

i vote Yes to approve the CAMP and the map for air monitoring placement as indicated on pg 15.

I would like to hear of any concerns that other CSC voters might have. Maybe you could compile and email to the group.

Thanks

Margo Praus

From: Margo Praus <margopraus@msn.com>

Sent: Sunday, November 1, 2020 1:06 PM

To: AB 617 <AB617@valleyair.org>

Subject: Fw: Reminder: Stockton AB 617 CSC: Community Air Monitoring Plan feedback due Nov. 5

I'm not sure what kinds of comments you are asking for. Here are my impressions:

I don't see info about fugitive dust which has come up in our other discussions. Is it something that could be part of air monitoring?

Are there any updates on a location for the main stable air monitor that is currently at Hazelton? pg 21 still indicates the proposed stable location around University Park area.

I would like an update on the various possible monitoring locations for the network.

Might the CSC assist in some way with contacting possibilities for placement? Are there any difficulties the District is having?

Also a brief report on how the decision for Agilaire's software and monitoring systems came about. What other software possibilities were considered?

Has this system had any concerns where it has been used before?

The Appendix A maps for disease indicators all seem to be at least 7 years old. Is there more up to date info?

~Margo Praus

NED LEIBA

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November 5, 2020

San Joaquin Valley Air Pollution Control District (The District)
Stockton AB 617 Steering Committee (Steering Committee)
Stockton, California.

RE: Community Air Monitoring Plan October 22, 2020 Draft.

Dear District and Steering Committee:

I have several concerns about the draft Community Air Monitoring Plan (CAMP) published on October 22, 2020. I believe the plan should be refocused to ensure that meaningful data is captured relevant to health effects of air pollution. We should focus specifically on air pollution that may relate to the incidence and severity of childhood asthma in the Stockton AB 617 area.

In our Stockton AB 617 project area, there is a very significant incidence of childhood and adult asthma. That should be the focus of community air monitoring and indeed our incentive plans. Our programs should be designed to address this serious health problem.

While there has been a dramatic decrease over the last 40 years in criteria air pollution, the incidence of asthma has increased dramatically. We both need to (1) learn why there has been an increase in asthma, probably due to some types of air pollution, and (2) we should take steps to reduce the adverse health effects of asthma in our Stockton AB 617 area.

Air monitoring devices should be established in closely located pairs to measure (1) outside air quality and (2) inside air quality. We need monitors inside structures where people reside, work and study.

As a practical matter, I believe the air monitoring plan should have such paired outdoor and indoor monitors associated with the following schools:

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Washington
St. George
Edison
Hazelton
Spanos
Huerta

The draft CAMP makes no provision for indoor air monitors. Many of the proposed outdoor air monitors can be associated with the above schools, especially the trailer designated for Washington School.

We should seek to learn the relationship between outside and indoor air pollution, and the relationship to childhood asthma. The District indicated it wanted to facilitate health studies for our area that would involve randomized controlled tests of the effect of various pollutants and remedial measures. I believe such tests should include the effect of advanced air filtration systems in some of the schools. Advanced air filtration systems are a highly ranked AB 617 incentive program, and accordingly, the CAMP should provide for monitors that help measure the benefits from the air filtration systems.

We need to have monitors that register the amount of PM0.1, the ultrafine particles. The recent PM2.5 State Implementation Plan (SIP), Chapter 3 on Health Effects, included the following statement:

Elevated exposure to freshly emitted PM0.1 is a critical health risk factor that often does not correspond to ambient PM2.5 concentrations at local monitors. (Page 3-18)

The SIP Chapter 3 explained that a majority of the PM2.5 mass consists of low or none toxic constituents. Accordingly, the individual species of PM2.5 must be detected and reported by advanced monitoring devices. We want to know the potentially toxic constituent such as organic carbon and elemental carbon (Black Carbon). It does not seem the draft CAMP provides for such monitoring of PM0.1 and I cannot determine if the potentially toxic components of PM2.5 will be separately detected and reported.

Based on a number of CARB published research studies, the relationship between various pollutants and the incidence of asthma is unknown. I am hopeful that something like the Fresno Asthmatic Children's Environment Study (F.A.C.E.S.) can be

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undertaken in the Stockton AB 617 area. This CARB sponsored study contained the following goals:

Among the pollutants that have received the most attention in recent years is particulate matter (PM). However, there is a paucity of data on which components of the complex PM mixture produce these effects and no data on the relationship between the responses to short-term-exposures and the long-term progression of asthma in children. Furthermore, few studies have specifically looked at the effects of PM in the context of the complex exposures people experience outdoors and indoors - exposures that include not only other pollutants, but biologically active agents such as endotoxin, fungal spores, pollens, and common indoor allergens.

