

Heather Heinks

Subject: FW: Draft CERP - Stockton
Attachments: annotated draft-stockton-cerp_02032021.pdf

From: FLORENCE QUILANTANG <fqulantang@comcast.net>
Sent: Tuesday, February 9, 2021 4:01 PM
To: Heather Heinks <Heather.Heinks@valleyair.org>
Subject: Re: Draft CERP - Stockton

Hi, Heather. My first read through was for comprehension and clarity. I had to learn how to annotate the PDF directly without converting it first to a Word doc. Fortunately I succeeded. See attached edited draft. -f

On 02/03/2021 7:21 PM Heather Heinks <heather.heinks@valleyair.org> wrote:

Good evening Stockton Steering Committee Members,

As discussed tonight, the [Draft Stockton CERP](#) is now available on the Stockton AB 617 Community page.

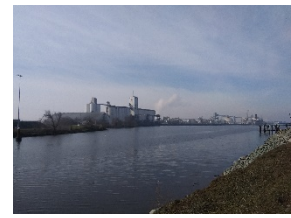
Heather E. Heinks

Outreach and Communications Manager

San Joaquin Valley Air Pollution Control District

1990 E. Gettysburg Avenue | Fresno, CA 93726

TO: Stockton AB617 via ab617@valleyair.org
From: Mary Elizabeth, Resident Steering Committee Member
Date: 2.14.2021
RE: February 3, 2021 Community Emissions Reduction Program



Thank you for your efforts to characterize the community emission reduction planned program. I have italicized my comments to distinguish from referenced text.

Page 1 “and other first-of-their kind measures.”

What other first of their kind measure – no other mention found in document. Evidence is needed if included in the Executive Summary.

Page 1 “Emissions from stationary sources have been reduced by 85%, cancer risk from exposure to air pollutants has been reduced by 95%, population exposure to elevated PM2.5 levels have been reduced by 85%, and population exposure to elevated ozone levels have been reduced by 90%.”

Is this reduction since 1992?

Page 2” These efforts are projected to achieve approximately XXX tons of PM2.5 reductions and XXX tons of NOx reductions as well as significant reductions in air toxics emissions in the community, particularly with respect to diesel particulate matter from mobile sources, the main contributor to community air toxics health risk.”

According to the 2019 analysis¹ of the SJVAPCD 2016 Ozone Plan relating to winery operations, modelling demonstrated that the Valley is a NOx-limited regime meaning the resultant ozone concentrations relate more strongly to NOx than VOC concentrations. I am confused by the statement on page 10 that ozone and related precursors have not been addressed as a part of the CERP development, when NOx is thought to be the primary precursor needed for ozone production in the troposphere.

Page 6 *Need a table of appendices which can be linked if in separate documents. Also a listing of abbreviations used would be helpful.*

Page 8 “various other socioeconomic indicators.”

A summary paragraph of these socioeconomic indicators is needed to contextual the challenges that face community members and that clearly demonstrates the need for technical and regulatory assistance during implementation. A process that builds community capacity yields sustainability.

Page 8 “In accordance with the community-driven nature of AB 617 directives, in September of 2019 the District Governing Board directed staff to immediately convene a CSC committee under a set of guiding principles. The CSC is comprised of residents, businesses, non-governmental organizations, and public agencies, working together to craft and develop a community air monitoring plan and a Community Emissions Reduction Program (CERP).”

The first meeting of the CSC committee was March 2020 as stated elsewhere. Perhaps the immediate response involved pre-planning with organizations. Please list those organizations that assisted the SJVAPCD staff with an immediate response. Please provide a link to the District Governing Board record when this directive occurred.

¹ [Rule-4694-Analysis-Summary.pdf \(valleyair.org\)](#)

Page 9-10 “The U.S. Environmental Protection Agency and the State of California have established ambient air quality standards, which set health-protective levels for the following criteria pollutants: ozone, particulate matter with a diameter of 10 microns or smaller (PM10), particulate matter with a diameter of 2.5 microns or smaller (PM2.5), carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead. California also has standards for sulfates, vinyl chloride, and hydrogen sulfide. Due to the region’s topography and meteorology, the Valley is classified as Serious nonattainment for the federal PM2.5 standards, and Extreme nonattainment for federal ozone standards.”

Where does the AB617 area rank for these standards?

Page 10 “PM2.5 can be inhaled more deeply into the gas exchange tissues of the lungs, where it can be absorbed into the bloodstream and carried to other parts of the body.”

Please consider a clarification: PM2.5 is smaller than PM10 and can move deeper into the gas exchange tissues of lungs where PM2.5 can be absorbed into the bloodstream and carried to other parts of the body. Inhaling deeply is healing when inhaling air free of anthropogenic pollutants.

Outreach

Page 12 *Organize chronologically. Thank you for the link to virtual tour. I am not aware of a specific City of Stockton presentation, but one is needed to describe City’s planning activities including VMT analysis and implementation. Please add a link for the recorded CSC meetings: [Steering Committee Meetings / Valley Air District](#).*

Page 17 *List of members require updating.*

Page 18. *Through March 2020: delete the “s” on meetings as only one monthly meeting occurred.*

Page 24 *As the City of Stockton has agreed to coordinate the TCC program efforts and the AB617 program, it would be great to have a map of the TCC planning boundary, and a link to the City’s TCC information.*

Page 25 “District staff and CSC members also attended and often made presentations at city and county government meetings, the District’s Environmental Justice Advisory Group meetings, the District’s Citizens Advisory Committee meetings, the District’s Governing Board meetings, environmental justice meetings, and industry professional group meetings to promote participation in the development of the CERP and once completed the implementation of the CERP.”

As you all have often made presentations at city and county government meetings, please consider at the earliest possible time that you also make a presentation to the Port of Stockton Commissioners. Are these presentations summarized someplace and available to the public?

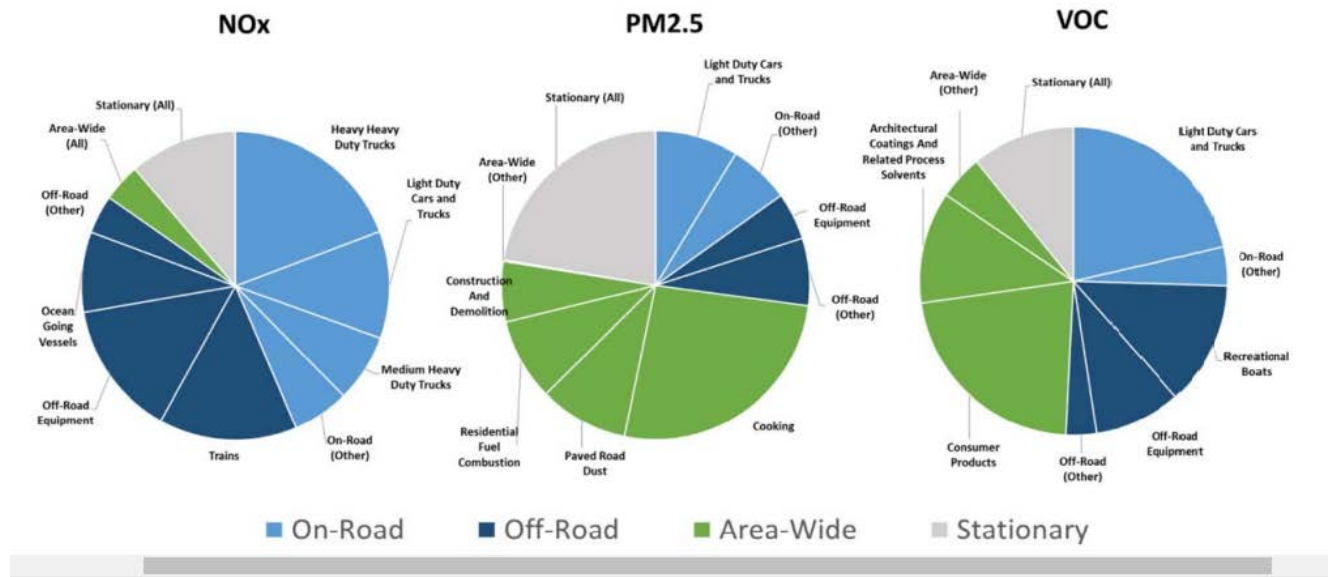
Particulate Matter and Emissions

Page 27 “This community also ranked highest in PM2.5 impacts, and second highest in diesel PM exposure, compared to all other disadvantaged communities in the northern District counties. Specifically, the average overall CES score, PM2.5 exposure, and pollution burden values are all above the 90th percentile. Additionally, most of the community is within the “Rise Stockton” Transformative Climate Community boundary, which allows the District and community to leverage resources to maximize benefits under AB 617.

The majority of emissions impacting the Stockton AB 617 Community come from passenger vehicle and heavy-duty truck emissions from major freeways, interchanges, and main regional roads that run through the community.”

The northern area of the SJVAPCD includes the counties of San Joaquin, Stanislaus, and Merced. Again, the reference to TCC boundary which I have seen in documents encompassing different areas. Please provide a map of the TCC Stockton boundary in the current awarded grant. The statement that the majority of emission are from vehicles is somewhat oversimplified according to the emissions summaries provided in outreach materials in Appendix A.

Emissions Source Summary



Please note that the source proportions for PM2.5 shown in the outreach does not seem to match up with Figure 3.5 which was developed by CARB and the SJVAPCD and which has almost 20% attributed to other sources. The SJVAPCD working with stationary source facilities determined the PM2.5 attributable to stationary source facilities constituted only 13.2% significantly less than the 25.6% due to cooking, including charbroiling. CARB worked with agencies such as Caltrans, DMV, the Port and California Energy Commission to estimate community level mobile and local sources identified in Table 3-2 (included below).

Page 28 “Based on District air quality analysis modeling, the Stockton AB 617 Community was found to have exceeded the 24-hour average PM2.5 concentration prioritization factor levels of 12, 35, 55, and 65 $\mu\text{g}/\text{m}^3$ a total of 120, 18, 4, and 3 days, annually, on average during the 2017-2019 period, respectively. In addition, this community was found to have exceeded the 8-hour average ozone concentration prioritization factor levels of 70, 75, and 84 ppb a total of 15, 7, and 1 days, annually, on average during the 2017-2019 period, respectively.”

I looked through the referenced Appendix G and did not find information about this referenced prioritization factor. Please provide a brief explanation of the prioritization factor. Also in Appendix G was a statement that PM2.5 in Stockton would be regularly speciated. Is it possible with the existing CARB monitor at the SJC Hazelton Health Complex to obtain speciated data? Figure 3-7 and 3-8 included speciation of PM2.5 are these values estimates from the inventory?

According to the SJVAPCD adopted particulate matter plan²

“While the bulk of the Valley’s remaining emissions come from mobile sources outside of the District’s regulatory authority, under the federal Clean Air Act (CAA), the responsibility to bring the region into attainment with the federal standards rests with the local air district. Given the enormity of the reductions needed for attainment, mobile sources, particularly in the goods movement sector, must transition to zero or near-zero emission levels through the implementation of transformative measures.”

“The Valley’s peak 24- hour design value has decreased by over 43% over the 1999–2017 period, while the peak annual design value has decreased by 30% over the same period. Because NOx is a significant PM2.5 precursor and the Valley is NOx-limited, the District relies heavily on NOx emissions to reduce PM2.5 emissions.”

