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## WSPA's Detailed Comments on the ARB Draft Community Air Protection Blueprint and Appendices

Page #	Document Text	Comment	Recommendation
BP-2	<i>Most importantly, underpinning AB 617 is the understanding that community residents must be active partners in envisioning, developing, and implementing actions to clean up the air in their communities.</i>	This language uses the term “community resident” which does not seem to include businesses that operate in the community.	ARB should use the term “community members” instead of “community residents”.
BP-3	<i>Figure 2: Partnerships with community members in Program development through community assistance grants and community steering committees, where community members and local air districts will work together to craft solutions for each selected community.</i>	ARB is also a critical partner in the AB 617 implementation process even after the Blueprint is finalized in September. ARB should continue to be a partner in the process and be deeply imbedded in each Community Steering Committee due to the significant impact of mobile sources on overburdened communities.	ARB should include itself in this box as it is a critical partner in the AB 617 process.
BP-4	<i>For example, lower cost sensors and other emerging technologies can be located in more locations within communities than more expensive regulatory-grade monitoring systems in place today.</i>	While there are significant upsides to low-cost sensors there are also significant limitations. ARB needs to manage expectations around low-cost sensors by discussing their limitations in more detail especially when promoting them this early in the Blueprint. This is especially true where low-cost sensors cannot be effectively used to measure air toxics, which are one of the two main program targets.	ARB should include a discussion of the limitations of low-cost sensors (e.g. limited timeframes for usage due to the inability to calibrate any model, lower accuracy, lower precision, lower ability to limit tampering, etc.) alongside this statement.
BP-4	<i>Under AB 617, air quality data from community-operated and agency-operated regulatory monitoring will be made available to the public through easily accessible online tools.</i>	If ARB is committed to putting community monitoring on the same webpages as district run monitoring, it needs to ensure that monitoring is accurate and equivalent to district run monitoring. Without this critical oversight community members will be confused, especially if the monitoring by community members does not	ARB should either eliminate this sentence or add minimum requirements for any community monitoring data posted alongside district monitoring data. The minimum requirements should follow the checklist required of districts in the Statewide Air Monitoring Plan. Additionally, it is critical that ARB include

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		produce the same results as that done by the district.	language in the Blueprint Summary document and Appendix E stipulating that a public education component will be developed to ensure that any monitoring data released/posted to the public is accompanied by an explanation of what the data means and what it doesn't mean, the accuracy level and what is appropriate from a regulatory standpoint as opposed to what is used for general informational purposes.
BP-4	<i>Similarly, CARB will be providing greater access to community-level source and emissions data. California is already taking its detailed regional-scale inventories down to the community level so that the public can easily see the emissions sources near where they live.</i>	WSPA supports more detailed reporting from small stationary sources, area sources, and mobile sources in communities selected for monitoring or emission reductions. Detailed community emission inventories are critical to ensure that large stationary sources are not disproportionately targeted in emission reduction plans simply because the district has inventory data for those sources.	N/A
BP-5	<i>We expect to select up to 10 communities in the first year of the Program, with the majority selected for community emissions reduction programs, many of which may also include an associated monitoring component.</i>	The requirements differentiating monitoring communities from emission reduction communities were released for the first time in the Blueprint Appendices. ARB should not prejudge decisions about whether communities will be selected for monitoring or emissions reduction programs until ARB has considered public comments on the criteria differentiating the two.	Remove all text after the first comma. ( <i>"...with the majority selected for community emissions reduction programs, many of which may also include an associated monitoring component."</i> )
BP-5	<i>Selecting initial communities impacted by a range of pollution sources will drive the</i>	Community selection should only be based on criteria that helps define the	Remove this sentence and these criteria from the selection process.

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	<i>development of strategies that can serve as models for action in other communities.</i>	most overburdened communities across the state pursuant to AB 617. Communities should not be selected on the basis of capturing a “variety” of sources in the programs.	
BP-6	<i>AB 617 will help community members work with local agencies that have land use authority to address the impacts of past land use decisions and to avoid bad land use decisions in the future</i>	This language raises the concern that even sources operating in compliance with existing zoning laws and other applicable regulations could be subject to revocation of land use authority.	ARB should clarify that the intent is not to shut down legally operating facilities in order to correct past land use decisions.
B-6	<i>3. Cancer risk estimates based on existing or new air quality modeling that characterizes the burden faced by the community.</i>	ARB should not include cancer risk assessments under AB 2588 in this step as it would essentially be double counting for large industrial sources which are already taken into account in bullet #2.	ARB should also use the term “regional” in front of “cancer risk estimates” in this bullet to provide clarity as to the types of cancer risk estimates included in this step to avoid double counting for large industrial sources.
BP-6, C-7, E-7	<i>CARB staff will participate as observers and provide technical support and other input, as appropriate.</i>	ARB should not be simply an observer in the Community Steering Committee process. ARB should have role equivalent to the air districts as the air quality challenge in many overburdened communities will be driven by mobile sources for which ARB has sole jurisdiction. This is especially true as ARB will have the expertise and information on all of the actions being undertaken in the Statewide strategy.	ARB should remove this sentence and include itself in the list of participating members of the Community Steering Committee.
BP-8, E-1	<i>These include projects that focus on community-driven air monitoring, dissemination of information on local emission sources, as well as the development of actions to reduce community exposure to pollution, and to track progress.</i>	Without committing to any clear oversight of the community grant programs, it is unclear how ARB intends to ensure that the money given to these community organizations is spent within the boundaries of the grant application.	ARB needs to take ownership for oversight around these grant projects. ARB should include oversight requirements (including financial reporting requirements) in the Blueprint documents that grant recipients should be required to meet to ensure that the

