

APPENDIX I

Comments and Responses

Stockton CERP

San Joaquin Valley Air Pollution Control District

SUMMARY OF SIGNIFICANT COMMENTS AND RESPONSES
Stockton Draft CERP

COMMENTERS:

Catherine Garoupa White (Groupa White)

EJCW Water Justice for All& Café Coop (EJCW-Café Coop)

Mary Elizabeth (M.E.)

Nate Knodt (Knodt)

Ned Leiba (Leiba)

Jonathan Pruitt-Catholic Charities (Pruitt)

Oluchi Njoku-Catholic Charities Environmental Justice Project (Njoku)

Stacey Panyasee (Panyasee)

Taylor Williams (Williams)

Debbie Provost (Provost)

PM 2.5 and Ozone

1. **COMMENT:** Page 1 of the CERP mentions “and other first-of-their kind measures.” What other first of their kind measures? There was no other mention found in the draft document. Evidence is needed if it is included in the Executive Summary. (M.E. pg. 1)

RESPONSE: Several examples of “first-of-their-kind” measures have now been highlighted in the Executive Summary, including the District’s Indirect Source Review regulation, which reduces emissions from new construction and development projects, and the nationally recognized Tune In Tune Up vehicle repair program.

2. **COMMENT:** Page 1 of the CERP states “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? (M.E. pg. 1)

RESPONSE: These reductions have been since 1992. This was clarified in the Executive Summary of the CERP.

3. **COMMENT:** Provide a summary of the stated socioeconomic indicators that are relatable to the challenges that community member’s face and that clearly demonstrates the need for technical and regulatory assistance during implementation. (M.E., Pruitt, pg.8)

RESPONSE: Under the section “Understanding the Community,” the CERP now includes a section on the history of Stockton to help outline the socioeconomic factors and historical perspective that lead to the need for this AB 617 program. There is also a description of the CalEnviroScreen “score,” which highlights the pollution burden on this specific community. Specifically, the average overall CES score, PM2.5 exposure, and pollution burden values are all above the 90th percentile in the state.

4. **COMMENT:** If the Valley is classified as serious nonattainment for the federal PM2.5 standards and Extreme nonattainment for federal ozone standards, where does the AB 617 area rank for criteria air pollutants? (M.E.)

RESPONSE: Attainment status is a regional designation and areas do not receive a specific status. During the community recommendation and selection process, the District shared key information regarding where Stockton ranked according to the CalEnviroScreen tool, a nationally recognized tool used to rank community based on pollution burdens. According to CalEnviroScreen, Stockton ranked in the 94th percentile (higher is bad) for PM2.5, 53rd percentile for ozone, and 61st in diesel particulate matter.

5. **COMMENT:** The northern area of the SJVAPCD includes the counties of San Joaquin, Stanislaus, and Merced. The reference to the TCC boundary is in documents encompassing different areas. Please provide a map of the TCC Stockton boundary in the current awarded grant. (M.E.)

RESPONSE: There is now a map and description of the TCC boundaries and efforts in Figure 3-5.

6. **COMMENT:** 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. (M.E.)

RESPONSE: As described in the Technical Assessment of the Community section on page 33 of the CERP, nearly 75% of the NO_x emissions in the community come from on and off-road mobile sources. NO_x is the community's driving precursor to both ozone and PM_{2.5} formation. Over 25% of the direct PM_{2.5} is also from mobile sources in the community. Overall, a variety of mobile sources account for the vast majority of the emissions in the Stockton AB 617 community.

7. **COMMENT:** Please note that the source proportions for PM_{2.5} shown in Figure 3.5 and Table 3-2 are not consistent with one another. (M.E.)

RESPONSE: Table 3-2 has been updated to correctly reflect the proportions shown in Figure 3.5.

8. **COMMENT:** Please provide a brief explanation of the prioritization factor. 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 PM_{2.5} are these values estimates from the inventory? (M.E.)