How much NOx emissions contribute to PM2.5 seems in part to be related to ammonia which is commonly associated with agricultural operations. Whether Stockton’s PM2.5 is due to NOx emission, organic carbon, or elemental carbon will be better determined after Stockton specific speciation results are available.

Page 33 The largest sources of PM2.5 emissions in Stockton AB 617 Community are cooking and on-road mobile vehicles (light and medium-duty vehicles and heavy-duty diesel trucks). Road dust, stationary fuel sources, construction & demolition, and residential wood burning are also significant sources of PM2.5 in the community. Other sources *include* aircraft, trains, ocean going vessels, commercial harbor craft, recreational boats, off-road recreational equipment, off-road equipment, fuel storage and handling.

Page 133 states that **Commercial Cooking Suggested Control Measure** – This strategy consists of a two-phase process to evaluate California’s current emission reduction requirements for commercial cooking operations that prepare food for human consumption, and if necessary, make improvements to achieve additional reductions in particulate matter 10 microns or less in diameter (PM10), particulate matter 2.5 microns or less in diameter (PM2.5) and volatile organic compound emissions that contribute to ozone formation.

The elimination of the SJVAPCD cooking study was a surprise to me during a January 2021 meeting. Cooking smoke pollution was discussed by Community Steering Committee and was identified as a problem that required mitigation, particularly the intense smoke due barbequing on South El Dorado Street. Within the last couple of weeks, I had occasion to drive north on South El Dorado Street and observed myself the dense smoke plumes. I somehow missed the explanation that the SJVAPCD was stepping back from their consideration and study to allow CARB to implement the Commercial Cooking Suggested Control Measure. Thank you for the reference link. Evidently, CARB began development in 2020 and in the first phase will conduct an assessments of existing air district commercial cooking rules and availability of emission control devices or methods to reduce PM10, PM2.5, and VOCs. Since cooking has been identified as the greatest source of PM2.5 in the Stockton AB617 area (26.4% according to Figure 3-5) it is critical that we obtain a status report from CARB on their efforts to evaluate this issue.

² [2018-Plan-for-the-1997-2006-and-2012-PM2.5-Standards.pdf \(valleyair.org\)](#)

Page 36 Table 3-2 mobile source emission inventory does not match the Appendix C Table 6 or Table 11: Year 2018 Area Source Emissions for Stockton Community. I did not add up the stationary source estimates. Please clarify, so that the information presented in Appendix C matches with the CERP Emissions Inventory

Table 3-2 2018 Stockton AB 617 Community Emissions Inventory

Source Categories	NOx (tpy)	VOC (tpy)	PM2.5 (tpy)
Stationary Sources	276.4	281.1	34.9
Area Source	40.2	247.6	75.1
Mobile Sources	884.1	332.1	40.2

Table 6: Year 2018 Mobile Source Emissions Summary

Mobile Source Categories	NOx (tpy)	VOC (tpy)	PM2.5 (tpy)
On-Road Mobile Sources	433.46	164.18	21.72
Off-Road Mobile Sources	312.55	157.38	14.61
Total	746.01	321.56	36.33

Page 45 Please describe how the benchmarks that SJVAPCD rules implement are “the most stringent measures”. Statements like these require some evidence.

Page 50 District Indirect Source Requirements “This rule requires mitigation of the growth in emissions from mobile and area sources associated with construction and operation of new development projects in the Valley.”

How does the SJVAPCD ensure that CEQA agencies adopt and implement all required mitigation for mobile and area sources? This assurance is also stated on page 66.

“Additionally, the District has adopted innovative regulations such as the Indirect Source Review and Employer-based Trip Reduction rules to reduce emissions.”

How many employers are located within the AB617 area that are required to develop and implement a trip reduction plan?

Page 51 The table 3-6 Grant Funding lists the incentive program funding as of October 7, 2020 but does not state since when, since the inception in 1992? Of the 22,881,939 dollars dispersed almost 40% has been spent on 5 heavy duty locomotives. Are these locomotives local? I am wondering why there has not been any funding of the catalytic converter program that deters theft?

Page 63-64 Heavy Duty Rerouting. The agencies involved in this scope of work development and coordinating conversations include the City, County, SJCOG, Caltrans and Port of Stockton. I understand that similar conversations are occurring related to the development of the Boggs Tract Sustainability Plan. Please provide the CSC an update from the outreach and plan development consultants for the sustainability plan development.

Page 76 Port of Stockton *The description of the port failed to include the several pipeline systems on site or the short-line trains that serve the facilities operated or leased by the Port. Additionally, the Port leases warehouse space that should be characterized by square footage as well as a description of the CEQA approved total truck, train, and ship visits to and from facilities. Using marketing statistics is not appropriate unless evidence is provided to support claims. [Port of Stockton, California - Pacific Ports](#). Additionally, as the SJVAPCD grants air pollution permits, a summary of permitted facility specifically within the area under the land domain of the Port Commission would be helpful. Typo at there.*

Commitment by the Port Commissioners is needed. The Commissioners also should be regularly provided with updates especially with regards to information and commitments included in the Stockton CERP. The Strategic Plan is related primarily to business relations and capacity instead of being a good neighbor. I have heard lots of talk but still there are no draft minutes circulated before the Commissioners approve them, and comments are limited to a length of 250 or less and are not read into the record. Specific outreach to the public and Port Commissioners is necessary when the Port releases its recently completed emissions inventory.

Page 83 Commercial Cooking Operations. *Where do open air barbequing operations fall since evidently these are not regulated by any agency? If I make a fire in my backyard and put some meat on a grill am I free to pollute the air of my neighborhood?*

Page 84 Agricultural Products Processing Operations – *Visible emission data from Port monitoring should be made available for public inspection.*

Page 84 Biomass Power Facilities – *The DTE facility at the Port is the greatest source of emissions in the AB617 area according to Appendix C. A description of compliance would be helpful as well as a description of visible emissions requirements since its plume is a characteristic of a western view. Additionally, since DTE airborne plume is attributed as a visible source what are the allowable components and what is the odor profile for the facility operations. All emission data should be readily available to the public in an online database.*

Page 97-98. Exposure reduction strategies for sensitive receptors. *Stockton Unified School district has committed to the community enhanced filtration and ventilation: [Final Health and Safety COVID SUSd english.pdf \(stocktonusd.net\)](#). Is the difference in Merv rating between 13 and 14 worth 2.6 million dollars and what is the term life for this investment?*

Page 105 *Has the SJVAPCD obtained any indication from local and state agencies that they are amenable to discuss urban greening?*

Page 121 *When did the SJVAPCD begin implementing more stringent local permitting referenced?*

Page 134 *“As a result, the District implemented a gasoline dispensing tester certification and training program to ensure qualified third party contractors are available for operators of this equipment.”*

Page 141 *“Accordingly, the District has included a compliance assistance CERP measure to develop a new training program to instruct gas station operators on conducting thorough self-inspections to aid in the identifications and timely repair of system defects.”*

The CSC did not approve of the District CERP measure to develop a new training program. So, I guess when I walk by a gas station and smell the sweet odor of gasoline components it is time for a complaint?

Complaints

Page 139 “The District received 31 odor complaints during this period and determined that none of the complaints resulted in a violation failing under the District’s jurisdiction. Under state law, odors are regulated under public nuisance requirements. To become a violation, an odor must cause “injury, detriment, nuisance, or annoyance” to a considerable number of people or the public. Each of the odor complaints were separate instances from a single party; and therefore, did not rise to the level of a public nuisance under state law. Three of the complaints fell outside of the District’s jurisdiction and were referred to the appropriate agency.”

Appendix F reports one of 8 odor complaints which seems to directly contradict the description on page 139. One problem I noticed with the compliant summary is that rarely was the date of the inspection or follow-up provided in the summary. Property owners are ultimate responsible parties so there should never be a situation where a responsible party cannot be located.

Additional outreach is needed to inform residents not to give up because clearly there are odors originating in the area of the Port of Stockton. But at what point is it like knocking your head against the wall. “A public nuisance was not confirmed.”

Page 147 *Marine Program referenced a Appendix 4.4???*

Page 152 *CARB encourages the community to report possible violations regularly and makes referral to appropriate section in a timely manner but what are the outcomes?*

General Comments for First Draft CERP

1. Based on the text in the draft CERP, it appears that the Valley Air District is not planning to use AB 617 funds for many of the measures that are not directly within their jurisdictional authority, including high priority measures like vegetative barriers and urban greening.
2. The Port of Stockton should provide robust, multiyear emissions inventory. Clarify whether it's based on modeling or monitoring. Estimate increases from proposed expansion. Estimate reductions for proposed technologies (bonnet, short power). Can someone conduct a study on how to transition infrastructure to all electric? What is the cost of a bonnet?
3. We believed that there was already existing consensus that the Stockton AB 617 Steering Committee wanted funding for only zero emission technology, not zero and near zero emission technology.
4. The CERP does not provide the ranking of strategies that the steering community provided for priority and importance to our community.
5. From the AB 617 Blueprint: "The purpose of the community emissions reduction programs is to focus and accelerate new actions that go beyond existing State and regional programs to provide direct reductions in air pollution emissions and exposure within overburdened communities." The first draft CERP provided by the SJVAPCD favors already existing programs run by themselves. Furthermore, the community's request to better understand existing programs and their funding so that we could "focus and accelerate new actions that go beyond existing State and regional programs" have been made over and over again, but ignored by SJVAPCD. It was not until the first draft of the CERP (provided to us on February 4, 2021) that we saw data such as Table 3-6 which is incredibly confusing because the narrative says that incentive programs achieve "nearly 3,000 tons of combined PM, NO_x, and VOC emissions reductions in the community" when the table shows "1,235.56" total tons PM, NO_x, VOC emissions reduced.
6. To emphasize our concern regarding #5, the rhetoric of SJVAPCD staff to the Stockton AB 617 Steering Committee to "focus specifically on emission

reductions otherwise CARB will not approve our CERP” when the AB 617 Blueprint clearly states “to focus and accelerate **new actions that go beyond existing State and regional programs** to provide direct reductions in air pollution emissions **and exposure...**” has reframed the purpose of AB 617 toward enhanced funding for already existing programs as evident in the first draft. The result is that the Stockton AB 617 Steering Committee has not been able “to focus and accelerate new actions that go beyond existing State and regional programs...” we fear that this more than anything else would actually endanger our CERP from approval by CARB.

Suggested changes, questions asked in October 2020 that have been unanswered, and new questions:

HD.1:

Add: “Funding will be restricted to short-haul trucks serving mainly in the Stockton AB 617 area.”

HD.3:

Change title to: “SUPPORT PLANNING AND DEVELOPMENT OF ELECTRIC INFRASTRUCTURE”

HD.7:

Question: How many buses are actually in-use on a daily basis pre-COVID in schools in the AB 617 boundary. What types of buses are in use?

HD.11:

Question from this statement: “However, the District is committed to working with the implementing agencies to identify funding sources for the study...”

Does this mean that no AB 617 funds will be used for the study?

Comments and questions asked in October 2020 that were not answered or addressed: What is "assess" current truck routes? Is a technical study required, or can the city and county develop and implement a plan? What is the timeframe?

(1 year?) CLARIFY to establish what the money is needed for. For example, could this money be used to actually add speed bumps and signs directing trucks rather than just studying? Traffic signals could be adjusted to improve traffic flow. Study should be comprehensive. Dollar amount should change based on this information.

TP.1:

Comments and questions asked in October 2020 that were not answered or addressed: How many events? What timeframe? How many cars, how many emission reductions? Existing District program. Would rather fund new approaches and immediate protections.