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			money awarded under the AB 617 grant program is used appropriately and for the intended purpose.
B-8	<i>Statute implemented by both CARB and DTSC require method development to assess cumulative impacts and integrate indicators of community vulnerability for the implementation of regulatory programs and community monitoring.</i>	Stakeholders need more information on DTSC activities and how they will link with ARB assessments of community vulnerability.	N/A
B-8	<i>Based on this analysis, air district submittals will include specific recommendations for selection of annual communities for air monitoring and/or emissions reduction programs.</i>	The Blueprint documents remain unclear about what criteria will be used to determine when a community is selected for monitoring or an emissions reduction plan.	ARB should specify whether the monitoring is intended to fill a data gap for a community with known sensitive receptors but limited or low-quality data.
BP-9	<i>Common themes expressed during the public engagement process to date are...</i>	ARB does not list many of the themes raised by business representatives. Most critically, ARB does not reference the need for cost-effective and feasible solutions for emission reduction plans.	ARB should add a bullet to discuss the criticality of ensuring that emission reduction measures in communities and throughout the state are developed and implemented in a cost-effective and feasible manner consistent with statutory language in AB 617.
BP-10	<i>Ensure that emissions do not increase in communities that are already heavily impacted.</i>	It is difficult to "ensure" that emissions will not increase.	ARB needs to provide greater specificity regarding the baseline for this determination and specify that this baseline should take into account typical business cycle fluctuations and avoid no-growth redlining within selected communities.
BP-10	<i>Implement measures to reduce the impacts of emissions sources that sit close to sensitive populations, such as mandatory setbacks.</i>	Mandatory setbacks may not be possible for existing sources, especially where local planning decisions have allowed encroachment of other uses.	ARB needs to specify how it would implement mandatory setbacks for existing land uses.
BP-10, B-	<i>1. Concentrations of ozone, particle</i>	As ozone is a regional pollutant and	Remove ozone from consideration when

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6	<i>pollution, and toxic air pollutants from measurements, air quality modeling, or other information quantifying air pollution exposure burden.</i>	unlikely to be addressed under AB 617, ARB should not include it in the analysis to determine which locations are selected for community monitoring or emissions reduction programs. Additionally, this element is confusing as other regional criteria pollutants are not included in the analysis and ARB provides no explanation why certain pollutants were included while others were not.	selecting communities for monitoring or emissions reduction programs.
BP 11	<i>Other measures of vulnerability to air pollution – 5. Public health indicators that are representative of the incidence or worsening of disease related to air quality such as the prevalence of asthma, heart disease, and low birth weights.</i>	The listed factors do not always correlate well with air pollution as demonstrated by CalEnviroScreen.	N/A
BP-12, B-10	<i>CARB staff is proposing additional considerations to recommend to the CARB Governing Board in defining a list of up to 10 communities for action in the first year of the Program's implementation. Along with air district and community-based recommendations for first-year communities, these considerations include:</i>	Community selection should only be based on criteria that help define the most overburdened communities across the state pursuant to AB 617. Neither regional diversity nor a variety of sources will help determine which communities across the state are most overburdened by air pollution. ARB should follow the statute and ensure resources are directed to those communities most in need.	ARB should remove this section from the Blueprint and eliminate the additional considerations for regional diversity and variety of sources.
BP-13	VIII. REQUIREMENTS FOR COMMUNITY EMISSIONS REDUCTION PROGRAMS	ARB does not mention two critical requirements for community emissions reduction plans: 1) the requirement that all emissions reductions should be done in a cost-effective and feasible manner, and 2) the requirement that emissions reductions should be commensurate with	ARB should include a significant discussion addressing many of the concerns raised in WSPA's primary comment letter for these two critical elements in this section.

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		source contribution.	
BP-13	<i>Once CARB selects communities for focused action, air districts must develop local community emissions reduction programs in partnership with community members, CARB, and other stakeholders, based on criteria set by CARB.</i>	Using the term “communities selected for focused action” is confusing. It is unclear if this is referencing just communities selected for emissions reduction or communities selected for monitoring or both.	ARB should only use the terms “communities selected for monitoring” or “communities selected for emissions reductions.”
BP-15	<i>Enforcement strategies to ensure rules and regulations achieve their expected reductions.</i>	ARB should not assume that non-compliance or a lack of enforcement are the only reasons a rule will not achieve its intended emissions reductions. Other reasons may include, but are not limited to, changes in markets, inaccurate predictions of available technology, or poor performance of technology relative to predictions.	ARB should remove this sentence or reword it so it does not imply that noncompliance is the sole reason a regulation does not achieve its intended emissions reductions.
BP-16	<i>Each community emissions reduction program will also include...</i>	Without an assessment of planned future actions (such as ARB’s statewide measures), communities may require emission reductions which are not needed to ensure a community is no longer overburdened by air pollution.	ARB should include a requirement for emissions reduction programs to assess the impact of all <b>future</b> emission reductions that will result from plans already on the books.
BP-20	<i>For communities heavily impacted by freight sources – o Expanded standards for clean operation for ships while they are in port.</i>	ARB should not specify reliance on regulations that are still under development.	Remove references to specific rulemakings still pending adoption and not yet available for inclusion in community emissions reduction programs.
BP-21	<i>At the local level, AB 617 also requires air districts to develop expedited schedules to implement retrofit pollution controls on certain industrial sources by 2023 which will reduce emissions in communities located near these sources.</i>	ARB should be clear that the requirement in AB 617 is for air districts to complete rulemaking for BARCT by 2023.	ARB should include the word “regulations” after “controls” to ensure clarity around the requirements for BARCT in AB 617.
BP-23	<i>However, CARB is developing a number of</i>	ARB provides very little information on	ARB should expand the discussion of this