The conclusions from this very large study included the following:

To date, the results of the analyses of exposures to PM_{2.5} and lung function have not demonstrated an association.

We need to focus on resolving unknowns about air pollution and childhood asthma. And we need proper monitors, outdoor and indoor, to help solve that mystery.

My other profound concern is a lack of cost information and a lack of cost benefit analysis. We were told at the AB 617 meeting yesterday, I believe for the first time, that the budget for implementation measures is about \$12 million and that includes air monitoring equipment costs. We need to know the specific costs of the various proposed air monitoring equipment; the cost to operate and maintain those devices. And we need to know the cost to remove, if necessary, those devices once studies are completed.

Members of our steering committee have requested, over and over again, information about budgets, costs and benefits. Those requests extend to the monitoring devices as well as other implementation and incentive strategies. We have received precious little information in response. How can we make rational recommendations without detailed budget, cost and benefit information?

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Our AB 617 Committee has faced extraordinary difficulties because of the Covid 19 situation. We had to conduct meetings by Zoom. We need more structure and we need to use subcommittees to work through some of the details of the CAMP, the other implementation strategies and the incentive proposals. We cannot work efficiently with such a large group as our steering committee. We need subcommittees.

I look forward to receiving cogent, responsive answers to the concerns and questions I have raised. Until those questions are addressed, I will not vote to recommend acceptance of the October 22, 2020 CAMP.

Sincerely,

Ned Leiba

20.1105 NL letter SJVAPCD CARB Oct 22.2020.wpd

(From CSC Member - Gov: Ann Rogan)

Hi AB 617 team

Below is our feedback on the Stockton Community Air Monitoring Plan (CAMP). Please let us know if anything is unclear.

Would like to understand the process for reviewing feedback and addressing open questions within the CSC before voting on it. Is that happening online, on the next call, etc?

- Will the data collected in the CAMP be correlated to hospitalization rates? (or relevant proxy healthcare data). Recommend alignment that CAMP is aligned to stricter air quality standards (ie, the World Health Organization's ambient outdoor air quality standards). Referenced here: <https://www.who.int/news-room/fact-sheets/detail/ambient-%28outdoor%29-air-quality-and-health>
- We noticed that black carbon (a short-lived climate pollutant) is being captured in the proposed system. What types of black carbon are being captured - elemental and combustion? In what concentrations? What proportion of funding is being used to monitor black carbon?
- What would it take to monitor the other short-lived climate pollutants, like methane, tropospheric ozone and fluorinated gases?
- For the current pollutants mentioned (PM 2.5, ozone, black carbon, carbon monoxide, VOCs, nitrogen oxides, BTEX, hydrogen sulfide, toxic air contaminants), where is there any mention of the health effects associated with ambient exposure to each of these pollutants?
- Has the CSC considered implementation structures where parts of the CAMP are operated or monitored by community-based organizations?
- This document requires clarity and definition around a governance structure for current and future decision making pertaining to the CAMP. If a governing charter exists for 617 work, this should be linked to that. Is that available for review?
- In the current proposal, it appears as though a vendor has been identified. Would recommend greater transparency around the procurement process - and whether it's intended to be competitive? If not, why? That may have implications for cost-effectiveness.
- For any future vendor selection, who are the responsible parties for making vendor decisions around hardware procurement and associated activities?
- Based on the CSC conversations to date, have they outlined a preference as to whether they would prefer data to be community-owned vs community-accessible?
- Based on their SJ Air map, can the Central California Asthma Collaborative present their map and work to the CSC, to identify potential for collaboration in the CAMP? Need additional on the CCAC deployment strategy for Stockton.
- What are the local workforce opportunities available through the CAMP system? Seems like there should be more of an emphasis here, given the potential to increase community engagement through the process and within the project boundary area.
- We did not see mention of how the CAMP data will inform the future prioritization of CERP strategies. The CSC should ideally be able to shift prioritization of CERP based on real-time CAMP data that is gathered (because this relates to decision-making, this point links to governance structure).

- There seems to be a budget missing from the CAMP proposal around the allocations for specific categories.

Jonathan Pruitt

Environmental Justice Program Coordinator

Catholic Charities Diocese of Stockton

November 6th, 2020

San Joaquin Valley Air Pollution Control District (Valley Air District)

Stockton AB 617 Steering Committee (Steering Committee)

To Valley Air District and Steering Committee:

First, I want to say that it has been extremely difficult to be on top of all of these documents and plans. For residents and EJ advocates to come up with an informed decision on these things, it's important to look at what other AB 617 communities are doing. To not have a presentation or two on other AB 617 communities' Community Air Monitoring Plan (CAMP) and Community Emission Reduction Programs (CERPs), I took it upon myself to cross reference key ideas that are representative to the Stockton community. Unfortunately, reading through three CAMPs took way long than it should have and would've been easier if Valley Air District provided those things. Due to the fact that we have not been shared CAMPs from other AB 617 communities, we are not ready to vote on this Community Air Monitoring Plan by November 18th, 2020.