P.4:

Questions asked in October 2020 that were not answered: What is the estimated reductions from the use of a bonnet? Are there other cleaner options such as electrical plug-in?

IAQ.1:

Change first sentence to: "Overview: The goal of this strategy is to reduce the impact of and exposure to air pollution on community residents **in the Stockton AB 617 area** near sources of pollution within their homes."

Urban Greening: Community Concerns and comments:

Change first sentence to: "The steering committee **ranked this incentive second highest in priority and** expressed an interest in opportunities for increased urban greening and forestry in the community of Stockton..."

Urban Greening: STRATEGIES DEVELOPED FOR IMPLEMENTATION IN THE COMMUNITY:

Question regarding this statement "the District will be working with other agency partners to bring increased funding..." does this mean that no AB 617 funds will be used for urban greening?

Vegetative Barriers: Background:

Add as first sentence: "This strategy was ranked first priority by the Stockton Community Steering Committee and members requested that more funds be allocated to this incentive from the suggested \$1 million to \$3 million."

Taylor Williams (Resident) - CERP Feedback

Page/Text from the CERP

Notes of Air District

- General
 - Please include a list of definitions and acronyms/initialisms at the top of the CERP
 - I have not seen any reference to climate pollutants. There should be a substantial passage somewhere in this document that addresses how climate will influence decisions throughout CERP strategies. In 30 years, whether someone experiences heat death because of climate change or a lethal asthma attack as a result of criteria air pollutants is immaterial. As such, please delete reference to “near-zero” anything in this document.
- Page 27
 - Additionally, most of the community is within the “Rise Stockton” Transformative Climate Community boundary, which allows the District and community to leverage resources to maximize benefits under AB 617.
 - Can you include examples of how this is being coordinated? Also are you referring to the Rise Stockton coalition or the City of Stockton project, “Stockton Rising”?
- Page 31
 - Developing community-scale emission inventories for understanding existing baseline emissions and tracking future emission reductions within communities selected for Community Emission Reduction Programs and community air monitoring plans is an important piece of AB 617.
 - This document must reference how the CAMP influences the CERP as we get more data on air quality. Many of these strategies lack specificity in historical data, so adding data in real-time from the CAMP will be instrumental in measuring air quality strategies in the CERP.
- Page 32
 - Figure 3-5, where does this data come from? Can it be made available in a table with real figures (rather than only percent values)?
- Page 43, 44
 - Plans for attainment: PM2.5, PM10, Ozone
- Page 45
 - Emissions from stationary sources have been reduced by 85%, cancer risk from exposure to air pollutants has been reduced by 95%, population exposure to elevated PM2.5 levels have been reduced by 85%, and population exposure to elevated ozone levels have been reduced by 90%.
 - Please provide tables/figures for pollutant reductions over time and links to these data sets. As mentioned in a previous comment, we lack high resolution data for air quality in Stockton. What historical data we do have needs to be explicit so readers are operating from the same baseline as the author.

- Page 49
 - AB 617 legislation requires that CARB develop and maintain a state-wide Technology Clearinghouse for BACT and T-BACT. Once available, District staff will review the Technology Clearinghouse as an additional resource when updating the District's BACT Clearinghouse.
 - When is this clearinghouse going to be made available?
- Page 49
 - Can you please link to further information on Risk Management Reviews?
- Page 49
 - Can you please link to further information on Ambient Air Quality Analysis for both federal and state standards?
- Page 51-52
 - Table 3-6 is confusing. Is this money that has already been spent from the Stockton AB617 community pot? If so, that is a whole other issue of expending unauthorized funds. If not, please change the language to make it more clear.
- Page 53
 - The above programs are available to community members, and have helped residents and school administrators take health protective action during poor air quality episodes.
 - Please provide hyperlinks to these resources
- Page 56
 - ... and enhanced enforcement in the community, these local measures provide accelerated emissions reductions in the community.
 - Can you provide here a definition of "enhanced enforcement"?
- Page 56
 - voluntary incentive-based programs
 - These incentive programs that the CSC has voted to include in the CERP, do you have reference to these voluntary programs affecting meaningful exposure/emissions reductions?
- Page 56-57
 - Committee input on these considerations, and discussions about funding availability and cost-effectiveness of projects, may lead to adjustments to strategy goals and/or funding amounts to achieve overall emission reduction targets of the CERP.
 - Again, a good time to input language about the CAMP and how data gathered in a parallel process of CERP implementation may affect the CERP document. Also please include language about strategies themselves changing and being added/removed, as that was a detail the air district shared several meetings ago (not just goals/budget allotments).
- Page 58
 - Mobile sources account for more than 85% of the NOx inventory...
 - For the reasons stated in page 45's comment, can you provide references for all stats about pollution sources?
- Page 59

- ...the District has implemented a broad suite of voluntary incentive programs, targeted at reducing emissions from heavy-duty engines operating throughout the Valley.
- A short overview of other regulatory bodies/policies for these strategies is helpful. I think it would be helpful as a reader to see a list of such bodies and policies explicitly included in this section
- I would also like to see other grantmaking institutions or pots of funding available for particular strategies, including incentive/budget amounts where possible. Finding alignment with entities that share similar funding interests would greatly benefit this document as a tool to continually make decisions on emissions reductions strategies.
- Page 60
 - This strategy would provide enhanced outreach and access to incentive funding
 - This funding should be used to replace trucks. It is clear from your language around the district's outreach in the past, that you are reaching enough people to replace equipment (given your continual communication with permitted facilities). This money should be used to replace equipment, not pay personnel for outreach. Please make that clear in the language.
- All strategies under Chapter 4
 - In addition to implementing agency, budget allocation, etc. and the two comments above, can we include identified projects going on in Stockton at the moment? Eg, HACSJ for charging infrastructure or STEP for bike share.. Again, this addition would make this a more effective decision-making document
 - I'd also like to include any health studies we might have. So not just how much emissions are reduced, but what the effect on human bodies will be. Appendix G does not appropriately answer that question on a strategy-by-strategy basis.
- Page 62
 - The emission reductions associated with this measure will be calculated at a later time.
 - Doesn't this emissions source fall under an identified category of sources in figures such as 3-5? Why is there no estimate for this reduction?
- Chapter 4 - general
 - Does the air district identify the original source of these strategies? The vast majority of them were presented as options to the CSC, and a few were added on as ideas born of CSC members' input. At the top of chapter 4, can we include why these strategies were included/voted on in the first place?
- Page 63
 - The District will work with the City of Stockton and other appropriate agencies to seek funding to support this study.
 - Wouldn't the funding come from AB617 dollars? The partnership would be one of process not funding, correct?
- Chapter 4
 - Can these strategies be listed in the order in which the CSC prioritized them? There is no reference to the CSC's specific priorities for these strategies

- General
 - In places where my comments include the CAMP, reference specific CAMP data to determine the efficacy of given strategies/measures by a particular date
- Page 71
 - The Stockton community made recommendations to ensure significant efforts are made to conduct outreach and education in support of this measure and to increase compliance rates with District Rules 4901 – Wood Burning Fireplaces and Wood Burning Heaters and Rule 4103 – Open Burning.
 - Let's include that the CSC also wanted to DE-emphasize the use of enhanced enforcement
- Page 72
 - The goal of this strategy is to reduce the impact of PM2.5 pollution associated with residential wood burning by replacing approximately XX wood burning devices in Stockton with new natural gas devices or electric heat pumps.
 - For the same reason the CSC wanted to see only zero emission trucks (not near zero), I'd like to see only electric heat pumps provided through this program. Would be willing to bring this up as a general area of concern during the next CSC meeting.
- Page 74
 - Tagalog, not Tagalong - this appears multiple times in this document, please correct throughout
- Page 74
 - RB.5: ENHANCED ENFORCEMENT TO REDUCE ILLEGAL BURNING OF RESIDENTIAL WASTE
 - Did the CSC not decide that we were only doing education and outreach for this strategy? Otherwise, we are disproportionately targeting low-income communities and unsheltered persons
 - Mariah Looney commented as such during the January 19, 2021 meeting
 - Other CSC members' (including my own) comments are captured below:

02:07:43 R - Jennifer Flores: yes!

02:08:06 CSC Melissa Vargas - Catholic Charities: Great point, Mariah

02:08:36 Irene Calimlim - CSC: I agree with Mariah also

02:10:25 CSC - Jonathan Pruitt - Catholic Charities: I agree with Mariah. It defeats the purpose of Environmental justice if we aren't also aware of communities already burdened

02:10:49 CSC - Taylor Williams: Same. Enhanced enforcement on residential woodburning seems like it would have an undue burden on low income residents.. I agree education and outreach is the better option

02:11:55 CSC - Matt Holmes: Also sounds like an existing successful program that can benefit from the new Ed & Outreach efforts we are already committed to funding.

- Page 76

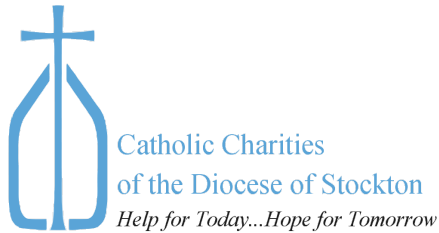
- In 2017, nearly 4.7 million tons of cargo moved through the Port of Stockton, and that number is expected to continue to grow.
 - This passage should mention what the expected growth looks like. The Port should have plenty of language on their plans for expansion
- Page 78
 - COLLABORATING TO FACILITATE ENHANCED PLATFORMS FOR DISCUSSION AND INFORMATION SHARING BETWEEN THE COMMUNITY AND THE PORT OF STOCKTON AS PORT-RELATED PROGRAMS AND PROJECTS ARE DEVELOPED
 - I don't recall voting on this. I didn't see it in the list of strategies on which the CSC voted or provided comment. Where did this come from?
- Page 85
 - Compliance inspections are unannounced whenever possible and involve both a physical inspection of the facility and a review of their records.
 - "Whenever possible"? When reviewing records, are those made publicly available? If so, where?
- Page 85
 - The District...determined that 51 enforcement actions were issued to facilities...
 - Please define an "enforcement action"
- Page 87
 - The District's implementation of AB 2588, California's Air Toxics "Hot Spots" Information and Assessment Act, has resulted in major reductions in emissions of air toxics from existing sources in the San Joaquin Valley.
 - Source missing
- Page 89
 - Infrastructure to support alternative modes of transportation (electrical vehicles, near-zero emissions vehicles)
 - Again, please only include strategies for zero-emission vehicles, per the wishes of the CSC
- Page 92
 - This rule series contains a comprehensive suite of rules designed to reduce fugitive PM10 emissions from a range of sources
 - The background section above this one lists the PM2.5 implications from various sources, not PM10. Please include control measures that reduce PM2.5, as those are the pollutants that are apparently need reduction
- Page 102
 - Implementing Agency: SJVAPCD, partner agencies such as San Joaquin County Human Services Agency: Home Energy Assistance Program (HEAP)
 - I highly recommend that the air district reach out to both Rising Sun Center for Opportunity and/or GRID Alternatives to help message out this program. Both serve in the Project Area for AB617 and do installation work akin to weatherization. Happy to make that connection whenever appropriate.
- Page 105
 - The measure would also include an on-going maintenance program with the city.