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	<i>tools and resources to better support engagement on land use and transportation strategies in impacted communities. These include: Developing updated guidance on conducting risk assessments for gas stations</i>	the process for updating risk assessment guidelines for gasoline dispensing facilities.	action in Appendix F-18.
BP-25	<i>We will collaborate with work being done by the South Coast Air Quality Management District and the U.S. EPA to evaluate new low-cost air pollution sensors. The monitoring toolbox will be available by October 1, 2018 and CARB will regularly update the toolbox with new information.</i>	WSPA supports coordination between ARB, SCAQMD, and EPA so that information on air monitoring technologies is consistently communicated to the public across California and the US.	N/A
BP-26	<i>Table 2 Checklist for Developing Community Air Monitoring</i>	Data accessibility is not sufficient and significant work needs to be invested in educating members of the community on what are expected to be very complex monitoring campaigns.	All districts should be required to include an educational component in every community monitoring plan. This component should include an outreach element to ensure that members of the community understand monitoring results.
A-3	<i>Developing a statewide strategy, including measures to reduce emissions and exposure, methods for identifying contributing sources, and criteria to serve as the benchmark that air districts must meet when developing and implementing community emissions reduction</i>	ARB does not discuss any of the methods for identifying contributing sources (source attribution) or criteria for how districts should choose among those methods in the Blueprint.	ARB should add a new subsection to the community emissions reduction section to discuss the various available methods and how districts should approach choosing the correct method for source attribution. ARB should post this new language and take public comments on it prior to finalizing the Blueprint.
B-1	<i>Step 2: Assessment – CARB staff will work with air districts to assess the cumulative air pollution exposure burden in each community on the list based on the factors</i>	WSPA supports a full and transparent assessment of each community being assessed to ensure that the most overburdened communities are selected	ARB should not only post the list but also the analysis showing how each community compares according to the 6 criteria listed in Blueprint. This process

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	<i>outlined throughout this appendix. CARB will publicly post this statewide assessment in early summer each year.</i>	on a statewide basis.	will ensure that communities in different districts are being assessed against the same criteria and that the most impacted communities are selected on a statewide basis.
B-1, B-10	<i>The selection of priority communities will also include a description of near-term actions to be taken in communities not selected to underscore efforts that will be taken to reduce emissions and exposure in all communities, not just those selected that year.</i>	ARB appears to be committing communities which are not selected to “mini” community emissions reduction plans which would conflict with AB 617 requirements.	ARB should remove this sentence as it could be interpreted to require actions that would be taken outside of the AB 617 process. The process is critical to ensure that program resources are directed toward the most overburdened communities and that AB 617 programs are cost effective and feasible.
B-2	<i>In February 2018, CARB staff released a Draft Process to guide first year community self-nominations and the air district recommendation process.</i>	ARB has not posted the comments it received nor its responses to those comments for this document or the draft Concept Paper.	ARB should be transparent in the development of the Blueprint and publish all comments it has received as well as ARB's response to comments on all previously released documents.
B-8	<i>Coordinate with community leaders and community-based organizations to determine the appropriate place and time for the meetings.</i>	ARB has not included local businesses among the groups identified for determining the appropriate places and times for meetings. Local businesses also have challenges in attending meetings at certain times and locations. This is especially true for small local businesses.	ARB should revise the language to ensure coordination with local business is also part of the process for setting meeting times and locations.
B-8	<i>Air districts should also consider additional factors in recommending specific communities for community air monitoring and/or community emissions reduction program preparation that year, including but not limited to:</i> <ul style="list-style-type: none"> <li>• Existing community air monitoring and/or emissions reduction efforts.</li> <li>• Community organization administrative</li> </ul>	While WSPA understands the challenges in implementing AB 617 community monitoring or emission reduction programs in communities with less capacity, “readiness” of the community should not be a factor in deciding which communities are selected. ARB should ensure that the most overburdened communities are selected as they are the	ARB should remove this section and eliminate this consideration from the selection process.



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	<p><i>and technical resources.</i></p> <ul style="list-style-type: none"> <li>• <i>Anticipated community, government, and business stakeholder resource needs for capacity building, mitigation, public process, etc.</i></li> </ul>	ones with the greatest need.	
B-9	<p>•<i>If the communities are recommended for community emissions reduction programs, provide the following information...</i></p>	<p>While WSPA supports inclusion of criteria to differentiate between communities selected for monitoring and communities selected for emissions reduction programs, absent greater specificity it is unclear how ARB will ensure that these criteria are satisfied for a given community.</p>	<p>ARB should propose more specific minimum requirements which can be assessed prior to selecting a community for emissions reduction. Example 1: Providing a definition of “well-characterized” would be helpful in ensuring that communities selected for emissions reduction programs are truly ready to advance to that part of the process instead of entering the process as a monitoring community. Example 2: ARB should not place a community into an emission reduction program unless it has speciated PM data across the community. Without this data it will be impossible to determine the source(s) of the PM. Example 3: The district should have information on area sources (such as number or percentage of residential properties with a specific piece of equipment like a wood-burning fireplace) such that it can accurately model the extent of the impact from that activity.</p>
B-10	<p><i>Communities included in the statewide assessment, but not selected for the preparation of an emissions reduction program or community air monitoring system in the current year, will remain candidates on the list for selection in</i></p>	<p>ARB must have a mechanism for removing communities from the candidate list (perhaps based on findings from technical assessments) in order to ensure that sufficient program resources are directed to the communities with the greatest</p>	<p>ARB should specify the circumstances by which communities are removed from the candidate list.</p>

