

# Community Air Monitoring Plan Appendix J

California Statewide Mobile Monitoring Initiative (SMMI)  
Public Comments and Responses



Prepared by Aclima

August 2025



The Statewide Mobile Monitoring Initiative is part of California Climate Investments, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment – particularly in disadvantaged communities.

**Public Comment Period for SMMI**

A two-week public comment period was opened for most CAMPs on May 19, 2025. CAMPs for the communities of Salton City, Fairmead, Van Nuys, (North Sacramento, Del Paso Heights and Norwood), South Tulare and Matheny Tract, Le Grand, and Lanare opened for public review on May 28, 2025 and also had a two-week public review period. The following public comments were received during these respective periods and Aclima’s responses are included in the table below.

First and Last Name Nombre y Apellido	Select the community. Seleccione la comunidad.	What is your comment? ¿Cuál es su comentario?	Aclima Response Respuesta de Aclima
Tom Edmunds	Tri-Valley	<p>The CAMP document looks great. A lot of detail on how Aclima is going to take, process, curate, and communicate the measurements. I have three suggestions:</p> <p>1) On page 9, Tom Edmunds (tomemunds@tvagca.org) should be listed as the engagement lead, not Terry Chang as shown.</p> <p>2) Figures 2 through 8 are fuzzy. Higher resolution images are available from TVAQCA.</p> <p>3) There is no Figure 1 in the report. You could label the graphic on page 2 as Figure 1 and retain the rest of the figure numbers. Then the figure numbers in the CAMP would coincide with the figure numbers in TVAQCA's community profile report.</p> <p>Regards, Tom Edmunds</p>	<p>1) Changed email address                  2) Figures 2-8 have been replaced with sharper images                  3) All figure numbers have been updated</p>
Ron Baskett	Tri-Valley	<p>Best resolution TVAQCA original figures to be included in our CAMP have been uploaded to our shared folder</p>	<p>Figures 2-8 have been replaced with sharper images</p>
Armond Bradford	Oak Park, Fruitridge (Sacramento)	<p>Are you doing any personal monitoring?</p>	<p>We are conducting mobile air quality monitoring only.</p>

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			Personal monitoring devices are not being used as part of this initiative.
Sara Pacheco	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Si pudieran sembrar más arboles para qué mejore la calidad de aire	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Claudia Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality in the San Fernando Valley is in poor condition, especially in areas where toxic companies, waste dumps, and the Whiteman Airport are located. In addition, waste from recent fires has been dumped in communities like Sylmar and Sun Valley, further contributing to pollution and health concerns in these neighborhoods.	The Whiteman Airport is already the subject of a targeted area study. Additionally, both this source as well as waste management facilities along Glen Oaks Boulevard in Sun Valley will be monitored as part of the initiatives "broad area monitoring". While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP.
Maria Magana	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad and apart from us they are bringing us all the debris from the fires that are going to make it worse for a more.	While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in

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			the CAMP.
Claudia Ramos	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	As a Sylmar resident, I'm devastated by the poor air quality our community continues to endure. We are being impacted by debris from recent fires that has been dumped in both Sylmar and Sun Valley. On top of that, many local fabrication shops that cut and grind quartz are releasing harmful crystalline silica into the air. These pollutants are severely affecting our health and quality of life, and something needs to be done to protect our communities.	Without having specific location information about these fabrication shops, we cannot say whether they would get covered by our monitoring plan. However, our vehicles will be measuring particulate matter (PM) throughout the community and it may be possible to identify locations where PM hot spots exist in the vicinity of these shops. We have added this to the list of concerns in the CAMP.
Isabel Cabrera	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad and apart from us they are bringing us all the debris from the fires that are going to make it worse for a more.	While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP.
Nererida Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	As a concerned resident of Sun Valley, I'm deeply troubled by the ongoing air quality issues plaguing our community. The aftermath of recent fires has resulted in debris being dumped in both Sylmar and Sun Valley, worsening our already fragile environment. Additionally, the dust and crystalline silica released by	While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These