- This is an absolutely critical piece. Glad to see it here, but it requires more detail on what maintenance entails. I.e., who covers watering, trimming, siting, etc. and at what frequency? When do maintenance costs get moved back over to the City, when funding runs out from the AB617 pot of dollars
- Page 114
 - While the remaining 13 rules likely already meet BARCT due to the District's ongoing and extensive regulatory evaluations and enhancements, the proposed BARCT implementation schedule includes commitments to establish updated BARCT determinations for these rules, which will occur in the 2020-2022 timeframe.
 - Just clarifying, this means that 13 of the 32 rules examined will undergo BARCT analysis?
- Pages 116-119
 - How will these measures impact the strategies by the CSC? Please indicate that in the text of the CERP somewhere in this section
- Page 141
 - Over the past 3 years, the District has issued 175 NOVs and 37 NTCs in the Stockton AB 617 Community. Figure 5-3 shows the annual breakdown of NOVs and NTCs since 2017.
 - If NTCs precede NOVs, how do you have more of them than the other? Confused by this number breakdown, and want to better understand how we are regulating our community members
- Page 154
 - CARB staff installed two Aeroqual sensors at the George Washington Elementary School and data was collected from July 30, 2019 to August 28, 2019. These sensors measured PM2.5, ozone and NO₂ concentrations in the community.
 - What happened to these sensors?
- Page 175
 - To better leverage community involvement, the District and CARB will also assign a dedicated team to work with the Community Steering Committee to follow-up on community concerns, and to conduct community-level compliance assistance, outreach, and education related to compliance and enforcement of local and state rules and regulations.
 - Instead of resourcing an external body, we'd like to direct those dollars to hire a local organization. Some organizations in Stockton have been fighting for environmental justice for decades, so the facilitation of these meetings would be most skillfully and aptly conducted by those groups.
- Page 180
 - METRICS TO TRACK PROGRESS
 - This section absolutely must reference the Community Air Monitoring Plan. The CAMP should inform how we make decisions about the CERP strategies over time, and how we measure the impact of those strategies over time. For example, after the installation of the air monitoring network the CSC should

convene twice per year to see how District interventions have affected various criteria pollutants' levels in a high resolution data model of air quality across Stockton. Given the CERP is subject to change over time, this will allow CSC members to see which strategies they should double down on, reconsider, or continue monitoring.

APPENDICES

- C-2
 - The District relies on the regulated facility owners and operators to submit accurate process rate and/or fuel use data, and identify the approved emission factors as well identify necessary updates to those emission factors.
 - Is there detail in any of these documents about the District's standards for gathering data? Is there common methodology for data collection processes, and does the District audit the equipment and methodology used by regulated facilities?
- D-11
 - Table includes the replacement devices for wood burning stoves, but I don't see any electric options for replacement subsidies. If the CSC agrees, I would like to see AB617 dollars allocated to replacing these devices with truly clean (electric) ones, not natural gas, pellet stoves, etc.
- D-14
 - Currently 959 schools in the Valley utilize the District's air quality notifications to adjust outdoor activities and notify staff, students and parents
 - Please include some detail of your relationship with schools in Stockton, and what the air district and school district do to collaboratively communicate with students and their families. What duties of outreach/communication fall to which district?
- D-29
 - To ensure that the emission reduction projects funded by the District's incentive programs are real and permanent, the District monitors the pre-project and post-project contract performance of grant recipients.
 - This is fantastic, and the details of those incentive programs should be included in this CERP. The efficacy of the programs for which the CSC eventually votes is crucial information.
- Appendix G - general
 - It is helpful to know how the pollutants you are measuring affect human health. But these must be tied back to specific strategies. Wherever possible, the CERP document should refer back to health impacts -- whether in the main text or in appendix G.



February 14th, 2021

Jonathan Pruitt
Catholic Charities Diocese of Stockton
1106 North El Dorado Street
Stockton CA 95202

San Joaquin Valley Air Pollution Control District
% AB617@valleyair.org
4800 Enterprise Way,
Modesto, CA 95356

Dear Valley Air District,

Thank you for your hard work and diligence in developing a comprehensive CERP draft. Below are Catholic Charities' comments on Stockton's AB 617 Community Emission Reduction Program draft document. There are both recommendations and clarifying questions for specific sections and pages. We look forward to a strong CERP that represents the Stockton community and will present public health improvements for years to come.

-Cover page: change the bottom picture to be more representative to the Stockton community. May need to change a few pictures utilized in the boxes.

-Glossary section? Could we provide a glossary section for people to reference if they aren't familiar with a term?

Page 8 "various other socioeconomic indicators."

A summary paragraph of these socioeconomic indicators is needed to contextualize the challenges that face community members and that clearly demonstrates the need for technical and regulatory assistance during implementation. A process that builds community capacity yields sustainability.

Page 9: "The CSC is comprised of residents...[Include 'environmental justice advocates and organizations]

Page 3: Include an acknowledgments section of the CERP after the executive summary. Sectioning it by **Residents of the Steering Committee, Members of Community Based Organizations and Faith Based Organizations, California Air Resources Board, City of Stockton, Stockton Unified School District, San Joaquin Council of Governments, San Joaquin County Public Health Services, Port of Stockton, Business Representatives, Members of the Public, Facilitation Team, and San Joaquin Valley Air Quality Control District.**

Community Profile section: Recommend including a Stockton History part for historical context on redlining.

Prior to the 1870s, San Joaquin lacked access to water for agriculture. The promise of local agriculture led to waves of investment capital from San Francisco for agriculture in San Joaquin County between 1870-1910. Lack of technological innovation forced agricultural interests to recruit labor globally. People of color, such as Chinese, African-Americans from the South, Japanese, Punjabis, Filipinos, and Mexicans, were forced into labor by employment segregation. Beginning in the late 19th Century, racially restrictive housing covenants were written into housing deeds to restrict people of color into living in certain zones of the city. These covenants were written into property deeds by developers looking to inflate the values of their homes. Examples of this practice in Stockton was the exclusion of African-American, Indian, Mexican, and Filipino communities south of Main Street and west of Wilson Way. Beginning in the 1930s, the Federal Housing Administration created maps to guide mortgage investment. Intentionally, these maps directed investments away from communities of color, which were deemed risky for investment. This practice is known as “redlining” because the neighborhoods were designated as the color red. Figure “ “ shows the 1938 Residential Security Map for the City of Stockton.

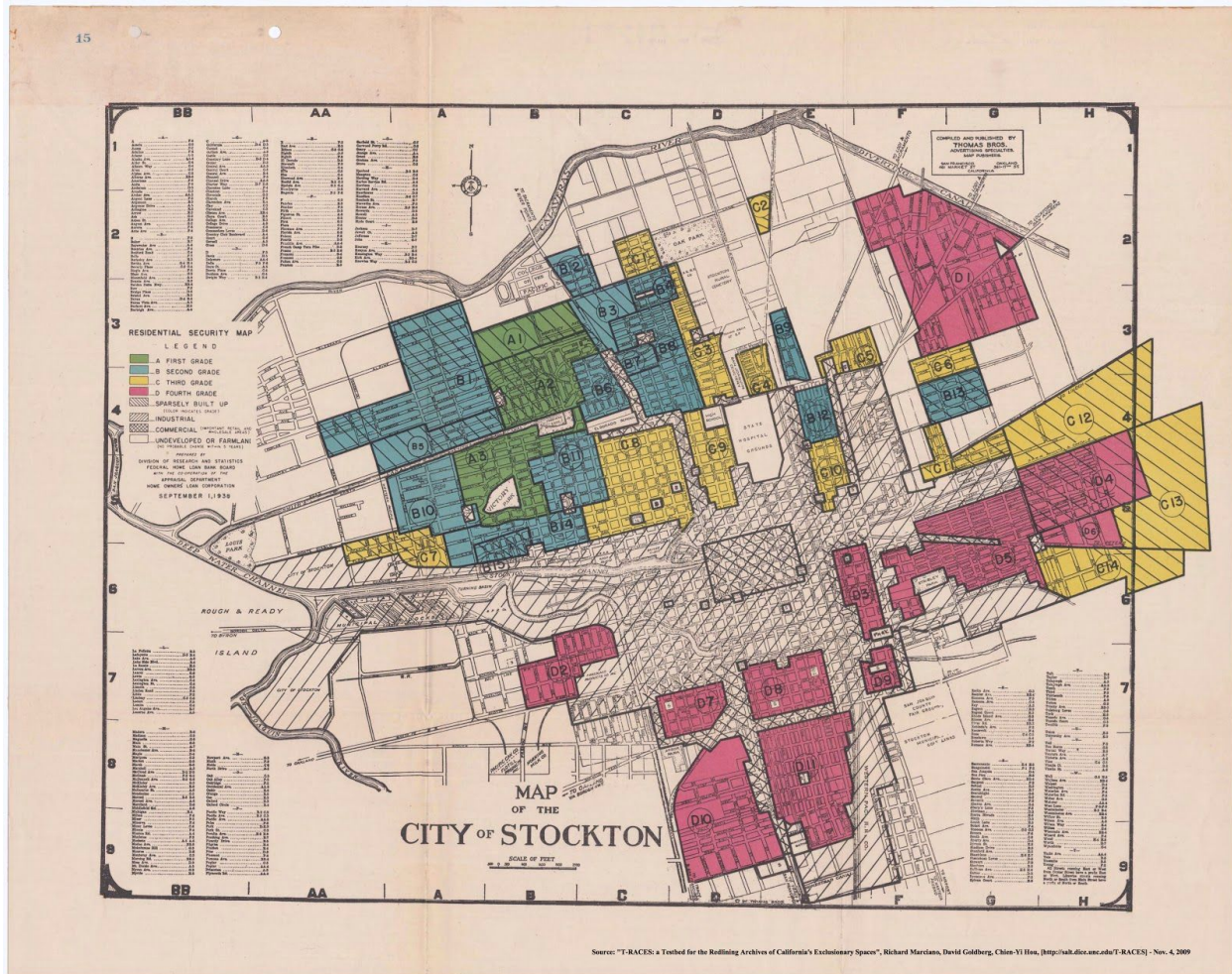


Figure “ “. Home Owners’ Loan Corporation Residential Security Map (1938)

Although the racial practice was banned in 1968’s Fair Housing Act, the years preceding contributed to both the built environment and unequal distribution of wealth in the United States today.