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	<i>future years.</i>	need over the life of the program.	
C-3	• <i>Develop a strong technical foundation for understanding the sources of air pollution impacting the community.</i>	WSPA supports a full assessment and characterization of all sources in communities selected for community emissions reduction programs.	N/A
C-3, C-10	• <i>Characterize the current of indicators of public health in the community related to air pollution.</i>	Characterizing health indicators as part of the community profile has the potential to confuse Community Steering Communities by leading them to conclude that health indicators can be used as a metric or target in the emissions reduction program.	ARB should clarify that health indicators are included in the community profile only to help identify pollutants of concern and that they will not be used as metrics or targets. We recommend ARB reinstate the footnote reference in the Framework document that cites not only air pollution, but other factors which contribute to overall health outcomes.
C-3	• <i>Identify applicable regulatory, enforcement, incentive, and permitting strategies to implement the most stringent approaches for reducing emissions, with a focus on zero emission technologies where feasible.</i>	ARB's use of the term "most stringent approaches" will lead communities to believe that cost-effectiveness and feasibility are not factors in determining which approaches will be included in emissions reduction programs.	ARB should modify the sentence by including a reference to ensure that the selected approaches are both cost effective and feasible.
C-4	<i>Ozone is a regional air pollutant that is formed through complex chemical reactions in the atmosphere. While significant work remains to meet ozone standards in many areas of the State, ozone pollution is driven by regional rather than localized source contributions and is most appropriately addressed through regional air quality improvement efforts like the State Implementation Plan.</i>	WSPA supports the exclusion of ozone from community emissions reduction programs as it is a regional pollutant and local changes are unlikely to impact ozone levels in a specific community.	N/A
C-5	<i>Although reference exposure levels represent safe exposure levels for non-cancer health effects, there are no safe exposure thresholds for carcinogens.</i>	As WSPA indicated in our comments on the draft Concept Paper, this statement assumes that all carcinogens operate by the same basic (mutagenic) mechanism of	ARB should remove this statement from Appendix C.

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		action. This statement is not universally true and must be evaluated on a case-by-case basis. Continuing to promote this outdated, overly-broad and unscientific point of view is misleading and a disservice to AB 617 stakeholders.	
C-5	<i>Efforts to significantly reduce exposure to toxic air contaminants therefore rely on identifying technologies and practices that offer the maximum level of emissions reductions achievable.</i>	Whenever ARB discusses “maximizing emission reductions” without a discussion of cost-effectiveness and feasibility, it will only serve to confuse communities about the requirements for including control measures in emissions reduction programs. Community members need to understand that the requirement is not to drive to zero emissions but rather to pursue reductions that make sense and will achieve meaningful air quality benefits in selected communities.	ARB should modify the sentence by including a reference to ensure that the approaches selected are cost effective and feasible.
C-5	<i>In addition to reducing PM2.5 and toxic air contaminant emissions, many of the strategies included in community emissions reduction programs may deliver reductions in other pollutants, including greenhouse gases and ozone precursors. These co-benefits can contribute to statewide and regional emissions reduction efforts, delivering additional local health benefits.</i>	It is misleading to include greenhouse gases (GHG) in this statement. GHG emissions are addressed through the AB 32 Scoping Plan and related control measures. Incidental GHG reductions achieved as a co-benefit of AB 617 emissions reduction programs, even in several California communities, will not affect climate change enough to deliver local health benefits.	This language should be removed from Appendix C.
C-5	<i>Diesel particulate matter continues to be a concern in many communities; however, other toxic air contaminants can also contribute to localized health risk including metals such as hexavalent chromium and lead, air toxics related to</i>	Benzene and Toluene can come from other sources outside of fossil fuel production. ARB's reference will lead community members to conclude that only fossil fuel production should be considered in cases where benzene or	ARB should remove the reference to “fossil fuel production” in this sentence, or revise it to include the broad range of sources that may contribute to benzene and toluene emissions.

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	<i>fossil fuel production such as benzene and toluene, and compounds associated with combustion including polycyclic aromatic hydrocarbons and dioxins.</i>	toluene is a pollutant of concern.	
C-5	<p><i>To address disproportionate localized air quality impacts, community emissions reduction programs will focus on two objectives:</i></p> <ul style="list-style-type: none"> <li><i>• Reducing exposure caused by local sources to achieve healthful levels of PM2.5 within the community.</i></li> <li><i>• Maximizing progress on reducing exposure to toxic air contaminants that contribute to the cumulative exposure burden.</i></li> </ul>	WSPA supports the focus on PM2.5 and toxic air contaminants as they are pollutants which can have impacts at the local level. However, air districts should determine when PM precursors are regional and separate regional precursors from local precursors. If regional contributions are the primary source, local sources should not be burdened with additional controls just because they are located in an emissions reduction program community.	ARB should discuss how the air districts should distinguish between regional and local contributors to PM2.5.
C-7	<i>To ensure that the committee members can inform the early stages of community emissions reduction program development, the air district should hold the first meeting of the community steering committee within 60 days of a community being selected by the CARB Governing Board for community emissions reduction program preparation.</i>	With the short amount of time given to districts to develop and prepare a community emissions reduction program, 60 days is simply too long to set up and convene the Community Steering Committee.	ARB should revise the requirement to set up Community Steering Committees within 30 days.
C-7	<i>The community steering committee must be comprised primarily of community members, which includes participants who live, work, or own businesses within the community.</i>	WSPA supports the involvement of only those that live and work within selected communities and believe this is critical to program success. Ensuring that organizations outside the community do not hijack the process is critical to ensuring a fair and equitable process. Additionally, those in the community are most knowledgeable on the issues and	N/A