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		<p>nearby quartz fabrication shops pose a serious health risk. These combined pollutants are not only degrading our air but also endangering the well-being of our families. Immediate action is needed to address these environmental hazards and safeguard our communities.</p>	<p>concerns are already listed in the CAMP. We have added the concern about crystalline silica to the community concerns table.</p>
<p>Sergio Magana</p>	<p>Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar</p>	<p>The air here in the San Fernando Valley is very bad, we urgently need your help.</p>	<p>Thank you for your comment. We are grateful for the opportunity to work in your community.</p>
<p>Claudio Arias</p>	<p>Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar</p>	<p>The San Fernando Valley, a sprawling suburban region of Los Angeles, has long struggled with air pollution but recent days have seen air quality levels dip to particularly concerning lows. With a combination of rising temperatures, stagnant weather patterns, and high vehicle emissions, smog and particulate matter have become a serious health hazard for residents.</p> <p>Geographically, the Valley's bowl-like shape traps pollutants, making it one of the most affected areas in the county when it comes to poor air quality. During warmer months, ozone levels frequently exceed safe thresholds, putting vulnerable populations especially children, the elderly, and people with respiratory conditions at risk.</p>	<p>Thank you for your comment and for sharing your knowledge about your community.</p>

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		<p>Residents have reported increased respiratory issues, eye irritation, and fatigue during days with high AQI (Air Quality Index) readings. Officials have advised people to limit outdoor activities, especially during peak smog hours in the afternoon.</p> <p>Experts emphasize the need for systemic solutions, including reducing emissions from vehicles, transitioning to clean energy sources, and increasing urban greenery. While individual actions like driving less or using air purifiers can help on a small scale, addressing the root causes requires collective effort and policy changes.</p> <p>The bad air quality in the San Fernando Valley is not just an environmental issue it's a public health crisis that demands immediate attention.</p>	
Luisa Bedolla	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad, we urgently need your help.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Fidel Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality in the San Fernando Valley is in bad condition and is affecting our communities.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Adrian Escobedo	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality is hell affecting us due to the White Man Airport.	Whiteman Airport will be the subject of targeted area monitoring as part of this study.
Manny Escobedo	Pacoima, North Hollywood, Sun Valley, San Fernando,	My comment is that the air quality is affecting us and I would like a air monitor by	Whiteman Airport will be the subject of targeted area monitoring as part of this

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	Sylmar	Whiteman airport.	study.
Crystal Lopez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that as a resident of Sylmar the air quality has been really bad and has been affecting my health. I been having asthma since I was a child and I been living in Sylmar for over 30 years.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Maria Ramos	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment as a resident of Sylmar I would like to say that I been having struggling with health issues due to the bad air quality that I have in my community and especially now that we are receiving the debris from the recent fire.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Vanessa Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that as resident of Sun Valley we been getting affected by the waste dumpsters we have and all the landfills.	As part of broad area monitoring in this community, we will be monitoring in the Glenoaks Blvd area of Sun Valley with a focus on sources that include recycling and waste plants.
meryl siegal	West Berkeley	We are trying to ascertain what the plan is. At our meetings we discussed the need for a thorough look at San Pablo avenue as well as two blocks up from San Pablo on Cedar because of the Accordion Buses that emit not only diesel emmissions toxic fumes but also particles from the heavy tires. We need to see if this is influencing air quality . We also discussed University avenue and Dwight as well (Anywhere in west berkeley where these PPMs can co-combine with industry to create ultra ppm's that harm children and the elderly in these areas.	Thank you for your comment on West Berkeley's CAMP. The streets that you mentioned in your comment are included in the broad area monitoring plan, described in Section 8.2 of the plan. You are also welcome to explore the West Berkeley broad monitoring area through this link: <a href="https://felt.com/map/EXTERN-AL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.86943,-122.3005,14.52z">https://felt.com/map/EXTERN-AL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.86943,-122.3005,14.52z</a>

