as a source category in its BACT/RACT/LAER clearinghouse database.

Since emissions controls of methyl bromide have been demonstrated for these types of fumigations for over 5 years, and independent source tests have confirmed the efficiency of the emissions controls, why is this allowed to continue.

A major portion of this initiative is in air monitoring and yet you have the ability to STOP the emissions of a toxic and hazardous air pollutant and offer no reason why this is allowed to continue.

Regards,

Peter J Joyce

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-02-08 07:32:47

No Duplicates.

## **Comment 2 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Lee

Last Name: Kindberg

Email Address: lee.kindberg@maersk.com

Affiliation: Maersk Line

Subject: CAPP vs CAAP

Comment:

I'm writing to encourage you to reconsider the new AB617 program acronym, which now appears to be "CAPP." This is too easily confused with Clean Air Action Plans such as the San Pedro Bay Ports CAAP. I understand from SCAQMD that an airport CAAP is now under development.

If the CAPP terminology is inflexible, please consider establishing a method to clarify when something refers to the program and when to the plans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-02-08 10:40:59

No Duplicates.

## **Comment 3 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Penelope (Jenny)

Last Name: Quintana

Email Address: jquintan@mail.sdsu.edu

Affiliation: San Diego State University

Subject: Comments on DRAFT Process and Criteria for 2018 Community Selections

Comment:

Comments on DRAFT Process and Criteria for 2018 Community Selections,

1. The current requirements for suggesting a community for monitoring consist of a simple form for community members and a much more complicated and extensive process for the local air district. I think this will favor more well funded and active air districts involved in environmental justice, and the process will be a disincentive for less active or less well funded air districts to make proposals. I think the initial process should be simpler for local air districts to reduce the burden and encourage submissions.

2. An community highly affected by pollution but with no local EJ organizations and without a very active air district might not be nominated, under current structure. I think CARB ought to also have a process for nominating affected communities based on a review of pollution California and CARB's expertise.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-02-13 16:54:05

No Duplicates.

## **Comment 4 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: nadine

Last Name: spertus

Email Address: nadinespertus@gmail.com

Affiliation: interested person

Subject: AB617

Comment:

I was wondering if AB617 would address highly impacted communities like Modesto that are clearly impacted by air issues but they are impacted severely due to almond production and the agricultural industry. Clearly there is a high exposure burden from particulates due to agriculture which has been exempt from these CARB rules. Seems unfair for this industry to get a pass while other industries hold the burden financially.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-03-08 12:42:16

No Duplicates.

## **Comment 5 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Gwen

Last Name: Ottinger

Email Address: ottinger@drexel.edu

Affiliation: Drexel University

Subject: Comments on Community Air Protection Concept Paper

Comment:

Please see attached file for comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-capp-conceptpaper-ws-ADJVY1FhBW4BKgU1.docx>

Original File Name: 2018-03-15 Ottinger comments on CARB Concept Paper.docx

Date and Time Comment Was Submitted: 2018-03-15 08:41:54

No Duplicates.

## **Comment 6 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Tsai

Email Address: stephanie@caleja.org

Affiliation: Cal Environmental Justice Alliance

Subject: CEJA Comments on Concept Paper and Draft Process and Criteria for 2018 Community Selection  
Comment:

Attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-capp-conceptpaper-ws-UDMFZlw3BTdWDwcx.pdf>

Original File Name: CEJA 617 Comments-March 2018.pdf

Date and Time Comment Was Submitted: 2018-03-26 14:36:42

No Duplicates.

## **Comment 7 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Dolores

Last Name: Barajas-Weller

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: San Joaquin Valley Recommendations for Implementation of Assembly Bill 617

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-capp-conceptpaper-ws-VjUGdgBgAyEFXAdm.pdf>

Original File Name: CVAQ AB 617 Implementation Recommendations.pdf

Date and Time Comment Was Submitted: 2018-03-29 12:43:49

No Duplicates.

## **Comment 8 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Paulina  
Last Name: Torres  
Email Address: ombcomm@arb.ca.gov  
Affiliation: CRPE

Subject: Public Comment on March Board Meeting, Discussion Item  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-capp-conceptpaper-ws-BmUAdABxUWcLUlcn.pdf>

Original File Name: CRPE\_Public Comment Board Meeting 32218.pdf

Date and Time Comment Was Submitted: 2018-03-29 12:43:49

No Duplicates.