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		most impacted by the outcomes.	
C-9	<ul style="list-style-type: none"> <li>• <i>A designated contact person at the air district for each community emissions reduction program – Each air district should identify a contact person to address general questions regarding community emissions reduction programs and Community Air Protection Program implementation for each selected community.</i></li> </ul>	ARB is a critical participant in the Community Steering Committees. A single point of contact between community members and ARB is critical.	ARB should also provide a designated contact for each Community Steering Committee.
C-11	<i>Conducting a technical assessment is a necessary step in community emissions reduction program development.</i>	One of the most important functions of the technical assessment is to identify any data gaps that may need to be filled to properly characterize the nature and extent of the air quality burden in a candidate community. Here ARB has relegated this critical issue to the last paragraph of the “Required Analytical Tasks” section.	The data gap issue should be addressed in the opening paragraph.
C-11	<ul style="list-style-type: none"> <li>• <i>An assessment and description of the existing high cumulative air quality exposure burden within the community. This assessment includes a list of the key pollutants driving the exposure burden in the community and how exposure may change over time due to existing air quality policies or programs.</i></li> </ul>	With ARB committing to such a large array of future rule changes in its Statewide Strategy, it will be critical to include those measures in a description of how exposure will change over time as part of the technical assessment.	ARB should include both “existing” and <b>“future”</b> air quality programs and regulations in the assessment.
C-11	<ul style="list-style-type: none"> <li>• <i>A community-level emissions inventory, which estimates pollutant emissions of the mobile sources (e.g., cars, heavy-duty trucks, locomotives), area-wide sources (e.g., fireplaces, charbroilers, fugitive dust), and stationary sources (e.g., oil refineries, auto body shops,</i></li> </ul>	WSPA supports specific community emission inventories that capture small and mobile sources. These will be necessary to ensure program success. Community level emission inventories for those communities selected for monitoring and emissions reduction	ARB should also include community emission inventories in communities selected for monitoring as this will help inform selection of proper monitoring technologies and locations.

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	<i>manufacturing facilities) contributing to the high cumulative air quality exposure burden within the community. CARB will provide guidance for development of emissions inventories in the online Resource Center. Developing more granular community-scale emissions inventories is critical for understanding existing baseline emissions and tracking future emission reductions within a community.</i>	programs will be critical to ensure that all sources are properly characterized and sufficient data is available to determine source attribution so that emissions reduction strategies are commensurate with relative source contributions.	
C-12	<ul style="list-style-type: none"> <li>• ...This task is necessary for identifying the applicable pollutants, emission sources for these pollutants, and the magnitude of the local pollutant impacts to be addressed by source type within the community emissions reduction programs. The community emissions reduction program needs to describe the source attribution methodology or methodologies used and explain why each methodology was selected.</li> </ul>	The Blueprint documents do not include sufficient discussion regarding the statutory requirement that emission reductions must be “commensurate with a source’s contribution.” While there is discussion of the need for source attribution the documents do not address how that information should be used for emissions reduction. It is critical that source attribution be employed in every emissions reduction program to ensure sources are only required to reduce emission commensurate with their relative contribution to the community air quality burden.	ARB should include language which links the source attribution work required to be performed by the districts to the specific measures included in the emissions reduction programs. For example, ARB could include the following: “After conducting source attribution as required in the technical assessment, districts should identify the relative contributions from various sources. In selecting emission reduction strategies, no source should be required to reduce emissions beyond their relative contribution.”
C-12	<ul style="list-style-type: none"> <li>• An assessment of compliance with air quality rules and regulations for sources impacting the community, consistent with the enforcement plan.</li> </ul>	It makes no sense that the enforcement assessment be consistent with the enforcement plan, when the assessment should come first and form the basis for the enforcement plan.	ARB should reword this sentence to eliminate confusion regarding how the assessment of compliance leads to an enforcement plan.
C-12	<i>As part of their submittal of the community emissions reduction program to CARB, air districts are to include</i>	ARB is indicating that in some cases assessment of data gaps and actions to fill them would occur <u>after</u> a community has	ARB should include this requirement earlier in the process as part of the initial determination as to whether a

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	<i>documentation of data sources and methods and a discussion of any data gaps, the implications of these data gaps, and potential opportunities to improve technical analysis in the future.</i>	been selected for emissions reduction program development. If there are data gaps that still need to be filled, the community should not be selected in the first instance, as selection for emissions reduction programs requires well-characterized emissions sources.	community should be selected for an emissions reduction program or for a monitoring program.
C-12	<i>Several air districts have already conducted detailed analytical work at the community level and have granular, robust data on community-level emissions and exposure. These high-resolution datasets can support detailed source attribution analysis for strategy development. In other cases, high-resolution data may be unavailable at the community-level, and community emissions reduction program strategies will be focused on broader source categories.</i>	Similar to the comment above, communities should not be selected for emission reductions unless high-resolution data is already available.	ARB should not select communities for emission reductions unless the sources and emission are already "well-characterized". The last sentence should be reworded to indicate that communities without high-resolution data should not be selected as communities for emission reductions.
C-13	<i>Reducing PM2.5 concentrations beyond what the federal or State PM2.5 standard require can deliver additional health benefits. In communities where PM2.5 levels are already at or below the standards, air districts may want to consider establishing targets to further improve PM2.5 levels if doing so would reduce the cumulative exposure burden.</i>	Direction to reduce pollutants below the CAAQS/NAAQS is concerning, especially given statutory direction that this program must focus on overburdened communities. While most overburdened communities will be above the NAAQS for PM2.5 and PM10, that will not always be the case. ARB should not require additional reductions beyond the CAAQS/NAAQS because meeting these standards will likely ensure the community is no longer overburdened.	In the interest of program sustainability, ARB should strike any language from the document, including the referenced sentence, that would allow air districts to establish targets below the NAAQS or CAAQS.
C-14	<i>To establish the emissions reduction targets, community emissions reduction</i>	It is unclear if emissions reduction targets will be set based on the technology	ARB should clarify that while evaluating technology for cost-effectiveness and