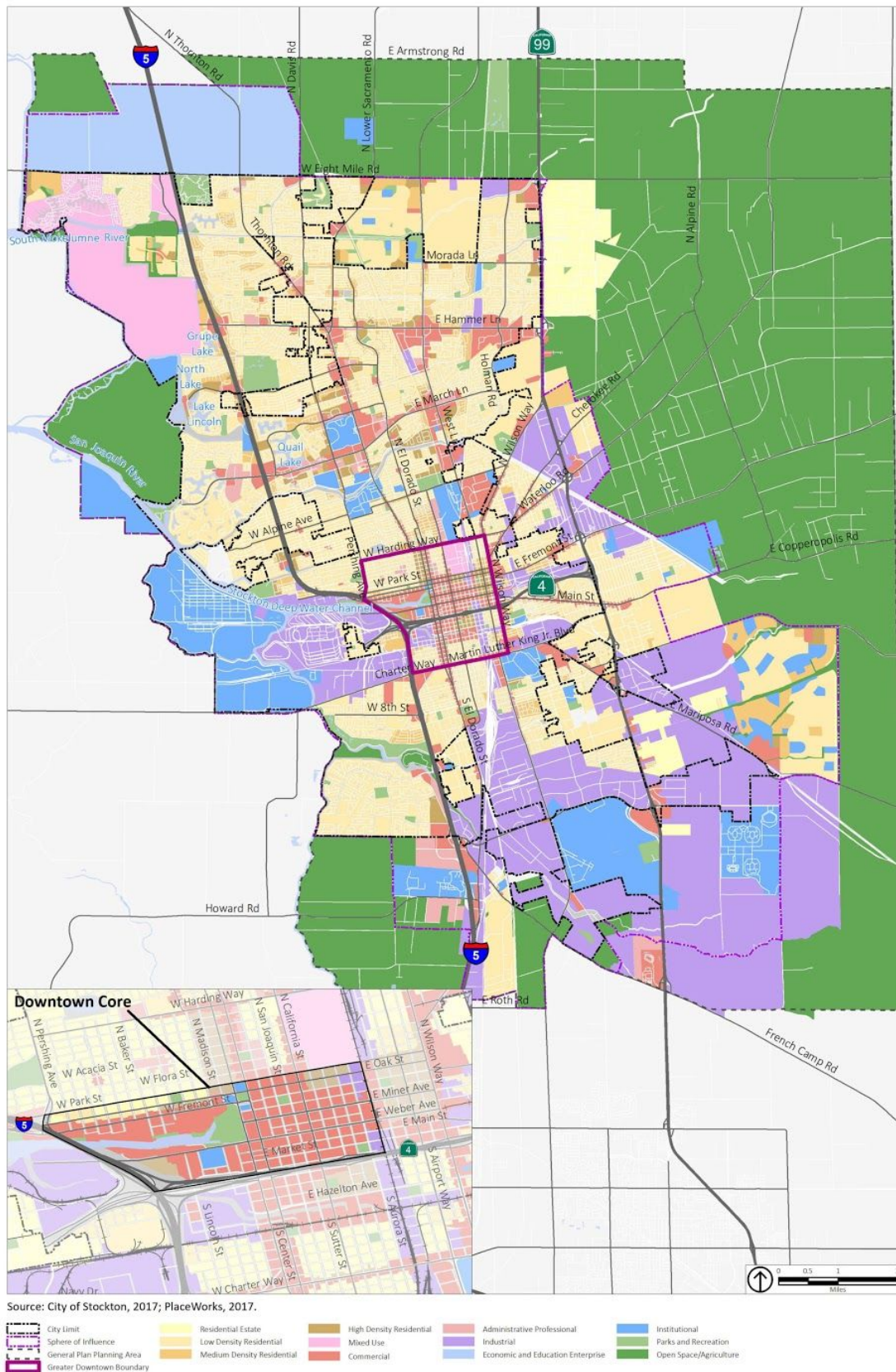
In the 1930-1940, Stockton experienced huge growth in local industry. Built in 1931 and opened in 1933, the Port of Stockton became the City’s first major industrial center for logistics purposes. Between 1933 and 1940, it grew faster than any port in the U.S. History, doubling tonnage every fiscal quarter. The Port’s success led to business interests in Stockton being perfectly centered for logistical industries, or industries focused on the transportation of products. With the anticipation of future growth in residents and commerce, the City of Stockton actively lobbied for the construction of freeways in Stockton. Between 1955 and the 1970s, I-5, Highway 99, and Highway 4 crosstown freeway were constructed intentionally near low-income “redlined” communities to reduce the costs of eminent domain. In the 1970s, the construction of the Highway 4 Crosstown freeway demolished a significant portion of the Filipino American

community of Little Manila of Stockton, displacing what was once the largest population of Filipinos outside of the Philippines.

Page 29: Please include a map of Stockton's TCC after the TCC 12 goals figure.

Page 39: The Map used for Stockton's General Plan Land Use map is hard to read. Attached is the official Land Use map from City of Stockton's website.

Figure 2-8
General Plan Land Use Map



-The table of contents shows the strategies to reduce the cumulative exposure burden in Stockton. Is there a specific reason for the order of the strategies? Would it be possible to order them based on the priority list from the steering committee? Vegetative barriers and urban greening was voted as the top priority. On the draft CERP they are located at the very bottom of the list.

-Is it possible to develop this table for future reference? When it comes to multiple partnerships with the City of Stockton, San Joaquin County, San Joaquin County Public Health Services, Stockton Unified School District, and more, a clear table to show the timelines of the plans would be helpful with transparency as well as consistency. This table comes from Owning Our Air plan from West Oakland:

Owning Our Air: The West Oakland Community Action Plan

#	Strategies	Authority	Implementation Timeframe (A = regulatory action; I = regulatory implementation; D = regulatory development)				
			2020	2021	2022	2023	2024
	provide long-term leases to parking operators and truck owner-operators at competitive rates. Such facilities will be at the City or Port logistics center or otherwise not adjacent to West Oakland residents.						
27	The City of Oakland and other appropriate local agencies limit fugitive dust from construction activity through better enforcement of existing regulations and permit requirements.	City of Oakland					
Mobile Sources							
28	The California Air Resources Board develops improvements to the existing truck and bus inspection and maintenance programs. Potential improvements include increasing warranty requirements, adding a lower in-use emissions performance level, increasing inspections in West Oakland, using aggregated GPS and other telecommunication records to identify locations of idling trucks and buses, and partnering with the Air District to develop a system using on-board diagnostic and remote sensing devices to identify and fix faulty emissions abatement devices on trucks and buses.	CARB	A				
29	The California Air Resources Board develops the following regulations to increase the number of zero-emission trucks and buses operating in West Oakland: <ul style="list-style-type: none"> The Advanced Clean Trucks regulation to transition to zero-emission technology those truck fleets that operate in urban centers, have stop-and-go driving cycles, and are centrally maintained and fueled. Amendment to the drayage truck regulation to transition the drayage truck fleet to zero emissions. 	CARB	A				I
30	The California Air Resources Board, in partnership with the Steering Committee, WOEIP and the Air District, conduct a pilot study to assess local idling impacts from trucks and buses. The Steering Committee, WOEIP and the Air District advocate for "Clean Idle" trucks and buses to idle no more than 5 minutes when in West Oakland.	CARB	I				
31	The California Air Resources Board develops amendments to the transport refrigeration unit (TRU) regulation to transition the TRU fleet to zero-emission operations by requiring both zero-emission technology and supporting infrastructure.	CARB	A		I		
32	The California Air Resources Board develops amendments to the existing cargo handling equipment regulation, which includes yard trucks, rubber-tired gantry cranes, and top handlers, that may reduce idling and transition the various types of equipment to zero-emission operation.	CARB			A		

Owning Our Air: The West Oakland Community Action Plan

#	Strategies	Authority	Implementation Timeframe (A = regulatory action; I = regulatory implementation; D = regulatory development)				
			2020	2021	2022	2023	2024
	forges to minimize fugitive emissions of PM and odorous substances through the development and implementation of facility Emission Minimization Plans by 2025.						
69	The Air District's Rule 11-18: Reduce Risk from TACS at Existing Facilities requires selected Bay Area facilities to reduce risk or install best available retrofit control technology for toxics on all significant sources of toxic emissions. Based on the results of the facility-specific health risk assessment, the Air District may require Schnitzer Steel and the East Bay Municipal Utility District to adopt a Risk Reduction Plan if the health risk exceeds a risk action level per the requirements of Rule 11-18 implementation.	Air District					
70	The Air District intends to provide incentives to replace existing diesel stationary and standby engines (fire pumps, dryers, conveyor belts, cranes) with Tier 4 diesel or cleaner engines. Priority is given to upgrading Tier 0, 1 & 2 engines located closest to schools, senior citizen centers, childcare facilities, and hospitals.	Air District					
71	The Air District proposes new regulations to reduce emission sources from autobody and other coating operations, including the use of vanishing oils and rust inhibitors by 2025.	Air District				D	A
72	The Air District proposes new regulations to reduce emissions from wastewater treatment plants and anaerobic digestion facilities, such as a regulation to reduce emissions of methane, reactive organic gases, and oxides of nitrogen by 2020.	Air District	D	A			
73	The Air District proposes amendments to existing Regulation 8-5 to further reduce emissions of reactive organic gases and other toxic compounds from organic liquid storage tanks by 2020. Organic liquid storage tanks are defined in Regulation 8-5.	Air District	A				
74	The Air District advocates for a plan that East Bay Clean Energy and PG&E are spearheading to replace the Dynegy Power Plant with a cleaner and more reliable source of energy by 2022. The proposed location for this initiative is the Oakland C, Oakland I, Maritime Port of Oakland, and Schnitzer Steel substation pocket, which is located within PG&E's Oakland distribution planning area. Eligible resource types include: (1) in-front-of-the-meter renewable generation; (2) in-front-of-the-meter energy storage, and (3) behind-the-meter energy storage. EBCE is seeking to procure the energy, resource adequacy (RA), and renewable energy credits (RECs) associated with these local resources, while PG&E will focus on meeting Oakland's transmission reliability needs.	East Bay Clean Energy, PG&E					

Owning Our Air: The West Oakland Community Action Plan

			Implementation Timeframe (A = regulatory action; I = regulatory implementation; D= regulatory development)				
#	Strategies	Authority	2020	2021	2022	2023	2024
	Health Programs						
75	The Air District intends to develop and fund a program to reduce exposure to air pollution at schools, day care facilities, senior centers, health facilities, public facilities, apartments and homes in West Oakland by 2021. This Strategy includes policies or grants for building energy efficiency upgrades to reduce infiltration of pollutants and the installation of high-efficiency air filtration systems (rated MERV 14 or higher).	Air District					
76	The City of Oakland works with local and agency partners to implement regional and local adoption of the State Department of Public Health's Health In All Policies program.	City of Oakland					
77	Consistent with the Healthy Development Guidelines, the City of Oakland implements a project-wide smoking ban in Oakland at new developments.	City of Oakland					
78	Consistent with the State's Building Energy Efficiency Standards for air filtration in effect as of January 1, 2020, the City of Oakland requires newly constructed buildings of four or more habitable floors to include air filtration systems equal to or greater than MERV 13 (ASHRAE Standard 52.2), or a particle size efficiency rating equal to or greater than 50 percent in the 0.3-1.0 µm range and equal to or greater than 85 percent in the 1.0-3.0 µm range (AHRI Standard 680).	City of Oakland					
79	The City of Oakland works with agency and community partners to undertake participatory budgeting with West Oakland community members to allocate local health improvement grants that reduce emissions or exposure to emissions.	City of Oakland					
80	The Air District researches actions that are potentially exposure-reducing, such as: 1) an engineering evaluation of exhaust stacks and/or vents to determine if relocation will reduce local exposure; (2) a study to determine if smart air filtration systems can reduce exposure by in-taking air during daily non-peak vehicle travel times, such as between midnight and four a.m.; and (3) a study of the potential air quality benefits of a centralized package delivery site such as personal lockers by 2025.	Air District					
81	The City of Oakland works with local businesses, partner agencies, and community members to develop a Green Business Strategic Plan to attract, retain, and support innovative green companies in West Oakland. This effort includes coordination with State and local agencies to develop criteria for green business certification for new and existing businesses.	City of Oakland					

Table 6-4. *Owning Our Air: The West Oakland Community Action Plan Implementation Schedule*