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Daniel Polk	Colton, Grand Terrace, San Bernardino	<p>I'm with HARC. We did the community engagement for this CNC. The Targeted Area Monitoring for the San Bernardino/Colton/Grand Terrace CNC lists only one location, and it's a location that we recommended excluding in our Meeting 2 feedback—it's simply a new warehouse facility that only two community members had suggested in Meeting 1 (without high priority). (Apologies if this feedback wasn't clear and for our last-minute feedback submission). There are *five locations* that community members strongly recommended including. Could all or some of these locations be included for Targeted Area Monitoring? Here are the location is rough order of importance:</p> <ol style="list-style-type: none"> <li>1. BNSF Intermodal Rail Yard 301 Flower St. San Bernardino, CA 92411</li> <li>2. Condor Energy Storage Project (battery storage facility) 21658 Main Street Colton, CA 92313</li> <li>3. (a) AIM Recycling facility 785 E M St, Colton, CA 92324</li> <li>(b) Leemco Piping Solutions, Inc 360 S Mt Vernon Ave, Colton, CA 92324</li> </ol> <p>[Note: AIM Recycling and</p>	<p>After reviewing your list here, we are able to add the AIM recycling facility, Leemco Piping, and Copart as secondary monitoring objectives because they are in the immediate vicinity of these new warehouses. We have added these secondary objectives to the CAMP. The BNSF railyard was in the area that Aclima monitored in 2021 and it was found that diesel particulate matter was impacting the communities directly to the northeast; this same area is part of the SMMI broad area monitoring boundaries and we can do comparisons with the original data set from 2021. The remaining concerns are all within the broad area monitoring boundaries, so the Condor Energy Storage facility, for example, can be included as part of the broad area monitoring objectives; we can characterize locations where TVOCs are emitted, though we will not be able to characterize the specific air toxics being emitted.</p>

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		<p>Leemco Piping Solutions are across the street from each other--perhaps they can be included as a single targeting area]</p> <p>4. Inland Regional Material Recovery Facility (operated by CR&amp;R)            2059 E. Steel Road            Colton, CA 92324</p> <p>5. Copart - San Bernardino (the name of a car auction facility in Colton, CA)            1203 S Rancho Ave Bldg 1            Colton, CA 92324</p>	
Tom Edmunds	Tri-Valley	<p>Figures 2-8 are not clear. Higher resolution figures have been placed in the TVAQCA-Aclima shared folder for your use.</p>	<p>Figures 2-8 have been replaced with sharper images.</p>
Ashley Simon	South Natomas (Sacramento)	<p>I may have misunderstood the report, but the community voted on Northgate having more specific monitoring. Northgate was identified as a specific area of concern.</p>	<p>Thank you for your comment on South Natomas' CAMP. Northgate Blvd will be a focus of a special monitoring study, as described in Section 8.3 of the plan.</p>
STOP THE RIDERS FROM STIRRING ALL THE TOXIC DIRT!	Salton City	<p>Clean up this toxic mess!</p>	<p>Thank you for your comment. We hope that the data produced by this project helps communities and other decision-makers to take actions for healthier air.</p>
Agustina Rodriguez	Van Nuys	<p>Me gustaria que hubiera mas Arboles en la comunidad.</p>	<p>Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.</p>
Josefina	Pacoima, North Hollywood, Sun Valley, San Fernando,	<p>Me gustarian mas arboles y mas espacios para los niños.</p>	<p>Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este</p>