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	<i>programs first establish specific, numerical goals for compliance and for the deployment or implementation of control technology and techniques that can deliver emissions reductions for the identified pollutants and associated precursors contributing to the cumulative exposure burden. The community emissions reduction programs will then calculate the emissions reductions associated with the compliance and technology goals to establish emissions reduction targets that ensure steady progress towards meeting the air quality objectives.</i>	desired by the district or based on what is necessary to address a high exposure burden from PM 2.5 and TACs.	feasibility is a critical step, measure selection should not be based on a desire by the district or community to see a specific technology installed.
C-14	<i>The community emissions reduction programs include:</i> <ul style="list-style-type: none"> <li>• <i>Commitments to achieve compliance goals for the identified mobile, stationary, and area-wide sources.</i></li> <li>• <i>Commitments to achieve numerical goals for deploying or implementing available technologies or operational practices that provide the greatest emissions reduction potential for the identified mobile, stationary, and area-wide sources.</i></li> </ul>	Once again it is concerning that ARB discusses control options without also discussing cost-effectiveness and feasibility. Technology should not be required simply because it is available or has the greatest emissions reduction potential.	ARB should modify this statement to stipulate that selected technologies must be cost effective and feasible.
C-14	<i>Ibid</i>	ARB does not clearly describe the difference between a compliance goal and a numerical goal. An emissions reduction program should be tied to the latter. A compliance goal should only be related to compliance with the emissions reduction identified in the program and not all air	ARB should clarify this section to more clearly differentiate between a compliance goal and a numerical goal.



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		quality regulations. For example, compliance with reporting requirements for unrelated regulations has no bearing on the emissions impact in the community.	
C-15	<i>The community emissions reduction program must draw from the Technology Clearinghouse in identifying technologies but may also use other sources.</i>	The description of the technology deployment goals being tied to the BARCT clearinghouse seems like a new interaction between these two requirements. Technology deployment should be tied to actions that achieve the necessary emissions reduction to address the disproportionate burden – not to maximize deployment of control technology for the sake of the technology.	ARB should revise this section to tie technology selection to actions that will achieve the necessary emissions reduction in the selected community.
C-16	<i>To determine proximity-based goals, the community emissions reduction program will:</i> <ul style="list-style-type: none"> <li>• <i>Identify the sensitive receptor locations that are exposed to elevated levels of air pollution because of their proximity to emissions sources.</i></li> </ul>	Proximity alone is not a sufficient basis for establishing emissions reduction goals or for deploying or implementing exposure reduction measures at particular sources, especially if the risk to the sensitive receptors is driven by other sources.	ARB should include an additional bullet(s) in this section stipulating that proximity-based goals should be tied to air quality modeling/monitoring and robust source attribution.
C-17	<i>The scope of strategies included in each community emissions reduction program will be informed by the technical assessment and the types of sources contributing to elevated pollution levels and the nature of the goals and targets.</i>	ARB is missing a critical step in the process for establishing emissions reduction strategies. Strategies need to be based on the source attribution to ensure they reduce emissions commensurate with source contribution.	ARB should include a discussion in this paragraph describing how source attribution results should be used in establishing emissions reduction strategies commensurate with a source's contribution to the overall emission burden.
C-18	<i>Statute requires that any air district in nonattainment for at least one criteria air pollutant adopt an expedited BARCT implementation schedule for certain</i>	WSPA agrees that ARB and the districts should consider the BARCT implementation requirement and impacts from other rules on facilities operating in	N/A

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	<i>industrial sources. The community emissions reduction programs must identify which sources in the community will be subject to these requirements and ensure deployment of BARCT measures as applicable within the community.</i>	communities subject to emissions reduction programs. We are concerned, however, that requirements to consider certain other measures, such as activity limits and indirect source regulations have the potential to chill economic growth in emissions reduction program communities.	
C-19	<i>Review facility risk reduction audits for selected facilities and identify and list facilities that will be required to update their emissions reduction plans – Statute requires an assessment of which facilities' risk reduction audits and emission reduction plans an air district should review and update and authorizes air districts to reopen existing plans to strengthen them as appropriate. In the technical assessment, air districts will have identified the major sources contributing to health risk in the community.</i>	This section seems to focus only on those facilities that trigger HRAs under district regulations, despite the fact that the health risk may be driven by other sources. In order to reduce health risks to acceptable levels, all risk-driving sources must be identified and controlled.	ARB should stipulate that health risk evaluations will not be limited just to those sources subject to district risk reduction audit and plan requirements.
C-20	<i>• Identify and include near-term enforcement strategies to improve compliance with existing rules – Identify any non-compliance issues within the community and include near-term enforcement strategies. Enforcement of rules and regulations is critical to ensuring that CARB and air district policies achieve the anticipated benefits. Increased enforcement of existing rules and regulations can be implemented without requiring new regulatory processes,</i>	Enforcement strategies should be based on a clear and documented lack of compliance with a given rule or regulation instead of a community or air district "hunch" that there is potential non-compliance.	ARB should adjust this language to better reflect the 3-year enforcement history evaluation in the enforcement plan (C-26). This will ensure that the enforcement strategy is based on a documented lack of compliance with a specific rule or regulation.

