# Summary of Public Comments - Blueprint 2.0

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Any questions regarding this document can be emailed to communityair@arb.ca.gov.

# 1. Proposal to Delegate CARB Board Authority to the Executive Officer

Source of Comments: Consultation Group Meeting, California Manufacturers and Technology Association (CMTA), San Joaquin Valley Air Pollution Control District (SJVAPCD), public comment

#### **Main Comments**

Concerns regarding California Air Resources Board's (CARB's) delegation of annual consideration for selection of communities and approval of Community Emissions Reduction Programs (CERPs) to CARB's Executive Officer.

• Do not reduce the level of oversight and public access to the process.

### **CARB** Response

As part of streamlining the CERP approval process and expediting the implementation of new pathways to broaden benefits to more communities, CARB sought the CARB Board to delegate the authority to approve CERPs to the Executive Officer. CARB will collaborate with the Community Steering Committee (CSC) and air district to design a public workshop on the CERP if needed, consistent with the current practice. After engaging with the CSC, CARB staff will evaluate the CERP and develop a staff report for public review and comment before providing it to CARB's Executive Officer for consideration. This approach ensures oversight to uphold Program requirements and aligns with community goals. However, the selection of new CERP and CAMP communities will remain under the jurisdiction of the CARB Board.

CARB anticipates that few, if any, new communities will be selected over the next five years of the Program. As required by AB 617, CARB staff will annually consider whether it is appropriate to recommend selection of new communities to the CARB Board for which the local air district will develop a Community Air Monitoring Plan (CAMP) and/or CERP. If there is an appropriate basis for selection, air districts or communities may nominate a community for selection for CARB to consider. See *Blueprint 2.0, Appendix C* for details.

# 2. Stationary Sources, Permitting, and Technology Clearinghouse

Source of Comments: Bay Area Air Quality Management District (BAAQMD), California Council for Environmental and Economic Balance (CCEEB), CMTA, Leilac, South Coast Air Quality Management District (SCAQMD), public comments, CARB Board meeting testimony

- Standard, statewide technology minimums on feasibility and best available retrofit control technology for major industrial facilities would be a helpful, practical tool to implement the guiding principle on emissions reduction strategies listed in the "Equity Lens" section, on page 13.
- Since CARB provides oversight of the Expedited Best Available Retrofit Control Technology (BARCT) requirement, any industry deviations from the minimum BARCT benchmark should require a justification showing compliance with civil rights law (*Title VI* and *Code 11135*). A higher BARCT standard should be considered for communities that are especially overburdened.
- Rebuild CARB's historical stationary source program, including the source testing program and issuance of CARB determinations of BARCT for major industrial sources to ensure that BARCT controls considered are technology-forcing.
- Air district's regulatory authority related to permitting requirements, indirect source rules, stationary sources, and regulations on area-wide emissions is essential to the successful implementation of the Community Air Protection Program. The BP 2.0 must detail expectations for air districts to target implementation and enforcement of these programs and regulations. Additionally, there must be an established procedure on how CARB will collaborate with the air districts to ensure these expectations are met.
- Support commercializing alternative technologies in the industrial sector.
- Offer source-specific assistance to address local emissions sources with overlapping agency jurisdiction issues.
- Provide guidance on when alternative technologies should be considered reliable and commercially available, and therefore required when best available control technologies (BACT) are triggered.
- Concern that CARB is going beyond the statutory requirements for the Technology Clearinghouse (which is to identify best available control and retrofit control technology) by also requiring that the most stringent technologies be used by stationary sources. The Clearinghouse also does not communicate how or why BACT is established within each air district, creating confusion for users.
- Ensure Program actions can be technically and cost-effectively integrated into a business's operation, have been demonstrated to be achievable within the proposed time frames, and are supported by monitoring data.
- Concerns over CARB developing new web-based tools, without stakeholder input, including the launch of the Technology Clearinghouse in 2024. Blueprint 2.0 should include a complete list of the technical support tools CARB is developing or updating, the intended purpose of each, and specific opportunities for stakeholder input on them.

### April 2024

• BP2.0 lacks a commitment on industrial sources. Commenter calls on CARB to evaluate climate and local air permitted facilities to ensure non-combustion first. Industry is receiving mixed signals, technologies to decarbonize and efforts to address local impacts are not always the same.

### **CARB** Response

Blueprint 2.0 includes Goal 4, *Partner with Air Districts to Enhance Stationary and Mobile Source Strategies* (page 15). Details are also described in the *Addressing Emissions from Stationary Sources* (pages 32-34) section. Blueprint 2.0 also describes the air district's role in permitting stationary sources (pages 57-58).

The *Technology Clearinghouse* will contain user friendly tools to support air district and community interests in reducing emissions from stationary sources whose emissions contribute disproportionately to local air pollution in overburdened communities. The clearinghouse will contain webpages that house information such as: *expedited BARCT schedules, BACT, BARCT*, related *technologies for the control of toxic air contaminants* (T-BACT), next generation technology, historic guidance documents, and community stationary source permitting Q&A. The depth and breadth of the information stored in the clearinghouse and related webpages will be based on stakeholder (including communities, regulatory agencies, emissions sources, and control technology manufacturer) interest and opportunity for meaningful reductions.

# 3. Community Selection

Source of Comments: BAAQMD, SJVAPCD, CARB Board meeting testimony

- Need detail on how CARB and the air districts will continue to formally select communities for targeted emission reduction initiatives.
- CARB has a statutory obligation to select communities for emission reduction programs, however, the BP 2.0 does not detail how community selection will move forward in the next phase of the Program and instead alludes to an intent to no longer select communities. CARB must ensure the BP 2.0 contains clear commitments from CARB and the air districts to work in collaboration with communities to continue to implement the CERPs and/or Local Community Emission Reduction Plans (L-CERP) in formally selected communities.
- There needs to be a pathway for communities outside those selected and the communities on the consistently nominated community list.

#### **CARB** Response

With the efforts to reimagine the Community Air Protection Program and update the statewide strategy in Blueprint 2.0, the community selection process has been refocused. Per statute, CARB staff will continue to make community recommendations to the CARB Board to consider for selection, as appropriate, communities for the development of a CAMP and/or CERP. With prioritizing outreach to the consistently nominated communities for this upcoming year, CARB does not believe it is appropriate to select new communities for CERP or CAMP development in 2024. *Appendix C: Community Selection Process* has been added to Blueprint 2.0 and describes this process.

One of the main actions for CARB over the next year is to work with air districts to ensure completion of actions in all CERPs adopted to date, including for CERPs that will require more than five years to implement, with a priority focus on CERPs that are in their fourth or fifth year of implementation. This is stated in Goal 5 of Blueprint 2.0 on page 16.

As part of Blueprint 2.0, the *Consistently Nominated Communities List* will be a pathway to add other communities. There will be an annual update to the list in response to district and community self-nominations, with the first update to be made in 2025 (Blueprint 2.0, page 66).

# 4. Equity, Non-Discrimination, and Civil Rights Policy

Source of Comments: BP 2.0 Workshops, consultation group members, public comment, CARB Board meeting testimony

- Expand the priority actions under Goal 2 of Part One by: (1) developing
  investigative guidance for processing external complaints, DOJ and EPA manuals;
  (2) going beyond "orientation" for AB 617 Program participants and highlighting the
  nondiscrimination requirements imposed on recipients of state assistance; (3)
  updating terms and conditions in all CARB grants to reflect "affirmative"
  commitment to civil rights; (4) applying a racial equity lens to the entire Program;
  and (5) working with U.S. EPA and California Department of Civil Rights to train
  CARB staff.
- Create a goal to uplift environmental justice and racial equity in Part One and embed a vision for a Just Transition in Blueprint 2.0. Put goal of meeting environmental justice and racial equity goals into all agency staff duty statements.
- Update not only grant agreements but all actions taken by CARB and the air district to be consistent with civil rights law.

### April 2024

- Work with the U.S. EPA and other relevant agencies in developing CARB's policies and practices incorporating environmental justice and civil rights.
- All efforts at CARB must infuse AB 617 principles into all CARB, air district, and other agency programs.
- CARB should be proactive instead of reactive to non-discrimination policies.

### **CARB** Response

Blueprint 2.0 includes CARB's Vision for Racial Equality and Environmental Justice (pages 7-8) and Goal 2 (*Center Civil Rights Laws and Protections*, page 13) details CARB's plan to update CARB's Civil Rights Policy and Discrimination Complaints Process, orient new CSC members, train staff, and work with CAPCOA and air districts to ensure transparent compliance with non-discrimination laws. Blueprint 2.0 includes sections on *State Non-Discrimination Laws* (pages 38-39) and the *Building Capacity* section focuses on ways to uplift environmental justice and racial equity (page 46).

# 5. Consistently Nominated Communities

Source of Comments: BAAQMD, BP 2.0 Workshops, Consultation Group Meeting, CMTA, SCAQMD, SJVAPCD, CARB Board meeting testimony

#### **Main Comments**

- Clearly define "consistently nominated communities" and leave flexibility for new communities to be added.
- Include information in Part Two describing CARB's methodology or what it predicts for the Consistently Nominated Communities, such as whether they will have CARB liaisons.

### **CARB** Response

Blueprint 2.0 aims to prioritize Goal 6, found on page 16, which focuses on supporting consistently nominated communities. Over the next five years, the plan involves collaborating with various agencies at state, tribal, local, and federal levels to allocate resources and take action to improve air quality in over 60 communities that were nominated for the Program but not selected for CAMP or CERP development. The way the Program operated in the initial five years, detailed in Appendix B of the original Blueprint (2018), cannot continue given the current resources available. As part of changing how the Program works, CARB staff is implementing three new pathways to benefit a larger number of communities.

The *Consistently Nominated AB 617 Communities list* is built from air district and community-based organization recommendations and community self-nominations since

the first year of the Program. In July 2022, for the fifth year of the Program, CARB staff provided the air districts with a copy of the list for confirmation or adjustments. The Consistently Nominated AB 617 Communities list updates the priority communities for each air district and identifies support from community members or community-based organizations, (*Transforming Community Selection -Focus on Consistently Nominated Communities*, page 64). As part of Blueprint 2.0, the Consistently Nominated Communities List will be a pathway to add other communities. There will be an annual update to the list in response to district and community self-nominations, with the first update to be made in 2025 (Blueprint 2.0, page 66).Additional details can be found in the *Consistently Nominated Communities Geolocation Methodology*.

# 6. Funding Transparency

Source of Comments: BAAQMD, BP 2.0 Workshops, CCEEB, public, SCAQMD, CARB Board meeting testimony, CMTA

### **Main Comments**

- Create a priority action to provide transparency on staff and budget resource allocation by air districts and CARB. Report annual funding and aggregate expenses for the Program in a centralized, standardized manner.
- Disclose the resources already committed to the 19 communities in the Program, and what is available for the consistently nominated communities in the 2023-2024 budget.
- Need longer-term or continuous streams of funding and resources for the Program to ensure stability and continuity, e.g. having CARB staff remain on a project until it is completed.

### **CARB** Response

Funding transparency is described in the *Transparency and Accountability* section of Blueprint 2.0 (page 48). The *AB 617 Funding* webpage has summary tables detailing funding for the Program since its inception, frequently asked questions with responses, and an archived webinar that provides information on AB 617 funding. For additional information on Community Air Protection Program Incentives (CAP Incentives) there is a *Community Air Protection Incentives Project Dashboard* which provides information about how and where CAP incentives projects are being implemented.

CERP implementation is taking longer than the five years initially envisioned. In Goal 5, *Track Program Commitments and Ensure Completion of Community Emissions Reduction Programs* (page 16), CARB explains how it will work with air districts to ensure the completion of current CERPs.

### April 2024

As described in the *frequently asked questions about funding* document, the California Legislature provides funding to CARB and air districts to implement the Program and the funds are allocated as part of the annual budget process. There is no continuous stream of funding for the Program.

# 7. Accessibility and Community Capacity Building

Source of Comments: BP 2.0 Workshops, CCEEB, CMTA

#### **Main Comments**

- Facilitate peer-to-peer learning across Community Steering Committees (CSCs) and knowledge sharing, especially for non-CSC residents and youth.
- Help communities build technical capacity by cataloging information and tools, documenting what other CSCs have accomplished on a single platform, making air quality data accessible for non-experts, and explaining acronyms.
- Distribute more information about the Program through non-digital channels, such as physical mail.

### **CARB** Response

As one of the Guiding Principles in Blueprint 2.0 in the *Support Power Sharing* section (page 11), Blueprint 2.0 describes how peer-to-peer learning can establish networks and mentoring relationships. This is also a priority action in support of Goal 5 (*Track Program Commitments and Ensure Completion of Community Emissions Reduction Programs*, page 16).

CARB staff has built a *Community Air Protection Program Online Resource Center* that has information and tools to support the development and implementation of CAMPs and CERPs. This information can be used by community members and the public to develop actions. Goal 8 (*Make Programs and Information and Tools More Accessible to Communities*, page 19) can help communities build capacity and develop informed actions. CARB provides information in different ways, ranging from educational videos to data visualization and budgeting information. Beginning on page 40 under the *Engaging with Partners in the Community Air Protection Program* section, Blueprint 2.0 provides examples of various forms of engagement that CARB has seen across communities during the first five years of the Program.

# 8. Local Community Emissions Reduction Plans

Source of Comments: BAAQMD, CCEEB, CMTA, public comment, SCAQMD, SJVAPCD CARB Board meeting testimony

#### **Main Comments**

- Provide detailed guidance on the process for developing Local Community Emissions Reduction Plans (L-CERPs), what types of emission reduction measures are permissible in an L-CERP, and what enforcement mechanisms exist to implement them. Otherwise, specify that L-CERPs must be based on the guidance for CERPs in Appendix C of the 2018 Blueprint.
- The L-CERP may be vulnerable to challenge as an underground regulation. Blueprint 2.0 should provide clear direction that the selection, development, and implementation of regulatory measures are the sole province of CARB, the air districts, and any other regulatory agency whose authority extends to measures recommended by community representatives.
- During the development of an L-CERP, require engagement with CARB, the air district, and other relevant agencies. L-CERPs should be brought before these agencies for review and formal approval pursuant to these agencies' rulemaking processes.
- Does an L-CERP need to be approved by the air district or CARB? How will the L-CERPs be implemented and enforced?
- There needs to be a funding source for L-CERPs.

### **CARB** Response

As one of three new pathways to support consistently nominated communities, CARB included the L-CERP as a new type of *Community Air Grant* (CAG) project in Blueprint 2.0. Community Air Grants have been annually funded by the Legislature. More details about L-CERPs can be found under Goal 7 (*Use of Community Air Grants to Build Community Capacity and Local Community Emissions Reduction Programs*, page 18) and under *New Pathways for Community Action, Local Community Emissions Reduction Plans* (page 68). L-CERP encourages community collaboration with local air districts and other government agencies that can help implement proposed air improvement actions prioritized by communities. L-CERPs could include priority actions focused on exposure reduction incentives projects such as air filtration in homes or schools. Details on the scope needed for an L-CERP project will be included as part of CARB's annual solicitation for Community Air Grants. In the current CAG (*Cycle 4*) eight L-CERP projects have been funded. Based on experience, the goal will be to improve upcoming solicitations for the L-CERP projects.

L-CERP projects will be selected through a competitive application process with detailed scopes of the work. Final selection for all types of Community Air Grant projects is made by the CARB Executive Team. Neither an L-CERP nor any other type of CAG project deliverable require approval from CARB. However, grantees must complete the project as

specified in the scope of work and grant agreement. Table 1 clarifies the differences between a L-CERP and a CERP.

#### Table 1: CERP versus L-CERP

	Community Emissions Reduction Program (CERP)	Local Community Emissions Reduction Plan (L -CERP)
CARB Board Approved?	Yes	No
Defined by:	AB 617 Blueprint 2.0, Part 2	Community Air Grant Request for Application (RFA)
Funding to Develop	Air District Implementation funds (~\$1M - \$3M annually per CSC)	Competitive Community Air Grant (CAG) funds (\$300K max per grant award)
Role of CARB	<ul> <li>Participate in CSC</li> <li>Review and approve CERP actions</li> <li>Implement CARB actions, as appropriate</li> </ul>	<ul> <li>Develop CAG RFA through public process</li> <li>Administer CAG grant</li> <li>Technical assistance via staff liaison support</li> <li>Participate as invited</li> <li>Implement CARB actions, as appropriate</li> </ul>
Role of Air District	<ul> <li>Convene the CSC</li> <li>Co-lead CSC</li> <li>Co-develop CERP</li> <li>Review and approve CERP</li> <li>Implement CERP actions</li> </ul>	<ul> <li>May provide letters of support as requested and appropriate</li> <li>As resources allow, participate as invited</li> <li>Implement actions as authorities and resources allow (e.g., may use implementation funding)</li> </ul>

# 9. Tracking Progress and Metrics

Source of Comments: BAAQMD, BP 2.0 Workshops, CCEEB, Consultation Group Meeting, SCAQMD, CARB Board meeting testimony

- Create a new goal to track community accomplishments and capacity over time in addition to tracking and evaluating CERPs, CAGs, and other Blueprint actions.
- Track health-related data to measure Program progress, e.g., consider days of school sick-absent children, and discuss health disparities in Blueprint 2.0.
- Consider metrics of success when completing CERP implementation, not just metrics of strategies being completed, e.g., using data to measure air pollution reductions.
- To improve CERPs, include health evaluation and public health outcomes.
- Annual Progress Reports and metrics established in CERPs need to be standardized.

### **CARB** Response

Any air quality data collected during Program activities (by the air districts or through Community Air Grant projects), is made available through CARB's community-focused air quality data portal, *AQview*.

Blueprint 2.0 has been reimagined to ensure that Program actions reduce emissions and exposure to harmful air pollutants, ultimately reducing the risk of air pollution related health conditions. CARB has committed working closely with *California's Office of Environmental Health Hazard Assessment* to produce health-related data at the community level (*Office of Environmental Health Hazard Assessment*, page 43). Blueprint 2.0 describes what type of actions that can be taken to reduce community exposure to air pollution and the resulting health impacts (*Health and Exposure Mitigation Actions*, page 63).

To ensure CERP progress is tracked and reported, Blueprint 2.0 has Goal 5 (*Track Program Commitments and Ensure Completion of CERPs*, page 16). Blueprint 2.0 also streamlines and clarifies the CERP action tracking progress. Refer to the *Tracking Results and Progress* beginning on page 88.

# **10.** Community Emission Reduction Programs

Source of Comments: BAAQMD, CMTA, CEEB

### **Main Comments**

- Discuss what constitutes a feasible CERP measure and how feasibility is to be evaluated in the context of CERP development. This information can be presented on Pages 64-65 of Part Two.
- According to the statute, Blueprint 2.0 should clarify that resources committed to CERPs must be focused on achieving emissions reductions of pollutants impacting local air quality.
- Define a precise time frame for CERP completion so that Program resources can be allocated to other deserving communities.
- For CERP action-specific targets (Page 80, Part Two), tracking results and progress cannot solely be based on quantitative targets since some crucial actions cannot be quantified.

## CARB Response

Blueprint 2.0 describes actions to reduce air pollution emissions and exposure. "Action" is a general term that is used to describe, regulatory, facility-specific risk reduction, land use and transportation, health and exposure mitigation.

CARB has learned that it can take more than 5 years to develop and implement all of the actions in CERP. CARB and the air districts will work together to ensure all actions in each of the CERPs are completed. Blueprint 2.0 has included Goal 5, *Track Program Commitments, and Ensure Completion of Community Emissions Reduction Programs* (page 16).

Blueprint 2.0 outlines the process for developing and tracking CERP actions (*Tracking Results and Progress*, page 88). Blueprint 2.0 acknowledges the need to quantify emissions reductions as part of the CERP process, but also recognizes the value of actions that may not lead to measurable emissions reductions (exposure reductions, community capacity building, outreach). See the section titled *What Makes a Good CERP Action Metric for Tracking Progress?* on page 90.

# 11. Community Air Monitoring

Source of Comments: CCEEB, CMTA

#### **Main Comments**

- Clarify that actions informed by data from community air monitoring programs may not always align with initial community priorities.
- Emissions reduction targets should be on a rate basis and validated using operational and/or monitoring data concerning activity at the affected source. CARB should enforce emission reductions.
- Concerns that CARB's new data portal, AQview, has files available for download in "Lab Data & Reports" that "may contain preliminary data that have not been verified or extensively quality assured."

### **CARB** Response

Blueprint 2.0 updates community air monitoring plan guidance based on the first five years of the Program (*Community Air Monitoring Plan*, page 72). CARB suggests that when a community is selected for both a CAMP and CERP, the plans be developed in tandem to strengthen both when monitoring data is necessary to address the community's concerns.

AQview is a data repository and display for Statewide community air monitoring. *AQview* - *Air Quality Viewer* is continually improving with the help of its users, for specific concerns on the data platform submit concerns to *AQview Feedback Ideas*. The comment here has been provided to the AQview team and updates to the tool were made as appropriate. AQview offers a data download option and does perform quality assurance and quality control procedures (QA/QC) to ensure the accuracy of the data. For specifics on the QA/QC process, please *contact the AQview team*.

### 12. Partnerships

Source of Comments: BP 2.0 Workshops, CCEEB, AB 617 Consultation Group Meeting, public, CARB Board meeting testimony

Main Comments

- **Local government:** Improve collaboration with local government for efficient L-CERP development. Acknowledge agency challenges in collaborating with others and avoid relying solely on their goodwill for CERP efforts. Strengthen BP 2.0 language regarding land use and transportation action.
- **Community:** The role of community (Page 24, Part Two) should be more expansive and based on co-design principles.
- **Air districts:** The role of air districts should be partnership-based, like CARB (Page 24, Part Two). Air districts also need more guidance for setting priorities, e.g., delegating staff time to areas of high community concern.
- **Industry:** Industry stakeholders are not mentioned as partners in many sections. "Engaging with Business and Industry" (Page 68, Part Two) should be included in CERP development, not just implementation, and CARB should provide a catalog of examples/best practices for industry to contribute to Community Steering Committee problem-solving.
- **Attorney General:** Commit to work more closely with the Attorney General's office.
- Recommend that CARB formally partner with each agency to ensure resources will be directed to the communities as described in the BP 2.0.

### **CARB** Response

CARB's Community Air Protection Program is built on partnerships, one of the lessons learned over the past five years is that partnership and collaboration between community, government, and affected industry is instrumental to meet Program goals. Blueprint 2.0 describes partnerships, meaningful engagement practices, and effective power-sharing arrangements on pages 39-42 in the section titled *Working Together*.

# 13. Regulatory Strategies and Community-Focused Enforcement

Source of Comments: BP 2.0 Workshops, CMTA, public

### Main Comments

- Recognize CARB's regulatory authority over heavy-duty trucks and pesticides and include direct regulation of pesticides in priority actions for Goal 2 (Part One).
- Other commentors recommend that CARB modify Goal 2 priority actions to be more generalized, rather than including specific regulatory actions.
- Explore limitations in existing regulatory authorities for Blueprint 2.0.
- Provide clearer guidance on what community-focused enforcement looks like; defining local issues, identifying hotspots, and working with community groups (e.g. neighborhood watch) on inspections.
- Include detailed protocol for CARB and air districts when a land use or transportation action is considered inappropriate and update the "Air Quality and Land Use Handbook."

### **CARB** Response

Blueprint 2.0 includes an overview of CARB and air district regulatory roles (*Overview of CARB and Air District Regulatory Roles*, page 23). The roles of the agencies are provided along with the role of the California Department of Pesticides. In response to comments, CARB added Goal 4 establishing CARB's commitment to partnering with air districts to enhance stationary and mobile source strategies and associated priority actions.

CARB explicitly added language reaffirming its regulatory role of mobile sources, including heavy-duty trucks (page 23).

Community-focused enforcement is described under the *New Pathways for Community Action* section (page 69), CARB will implement community-focused enforcement actions to address mobile sources and partner with air districts to address stationary sources.

CARB does not have authority over land use decisions. The Blueprint describes examples of how CARB can provide guidance and, as resources allow, comment on the air quality impacts of major projects under *CEQA* (*Land Use and Transportation Actions*, page 61). CARB also maintains a *Land Use Resources* webpage to support smart growth land use strategies by providing land use resources on planning basics, sustainable policy, data, and tools.

# 14. Community Air Protection Program (CAPP) Incentives

Source of Comments: BAAQMD, BP 2.0 Workshops

#### **Main Comments**

- Provide more detail on getting incentive projects into the community and bring in community stakeholders early into the process.
- Look for multiple co-benefits in incentive projects; particular interest in naturebased projects and influencing land use decisions.
- Consider incentives for increased enforcement activity; truck re-routing studies are helpful.

### CARB Response

Blueprint 2.0 provides additional details on incentive actions, by describing the mobile source programs and the community-identified incentive project pathway. The *CAP Incentives 2019 Guidelines* are being revised to increase opportunities for disadvantaged communities,<sup>1</sup> particularly those that have been consistently nominated, to use selected actions and stationary source project categories that were developed in the first five years of the Program. These opportunities will be available statewide and implemented in partnership with communities. The CAP Incentives Guidelines update/revision process will include meaningful public engagement. (2024).

# 15. South Sacramento-Florin Community

Source of Comments: CARB Board meeting testimony

- Adequate funding and funding transparency is needed for South Sacramento-Florin to transition into a CERP community.
- The CSC and air district drew the community boundary to exclude stationary sources of concern to community members (e.g. old Cambell Soup facility location and airport) and leaves out the local black, indigenous, and people of color (BIPOC) and low-income communities. CARB should have higher standards for the air districts to implement AB 617.
- Restrictions on the number of members that can participate on the community steering committee.
- Request for the South Sacramento-Florin community to be selected for a CERP.

<sup>&</sup>lt;sup>1</sup> Disadvantaged communities are defined in California Health and Safety Code, section 39711 (SB 535, De León, Statutes of 2012, Chapter 830). Also see glossary for more information.

• Concern about how the Sacramento Metropolitan Air Quality Management (SMAQMD) district is administering the Community Air Protection Program.

#### **CARB** Responses

CARB staff have engaged in discussions with SMAQMD regarding the transition of the South Sacramento-Florin Community from a CAMP community to a CERP community. Community steering committee support for this transition has been acknowledged by CARB and SMAQMD. If the community is selected by the CARB Board for a CERP in the future, the air district with the CSC can determine how the CSC for the CERP process will be formed and function. The boundaries of the community can be re-evaluated by the CSC in preparation for CERP development.