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	Sylmar		proyecto para abogar por este tipo de acciones.
Mateo virves	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Arboles juegos con springols para los niños	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Silvia Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles y menos carros como que hubiera un dia de no circular.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Sam Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I would like to see more green spaces in my community for gatherings and better systems of transportation like a more efficient bus system.	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Silvia Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Close to the train rails, and all of the FWYS, especially along the 5, and the 118, all of them. There is a lot of contamination here in Pacoima. And along Sun Valley where the waste management site.	The waste management in Sun Valley is within the broad area monitoring. In addition, freeways will generally be monitored due to driver commuting, even if they don't appear within the broad area boundary in the CAMP.
Claudia Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles y calles mas limpias de basura y menos fabricas contaminantes.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Que las personas no tiraran tanta basura para que no contaminen.	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Emma Contreras	Gracias por su comentario.
Ramona Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y que las personas agan recoclage de basura.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Maria Guadalupe	Pacoima, North Hollywood, Sun	Muchos arboles y mucha limpieza en las calles que no	Gracias por su comentario. Le animamos a utilizar los datos

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	Valley, San Fernando, Sylmar	contaminen.	de calidad del aire de este proyecto para abogar por este tipo de acciones.
Sergio Olivares	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas parques para los niños y calles mas limpias.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Rosario Aguirre	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que no halla mas plastico en venta para qur no contamine el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Dominga Berdusco	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Yani Cabrera	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Maa arboles menos basura que contamine el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Jesus de Santiago	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Maa jardines donde pueda haber una sonda de descanso con mucha vegetacion y relajarse.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Cindy Ortiz	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y parques y mas seguridad y menos basura en las calles.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Rafaela Peralta	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que alla mas reforestaciones en los Arboles y cuidar de ellos y cuidar las plantas verdes.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Vanessa Sandoval	Pacoima, North Hollywood, Sun Valley, San Fernando,	Monitor air pollution around airports	Whiteman Airport will be the subject of targeted area monitoring as part of this

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	Sylmar		study.
Sofia Maldonado	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y parques las calles mas limpias para que no contaminen el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Alejandra Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Cleaner air	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
melanie torres	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	cool pavement to cool the ambient air temperature!!!	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Erick Duran	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air quality isn't that bad it's pretty good compare to other areas	Thank you for your comment.
Jovan sanchez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air needs to be good	Thank you for your comment.
Giovanni Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air quality improvement	Thank you for your comment.
Enrique soria	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Good	Thank you for your comment.
Serenity Flores	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Fix air please, thank you	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Cristian	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Bad air quality .	Thank you for your comment.

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Leonel Meza	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I feel that the air quality here is ok not the best though.	Thank you for your comment.
Andrea Parra	Van Nuys	Fix plants and air . thank u	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
emireth gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	air. clean. now. thanks. :D	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Angel Morales	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Good	Thank you for your comment.
Fabian Torres	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The pollution is bad from cars and planes .	Whiteman Airport will be the subject of targeted area monitoring as part of this study. Freeways will generally be included for monitoring as well. Please see the CAMP for other areas that we will be monitoring air quality in areas with vehicle traffic.
Gael Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air is clean in my opinion, i'm able to breath good with no problems that being that I have asthma.	Thank you for your comment.
Angel Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I just hate how they never think about the near by community before dumping.	Thank you for your comment.
Stefan Strong	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air quality could be improved especially in the economically poor areas	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Cesar Aguirre	North Bakersfield	I would like to add in a	The TRICOR facility has been

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		<p>locations for priority in North Bakersfield. The TRICOR facility at 1134 Manor St, Bakersfield, CA 93308, has issues. We have received several IVAN reports on different instances of strong smells coming for this site. This site was also noted as a problematic facility in the second community meeting with CRPE. From testimonies gathered during community canvassing there is strong crude like smells that emanate from this site, usually during non operational hours. There was also a emission loss event earlier this year that covered the neighboring community in small asphalt globules. Residents mentioned that some asphalt has covered the community on several locations. Due to the consistent and strong smells coming from this facility and the high heavy truck traffic in to the facility I recommend adding this site to a priority monitoring.</p>	<p>added to the CAMP as an area of community concern and will be included in the targeted area study conducted by Aerodyne.</p>
Irma Camarena	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Me gustaría en el área de pacoima	<p>Puede explorar el mapa de la zona de Pacoima en la que estamos llevando a cabo el monitoreo de la calidad del aire aquí:  <a href="https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.25761,-118.41925,14.32z">https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.25761,-118.41925,14.32z</a></p>
Rosa Ruiz	Pacoima, North Hollywood, Sun Valley, San Fernando,	Sheldon Arleta Park or Byrd Middle School	Byrd Middle School is within the broad area monitoring boundary. Unfortunately, we