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	<i>presenting an opportunity to rapidly address community concerns and quickly deliver emissions reductions.</i>		
C-21, C-40	<i>o Processes to terminate existing incompatible land uses within selected communities.</i>	WSPA is extremely concerned with the precedent this might set in seizing property rights from owners who are operating facilities in compliance with all applicable laws and regulations. It is also important to note that often the facility existed at the location prior to the sensitive receptor and should not be forced to shut down simply because the local land use authority allowed sensitive uses to encroach on the facility.	ARB should remove this bullet from the list.
C-24	<i>After assessing and selecting new strategies, development of an implementation schedule for those strategies is next.</i>	Understanding the implementation schedule for a given strategy is critical to understanding its cost-effectiveness and feasibility.	ARB should require that potential implementation schedules be analyzed earlier in the process before specific strategies are selected.
C-24-C28	<i>Enforcement Plan</i>	While WSPA appreciates the delineation of enforcement roles at C-25, the whole enforcement plan section goes well beyond enforcing new requirements imposed in the emissions reduction programs and enlists the community in ways that will be combative and detrimental to business.	ARB should limit the enforcement plan to the requirements established in the emissions reduction program.
C-29	<ul style="list-style-type: none"> <li>• <i>Additional enforcement activities such as:</i> <ul style="list-style-type: none"> <li><i>o Inspections conducted including type, date, and location.</i></li> <li><i>o Notices of violations issued including date, recipient, and regulation cited.</i></li> <li><i>o Number of complaints received by type and their resolution.</i></li> </ul> </li> </ul>	Using the <b>number</b> of Notices of Violation issued as an annual implementation metric is inappropriate. This approach could lead to pressure on the air district to issue NOV in situations where an NOV is not warranted. These metrics should be compliance-oriented, not punitive in nature.	ARB should clarify this section such that any metrics for NOV do not encourage air districts or ARB to increase the number of NOV issued. A more appropriate metric might be the percentage of NOV resolved or the average time to resolution for NOV.

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	<i>o Any additional compliance metrics relevant to enforcement issues in the community.</i>		
C-31	<i>CARB and the air districts are required to comply with CEQA insofar as activities required by statute are projects subject to CEQA. In its development and approval of a community emissions reduction program, air districts (as CEQA lead agencies) will need to determine the appropriate CEQA analysis required and consult with CARB. For every project that is not exempt, CEQA requires the appropriate level of environmental review be conducted before that project may be considered for approval.</i>	The CEQA analysis for emissions reduction programs (C-31) must not be done in a piecemeal fashion. The approach taken by the Bay Area AQMD for the suite of rules to implement its Refinery Emissions Reductions Strategy – separate CEQA analysis of individual rules that are part of a comprehensive regulatory package – diminishes the actual economic impact of the full suite of measures. This approach subverts the intent of CEQA analysis and is an example that should not be replicated in future programs.	Any regulations developed pursuant to AB 617 emissions reduction programs must be grouped together for purposes of CEQA analysis to ensure a more accurate identification and evaluation of the true environmental and economic impacts.
C-33	<i>Annual Progress Reports</i>	There should be an opportunity for public comment on the annual report ahead of the ARB Board meeting.	ARB should include this step as a requirement in the annual report process.
C-34	<i>o Characterized health-related benefits of any strategies under development or implemented.</i>	Including a characterization of the health benefits associated with strategies under development or implemented will only serve to further blur the lines between health indicators and AB 617 air quality indicators. Requiring this as part of the annual report, especially when health impacts from reducing air pollution will often be many years into the future, will further serve to confuse the public.	ARB should remove this bullet from the list.
C-35	<i>• Planned changes based on progress to-date – In developing the annual progress report, the air districts will identify any programmatic changes based on progress to-date. This could include any number of</i>	Air districts should not be able to change the community emissions reduction program in the annual report without first gaining approval from the district Board. This would be similar to what is required	ARB should clarify that air districts need to gain approval from their Boards prior to requesting changes in their annual reports to ARB. ARB should also commit to bringing those changes before the ARB

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	<i>modifications such as updating implementation schedules based on new data analysis, revising public outreach, or pursuing new enforcement activities. The annual progress report will identify if an update is needed to address any additional issues with implementation. This includes identification of how any updates will still ensure the emissions reduction targets will be achieved.</i>	upon initial development of the program. Similarly, ARB's Board should be required to approve any changes to the requirements in a community emissions reduction program.	Board for approval.
C-36	<b>VI. CHECKLIST FOR COMMUNITY EMISSIONS REDUCTION PROGRAM EVALUATION</b>	The section on community emission reduction plans contains no requirement or clear criteria for completing and sunseting community emissions reduction programs. Absent this feature, communities will continue to push for further reductions even when all of the emissions reduction program actions are completed.	ARB should add a subsection describing what is required to complete a community emission reduction plan.
C-36	<b>VI. CHECKLIST FOR COMMUNITY EMISSIONS REDUCTION PROGRAM EVALUATION</b>  <b>III. CHECKLIST FOR COMMUNITY AIR MONITORING EVALUATION</b>	WSPA supports the extensive checklists and clear requirements for both monitoring and emissions reduction programs to ensure fairness, transparency, and that corners are not cut in the implementation process. This detail will ensure that programs are well thought out and that critical elements can be easily are verified by ARB.	N/A
C-38	• <i>The share of pollution contributed by sources within the community, as well as the portion driven by regional or background pollution.</i>	WSPA supports the assessment of emissions coming from regional background. This is a critical element of community profiles. As AB 617 is focused on local sources of emissions, it will be important for districts to understand the	N/A