RESPONSE: The term "prioritization factor" was not appropriate in this context. The CERP will be changed to include the following language:

Based on District air quality analysis modeling, the Stockton AB 617 Community was found to have exceeded the 24-hour average PM_{2.5} concentration for National Ambient Air Quality Standard (NAAQS) levels of 12, 35, 55, and 65 µg/m³ a total of 120, 18, 4, and 3 days, annually, on average during the 2017-2019 period, respectively. In addition, the community was found to have exceeded the 8-hour average ozone concentration for NAAQS of 70, 75, and 84 ppb a total of 15, 7, and 1 day, annually, on average during the 2017-2019 period, respectively. Details about the nature and formation of local air pollution and its adverse health impacts are summarized in Appendix G: Health Impacts of Air Pollution.

The PM 2.5 speciation data in Figures 3-7 and 3-8 were developed using procedures used for PM 2.5 Modeling.

- 9. COMMENT:** How much NOx emissions contribute to PM2.5 seems in part to be related to ammonia which is commonly associated with AG 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. (M.E.)

RESPONSE: As outlined in the Community Air Monitoring Plan, the District will conduct PM2.5 speciation sampling and laboratory analysis, which is expected to provide more detail on what constituents contribute most to the total PM2.5 concentration at different times of the year. As noted in the comment, peak PM2.5 concentrations in the Valley are commonly caused by the constituent ammonium nitrate, which is driven primarily by NOx emissions. Ongoing reductions of NOx in the community of Stockton and across the Valley will continue to reduce the formation of ammonium nitrate, and thereby reduce the total concentration of PM2.5 across the region.

- 10. COMMENT:** 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.(M.E.)

RESPONSE: The District recently adopted its Commercial Underfired Charbroiling Emission Reduction strategy and can provide updates to the Stockton CSC as the strategy continues to be implemented. Additionally, CARB can also provide updates on their statewide effort to develop suggested control measures to reduce PM2.5 emissions from cooking operations.

- 11. COMMENT:** Please describe and provide evidence on how the District rules are "the most stringent measures".(M.E.)

RESPONSE: The District's current rules and regulations reflect technologies and methods that extend well beyond required control levels, and these rules are regularly reviewed by CARB and U.S. Environmental Protection Agency (EPA) due to requirements included in the federal Clean Air Act (CAA). The EPA is the oversight agency which regularly reviews District and state emission reduction measures for stationary, area, and mobile sources. As a part of the development of the District's latest attainment plan for PM2.5, the 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards (2018 PM2.5 Plan), the District was required to demonstrate that the most stringent emission reduction measures feasible for implementation in the Valley are currently required. EPA has defined "most stringent measures," or MSM, as the maximum degree of emission reduction that has been required or achieved from a source or source category in any other attainment plans or in practice in any other states and that can feasibly be implemented in a region.

The [2018 PM2.5 Plan](#) was adopted by the District Governing Board in November 2018, and includes a regulatory evaluation using the key factors defined in EPA's 2016 Fine Particulate Matter National Ambient Air Quality Standards: State Implementation Plan Requirements. Through this evaluation, the District and CARB determined that the State Implementation Plan (SIP) for the Valley includes the most stringent measures possible. In February 2020, U.S. EPA published a technical support document detailing their evaluation of the 2018 PM2.5 Plan, including an evaluation of Best Available Control Measures (BACM) and MSM for the Valley. On June 30, 2020, US EPA approved portions of the 2018 Plan for the 1997, 2006, and 2012 PM2.5 Standards related to the 2006 24-hour PM2.5 NAAQS of 35 µg/m³. Notably, part of this approval included a finding that District rules are MSM.

12.COMMENT: How does the SJVAPCD ensure that CEQA agencies adopt and implement all required mitigation for mobile and area sources? (M.E.)

RESPONSE: Under CEQA, a Lead Agency is a public agency with principal responsibility for carrying out or approving a project subject to CEQA. The District is considered a Trustee Agency in the process. While a Trustee Agency, such as the District, has "jurisdiction by law" over a particular natural resource, in this case the air, the District does not have discretionary approval power over a project under CEQA. One of the roles of the Lead Agency is to consider the comments issued by Trustee Agencies and include all feasible mitigation measures, which are determined by the Lead Agency under CEQA and to include those into the proposed project. As a Trustee Agency, the District provides comments on proposed projects, which identify applicable rules and regulations, and project design elements to further reduce and limit air quality impacts for which the Lead Agency assesses the feasibility of incorporating as mitigation measures. As a Trustee Agency, the District does not determine the feasibility of the proposed mitigation measures; and therefore, does not have the authority to require that such measures be adopted and implemented by Lead Agencies. However, Lead Agencies do address the comments provided and evaluate them for feasibility, and respond publicly with the conclusions. The Lead Agency adopts mitigation measures that they determine are feasible.

13.COMMENT: How many employers are located within the AB617 area that are required to develop and implement a trip reduction plan in accordance with the District Rule 9410 – Employer Based Trip Reduction? (M.E)

RESPONSE: As of 2/24/2021, there are 18 worksites in the Stockton AB 617 community that are required to implement a trip reduction plan in accordance with District Rule 9410.

14.COMMENT: The table 3-6 under Grant Funding, it lists the incentive program funding as of October 7, 2020. Please clarify the timeframe from the start of the

program. Of the 22,881,939 dollars dispersed almost 40% has been spent on 5 heavy duty locomotives. Are these locomotives local? (M.E.)

RESPONSE: The time frame for the data in table 3-6 is 2005 to 10/7/2020. The five locomotives funded operate in and around Stockton on a daily basis, three of which are switchers that operate locally in and around the Port of Stockton and the other two are the Altamont Corridor Express commuter trains that service Stockton on a daily basis.

Heavy-Duty Rerouting:

15. COMMENT: Please provide the CSC an update from the outreach and plan development consultants for the sustainability plan development (M.E., EJCW, Café Coop)

RESPONSE: The District plans to work with the CSC to develop a comprehensive outreach plan, during the CERP implementation period, that will most effectively reach the community. Currently, there are no consultants working on an outreach plan for AB 617.

Port of Stockton:

16. COMMENT: Please include in the description of the Port and the several pipeline systems on site or the short-line trains that serve the facilities operated or leased by the Port. The Port leases warehouse space that should be characterized by square footage as well as a description of the CEQA approval total truck, train, and ship visits to and from facilities. (M.E.)

RESPONSE: The Port of Stockton description has been updated.

17. COMMENT: The Port of Stockton should provide all emissions inventory and should make it available for public inspection. (M.E, Panyasee)

RESPONSE: The Port of Stockton has finalized their first emissions inventory, which was for the 2018 year. This report was shared with the CSC members and will be posted to their website.

18. COMMENT: Can someone conduct a study on how to transition (ship emission control) infrastructure to all electric? What is the cost of a bonnet? (Panyasee) The costs associated with Bonnets for ships docking at the Port is concerning as well as the lack of data. ACTI estimates that when dozens of systems are built they will sell for \$8 million each (Maio, 2014). (Groupa White)

RESPONSE: The requirements for the types of vessels coming into the Port of Stockton will not be required to have their controls until January 1, 2027. The funding proposed would look to get early emissions reductions in the community. The District is working with the Port of Stockton and technology providers to understand the cost and emission reduction benefits of installing a marine vessel exhaust control system, however expected costs for the system could range from \$6 million to \$10 million depending on equipment needed to appropriately capture and reduce emissions from the vessels at berth.

Biomass Power Facilities:

19. COMMENT: 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. 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. (M.E. pg. 84)

RESPONSE: A 3-year compliance history was provided to the CSC and posted on the community web page. This Enforcement Overview can be found: ([Appendix F Enforcement Overview](#)). The Enforcement Overview includes a description of the compliance history and activities the District has taken regarding DTE facility and other facilities in the Stockton community. Additionally, the District will be providing annual updates on inspections of stationary sources and enforcement action taken for any documented non-compliance under the District's regulatory jurisdiction.

District staff must go through a certification process to be allowed to conduct visible emissions evaluation using EPA Method 9 (Visible Determination of the Opacity of Emissions from Stationary Sources). District Rule 4101 - Visible Emissions limits visible emissions to no more 20% opacity, which means that a plume from an emission source cannot obscure the observers view equal to or more 20%, however, this opacity limitation does not apply a plume of steam or water vapor. EPA Method 9 has specific requirements for observing emissions from a wet plume, where readings are taken at the point of the plume where water vapors are no longer visible. DTE stack typically has a plume of steam in the exhaust, which is the result of the wet scrubber used to control emissions from the exhaust. District staff determine compliance with opacity limits during regular inspections conducted at the facility.

Indoor Air Quality:

20. COMMENT: Is the difference in MERV ratings between 13 and 14 worth 2.6 million dollars and what is the term life for this investment? (M.E.)

RESPONSE: The difference in the Minimum Efficiency Reporting Value (MERV) rating between 13 and 14 reflects the filter's ability to capture particles in the air. As the MERV rating increases, so does the filter's removal efficiency for smaller-sized particles. High efficiency filters remove very small particles and are rated as removing less than 75% to greater than 95% of particles 0.3 to 1 microns in size, and carry a MERV 13 to 16 rating. According to manufacturer recommendation, filters with higher MERV ratings need to be changed at least every three months and cost up to about \$25 per filter. The District will be discussing [Stockton Unified School District's COVID-19 Prevention Program](#) to better understand the School District's plan for air filtration in the school and the timelines and will share this information with the CSC. The budget currently allocates an incentive cost per unit at \$80,000 for 33 units totaling \$2,640,000.

21. COMMENT: The suggested measure on tackling community comments and concerns on indoor air quality is not sufficient for affected citizens in the community of Stockton. The community of Stockton demands a thorough proposed implemented plan that attempts to solve community concerns. (Njoku)

RESPONSE: During the CERP implementation period, the District will work with the CSC to further develop the indoor air quality measure to ensure that the strategy addresses the concerns of the community. The CERP acts as the framework for implementation, understanding that there are a considerable number of factors that will need to be taken into consideration when implementing the measures, including coordinating and taking feedback from the CSC.

22. Comment: The District should start with a proposed implementation plan that includes plans for access to indoor air quality filtration equipment and services for affected communities, mechanical air filtration systems for new buildings and homes, and financial and educational support for affected individuals with health complications due to indoor air pollution exposure. (Njoku, Leiba)

RESPONSE: During the CERP implementation period, the District will work with the CSC to further develop the indoor air quality measure to ensure that the strategy addresses the concerns of the community. The District will work to include education of health impacts of indoor air quality into the development of this measure.

Urban Greening:

23. COMMENT: Has the SJVAPCD obtained any indication from local and state agencies that they are open to discuss urban greening?(M.E.)

RESPONSE: There are several state and local agencies that are doing work in this area, including the City of Stockton working with various organizations on the

Transformative Climate Communities grant. The City of Stockton received approximately \$4 million dollars towards urban greening, the majority of which is in the AB 617 Stockton boundary.

24.COMMENT: Please add language to the Stockton CERP that includes giving low-income individual homeowners the chance to have a tree planted in their yard. (Provost)

RESPONSE: The District will encourage all CSC members to share their thoughts and ideas on how to implement this specific measure during the implementation phase of the CERP process.

25.COMMENT: Urban greening and forestry is critical, but it requires more detail on what maintenance entails. Who covers watering, trimming, siting, etc. and at what frequency? As AB617 funding runs out when would maintenance costs shift back over to the City? (Williams)

RESPONSE: As stated in the comment, there are numerous factors that need to be taken into account when looking to successfully implement vegetative barriers and urban greening projects and will require the close coordination of many groups to develop plans for these projects. These topics will be good topics of discussion with the CSC and those involved during the implementation process.

26.COMMENT: It is in the best interest of Stockton to include urban greening and vegetative barriers at and around schools. (Leiba)

RESPONSE: The District will look to collaborate with tree-planting partner organizations to help develop project plans in coordination with the CSC. These plans will include details about the CSC's priority locations and outline the research needed to ensure the proper placement of trees as effective barriers. As with every measure, the District, project partner organizations, and the CSC will work to evaluate the community benefit of these programs as the details are worked out through implementation.

Enforcement:

27.COMMENT: CARB encourages the community to report possible violations regularly and makes referral to appropriate section in a timely manner but what are the outcomes? (M.E.)

RESPONSE: The District has on call staff that receive and respond to complaints 24 hours a day, 7 days a week. The District provides multiple options for individuals to file complaints, including an automated voicemail in both English and Spanish, online complaint system, and a smart phone app (Valley Air). District vehicles are equipped with GPS systems and during normal business hours the field staff closest to the complaint location will typically be assigned to

investigate the complaint. Complaints received after hours are routed through the automated system to the on call staff to investigate to ensure a timely response to complaints in order to abate potential public nuisances and to determine compliance with District rules. District staff investigate each complaint by, contacting the complainant (if they have provided their contact information and wish to be contacted) to gather additional details which help to better understand the source of the complaint prior to conducting the investigation. The District staff assigned to the complaint will also follow up with the complainant via phone call or email to explain the results of the complaint investigation.

28. COMMENT: Regarding enhanced stationary source enforcement: Will the CSC be provided an annual report on the outcomes from these increased inspections? How will this information be shared with the public? (Groupa White)

RESPONSE: The District will provide an annual report that includes the results and activities that are completed. This will include a list of permitted facilities, facility inspections, a summary of complaints, and a summary of enforcement action taken when non-compliance was documented. The District and CARB can also provide quarterly enforcement update reports during CSC meetings and provide a summary worksheet of the activities that are completed during that quarter should the CSC request them.

Zero/Near Zero

29. COMMENT: The Stockton CSC only wants funding for zero emission technology not near zero emission technology. Please remove from the CERP. (Panyasee, Williams)

RESPONSE: For measures where both “zero” and “new-zero” emissions technologies eligible for incentives, the District will prioritize funding the zero-emissions (electric) vehicles and equipment over natural gas or other clean alternatives, where feasible. This could include focus on outreach to trucking businesses based in the community to determine their ability to transition to zero technology. However, there are some vehicles and industries where there are not yet feasible electric alternatives. In these cases, funding the near-zero technologies would replace diesel engines, which removes toxic diesel PM from the community.

30. COMMENT: Natural gas fueled trucks, buses, and infrastructure for natural gas fueling are not sound, sustainable long-term investments. Short range, medium-duty all electric trucks are available, which are the vehicle type CSC members requested this measure be targeted at. (Garoupa White)

RESPONSE: The District fully supports the transition to zero-emission technology as quickly as possible and will support, encourage and prioritize

funding for the replacement of existing equipment with zero-emission options whenever feasible. However, there are segments of the transportation and heavy-duty equipment sectors in which zero-emission technology is still not commercially available or feasible. For those segments, the District maintains that it is critical to support the deployment of available near-zero-emission options that provide immediate emission reductions of up to 90% from current compliant diesel vehicles and equipment. To achieve near-term reductions in emissions and associated health benefits, the District recommends including options for funding near-zero-emission equipment in situations where zero-emission equipment is not feasible or available.

District Programs:

31. COMMENT: The CSC has not been able to focus and accelerate new actions that go beyond existing state and regional programs. We do not recommend using AB 617 resources where other program funding or compliance requirements are already in place. We fear this will endanger the Stockton CERP from approval by CARB. (Panyasee, Leiba)

RESPONSE: The CSC has identified numerous new actions, including vegetative barriers, urban greening, school and home air filtration, and studying air pollution emissions from algal blooms. Incentive funds that would be used as part of the CERP are dedicated funding, meaning residents and businesses in the community would be able to request and receive funding soon after applying, if included in the CERP, resulting in near-term emission reductions. Many of the existing state and regional programs funding sources may or may not continue to receive funding and most of the programs are first-come-first-served, meaning that residents and businesses would potentially have to wait extended periods to possibly receive funding for their projects, meaning emissions reductions would at best be delayed and worst case would not happen at all.

32. COMMENT: A local “community benefits” fund should be established from fees that could be used to pay for community priorities. (Groupa White)

RESPONSE: The California Air Resources Board currently has a Community Air Protection grant program for those community priorities that do not fall within the CERP statutory goals of emissions and exposure reduction. More information about this program is available here: <https://ww2.arb.ca.gov/capp-cag>

33. COMMENT: Regarding “cleaner burning” replacements for fireplaces: New research shows USEPA certified “cleaner burning” devices do not burn cleaner and their installation should immediately be halted. Funding should only be used

for electric heat pumps. (Groupa White) Use strong incentives to replace wood-burning fireplace use with primarily heat pumps. (Knodt)

RESPONSE: The proposed strategy in the Stockton CERP only allows the replacement of a wood burning fireplace or wood burning heater with an electric heat pump or a natural gas insert. The new research regarding “cleaner burning” devices mentioned in the comment are in regards to wood burning devices that would not be eligible for funding under this strategy. The District recommends maintaining natural gas upgrades as an option due to electric heat pumps causing a significant increase to a home’s monthly electricity usage and cost, which may be too much of a financial burden for some that may be interested in eliminating a wood burning fireplace or device from their home. Natural gas units can provide more than 95% reduction in emissions from an uncertified wood burning unit or open hearth fireplace.

Cost Health Benefits Information:

34. COMMENT: We need to have cost health benefit information to make adequate decisions on the measures that we hope should benefit persons who reside, work, study and recreate within the Stockton AB 617 project area. The CERP measures should be strictly targeted to the projected area. (Leiba)

RESPONSE: The AB 617 legislation and the California Air Resources Board blueprint recognize that reducing emissions from stationary and mobile sources is tied to positive health outcomes.

There have been several health studies conducted in the Valley linking general air pollution to adverse health outcomes. One such study, the Children’s Health & Air Pollution Study (CHAPS), has studied a large cohort of children and pregnant women in the Fresno area to better understand the effects of pollution on preterm birth, low birthweight, childhood asthma, and more.

[Children’s Health & Air Pollution Study \(CHAPS\)](#)

Additionally, the two health studies linked below, while not conducted in the Valley or Stockton, are California-based studies that show a clear link between adverse health outcomes and locomotive and port activities, especially in children. Using the conclusions from these studies, we can expect that similar health impacts are occurring in the Stockton area.

Respiratory Health Risks for Children Living Near a Major Railyard – Inland Southern California (2012)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4703713/#R32>

Global Goods Movement and the Local Burden of Childhood Asthma in Southern California – Long Beach & Riverside (2009)

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2774197/>

The District, CARB, and the CSC will continue to work closely with the Office of Environmental Health Hazard Assessment (OEHHA) over the next several years to track and better understand the health outcomes associated with the significant emissions reductions expected from the CERP measures and will make available all emissions monitoring data collected available to aid in these efforts.

35. COMMENT: The measures within the CERP must come with a requirement to measure emissions over time and attempt to determine actual health effects. (Leiba)

RESPONSE: One of the intended goals of the community air monitoring plan is to gather data that will track emissions reduction and emissions speciation data that will help with research efforts and to inform future decisions regarding CERP strategies, including the possibility of adding or amending strategies as more information is made available.

36. COMMENT: CERP measures should provide amenities and neighborhood benefits to persons in the AB 617 area even if the health benefits are uncertain. (Leiba)

RESPONSE: As described in section 4 of the CERP “Strategies to Reduce the Cumulative Burden in Stockton,” there are several measures aimed at providing incentives for health protective exposure reduction strategies directly to residents in the AB 617 Stockton community. Such measures include Vegetative Barriers (VB.1), Urban Greening (UG.1), Lawn and Garden Equipment Incentives (LG.1), Home Air Filtration (IAQ.1), Incentives for Car Replacement and Repair (TP.1 and TP.2), and several community outreach strategies to help educate residents about the link between air quality and health.

Outreach:

37. COMMENT: Digital Engagement should be added in various languages, specific platforms and use 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-19 has set forth new standards of communication. (EJCW, Café Coop)

RESPONSE: The District plans to work with the CSC to develop a comprehensive multilingual outreach plan, during the CERP implementation period, that will most effectively reach the community. The District will work to enlist community-based organization to assess the feasibility of a wide variety of communication methods.

38. COMMENT: 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, and non-Spanish speaking residents and proprietors of micro and small lawn and garden businesses. We suggest the Spanish speaking media outlets and strategies be identified and measurable by AB 617 CSC. (EJCW, Café Coop, Leiba)

RESPONSE: The District plans to conduct outreach on the AB 617 strategies, including the commercial lawn and garden program, in Spanish (and in many cases other languages) and work with the CSC to develop a comprehensive outreach plan, during the CERP implementation period, that will most effectively reach the community.

Budget

39. COMMENT: Please include a summary budget for all incentive and non-incentive measures at the top of chapter 4. There are inconsistencies of direct emission reductions in the CERP from the February 16th draft and the latest draft, for this reason, request to see an independent technical advisory group to help CSC understand strategy efficacy, cost/benefit analysis, and implementation options for given strategies. (Williams)

RESPONSE: The District has provided a full budget of the incentive measures in Table 6-1 of the draft CERP. The funding identified is the money that will be used exclusively for the projects and does not include District time and resources to help facilitate this work, including attendance at various meetings and focused outreach provided by District staff to increase participation in available opportunities. During several CSC meetings, District staff has shared with the CSC that the District annually receives money to implement the AB 617 program District-wide, which includes support for CSC members for implementing all strategies in the CERP and performing community air monitoring. The District is committed to providing technical support and bringing in additional support, including third party experts and CARB staff, to assist CSC members during CERP strategy implementation.

Other

40. COMMENT: The document does not have any reference to climate pollutants (except in background information about CARB). There should be a substantial passage somewhere in this document that addresses how climate will influence decisions throughout CERP strategies. For instance, please delete reference to “near-zero” anything in the document. (Williams)

RESPONSE: The purpose of AB 617 legislation is to reduce toxic and criteria emissions in disadvantaged communities due to the negative health impacts associated with exposure to them and the language in the CERP is reflective of the conversations and discussions had with CSC members throughout the CERP development process. In regards to the removal of near-zero options, many CSC members have expressed a desire to prioritize zero emissions, having a near-zero option if there is not an ability or interest to transition to zero emission technology currently. For example, in the case of fireplace inserts, residents have been reluctant to transition to electric pumps for a variety of reasons but have been very willing to replace old, dirty wood burning fireplaces and heating devices with a natural gas insert, which substantially reduces toxic and criteria air pollutants in a very localized manner, helping where it is needed the most. However, implementation of these strategies, in most cases, will also have co-benefits of also reducing greenhouse gas reductions.

41. COMMENT: Due to the legal complexity, capital costs, implementation and long lead times associated with reducing ship emissions I would suggest passing on most of the plans currently in the CERP. (Knodt)

RESPONSE: During several CSC meetings, the CSC members participated in several exercises used to identify their sources of concern within the community. Through these efforts, one of the biggest sources of concern expressed by the residents were emissions from the Port of Stockton. CERPs are encouraged to identify strategies that bring new and innovative ideas and this type of strategy has not been used due to the uniqueness of the types of ocean going vessels that visit the Port of Stockton. Understanding there may be challenges to addressing emissions from ocean going vessels, there are considerable emissions coming from this source category, that if controlled sooner would benefit the community should the CSC choose to include this strategy in the CERP.

42. COMMENT: Figure 3-6, where does this data come from? Can it be made available in a table with real figures (rather than only percent values)?

RESPONSE: This section has been updated to include a hyperlink and reference to Appendix D – Source Apportionment and Community, which includes tables of source categories and criteria air pollutants breakdowns.

43. COMMENT: 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. (Williams)

RESPONSE: Yes, the District obtains information from the facilities and we work with directly with the facilities to ensure we are collecting accurate information and using our established emission factors.

44. COMMENT: In Appendix D, 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? (Williams)

RESPONSE: Appendix D has been updated to better describe the current collaborative efforts between the District and Stockton Unified School District to inform and educate students and parents regarding air pollution.

45. COMMENT: Please include in the additional paragraph a statement of commitment for ongoing community access to SJVAPCD and CARB Technical Staff. (M.E.)

RESPONSE: The District is committed to providing the CSC members with the support and information requested. Towards that end, the District will work closely with CARB to provide that information.