#	Strategies	Authority	Implementation Timeframe (A = regulatory action; I = regulatory implementation; D= regulatory development)				
			2020	2021	2022	2023	2024
	Land Use						
1	The City of Oakland continues working with California Waste Solutions and CASS, Inc. to relocate operations to the former Oakland Army Base and works with the property owners and local residents to redevelop the former sites in West Oakland with new business and light industrial uses that fit into a green economy.	City of Oakland					
2	The Air District will continue to engage in environmental review processes for development projects in West Oakland, such as the Oakland A's Ballpark and the MacArthur Maze Vertical Clearance Project, including coordinating with community partners and lead agency staff, providing data and technical assistance, and reviewing and commenting on CEQA documents through 2025.	Air District					
3	The Air District will study the potential air pollution and health outcomes of allowing truck traffic on I-580 and designating a truck lane on I-880. Allowing truck traffic on I-580 would require legislative approval, re-engineering, and re-construction.	Air District					
4	Consistent with measures in the West Oakland Specific Plan, the City of Oakland identifies locations outside of West Oakland for heavier industrial businesses currently in West Oakland that contribute to air pollution emissions and negative health outcomes in West Oakland.	City of Oakland					
5	The City of Oakland and Port of Oakland amends existing Ordinances, Resolutions, or Administrative policies to accelerate relocation of truck yards and truck repair, service, and fueling businesses in West Oakland currently located within the freeway boundaries that do not conform with the zoning designations adopted in the West Oakland Specific Plan.	City of Oakland, Port of Oakland					
6	The City of Oakland uses incentives and subsidies to relocate businesses away from West Oakland that do not conform with the zoning designations adopted in the West Oakland Specific Plan. The Air District will provide emissions data and technical support to assist the City in these efforts and to ensure that any relocated businesses do not cause exposure issues at the new location.	City of Oakland, Air District					
7	The City of Oakland revises business licensing procedures to require current and proposed businesses to disclose truck visits per day and works with Caltrans to determine the number of trucks that park in the Caltrans right-of-way near West Oakland. Caltrans works with WOEIP and the Air District to address air quality issues from truck parking leases, such as by modifying leases	City of Oakland, Caltrans					

Thank you,

Jonathan Pruitt
Environmental Justice Program Coordinator
Catholic Charities of the Diocese of Stockton

Proposed Implementation Measures For Indoor Air Quality

AUTHOR

Oluchi Njoku
Catholic Charities Environmental Justice Project Intern
BS, Geological and Environmental Sciences
o_njoku@u.pacific.edu

OBJECTIVES

The objective of this proposal is to provide suggested measures to the Indoor Air Quality (IAQ) section on the San Joaquin Valley Air Pollution Control District's recent Community Emission Reduction Plan (CERP) draft. These additional measures will be selected by:

- Thorough examination of the indoor air quality draft section current proposed measures.
- Cross analysis of indoor air quality solutions and adaptations.
- Further research on outside city implementation on indoor air quality concerns.

SIGNIFICANCE

After reviewing the indoor air quality section of the San Joaquin Valley Air Pollution Control District's CERP draft, the suggested measure on tackling community comments and concerns on indoor air quality is not sufficient enough for affected citizens in the community of Stockton. Stating a suggested measure with no official plan or guarantee of implementation lacks adequate momentum needed to begin solving the community's stated concerns. The community of Stockton demands a thorough proposed implemented plan that attempts to solve community concerns.

AVAILABLE DATA

The 2019 West Oakland Community Action Plan proposed ways to reduce emission and air pollution exposure such as strategies related to air filters and asthma management programs. These strategies also include, "to move truck related businesses, relocate truck parking and truck routes out of residential neighborhoods in West Oakland, require indoor air filtration, and advocate for more enforcement to respond to truck parking, routing, and idling complaints". The neighborhood West Oakland is dedicated to providing their community with a list of potential strategies to implement in order to tackle the community's concerns of emission and air pollution exposure. The San Joaquin Valley Air Pollution Control District's CERP draft does not reflect this and needs to provide their community with a list of their proposed implementation strategies to reduce indoor air pollution.

The Ameda County Public Health Department's Asthma Start Program is designed to help community members affected by asthma caused by air pollution exposure. The Asthma Start Program's goals are to, "prevent emergency room visits and hospitalizations related to asthma, enhance awareness and understanding of asthma, improve the ability of families to control the child's asthma, and prevent missed days of work and school." This is all accomplished by

providing resources such as home inspections to identify asthma triggers, housing, employment, and insurance assistance, education on asthma, and much more. This is a standard that needs to be implemented for the community of Stockton with collaboration with the San Joaquin County Public Health Services (SJCPHS) in order to begin providing the community with solutions to their concerns.

POSSIBLE APPROACHES

Possible approaches for solving indoor air quality concerns in the Stockton community should start with a proposed implementation plan that includes:

1. Access to indoor air quality filtration equipment and services for affected communities.
2. New buildings and homes to be created with mechanical air filtration systems.
3. Building upgrades to accommodate and adapt to indoor air quality and filtration systems.
4. Reduce source of emission exposure and residential impact of affected communities.
5. Routine maintenance of all air filtration systems.
6. Financial and educational support for affected individuals with health complications due to exposure from indoor air pollution.
7. Creation of an asthma management program that deals with, but not limited to, educating families on asthma, financial assistance with medical expenses related to asthma, collaboration with the San Joaquin County Public Health Services, neighboring schools and medical offices, and tailored guidance for individuals affected by air pollution driven asthma.

SUPPORTING MATERIALS

Environmental Protection Agency, Adapting Building for Indoor Air Quality in a Changing Climate, Indoor Air Quality (IAQ), EPA.
<https://www.epa.gov/indoor-air-quality-iaq/adapting-buildings-indoor-air-quality-changing-climate>

Environmental Protection Agency, Improving Indoor Air Quality, Indoor Air Quality (IAQ), EPA.
<https://www.epa.gov/indoor-air-quality-iaq/improving-indoor-air-quality>

REFERENCES

Ameda County Public Health Department, Asthma Start Program.
<https://acphd.org/asthma/>

San Joaquin Valley Air Pollution Control District, Community Emissions Reduction Plan, Feb. 3, 2021, http://community.valleyair.org/media/2301/draft-stockton-cerp_02032021.pdf

West Oakland Community Action Plan, Owning Our Air, October, 2019
https://www.baaqmd.gov/~/_media/files/ab617-community-health/west-oakland/100219-files/final-plan-vol-1-100219-pdf.pdf?la=en

I contributed to and collaborated with Little Manila Rising on the comments already submitted. Independently, I have the following additions:

Introduction:

1. The introduction includes an exhaustive background on what the Air District and industry have done. It would be strengthened and complemented by discussing the history of redlining, freeway building, destruction of historical buildings, and other events that shaped the Stockton community, as shared by the local historian and Dillon during one of our first meetings, and as raised by others in meetings such as the historical issues related to dredging raised by Nicholas Hatten and water quality issues raised by Mariah Looney. Sharing this community based expertise is instrumental to understanding roots causes and prioritizing among the urgent need for immediate protections and long term investments. Sharing these stories also contributes to learning across communities, as similarities and differences can be analyzed.
2. The introduction does not mention enhanced enforcement efforts, increased fees, though these measures are discussed toward the end. These efforts deserve more attention and discussion up front in the document, and at CSC meetings. A local “community benefits” fund should be established from fees that could be used to pay for community priorities.

On specific incentive measures:

3. Regarding **zero versus near zero** trucks, buses, fuels, infrastructure:
 - a. In terms of tailpipe emissions, **natural gas fueled trucks have similar PM emissions to a 2012 diesel truck with controls and only emit 10-20% less greenhouse gasses**, while the tailpipe of an **electric truck or bus emits 0 particulate matter and 0 greenhouse gases**. PM is a pollutant of focus for this plan and is particularly hazardous to health. Natural gas fueled trucks, buses, and infrastructure for natural gas fueling are not sound, sustainable long term investments. Natural gas use perpetuates burning fossil fuels, the root cause of climate change. Science shows burning fossil fuels must be phased out as expeditiously as possible to address human caused climate change. **Short range, medium duty all electric trucks are available, which are the vehicle type CSC members requested this measure be targeted at.** Funds should only be used for electric vehicles and infrastructure. See Quiros, *Greenhouse gas emissions from heavy-duty natural gas, hybrid, and conventional diesel on-road trucks during freight transport* (2017) <https://www.sciencedirect.com/science/article/pii/S1352231017305794>, and Quiros, *Real-World Emissions from Modern Heavy-Duty Diesel, Natural Gas, and Hybrid Diesel Trucks Operating Along Major California Freight Corridor* (2016) <https://link.springer.com/article/10.1007/s40825-016-0044-0>
4. Regarding **bonnets for ships** docking at the Port of Stockton:
 - a. I am concerned about the **cost** associated with this item, and the **lack of data** estimating how many emissions would be reduced. Regarding cost, “Since the technology is still new, accurate cost information is difficult to estimate. Initial

Regarding the process:

8. While in some measures I see a small nod to previous conversations through language like zero emissions will be “prioritized” for heavy duty trucks, in many other areas **measures read as if the feedback shared and questions asked to date have not been heard**, for example that it wasn’t noted that short haul trucks were the target for heavy duty trucks, or that in the vegetative barrier measure where it was requested the sound walls be included where feasible, which I did not find noted anywhere in the CERP.
9. It would have been useful to have more **time** to review this incredibly lengthy document – I’ve spent over 20 hours reading through it the past week, reviewing notes from previous rounds of feedback, and providing feedback, much of it repeating previous comments.
10. **Please clarify whether adopting a measure into the CERP authorizes the Air District to spend funds on that measure without seeking additional approval from the CSC.**
11. Members with a financial stake in the outcome of a vote should recuse themselves from voting on measures. **Industry representatives whose business could benefit materially from a CERP measure should not vote on that measure.** I have repeatedly made this request and gotten no response.
12. **Community building activities** and **community co-hosts** should never have been stopped. Relationship building, sharing community expertise, and co-powering the process with CSC members should be an integral part of each meeting.

Sincerely,
Catherine Garoupa White
Stockton Community Steering Committee member
Sunday, February 14, 2021



Little Manila
STOCKTON, CA | REMEMBER & RECLAIM

P.O. Box 1356
Stockton, CA 95201
(209) 336-6332
littlemanila.org

San Joaquin Valley Air Pollution Control District
% Heather Heinks
4800 Enterprise Way,
Modesto, CA 95356
Heather.Heinks@valleyair.org

Dear Heather,

Please acknowledge receipt of Little Manila Rising's comments on the Stockton CSC AB617 draft CERP. We developed these comments by working with many of our fellow CSC members. Little Manila Rising is eager to support specific emission and exposure reduction strategies that are outlined in this draft CERP and which we believe can deliver meaningful public health benefits for our community.

The following comments generally highlight areas of improvement for both the plan and our collaborative process.

General Comments for First Draft CERP

1. Based on the text in the draft CERP, it appears that the Valley Air District is not planning to use AB 617 funds for many of the measures that are not directly within their jurisdictional authority, including high priority measures like vegetative barriers and urban greening.
2. The Port of Stockton should provide robust, multiyear emissions inventory. Clarify whether it's based on modeling or monitoring. Estimate increases from proposed expansion. Estimate reductions for proposed technologies (bonnet, shore power). Can someone conduct a study on how to transition infrastructure to all electric? What is the cost of a bonnet? Recommend utilization of an independent Technical Advisory Group in keeping with other AB617 Communities to Evaluate projected emissions reduction benefits.
3. We believed that there was already an existing consensus that the Stockton AB 617 Steering Committee wanted funding for only zero emission technology, not zero and near zero emission technology. Recommend utilization of an independent Technical Advisory Group in keeping with other AB617 Communities to develop a transparent cost-benefit analysis of the two competing Technologies.
4. The CERP does not reflect the prioritization of strategies that the steering community defined last fall.
5. From the AB 617 Blueprint: "The purpose of the community emissions reduction programs is to focus and accelerate new actions that go beyond existing State and regional programs to provide direct reductions in air pollution emissions and exposure within overburdened communities." This first draft CERP heavily favors existing programs, it is not clear how their inclusion here reflects the concerns of the CSC. Furthermore, the community's request to better understand existing programs and their funding so that we could "focus and accelerate new actions that go beyond existing State and regional

programs” have been made over and over again, but appear to be ignored by SJVAPCD. It was not until the first draft of the CERP (provided to us on February 4, 2021) that we saw data such as Table 3-6 which is incredibly confusing because the narrative says that incentive programs achieve “nearly 3,000 tons of combined PM, NO_x, and VOC emissions reductions in the community” when the table shows “1,235.56” total tons PM, NO_x, VOC emissions reduced. Recommend utilization of an independent Technical Advisory Group in keeping with other AB617 Communities to evaluate such statistical anomalies.

6. To emphasize our concern regarding #5, the rhetoric of SJVAPCD staff to the Stockton AB 617 Steering Committee to “focus specifically on emission reductions otherwise CARB will not approve our CERP” when the AB 617 Blueprint clearly states “to focus and accelerate new actions that go beyond existing State and regional programs to provide direct reductions in air pollution emissions and exposure...” has reframed the purpose of AB 617 toward enhanced funding for already existing programs as evident in the first draft. The result is that the Stockton AB 617 Steering Committee has not been able “to focus and accelerate new actions that go beyond existing State and regional programs...” we fear that this more than anything else would actually endanger our CERP from approval by CARB. We recommend the utilization of a Blueprint Checklist similar to that used in the Wilmington, West Carson & Long Beach Draft CERP. The checklist provides a transparent strategy for CSC members and their District staff to share facts and thus cultivate a mutual understanding of how we arrived at our draft CERP. The current draft diverges from so many conversations and preceding meetings that it is difficult to correlate this draft to our history of work together. In addition a collaborative checklist, along with the utilization of an independent Technical Advisory Group, would not only bring our process into better alignment with preceding & successful CERP efforts they would also increase the likelihood of discovering the innovative early action strategies that are unique to our community and which remain, as yet, unexplored.

Suggested changes, questions asked in October 2020 that have been unanswered, and new questions:

HD.1:

Add: “Funding will be restricted to short-haul trucks serving mainly in the Stockton AB 617 area.”

HD.3:

Change title to: “SUPPORT PLANNING AND DEVELOPMENT OF ELECTRIC INFRASTRUCTURE”

HD.7:

Question: How many buses are actually in-use on a daily basis pre-COVID in schools in the AB 617 boundary. What types of buses are in use? Recommend utilization of an independent Technical Advisory Group To have the value the appropriate cost benefit analysis necessary to evaluate and implement this strategy..

HD.11:

Question from this statement: “However, the District is committed to working with the implementing agencies to identify funding sources for the study...” Does this mean that no AB 617 funds will be used for the study? Comments and questions asked in October 2020 that were not answered or addressed: What is “assess” current truck routes? Is a technical study required, or can the city and county develop and implement a plan? What is the timeframe? (1 year?) CLARIFY to establish what the money is needed for. For example, could this money be used to actually add speed bumps and signs directing trucks rather than just studying? Traffic signals could be adjusted to improve traffic flow. Study should be comprehensive by defining goals and, above all, it should identify the specific offices and office holders in the implementing agencies that will ultimately be responsible for executing the study and implementing the adaptation strategies. Dollar amounts would change based on this information.

TP.1:

Comments and questions asked in October 2020 that were not answered or addressed: How many events? Typographical error says “*a events*.” What time frame? How many cars, how many emission reductions? This is an existing District program Yet it is described as. Would rather fund innovative approaches that deliver immediate benefits to study area residents as well as emission reductions.

P.1: COLLABORATING TO FACILITATE ENHANCED PLATFORMS FOR DISCUSSION AND INFORMATION SHARING BETWEEN THE COMMUNITY AND THE PORT OF STOCKTON AS PORT-RELATED PROGRAMS AND PROJECTS ARE DEVELOPED.

This wasn’t discussed during the prioritization of strategies workshops last Fall. The Port forecasted this effort in Port Director Richard Aschieris letter. Why was this included here? Does the Port need this in the CERP to follow through? Please provide more detail on how this benefits the CERP Outcomes. Will it impact Valley Air Staff time?

P.4:

Questions asked in October 2020 that were not answered: What are the estimated reductions from the use of a bonnet? Are there other cleaner options such as electrical plug-in?

IAQ.1:

Change first sentence to: “Overview: The goal of this strategy is to reduce the impact of and exposure to air pollution on community residents in the Stockton AB 617 area near sources of pollution within their homes.”

Urban Greening: Community Concerns and comments:

Change first sentence to: “The steering committee ranked this incentive second highest in priority and expressed an interest in opportunities for increased urban greening and forestry in the community of Stockton...”

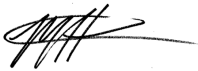
Urban Greening: STRATEGIES DEVELOPED FOR IMPLEMENTATION IN THE COMMUNITY:

Question regarding this statement “the District will be working with other agency partners to bring increased funding...” Does this mean that no AB 617 funds will be used for urban greening? We know from other communities that 617 funds are not restricted to the district as lead agency and that intergovernmental agreements can easily be executed to transfer funds to the appropriate jurisdictions.

Vegetative Barriers: Background:

Add as first sentence: “This strategy was ranked first priority by the Stockton Community Steering Committee and members requested that more funds be allocated to this incentive from the suggested \$1 million to \$3 million.” Doing so would acknowledge the value that the steering committee places upon investing in the community and the last thing invisible way.

Respectfully,

A handwritten signature in black ink, appearing to read 'Matt Holmes', with a stylized, flowing script.

Matt Holmes
Community Engagement Specialist
Little Manila Rising
Matt@LittleManila.Org

NED LEIBA
305 North El Dorado Street
Stockton, California 95202
(209) 948-9119

February 15, 2021

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

RE: Community Emissions Reduction Program
February 3, 2021 Draft.

Dear Steering Committee and District:

Please consider my comments regarding the draft community emissions reduction program (CERP or draft). Our steering committee is to recommend to the District and the California Air Resources Board (CARB) strategies to reduce exposure to air pollution in our Stockton AB 617 area.

Below is a list of proposals contained in the draft, with reference to the explanatory pages.

1. HEAVY DUTY MOBILE SOURCES	58
2. OLDER/HIGH POLLUTING PASSENGER CARS	65
3. RESIDENTIAL BURNING	71
4. PORT OF STOCKTON	76
5. STATIONARY SOURCES	82
6. EMISSIONS EXPOSURE AND LAND USE	88
7. DUST IN THE COMMUNITY.....	92
8. LAWN AND GARDEN EQUIPMENT	94
9. ERS FOR SENSITIVE RECEPTORS.....	97
10. ERS FOR SCHOOLS	99
11. INDOOR AIR QUALITY	101
12. URBAN GREENING	103
13. VEGETATIVE BARRIERS.....	107
14. COMMUNITY OUTREACH STRATEGIES.....	110

ERS: Exposure Reduction Strategies.

As admitted by the District Staff, we do not have cost health benefit information for the various proposals, and so it is difficult to rationally rank and recommend the various proposals. We do not know the funds that would be available, the likely emission reductions, and most importantly, the projected health benefits.

Accordingly, for now, we should recommend proposals based on several ascertainable standards:

1. Proposals should benefit persons who reside, work, study and recreate within the Stockton AB 617 project area. The proposal should be strictly targeted to the project area.
2. There should be the prospect of meaningful health benefits specifically to persons within the Stockton AB 617 project area. Each proposal must come with a requirement to measure emissions over time and attempt to determine actual health effects of the proposal. We should focus on childhood asthma, as explained below.
3. Proposals should provide amenities and neighborhood benefits to persons in the project area even if the health benefits are uncertain.
4. We should not recommend the use of AB 617 resources where other program funding is available or there exists compliance requirements already in place. We should not subsidize large businesses and institutions in meeting their responsibilities to comply with existing air quality standards.
5. We should not recommend enhanced compliance for persons within AB 617 given concerns about past discriminatory law and regulatory enforcement.

Of the 14 proposals, I strongly favor:

Proposal 10, exposure reduction strategies for schools especially in and around Boggs Tract. The specific measure should be to install and maintain advanced air filtration systems. Such systems should be placed in some classrooms that would serve as an experimental group while others without the systems would serve as a control group.

Proposal 12 urban greening. Tree planting and maintenance at and around schools.

Proposal 13 vegetative barriers. At and around schools.

The other proposals do not satisfy the criteria listed above, or would seem to have insignificant, measurable health or amenity effects for persons in the AB 617 project area.

Letter to AB 617 Committee
February 15, 2021
Page 3

As I recited in my November 5, 2020 letter attached, we should seek to learn the relationship between outside and indoor air pollution and childhood asthma. As recited several times in the draft, there has been a dramatic decrease over the last 40 years in criteria air pollution. The incidence of asthma however, 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 AB 617 area.

The Stockton AB 617 project area, like other parts of California, has a high incidence of childhood asthma. At the current lower levels of criteria pollutants, it is difficult to accurately establish a causal relationship between air pollution and effects on mortality and mortality generally. Accordingly, we should focus specifically on air pollution that may relate to the incidence and severity of childhood asthma in the Stockton AB 617 area.

The District indicated it wanted to facilitate health studies for our area that would involve randomized controlled tests of the effects of various pollutants and remedial measures. The remedial measures adopted should be the three school based proposals: 10 advanced air filtration, 12 urban greening and 13 vegetative barriers. The health outcomes to measure should related to childhood asthma.

As I recited before, based on a number of 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 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. Page 1-2

Letter to AB 617 Committee
February 15, 2021
Page 4

The conclusions from this very large study included the following:

To date, the results of the analyses of exposures to PM2.5 and lung function have not demonstrated an association. Page 1-16.

As a practical matter, we should focus proposals and monitoring on schools, and specifically the following schools.

Washington
St. George
Edison
Hazelton
Spanos
Huerta

There are many reasons to focus on schools. Children are especially susceptible to asthma likely caused by air pollution or where air pollution is a significant exacerbating factor. Schools are fixed locations. Studies can be done with some uniformity over years. There are personnel and resources which can maintain monitors and mitigation equipment such as air filtration. Existing landscape and gardening personnel can maintain vegetative barriers and trees. Good studies will be possible with comparable data collected over years. Our efforts will be focused, concentrated and not diluted by a scattershot of deployments throughout a large 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 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 using advanced monitoring devices in most cases. We want to know the potentially toxic constituent such as organic carbon and elemental carbon (Black Carbon).

Letter to AB 617 Committee
February 15, 2021
Page 5

Not all of the air monitoring equipment has to be costly and sophisticated. For example, a simple, inexpensive monitor could record PM2.5 on the road side of a vegetative barrier and another inexpensive monitor placed inside of the vegetative barrier presumably in a play area for school children. Such data over time could show the exposure reduction and other benefits from the vegetative barriers.

Proper selection of CERP proposals offer the prospect of improving the health of persons in Stockton AB 617 project area, especially children who suffer from asthma. Wise selection will address past inequities and provide an improved environment for residents, students and others. Finally, by supporting the recommendations in this letter and encouraging the District to follow up with proper monitoring, data collection and health studies, we can advance the science of air pollution and its relationship to health.

Sincerely,
Ned Leiba

21.0215 NL letter SJVAPCD CERP.wpd

NED LEIBA
305 North El Dorado Street
Stockton, California 95202
(209) 948-9119

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:

Letter to SJVAPCD AB 617 Steering Committee
November 5, 2020
Page 2

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

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?

Letter to SJVAPCD AB 617 Steering Committee
November 5, 2020
Page 4

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



café coop

February 16, 2021

Dear San Joaquin Valley Air Pollution Control District Staff:

We appreciate the assistance you have given us in the process of AB617 and the CERP Process

Please note we are submitting this comment letter in conjunction both Cafe Coop and The Environmental Justice Coalition for Water (EJCW)

Cafe Coop not listed on the CERP on page 17 Only EJ

2.6 Digital Engagement should be added in various languages, specific platforms and use of animation videos. We should also seek methods of communication that include text updates for specific incentive campaigns. The analytics of the digital engagement should be provided to the AB 617 steering committee to assist in any shortfalls in our perspective communities. Covid has set forth new standards of communication.

2.6 ADDITIONAL COMMUNITY ENGAGEMENT Since late 2020, the CSC and District staff have worked to engage and educate the public with regard to AB 617 and the efforts being made in the Stockton AB 617 Community. Meetings between community members, environmental justice organizations, industry, agency representatives, and other stakeholders have occurred to provide assistance and/or prompt responses to concerns raised regarding the AB 617 process. District staff and CSC members also attended and often made presentations at city and county government meetings, the District's Environmental Justice Advisory Group meetings, the District's Citizens Advisory Committee meetings, the District's Governing Board meetings, environmental justice meetings, and industry professional group meetings to promote participation in the development of the CERP and once completed the implementation of the CERP. In addition, staff often discussed AB 617 at media interviews and during outreach events and health fairs. A full list of outreach efforts is available in Appendix A. The Stockton AB 617 CSC will continue to work to implement the CERP actions after its adoption by the District Governing Board and the CARB Board, and to provide periodic community updates on implementation progress. Community engagement is essential to the success of the CERP as well as the AB 617 program as a whole, and all parties are committed to build and improve upon existing outreach efforts in the coming months

Lawn and Garden

On page 96 says, " Using existing District Board-approved criteria, (Please list the criteria.) strategy will provide enhanced outreach and education as well as higher incentive funds to local Stockton residents to encourage participation and maximize local emission reductions within the community." Please clarify strategies addressing the EJ communities of the AB617 area. Based on our informal research and outreach on the use of commercial lawn and garden equipment we suggest a focus on Spanish speaking residents and proprietors of micro and small lawn and garden businesses. However upon our outreach we have also found populations of non Spanish

speaking indigenous groups. We have access to translators of indigenous languages. We suggest the Spanish speaking media outlets and strategies be identified and be measurable by AB617 SC. (Communications strategies page 111)

3.1 P. 27 Community Profile Section: We recommend adding the diverse demographics of the AB617 area (i.e per ethnicity to include all ethnic groups and household income levels)

Latino Population Demographics STKN

Stockton – whose roughly 310,000 residents are 42% Hispanic, 24% Asian, 19% non-Hispanic white and 13% black

Community Outreach Strategies: Native Community

We suggest there be a Native outreach component added similar to the San Joaquin Council of Governments.

“It is important to recognize the difference between federal and non-federally recognized Tribes in terms of the consultation process. Government planning agencies are only required by state and federal law to consult with Tribes that are federally recognized when it comes to transportation decisions. Although the consultation is not mandated for non-federally recognized Tribes, this does not preclude SJCOG from consulting with local Tribes when plans and activities might impact cultural values or the community. A contact list of California Native American Tribes that are both federally and non-federally recognized is maintained by the Native American Heritage Commission. In San Joaquin County there is one federally recognized Tribe: • California Valley Miwok Tribe (CVMT) - previously known as the Sheep Ranch Rancheria or the Sheep Ranch Rancheria of Me-Wuk Indian In San Joaquin, specifically, they are considered a “landless” Tribe. Meaning, although they are federally recognized, they do not have land held in trust by the Bureau of Indian Affairs (i.e. no reservation or Rancheria). The CVMT not only oversees the San Joaquin County, they also have establishments in nine other counties that are in aboriginal Miwok territory/boundaries: Alameda County, Alpine County, Calaveras County, Contra Costa County, Fresno County, Madera County, Merced County, Solano County, and Stanislaus County. Federal recognition is a legal distinction that applies to a Tribe’s right to a government-to government relationship with the federal government and eligibility for federal programs. Federal and state laws require local agencies to consult with federally recognized Tribal governments prior to making transportation decisions, taking actions, or implementing programs that may impact their communities. This activity is separate from, and precedes the public participation process. Protocol should be flexible and dynamic with respect to initiation of communication and discussion format. Determining the degree and adequacy of consultation will vary depending on a number of factors including the scope of the proposed activities, whether the activity is short or long-term, the cultural or political sensitivity of the issue at hand, and the number of potential stakeholders.

SJCOG routinely notifies and consults with the North Valley Yokuts Tribe, a non-federally recognized Tribe in the San Joaquin County, and with the California Tribal TANF Partnership.

While they are not recognized under the federal government, California law AB-52 requires consultation on Tribal Cultural Resources under CEQA. They are as well considered a minority group, and federal executive orders require consultation with minority or disadvantaged groups. An example of this would be Presidential Executive Order 12898 about Environmental Justice. It places special emphasis on communication with these groups. SJCOG has procedures for coordination with minority and disadvantaged groups in its Public Participation Plan.”
San Joaquin Council of Governments Consultation Procedures with Indian Tribes (March 2018)

Migrant Population data to be included in order to provide input and outreach to this vulnerable environmental justice community. Spanish and indigenous language outreach needs to be added.

We will need to provide updated data on our migrant community within the AB 617 area (i.e. demographics, housing, miles traveled to and from work, vehicle type used)

US Bracero Program (Historical Context)

An executive order called the Mexican Farm Labor Program established the *Bracero Program* in 1942. This series of diplomatic accords between Mexico and the United States permitted millions of Mexican men to work legally in the United States on short-term labor contracts. Upon its termination in 1964, the *Bracero Program* had brought more than four million Braceros (arms) to work in U.S. agriculture and on railroads.

Pg. 110 Community Outreach Strategies

Page 110-111 Communication Strategies

We recommend the following to be added: Languages to be listed and add indigenous dialects. Digital and grassroots outreach. Virtual and on hand campaigns to include text alerts along with animation videos. Curated videos could also be added. Comprehensive education through various mediums. Measurable digital analytics to provide transparency and ensure proper outreach coverage among the EJ communities in our AB 617 area. Virtual tours to be offered in all languages. Analytics to be published at the end of the campaign.

As it currently reads:

O.1: MULTILINGUAL OUTREACH TO INCREASE COMMUNITY AWARENESS AND

KNOWLEDGE OF AIR QUALITY Overview: The goal of this strategy is to increase community awareness of available tools to keep informed of real-time changes in air quality, clean air efforts and how communities can get involved through multi-lingual educational campaigns, videos and partner workshops. The strategy looks to focus outreach on areas of Stockton CSC and resident concerns, including fireworks, illegal burning, trash burning, educating trucking operations about impacts of idling, promotion of biking (including bike paths and trails), Stockton Community Emissions Reduction Program March 18, 2021 111 | Page public transportation (including, bus, rail, ferry, and others) and other topics of concern/interest. An understanding of what conditions constitute poor air quality, the relative seriousness of a poor air quality episode, and any potential health impacts is necessary for the public to make informed decisions about how and when to limit their exposure. This strategy would aim to increase Valley Air App downloads and social media followers among members of the community. A partnership with local civic and community organizations would be established to host workshops at locations commonly available to the public such as libraries, schools, and community, health, or recreation centers. Both the social media outreach and live workshops would promote real-time tools such as myRAAN website, the Valley Air

App, the Real-time Outdoor Activity Risk (ROAR) Guidelines, the wildfire page of the District's website, as well as information about general air quality education, wildfire smoke impacts, health effects, and similar topics This strategy would aim to increase myRAAN website registrations, Valley Air App downloads, and social media followers among members of the community. In addition, this strategy would increase awareness of air quality issues with workshops hosted in locations commonly available to the public such as libraries, schools, and community, health, or recreation centers and on Zoom or other online platforms. Annual goals for these actions include: • Attend/host 4 community in person, in-person or online, to share information • 1 community targeted social media campaign

Heavy Duty Mobile Sources Pg 58

Statistics on pilot program for heavy duty trucks. Replacement of older trucks to zero and near zero emissions. Current numbers of heavy-duty trucks in use in AB 617 area. Definitive truck routes identified that currently run through communities such as Boggs Tract. (Information to be provided in Spanish) Status of all electric truck rollout.

Aforementioned suggestions to be applied to the vehicle replacement program.

Esperanza Vielma
Executive Direct
Disadvantaged Communities Liaison
Cafe Coop
Justice Coalition for Water

Arlene Galindo
Tribal &
Environmental

From: [Nate Knodt](#)
To: [AB 617](#)
Cc: [Nate Knodt](#)
Subject: CERP Draft Review Comments 02-16-21
Date: Tuesday, February 16, 2021 4:40:51 PM

AB617 CERP Comments to Air District Staff:

Providing comments later than February 14, so I will keep them very brief, but hopefully they will provide a useful record moving forward.

My priorities for AB617 Implementations and Enforcement are listed below:

***Urban Greening & Vegetative Barriers** - I strongly favor planting trees, shrubs, bushes, and plants to reduce pollution, provide strategic cooling shade (and reduction of energy consumption by HVAC), provide wind breaks, and beautify local streets, parking lots, sidewalks, buildings and corridors, This should be encouraged through funded incentives. I agree with Ned Leiba that health studies should be implemented to create quantifiable health benefits.

***Indoor Air Quality - School Air Filtration** and weather stripping to provide cleaner air and to conserve energy. Current added benefit to provide healthier classrooms air circulation to combat spread of COVID-19 and new variants. I agree with Ned Leiba to couple this effort to provide medical studies on asthma and other growing children related health concerns.

***Community Outreach Strategies** - Double down on education/outreach efforts to inform residents, households, businesses, schools/students/curriculum the benefits of pollution reduction strategies, active transportation, public transportation, bicycle use, bicycle lanes, truck/car idling, urban greening, illegal and residential burning, and energy conservation.

***Incentives to Replace Fireplace Use** - Use strong incentives to replace wood-burning fireplace use with primarily heat pumps.

***Electric Vehicle Charging Infrastructure** - Promotion of electric automobile and truck vehicle driving and fleet implementation must be enabled through wide availability of efficient and economical vehicle charging facilities.

***Truck Pathways** - Provide education and infrastructure to direct trucks away from sensitive neighborhood travel

***Railroad & Port of Stockton Strategies** - Due to the legal complexity, capital costs, implementation, and long lead times associated with reducing ship emissions through new infrastructure and capital equipment purchases, I would pass on most or all of these plans with the current CERP. I favor the following strategies if money and incentives can be included as listed below:

#Railroad Switch engines in constant use locally in Stockton area railyards

#Port of Stockton heavy loading/dock equipment in constant use when ships in port or used with warehousing activity.

Thank you.

Nate Knodt - Stockton CSC V - R