My second concern about the draft CAMP is the fact that it still feels to me like a top-down approach. The community investment in this plan isn't fully there and needs to be addressed. When comparing to Richmond's CAMP, they have a robust plan that includes community ownership and training. I understand they have more capacity with community partners helping with their own air monitoring and community engagement but I feel Stockton's CAMP could supplement some aspects to that. Due to the Stockton steering committee not provided the chance to hear about Richmond's CAMP, the steering committee wouldn't have imagined opportunities like community trainings, workforce development, and citizen science. It is cases like this where I feel the residents and community-based organizations are not given all the options that are out there.

I want to echo Neb Leiba's comment on looking to pair indoor and outdoor air monitors in schools. The following schools are perfect examples because they are either near a stationary pollution source or a mobile pollution source (i.e. highways and freeways):

- Washington Elementary
- St. George Parish School
- Edison High School
- Spanos Elementary School
- King Elementary School
- Huerta Elementary School

XIV. COMMUNICATE RESULTS TO SUPPORT ACTION

All collected preliminary and final data will be summarized and shared by the District through the following platforms:

- **District's website:** hourly for continuous data, quarterly for laboratory data
- **CARB's AQview portal:** hourly for continuous data
- **Community Steering Committee meetings:** Quarterly, or as requested by committee
- **Annual report:** Final, quality assured data published on District website

District staff will also share final monitoring results with community residents upon completion of the monitoring campaign.

Lastly, when looking at *XIV. Communicate Results to Support Action*, there are a few things I'd like to recommend to be added: 1) Is there another way to share the real time data that doesn't just involve going through a website? Is it possible that we can utilize the RAAN app and include the data from the different monitoring sites from there? This could potentially help residents have a one stop app to get all information instead of having to remember going to a website. It would also be helpful for residents to be able to view air quality data that is from a monitor close to them. 2) Including: "Shared to the public through social media, e-blasts, press releases, etc.". 3) Look to find ways for City of Stockton, SJCOG, and San Joaquin County to share this data too through their social medias/websites. 4) Distribution of multilingual factsheets. 5) Training sessions familiarizing steering committee members with reports. 6) Looking at coordinating with other non-Valley Air District monitoring initiatives to ingest their data into reports. 7) Looking at community workshops for the public to attend virtually or in-person (subject to state guidelines). We can look to providing a workshop every four months and a bigger Summit once every year.

I look forward to seeing how we can work to bring these recommendations in the draft CAMP.

Thank you,

Jonathan Pruitt

Environmental Justice Program Coordinator

Catholic Charities Diocese of Stockton

Stockton Steering Committee Member

(From CSC Member - Resident: Nate Knodt)

To Chay and all Air District and CARB Staff:

This monitoring plan appears to be detailed, accurate, and an excellent reflection of the comments made by community participants at the meetings that I participated in. I like the Monitoring Location Map and have no suggestions, revisions or comments to provide you. I like the report and the map as they are described and displayed in this report.

Thank you.

(From CSC Member- EJ/Alternate: Cynthia Pinto-Cabrera)

Comments:

- Overall the plan has some great components, however, the execution, the timeline, and the participation of the CSC remain very vague and unclear. Since this air monitoring network is indented to community-driven, more clarity on the role that the CSC will be playing is needed. This should include the process for moving monitors, the process for presenting information to the CSC, as well as the notification process for the community.
- **Section VIII.** Monitoring methods and equipment. "Community air monitoring network will be re-evaluated on a regular basis to determine changes needed"
 - What does consultation with the CSC look like? Will, there be a subcommittee to assist the running, if so will they received adequate training for this equipment? Can the CSC determine the re-evaluation schedule and process?
- **Section X:** Data Management. Data Review and Flagging process
 - I initially believed this section was for flagging violations for community members. While I do think it is important to flag readings due to malfunctions to ensure proper data. I believe it will also be important to add a section for flagging violations for CSC members and the Stockton Community. This section should include a timely procedure for notifying residents of any violations captured by the air monitors being used for this CAMP as well as a clear indication of what pollutants are being flagged.
- **Port Monitor:** The near Port monitor has the potential to not capture or only partly capture the port emissions based on the wind patterns. The Edison high and Dorado monitors might capture some of the port emissions but how can we guarantee port emissions are captured? I would point to the Port of LA that has 3 monitors, 1) community-facing, 2) source determined station 3)coastal bounty station.