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	Sylmar		were not able to monitor everywhere and Sheldon Arleta Park is not within our monitoring area. However, it is adjacent to the monitoring border, as well as nearby freeways, where monitoring will occur. This means that you may be able to get a sense of pollution levels in the general vicinity of Sheldon Arleta Park even though monitoring will not occur on the streets directly surrounding it.
Luis Romero	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Panorama City	Panorama City was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: <a href="https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf">https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf</a>
Genrich Criste	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	<ol style="list-style-type: none"> <li>1. Encourage Clear, Timely Communication with Residents                Consider creating a simple, visual timeline or flyer to let residents know exactly when and where the monitoring will happen. Many in the community may not read a full CAMP report but would engage with accessible updates.</li> <li>2. Prioritize Youth and School Engagement                Given the high youth population and school-related pollution spikes, it might be powerful to partner with local</li> </ol>	Thank you for your comments. Many of these ideas, such as the use of clear communication with residents about monitoring, youth engagement, use of StoryMaps, and cultural and language accessibility are laid out in our Community Engagement Plan (linked within the CAMP).

<b>First and Last Name</b> <b>Nombre y Apellido</b>	<b>Select the community.</b> <b>Seleccione la comunidad.</b>	<b>What is your comment?</b> <b>¿Cuál es su comentario?</b>	<b>Aclima Response</b> <b>Respuesta de Aclima</b>
		<p>schools for education, monitoring awareness, or student-led initiatives.</p> <p>3. Leverage Past Monitoring for Continuity            There's great value in connecting this project with past local efforts like PurpleAir and Pacoima Beautiful's earlier monitoring. Acknowledging that history could strengthen trust and continuity.</p> <p>4. Push for Early Data Access &amp; Public Use Tools            Since no data has been collected yet, ensuring that the public can explore early findings (even in draft form) through StoryMaps or dashboards would build momentum and transparency.</p> <p>5. Ensure Cultural and Language Accessibility            It's great that engagement materials are multilingual. Consider also having community translators or local youth leaders help facilitate Q&amp;A sessions or neighborhood canvassing.</p> <p>6. Address Community Fatigue Proactively            Because many community members have engaged in environmental issues for years with few results, setting realistic expectations – and celebrating even small wins – will be crucial.</p>	

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		7. Push for Policy Follow-Up The plan outlines how data could support action, but it might help to have a clearer pathway or commitment to how findings will be escalated to city or state policy channels.	
Joaquin Castillejos	Bloomington, Fontana, Rialto	Add more monitoring above the 210 freeway in Rialto area.	The 210 freeway in this area is included in our broad area monitoring boundary.
Edgar Garibay	West Modesto	<p>VIP proposes the following changes to be incorporated in the West Modesto CAMP:</p> <p>Page 6: List of Abbreviations Used in the Community Air Monitoring Plan Add "CDP" to the List of Abbreviations Used in the Community Air Monitoring Plan -</p> <p>Community Designated Place Page 11: 2.1 Community profile Write out CDP (Community Designated Place - US Census).</p> <p>Page 13: 2.3 Community-specific motivations for air monitoring VIP also participates in research projects with the University of California, Merced, the University of California, Berkeley, and Santa Clara University.</p>	Thank you for these comments! All requested edits have been made.
María Madrigal	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Necesitamos más espacios co aire menos contaminado , gracias	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Edgar Garibay	South Modesto	VIP proposes the following changes to be incorporated in	Thank you for these comments! All requested edits

First and Last Name Nombre y Apellido	Select the community. