

Final

California Air Resources Board
Community Air Protection Program

Richmond, North Richmond, San Pablo Community Emissions Reduction Program (Path to Clean Air) Staff Report

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Table of Contents

Staff Recommendation	1
Background	1
Community Emissions Reduction Program/Path to Clean Air Plan Overview	2
Summary of CARB's Evaluation	4
Recommended Actions to Strengthen Implementation	4
Appendix A. CERP Criteria Checklist	i

Staff Recommendation

Staff recommends that the California Air Resources Board (CARB or Board) Executive Officer approve the Richmond-North Richmond-San Pablo Community Emissions Reduction Program (CERP), also known as the Path to Clean Air (PTCA) Plan, developed pursuant to Assembly Bill (AB) 617.¹ Staff also recommends that the Executive Officer direct staff to work with the Bay Area Air Quality Management District (BAAQMD or Air District) and the PTCA Community Steering Committee (CSC) to take additional actions to strengthen implementation.

Background

CARB established the Community Air Protection Program² (Program) to implement AB 617, which requires community-focused action to reduce air pollution. CARB implements the Program which establishes criteria for developing and implementing community emissions reduction programs,³ community air monitoring plans, and other elements of the Program. The Blueprint 2.0⁴ was adopted by the Board in October 2023 and is the first five-year update to Program guidance. Blueprint 2.0 carries over certain elements from the 2018 Blueprint and incorporates clarifications of CERP requirements, which are referenced throughout this document.

The Board selected the Cities of Richmond, North Richmond, and San Pablo to develop both a community air monitoring plan in 2018 and a community emissions reduction program in 2021. The Air District worked with the PTCA CSC in 2021 to develop the CERP, otherwise known as the PTCA Plan,⁵ to reduce emissions and exposure to air pollution in the community.

The PTCA Plan includes a range of strategies to be implemented by the District, PTCA, CARB, and other public and private partners to directly address community air quality priorities from practical process improvements to ambitious, transformative actions. The plan clearly discusses potential political, fiscal, and legal challenges, aiming to ensure

¹ Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017. Note, this is the second selected community for which the Executive Officer is reviewing an air district CERP pursuant to the Board's delegation under Resolution 23-22. See CARB, Resolution 23-22 (Oct. 26, 2023),

<https://ww2.arb.ca.gov/sites/default/files/barcu/board/res/2023/res23-22.pdf>.

² CARB, Community Air Protection Program (last visited Aug. 26, 2024), <https://ww2.arb.ca.gov/capp>.

³ The Checklist for the Community Emissions Reduction Program Evaluation begins on page C-41.

⁴ CARB, Community Air Protection Program Blueprint 2.0 (Oct. 2023), <https://ww2.arb.ca.gov/blueprint-20>.

⁵ CSC & BAAQMD, PTCA Plan (Apr. 2024), https://www.baaqmd.gov/~media/files/ab617-community-health/richmond/2024/042024-final-ptca-plan-files/ptca-plan_final_april-2024-pdf.pdf?rev=275660fc2f6c4eecaa35b13451b99856.

these strategies can be feasibly implemented within a five-year timeframe. Overall, the PTCA Plan presents a proactive framework of strategies and actions designed to address longstanding environmental injustices, with a strong emphasis on addressing emissions from local fuel refining, storage, and distribution facilities. These strategies emphasize the importance of a just transition towards a renewable energy economy and holding the fuel refining industry accountable to laws and regulations for protecting public health.

On March 25, 2024, the PTCA CSC unanimously voted to approve the PTCA Plan. PTCA Plan strategies are organized by community concerns, which include: fuel refining, storage, and distribution; commercial and industrial sources near communities; vehicles and trucks, streets and freeways; marine vessels and locomotives; public health and exposures to emissions; compliance and enforcement; land use, and urban greening. On May 1, 2024, the BAAQMD Governing Board also voted unanimously to adopt the PTCA Plan.

This report summarizes the results of CARB staff's review and evaluation of the CERP to determine if it meets the criteria established in state law⁶ and the Blueprint 2.0, reflects community priorities, and if it is likely to reduce emissions and exposure to air pollution in the community.

Community Emissions Reduction Program/Path to Clean Air Plan Overview

The PTCA CERP boundary encompasses the cities of Richmond and San Pablo, along with several unincorporated areas in Contra Costa County: North Richmond, Bay View, East Richmond Heights, Rollingwood, Tara Hills, Montalvin Manor, and portions of El Sobrante. The boundary includes approximately 160,000 residents and covers about 28 square miles.

The Air District collaborated with local community leaders to create the CERP for the Richmond, North Richmond, and San Pablo PTCA area. Throughout the process, CARB staff attended PTCA CSC meetings to hear the community's ideas and concerns. CARB staff also met regularly with BAAQMD staff to help guide the development of the PTCA Plan.

The plan outlines strategies to mitigate harmful air pollution directly impacting residents' daily lives, as well as other strategies focused on promoting public health.

Figure 1, below, lists examples of the PTCA Plan actions and strategies to reduce emissions and exposure in eight categories. For the comprehensive list of strategies along with details, see the [PTCA Plan](#).

⁶ Cal. Health and Saf. Code, § 44391.2.

Figure 1. Examples of Actions in the Richmond-North Richmond-San Pablo Communities Path to Clean Air Plan

Commercial and industrial sources near community	<p>Concerns: fugitive dust</p> <p>Actions: By 2025, implement the most advanced best management practices for controlling fugitive dust at the project level.</p>
Fuel refining	<p>Concerns: Persistent flaring</p> <p>Actions: Reduce flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies / upset, via more consistent and competent operations with an ultimate goal of zero routine or planned flaring.</p>
Marine and rail	<p>Concerns: Cancer and Chronic Health Risk from Rail Operations and Facilities</p> <p>Actions: Lower the cancer and chronic health risk attributable to rail operations via CARB's existing In-Use Locomotive Regulation, which is anticipated to reduce rail emissions in the PTCA area by more than 70% by 2033.</p>
Public health	<p>Concerns: Exposure to air pollution</p> <p>Actions: Ensure that all residents in the PTCA area have access to a Resilience Center that provides indoor air filtration, has programming to meet community members' needs, and is sustainably funded.</p>
Mobile sources	<p>Concerns: Goods movement</p> <p>Actions: reduce truck-related emissions exposure and congestion from neighborhood streets through the creation of a TMP that reduces traffic flow, as well as exposure to humans, through the strategic timing and regulation of regional truck traffic.</p>
Compliance and enforcement	<p>Concerns: fuel refining sector in Richmond is the largest source of emissions in PTCA area</p> <p>Actions: prioritize complaints and conducting inspections and investigations to address facilities of community concern.</p>
Land use	<p>Concerns: commercial and smaller industrial facilities</p> <p>Actions: separate, buffer, and otherwise protect sensitive receptors and residential areas from existing and potential future pollution sources and exposure with an intended outcome of improving community health for all.</p>
Urban greening	<p>Concerns: streets and freeways</p> <p>Actions: increase tree planting within the Plan area in low-income census groups and around sensitive receptors.</p>

Summary of CARB's Evaluation

CARB staff recommend approval of the PTCA Plan with CARB's Executive Officer direction to CARB staff, BAAQMD, and the PTCA CSC to begin PTCA Plan implementation immediately and begin actions to reduce emissions and exposures. CARB staff has included recommendations for successful implementation based on lessons learned from other CERP implementation efforts. These recommendations draw directly from the core principles of the Board-adopted Blueprint 2.0.

Staff has organized this review into two categories:

- Blueprint 2.0 CERP criteria checklist
 - CARB staff's evaluation of the PTCA Plan found that the Plan follows the framework established in Blueprint 2.0. CARB staff determined that the PTCA Plan reflects community priorities, meets criteria established by state law and Blueprint 2.0, and sets a foundation to deliver air pollution emissions and exposure reductions in the PTCA Communities. The CERP criteria checklist is included in Appendix A of this document.
- Recommended actions for BAAQMD and CARB to strengthen implementation, including areas where additional discussion, information, clarification, and detail will help ensure the PTCA Plan is successful. These actions will also help achieve emissions reductions in the Richmond-North Richmond-San Pablo Communities.

Recommended Actions to Strengthen Implementation

Staff commends the PTCA CSC members and Air District staff for their multi-year effort to partner in the development of the ambitious and substantive PTCA Plan. CARB staff remain committed to working with BAAQMD and the CSC to refine implementation strategies and implement CARB focused actions, including providing resources and guidance to help implement these recommendations. CARB staff reinforce the value of annual progress reports as required under AB 617 as an important tool for accountability. Progress reports should include progress toward implementation of these recommendations.

Participatory Budgeting

Participatory budgeting is a democratic approach where community members have a say in how public funds are used, based on a participatory process. Elements of participatory budgeting have been used by a number of Air Districts to empower CSCs in determining how to allocate *Community Air Protection incentives* funding across CERP strategies. Additionally, Blueprint 2.0 has highlighted participatory budgeting as a focus area for

implementation guidance, as it has been a successful and popular feature leading to better outcomes from investments. In 2024, the landmark settlement between the Air District, other parties, and the refinery company, Chevron and Martinez Refining Company, led to the establishment of a \$20 million community air quality fund to fund projects aimed at reducing Particulate Matter (PM) exposures in the communities impacted by the refinery. This settlement provides an opportunity to the Air District and CSC to broaden engagement with the communities in Richmond, North Richmond, and San Pablo to educate local residents about CERP efforts, while also gaining valuable feedback on these funding opportunities to address local air quality issues. BAAQMD has a valuable opportunity to build on the success of previous participatory budgeting efforts with the PTCA CSC to develop this process further. This opportunity will foster transparency and meaningful community engagement to direct how and where funds are invested. CARB will share lessons learned from previous participatory budgeting projects and will offer staff support to help advance these efforts.

Agency Partnerships and Collaboration

BAAQMD has included several partnerships and collaborations with other public agencies, such as the Cities of Richmond and San Pablo, Contra Costa County, and Contra Costa Health Services. Some of the actions in the PTCA Plan do not fall within the jurisdiction of the Air District or CARB. Collaborating with other agencies with relevant jurisdiction over a community concern early in the implementation planning process is critical to building trust, setting expectations on all sides, and proactively addressing jurisdictional issues that ultimately support effective implementation. The Air District and CARB should continue to build and maintain effective relationships to clarify roles and bring these external agencies to the table to meet the overall goals and commitments established in the PTCA Plan.

Continue to Refine Strategies Informed by CSC Direction

The timeline required to develop a CERP makes it difficult to create and document detailed strategies. CARB applauds the ambitious vision and goals in the CERP. Annual planning to operationalize the Plan must be closely coordinated with the CSC to determine how to use limited resources to accomplish all the strategies and actions. Throughout the PTCA Plan implementation, BAAQMD and the PTCA CSC should work together to refine details and prioritize actions.

CARB staff encourage the Air District and PTCA CSC to continue work with CSC leadership and use the subcommittee approach to create opportunities for thorough CSC participation in decision-making, direction setting, and incorporating community engagement into key aspects of CERP implementation.

CARB Commitments

CARB actions that specifically relate to the Richmond, North Richmond, and San Pablo and identified by the PTCA CSC are provided in the CERP. However, some state regulations provided within the CERP are still in development or in the early phases of implementation, like the In-Use Locomotive Regulation, amendments to the Cargo Handling Equipment Regulation, and the At-Berth Regulation. A complete draft emissions inventory and estimated benefits are not yet available for these regulations. As these emissions inventories are developed, CARB staff will provide estimated benefits in future updates.

As described in Blueprint 2.0⁷, CARB's Enforcement Division will also aim to provide a broader array of assistance through the development of co-designed and co-led projects that empower communities, focus on community identified priorities, and leverage enforcement. This will result in investigations based on community input that will help CARB understand how to develop stronger enforcement approaches in the PTCA. For example, CARB enforcement could work with the PTCA CSC, BAAQMD, and California Highway Patrol to identify locations to deploy its *Portable Emissions Acquisition System (PEAQs)*⁸ within the PTCA boundary⁹ to monitor emissions, an area known to have high heavy-duty truck traffic. In addition, CARB enforcement could work with the CSC and local agencies to identify locations, where feasible, to install "No Idling" signs on roadsides or at schools and parks, as well as focused enforcement at construction sites of concern, as identified by the CSC, to evaluate compliance with CARB regulations.

Addressing the compliance and enforcement issues at permitted facilities such as the Chevron refinery will take concerted efforts from local, state, and federal agencies. As an example of these efforts, the California Environmental Protection Agency (CalEPA) and U.S. Environmental Protection Agency (U.S. EPA) Region 9 have entered into a "Memorandum of Understanding on Collaborative Efforts on Enforcement and Compliance Assurance in Overburdened Communities,"¹⁰ which focuses on strategic targeting of inspections, enforcement actions, and community engagement. CARB will

⁷ *Community Air Protection Program Blueprint 2.0* (ca.gov), pages 69 - 70

⁸ CARB, Portable Emissions Acquisition System (PEAQs) (youtube.com) (July 5, 2017), https://www.youtube.com/watch?v=5kdsRR7_VVE.

⁹ CARB, Richmond - North Richmond - San Pablo (Overview) (last visited Aug. 26, 2024), <https://www2.arb.ca.gov/our-work/programs/community-air-protection-program/communityhub-2-0/richmond-north-richmond-san>.

¹⁰ U.S. EPA & CalEPA, Environmental Justice 2023 Enforcement Action Plan (2023), <https://www.epa.gov/system/files/documents/2024-04/usepa-calepa-ej-enforcement-action-plan-2023.pdf>.

continue to look for similar opportunities to partner in this work, including identifying compliance issues at major polluters in the Richmond-North Richmond- San Pablo area.

California Environmental Quality Act Requirements

CARB has determined that the approval of the Richmond-North Richmond-San Pablo CERP (Proposed Project) is not a project subject to, or is otherwise exempt from, the requirements of the California Environmental Quality Act (CEQA). CARB's certified regulatory program, which applies to the adoption, approval, amendment, or repeal of standards, rules, regulations, or plans for the protection and enhancement of the state's ambient air quality, has been certified by the California Secretary for Natural Resources under Public Resources Code section 21080.5 of CEQA.¹¹ Public agencies with certified regulatory programs are exempt from certain CEQA requirements, including but not limited to, preparing environmental impact reports, negative declarations, and initial studies. For activities that constitute project approvals, as those terms are used in CEQA, CARB, as a lead agency, prepares a substitute environmental analysis as part of the Staff Report prepared for a proposed action to comply with CEQA.¹²

Staff has determined that approving the CERP (Proposed Project) is exempt from CEQA under Title 14, California Code of Regulations, section 15061 ("Common Sense Exemption") as it can be seen with certainty and supported by the record evidence that there is no possibility that the Proposed Project may have a significant effect on the environment; indeed, the Plan's overall goal and effect is to facilitate cleaner air. CEQA Guidelines state "[t]he activity is covered by the commonsense exemption that CEQA applies only to projects, which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA"¹³ The Proposed Project is exempt from CEQA under the commonsense exemption because the Plan has no reasonably foreseeable potential for causing a significant adverse impact on the environment. The Proposed Project approves a plan analyzed and found exempt by the lead agency responsible for implementing the plan, Bay Area Air Quality Management District.

The Proposed Project would be exempt under CEQA under the "Class 8" exemption for its protection of the environment.¹⁴ The evidence in the CERP plan shows that the Proposed Project will enhance the environment by better protecting the public from

¹¹ Cal. Code Regs., tit. 14, § 15251, subd. (d).

¹² Cal. Code Regs., tit. 17, §§ 60000-60008.

¹³ Cal. Code Regs., tit. 14, § 15601, subd. (b)(3).

¹⁴ Cal. Code Regs., tit. 14, § 15308.

health impacts associated with exposure to air pollution within the project area, the Proposed Project includes procedures for protection of the environment, and the Proposed Project does not relax any applicable standards. Rather, it includes monitoring and enforcing existing regulations to improve the environment, among other measures.

The Proposed Project would also be exempt under the "Class 6" exemption for information collection because many measures of the Proposed Project involve outreach and data collection from various parties to better hone particular efforts from implementing agencies in reducing localized pollution levels, which may lead to actions by those agencies.¹⁵

Finally, the Proposed Project would also be exempt under "Class 21" for enforcement actions by regulatory agencies because the record evidence shows that the Proposed Project incorporates actions by implementing agencies to enforce permits from the districts or other entitlements for use issued, adopted or prescribed by applicable regulatory agencies or enforcement of laws, general rules, standards, objectives administered or adopted by regulatory agencies identified as implementing agencies in the Proposed Project.¹⁶

¹⁵ Cal. Code Regs., tit. 14, § 15306.

¹⁶ Cal. Code Regs., tit. 14, § 15321.

Appendix A. CERP Criteria Checklist

Criteria	<input checked="" type="checkbox"/>
Health-Based Air Quality Actions	
<p>Develop actions to reduce negative health impacts by:</p> <ul style="list-style-type: none"> • Reducing emissions of, and exposure to, toxic air contaminants that contribute to the cumulative exposure burden within the community. • Reducing emissions of, and exposure to, local sources of PM_{2.5} that contribute to the cumulative exposure burden within the community. 	<input checked="" type="checkbox"/>
Community Steering Committee	
<p>Provide documentation on the community steering committee:</p> <ul style="list-style-type: none"> • Membership, including core community representation. • Charter that covers the following topics: <ul style="list-style-type: none"> ○ CSC objectives. ○ Roles and responsibilities. ○ Time, term expectations, stipends (<i>CARB guidance</i>). ○ Eligibility, recruitment, and on-boarding procedures. ○ Meeting frequency. ○ Meeting dates, times, and locations to ensure accessibility/participation. ○ Use of interpretation services at CSC meetings and in broader public outreach efforts. ○ Use of facilitation services. ○ Expectations for the timing and method of communications such as distributing information/data, meeting announcements and agendas, and specifying the expected deadlines for distribution in advance of events/activities. 	<input checked="" type="checkbox"/>

Richmond, North Richmond, San Pablo Community Emissions Reduction Program/Path to Clean Air Staff Report

<ul style="list-style-type: none"> ○ A decision-making process, including whether consensus, majority vote, supermajority, or any other method will be used to approve an item. ○ Provisions for dispute resolutions. ○ A clear conflict-of-interest and/or disclosure policy. ○ How CERP modifications can be made post-adoption. 	
Outreach and Engagement	
<p>Provide documentation that the air district board held a public board hearing when presenting the final CERP for air district board consideration.</p>	<input checked="" type="checkbox"/>
<p>Provide documentation that the air district provided materials in appropriate languages and that interpretation services were available at workshops and public board hearings in accordance with the steering committee charter.</p>	<input checked="" type="checkbox"/>
<p>Provide documentation of a dedicated public webpage that contains:</p> <ul style="list-style-type: none"> • Phone number and e-mail address for a dedicated contact person. • An up-to-date outreach calendar and notices for workshops and community steering committee meetings. • Any draft materials that will be shared at air district workshops and public board hearings. • Links to any relevant air quality data for the community. • A link to CARB’s Community Air Protection Program main webpage. • Access in multiple languages, as appropriate. 	<input checked="" type="checkbox"/>
<p>Provide a summary of the results of public outreach during CERP development and an overview of the planned approach for public engagement moving forward into implementation that includes:</p> <ul style="list-style-type: none"> • Ongoing outreach/recruitment/onboarding mechanisms. • Meeting frequency and attendance. • Outreach regarding annual reporting. • Summary of steering committee’s perspectives and other public input regarding the CERP (both the process and the document). 	<input checked="" type="checkbox"/>

Community Profile	
Provide a description of the community and include a discussion of community issues, including final geographic boundary, types of pollution impacting the community, sensitive receptors, a characterization of current public health data, and socioeconomic indicators.	<input checked="" type="checkbox"/>
Technical Foundation	
Provide a community-level emissions inventory developed in accordance with CARB's community inventory guidance (<i>AB 617 Community Planning Emission Inventory: Key Elements, AB 617 Calendar Years for Community Planning Emission Inventories</i>) that identifies relative contribution of toxic air contaminants and criteria air pollutants emissions in mobile, stationary, and area-wide source categories impacting the community. If requested, CARB, with input and support from air districts, can develop the community-level emissions inventory.	<input checked="" type="checkbox"/>
Provide results, if available, that augment the community-level emissions inventory using existing air quality monitoring data or best available modeling data and applying at least one of the <i>source attribution approaches</i> discussed in the online <i>Resource Center</i> .	<input checked="" type="checkbox"/>
Provide supporting documentation on methodologies and data sources used in the technical assessment.	<input checked="" type="checkbox"/>
Emissions and Exposure Reduction Targets	
Specify emissions reduction targets to be achieved within five years for directly emitted applicable toxic air contaminants, PM _{2.5} , and any other identified criteria pollutants (e.g., PM ₁₀) as defined in the technical assessment, designed to maximize reductions of emissions of PM _{2.5} and toxic air contaminants. Targets are to be presented in 5 th year benefits (tons per year) and lifetime benefits (total tons), as appropriate.	<input checked="" type="checkbox"/>
Specify metrics and mechanisms to track and achieve exposure reduction targets for any exposure reduction actions.	<input checked="" type="checkbox"/>

Reduction Actions and Required Metrics	
<p>Include emissions and/or exposure reduction actions, considering the following types of actions:</p> <ul style="list-style-type: none"> • Regulatory Actions • Air Quality Permitting • Facility-Specific Risk Reduction Actions • Enforcement Actions • Land Use and Transportation Actions • Health and Exposure Mitigation Actions • Incentives Actions <p>To see actions from existing CERPs, see Emissions Reduction Strategies and Statewide Regulations in the CommunityHub.</p>	<input checked="" type="checkbox"/>
<p>Identify statewide actions to reduce emissions and exposure that CARB will provide.</p>	<input checked="" type="checkbox"/>
<p>Specify required annual metrics to track progress (examples below):</p> <ul style="list-style-type: none"> • The emission reductions achieved and progress towards meeting the individual emissions and exposure (if available) reduction targets for each pollutant. • Status of rules and regulations adopted, or other strategies implemented. • Dollar amount invested and number of projects implemented in and/or benefitting the community if incentive strategies are part of the emissions reduction program. • An estimate of percent completion for each action (and when the action is considered complete), for both qualitative and quantifiable actions. • Additional enforcement activities. 	<input checked="" type="checkbox"/>
<p>Specify approaches for evaluating air quality and exposure at the five-year milestone.</p>	<input checked="" type="checkbox"/>
<p>Identify any additional metrics, as appropriate, to track progress of:</p> <ul style="list-style-type: none"> • Implementation. • Additional co-benefits. 	<input checked="" type="checkbox"/>

Implementation Schedule	
<p>Specify for each action, as applicable:</p> <ul style="list-style-type: none"> • A description of the action. • Metric(s) by which the action’s progress and completion will be measured. • The expected emissions and/or exposure reductions by pollutant, if quantifiable. • Cost-effectiveness, calculated in accordance with the air district’s cost-effectiveness methodologies, along with appropriate documentation. • Implementation roles and responsibilities, including authority. • A timeframe for implementation, including immediate and annual actions over the five-year timeframe. • A description of how the technical assessment informed strategy development, including a discussion of priority pollutants and sources. • The expected benefits beyond the five-year implementation timeframe, if applicable to the action. 	<input checked="" type="checkbox"/>
Enforcement Plan Requirements	
<p>Document a three-year enforcement history that includes:</p> <ul style="list-style-type: none"> • A summary of complaints received and their resolution. • A listing of all permitted facilities, including facility type. • Number of inspections conducted, including type, date, and location. • Notices of violation and notices to comply issued, including date, location, regulation cited, and description of issue. • An assessment of compliance with existing CARB and air district rules and regulations within and directly surrounding the community. • A discussion of opportunities for enhanced enforcement activities, including community outreach and communication, based on the historical data. 	<input checked="" type="checkbox"/>

Richmond, North Richmond, San Pablo Community Emissions Reduction Program/Path to Clean Air Staff Report

<p>Specify compliance mechanisms that will be implemented including:</p> <ul style="list-style-type: none"> • Compliance goals to support achieving the emissions and exposure reduction targets. • Specific approaches to enhance complaint reporting, industry compliance, and enforcement-related community outreach. • Formation of a dedicated team to conduct community-level outreach. • A process to track CARB and air district enforcement activities and identify potential solutions based on enforcement results. • A discussion of potential enforcement mechanisms for each new regulatory strategy. 	<input checked="" type="checkbox"/>
CEQA Analysis	
<p>Include any applicable CEQA analysis.</p>	<input checked="" type="checkbox"/>