## **Comment 9 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Gladys

Last Name: Limon

Email Address: ombcomm@arb.ca.gov

Affiliation: CEJA

Subject: CEJA Recommendations on Implementation of AB 617

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-capp-conceptpaper-ws-AmEAYwNoU2EBWAhp.zip>

Original File Name: CEJA AB617 Comments (002).zip

Date and Time Comment Was Submitted: 2018-03-29 12:56:12

No Duplicates.

## **Comment 10 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Hasson

Email Address: ombcomm@arb.ca.gov

Affiliation:

Subject: Comments on AB 617

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-capp-conceptpaper-ws-UzABZARKBTMEdABf.pdf>

Original File Name: CCAEJ 617 letter on ISR (ALM).pdf

Date and Time Comment Was Submitted: 2018-03-29 12:56:12

No Duplicates.

## **Comment 11 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Janet

Last Name: Whittick

Email Address: janetw@cceeb.org

Affiliation: CCEEB

Subject: CCEEB comments on AB 617 Concept Paper

Comment:

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-capp-conceptpaper-ws-UDNcOVA0UWdRNQBf.pdf>

Original File Name: CCEEB comments on AB 617 Concept Paper.pdf

Date and Time Comment Was Submitted: 2018-03-29 13:58:23

No Duplicates.

## **Comment 12 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Michele  
Last Name: Hasson  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Comment letter  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-capp-conceptpaper-ws-VjVdNAFtWGZRIgVr.pdf>

Original File Name: Community Air Protection Program AB617 in Southern California's Inland Valley.pdf

Date and Time Comment Was Submitted: 2018-04-05 09:32:57

No Duplicates.

## **Comment 13 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: Western States Petroleum Association

Comment:

On behalf of Cathy Reheis-Boyd, attached please find comments submitted by Western States Petroleum Association.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-capp-conceptpaper-ws-Wi0Cd1cmAzFSCwZl.zip>

Original File Name: WSPA Comment Letter\_ARB 617 Concept Paper.zip

Date and Time Comment Was Submitted: 2018-04-06 14:42:20

No Duplicates.

## **Comment 14 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Edith

Last Name: Moreno

Email Address: emoreno5@semprautilities.com

Affiliation: Southern California Gas Company

Subject: AB617 Draft Concept Paper Comments

Comment:

Please find attached the Southern California Gas Company's comments on the AB617 Draft Concept Paper. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-capp-conceptpaper-ws-UGIANlFhBW5VY1Nn.pdf>

Original File Name: 20180406\_SCG Comments on AB617 Concept Paper\_Final.pdf

Date and Time Comment Was Submitted: 2018-04-06 16:19:40

No Duplicates.

## **Comment 15 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Tom

Last Name: Jacob

Email Address: thomas.r.jacob@gmail.com

Affiliation: Chemical Industry Council of CA (CICC)

Subject: CAPP Concept Paper - CICC Comments

Comment:

Attached please find the comments of the Chemical Industry Council of California (CICC) regarding the CAPP Concept Paper. Please don't hesitate to contact me if you have any questions. Tom Jacob

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-capp-conceptpaper-ws-AWIGYVAhAyAGXwRn.docx>

Original File Name: CAPP Concept Paper - CICC Comments.docx

Date and Time Comment Was Submitted: 2018-04-09 13:40:03

No Duplicates.

## Comment 16 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.

First Name: Rebecca

Last Name: Skinner

Email Address: Trish.Johnson@arb.ca.gov

Affiliation:

Subject: Public Comments on Concept Paper

Comment:

I commend CalARB for the AB617 plan, and especially for drawing out subtleties that will become major policy issues within several years.

My comments on the Concept Paper focus on two issues. These are VIII.D, Data Communication and Accessibility; and V, Identification and Selection of Communities.

Re: VIII.D Data Communication and Accessibility

The Concept Paper indicates that CARB will "democratize data collection, display and interpretation" (p22). The implementation of an army of low-cost monitors would certainly help with this endeavor. Yet the AQ-SPEC's results indicate that no low-cost monitor meets FRM or FEM standards at present. However, the monies offered by the AB617 could be the progenitor of a new norm for democratic visual presentation of environmental data. Could AirNow data be posted on local screens in CAMP neighborhoods until more geographically high resolution data is available?

Another way in which the implementation of the Community Air Monitoring Plans could "enhance the accessibility and usability of data and tools" is to strive to offer contract opportunities to more than a handful of air quality monitoring service providers. Generally speaking, a "secular" data access plan for the AB617 Community pollution is the environmental data equivalent of net neutrality and anti-trust legislation. An oligopolistic supply market- that is one in which four or fewer companies hold the majority of market share- is commonly understood to have far less incentive to lower costs to end customers. The progress of the industry is encouraged by a larger number of entrants. Moreover, it would be encouraging if data is made accessible online to the general public at the same temporal resolution that the company reading the data and porting it to BAAQMD and CalARB has.

Re: V. Identification and Selection of Communities

Regarding issue V. Identification and Selection of Communities, the author is concerned with geographical boundaries for affected communities. It is certain that those communities that have been robustly represented in Environmental Justice circles in California will self-identify to the Community Air Protection Program.

It is encouraging to see that West Oakland, the Bayview-Hunter's Point, and Brawley in the Imperial Valley have developed strong leadership. Would it be possible to extend the geographical designations of disadvantaged communities adjacent to these areas, when political demarcations are narrower than geographical boundaries? The Visitacion Valley in San Francisco and the immediately adjacent eastern edge of Daly City comes to mind. The Midway Village housing project, a Superfund site built on a former PG&E facility, is no more than three-tenths of a mile from Daly City's northern border with San Francisco. Perhaps the CAMP project boundaries might be extended to include such areas, on consultation with the Measurements division of the local AQMDs.

Thank you to Cal-ARB for leading where dozens of other states will follow.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-04-10 11:16:24

No Duplicates.

## **Comment 17 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## **Comment 18 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Nikita

Last Name: Daryanani

Email Address: [ndaryanani@leadershipcounsel.org](mailto:ndaryanani@leadershipcounsel.org)

Affiliation:

Subject: 3/24 Fresno community meeting notes re AB 617

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-capp-conceptpaper-ws-VDdVPFwwBDoHdANt.docx>

Original File Name: community\_meeting.docx

Date and Time Comment Was Submitted: 2018-04-13 11:18:59

No Duplicates.

## **Comment 19 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Christine

Last Name: Montes

Email Address: cmontes@ph.lacounty.gov

Affiliation:

Subject: Comments on Community Air Protection Program Concept Paper

Comment:

Please see attached letter from the Toxicology and Environmental Assessment Branch of the Los Angeles County Department of Public Health (DPH).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-capp-conceptpaper-ws-YycCYQdnVVkKbwlo.pdf>

Original File Name: TEA Carb Comments--signed.pdf

Date and Time Comment Was Submitted: 2018-04-13 11:25:34

No Duplicates.

## **Comment 20 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Lois  
Last Name: Henry  
Email Address: [lois.henry@bizfed.org](mailto:lois.henry@bizfed.org)  
Affiliation: BizFed Central Valley

Subject: AB 617 implementation  
Comment:

Please see attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-capp-conceptpaper-ws-VzZSNIMNWD1XYAcw.pdf>

Original File Name: AB 617 implementation.pdf

Date and Time Comment Was Submitted: 2018-04-16 10:04:28

No Duplicates.

## Comment 21 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.

First Name: Richard  
Last Name: Chapman  
Email Address: richard@kedc.com  
Affiliation:

Subject: AB 617\_Kern EDC Letter

Comment:

Submitted for your consideration.

Best regards,

Richard

Richard D. Chapman  
President & CEO  
Kern Economic Development Corporation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-capp-conceptpaper-ws-AGFUMAFfWTxWYVJl.docx>

Original File Name: AB 617\_Kern EDC.docx

Date and Time Comment Was Submitted: 2018-04-20 22:41:17

No Duplicates.

## **Comment 22 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Wiltfong  
Email Address: [sarah.wiltfong@bizfed.org](mailto:sarah.wiltfong@bizfed.org)  
Affiliation: BizFed

Subject: AB 617

Comment:

Please see BizFed attached letter on AB 617 to CARB.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-capp-conceptpaper-ws-UzEAb1EqBzIHZAlt.pdf>

Original File Name: BizFed AB 617 Letter to CARB.pdf

Date and Time Comment Was Submitted: 2018-04-25 15:49:46

No Duplicates.

## **Comment 23 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Alicia

Last Name: Berhow

Email Address: aberhow@ocbc.org

Affiliation: Orange County Business Council

Subject: The Community Air Protection Program

Comment:

Please see the attached comment letter regarding the Community Air Protection Program from the Orange County Business Council.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-capp-conceptpaper-ws-UDFXM1BnVzUENQBf.pdf>

Original File Name: AB617\_Oppose\_California Air Resources Board.pdf

Date and Time Comment Was Submitted: 2018-04-26 11:06:25

No Duplicates.

## **Comment 24 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Yale

Last Name: Klat

Email Address: [yale.klat@idleair.com](mailto:yale.klat@idleair.com)

Affiliation: Convoy Solutions, dba IdleAir

Subject: CAPP and Truck Stop Electrification

Comment:

(see comments attached)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-capp-conceptpaper-ws-VD1dPwRpVGJVMgBp.pdf>

Original File Name: IdleAir comments\_Community Air Protection Funds Supplement.pdf

Date and Time Comment Was Submitted: 2018-04-26 15:09:53

No Duplicates.

## **Comment 25 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Gary

Last Name: Toebben

Email Address: kasuncion@lachamber.com

Affiliation:

Subject: AB 617 Comments

Comment:

Please see attachment for the Los Angeles Area Chamber of Commerce's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-capp-conceptpaper-ws-BjYFNwY1A2RWYlJi.pdf>

Original File Name: 04242018\_CARB-AB617.pdf

Date and Time Comment Was Submitted: 2018-04-26 16:33:35

No Duplicates.

## **Comment 26 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: omment Letter to CARB on AB 617 Implementation 04 26 2018

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-capp-conceptpaper-ws-WzgFbARoAD4LaFU7.pdf>

Original File Name: Comment Letter to CARB on AB 617 Implementation 04 26 2018.pdf

Date and Time Comment Was Submitted: 2018-04-27 10:25:02

No Duplicates.

## **Comment 27 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: Climate Change Policy Coalition

Subject: Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-capp-conceptpaper-ws-UzAHYgFwBTVRCAZn.pdf>

Original File Name: CCPC\_AB617 Comment Ltr\_4\_24\_18.pdf

Date and Time Comment Was Submitted: 2018-04-27 14:12:48

No Duplicates.

## **Comment 28 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Katrinka

Last Name: Ruk

Email Address: kpruk@sbcglobal.net

Affiliation: Council of Industries

Subject: AB617 Community Health Protection Program - Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-capp-conceptpaper-ws-B2YHYwYxVDZQYQNc.pdf>

Original File Name: AB617 COI ltr 04-26-18.pdf

Date and Time Comment Was Submitted: 2018-04-30 09:22:01

No Duplicates.

## **Comment 29 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Wiltfong

Email Address: [sarah.wiltfong@bizfed.org](mailto:sarah.wiltfong@bizfed.org)

Affiliation: BizFed

Subject: Re: Community Air Protection Program

Comment:

Please accept the attached letter regarding the Community Air Protection Program (AB 617). On behalf of BizFed and over 40 coalition members - we are pleased to provide input on this important public policy implementation.

If you have any questions - please feel free to contact me.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-capp-conceptpaper-ws-WjsFYVcJVzIHMAQz.pdf>

Original File Name: AB\_617\_Coalition Letter.pdf

Date and Time Comment Was Submitted: 2018-04-30 16:39:44

No Duplicates.

## **Comment 30 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Connelly

Email Address: ombcomm@arb.ca.gov

Affiliation: East Bay Leadership Council

Subject: Community Air Protection Program

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-capp-conceptpaper-ws-BzUFM1ZmA2gDWgc3.pdf>

Original File Name: 2018\_04\_25 East Bay Leadership Council.pdf

Date and Time Comment Was Submitted: 2018-05-01 11:36:36

No Duplicates.

## **Comment 31 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Courtney

Last Name: Sorensen

Email Address: Courtney@fcfb.org

Affiliation: Fresno County Farm Bureau

Subject: CARB AB 617 Community Air Protection Program

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-capp-conceptpaper-ws-VTZcOwFyUmMDWghu.pdf>

Original File Name: CARB Fresno Farm Bureau 4-30-18.pdf

Date and Time Comment Was Submitted: 2018-05-02 14:14:49

No Duplicates.

## **Comment 32 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Katelyn

Last Name: Roedner

Email Address: kroedner@edf.org

Affiliation: EDF

Subject: Community Air Protection Program concept note

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-capp-conceptpaper-ws-UzZUNIQzAw8LbIQ7.pdf>

Original File Name: EDF comments\_AB617 concept note.pdf

Date and Time Comment Was Submitted: 2018-05-08 12:09:06

No Duplicates.

## **Comment 33 for CAPP Concept Paper (capp-conceptpaper-ws) - 1st Workshop.**

First Name: Roger  
Last Name: Lin  
Email Address: ombcomm@arb.ca.gov  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-capp-conceptpaper-ws-BzEFMINIWVULbFUN.pdf>

Original File Name: 617\_ARB\_Authority\_CCST\_Comment.pdf

Date and Time Comment Was Submitted: 2018-05-15 15:07:36

No Duplicates.

**There are no comments posted to CAPP Concept Paper (capp-conceptpaper-ws) that were presented during the Workshop at this time.**