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		background levels for regional pollutants (especially PM2.5 and PM10) so that sources are not overly-controlled when emissions are actually coming from outside the local community.	
C-38	<i>For the mobile, stationary, and area-wide sources of applicable criteria air pollutants and toxic air contaminants impacting the community, specify:</i>	WSPA supports the inclusion of area sources (wood burning, cleaning products, etc.) in emissions reduction programs. Depending on the local meteorology and community makeup, area sources can be significant contributors to overall emissions.	Districts must address area sources as part of a community profile and assessment.
D-4, D-6, D-7	<i>“Some of the strategies focused on reducing climate pollutants will also provide opportunities to reduce criteria air pollutants and toxic air contaminants”.</i>	The Post-2020 Cap and Trade program is included at the end of the Table 6. It seems unlikely that this measure, which is intended to influence reductions of global greenhouse gas emissions, will contribute meaningfully to community-level PM 2.5 and TAC emissions reductions.	N/A
D-12	<i>Prior to adopting the schedule, the air district must hold a public meeting and take into account: (1) the local public health and clean air benefits to the surrounding community; (2) the cost-effectiveness of each control option; and (3) the air quality and attainment benefits of each control option.</i>	Assessment of regional air quality and attainment benefits of potential control options are beyond the scope of AB 617.	ARB should revise the third criterion to focus on the air quality benefits to the selected community.
E-4	<b>II. COMMUNITY AIR MONITORING PLAN ELEMENTS AND REQUIRED CRITERIA</b>	There is a need for an educational component in every monitoring program to ensure proper interpretation and use of the data generated by the program. Data accessibility without context will lead to misinterpretation and misdirected	ARB should include a requirement for air districts to develop an educational component in every monitoring program to ensure monitoring data is properly interpreted and properly used to inform future community program decisions.

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		actions. ARB and the districts need to educate community members on what are expected to be very complex monitoring campaigns.	
E-6	<i>For example, in some communities residents may take an active role in leading or conducting air monitoring while in other communities residents may be involved in selecting monitoring locations with air monitoring conducted by air district staff.</i>	While there may be a role for community residents to conduct air monitoring for screening purposes, air districts should not delegate any monitoring linked to emissions reduction, source attribution or enforcement.	ARB should clarify that air districts are responsible for conducting or directly overseeing any monitoring linked to emission reduction programs or source attribution work.
E-7	<i>Defining the quality of data that is needed for the proposed actions supports the selection of methods and equipment that are capable of producing data of appropriate quality.</i>	WSPA supports the idea that ARB identify appropriate uses for various monitoring technologies but is concerned that ARB is largely relegating this information to the online Resource Center.	Given the potential applications ARB envisions for various monitoring technologies, and the considerable emphasis placed on emerging and low-cost technologies, the Blueprint documents should include additional discussion of appropriate applications.
E-11	Methods and equipment must be capable of meeting the data quality objectives defined in the "Define Data Quality Objectives" section above.	WSPA supports the criteria listed in the previous section and the requirement that monitoring must meet defined data quality objectives. Data quality indicators should be aligned with the goals of the community monitoring program.	N/A
E-20	<i>To address this requirement, a data portal will be available on CARB's webpage, which will allow reporting of both real-time preliminary data and validated final data.</i>	WSPA supports the idea of posting both preliminary data and validated final data in separate locations. We remain concerned however, that preliminary data could cause confusion and be misunderstood by the public.	ARB should ensure that preliminary data is presented with appropriate context to prevent confusion and misinterpretation.
F-13	<i>It will be a useful tool to identify the best control technologies, rules, and measures for use in controlling emissions and will foster continued technology advancement</i>	By placing next generation technologies into the clearinghouse, ARB is creating an unreasonable expectation that those technologies are going to be installed	ARB should separate all forward-looking or next generation technologies in the Technology Clearinghouse from technologies that are cost-effective and

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	<i>by highlighting next generation technologies.</i>	when often they will be cost-ineffective or infeasible. This expectation will lead to confusion and frustration among communities when these technologies are not selected in emission reduction programs or future rulemakings.	achieved in practice.
F-13	<i>Prior to issuing a permit, air districts confirm that the facility and all emitting equipment are in compliance with applicable rules and regulations. Permit limits are usually updated every time a facility installs new equipment or modifies their existing equipment.</i>	This statement is a mischaracterization of the air quality permitting process and gives the impression that all equipment and limits are updated each time the permit is updated. This will only serve to confuse the public as new permits only change limits for new or modified equipment.	ARB should revise the sentence to provide needed clarity around the extent and nature of changes during a permit modification.
F-14	<i>Air districts determine the best-achievable emissions limit for each class and category of source over these emissions thresholds based on the cleanest technology available at that time (this is BACT).</i>	This is a mischaracterization of BACT which will only serve to confuse communities. BACT requires an assessment of feasibility and is not simply the selection of the cleanest technology.	ARB should revise the sentence to accurately describe what is required as part of a BACT review. Specifically, this should include the assessment of feasibility which also includes costs.
F-24	<b>ASSESS CURRENT AIR MONITORING TECHNOLOGIES AND PROVIDE INFORMATION</b>	ARB previously offered its initial thoughts to the AB 617 Consultation Group on how it would categorize the uses of various monitoring technologies.	ARB should propose this approach as part of the Blueprint so that stakeholders have an opportunity to comment on the criteria and thresholds for appropriate use of various monitoring technologies.
F-27	<b>EXPLORE COMMUNITY HEALTH INDICATORS...</b>  <i>Implementing Agency: CARB</i>	ARB is stating its intention to be the implementing agency for additional work to explore community health indicators.	ARB should leave this work to public health agencies. Having ARB lead this effort will only serve to further confuse the public about the scope of AB 617.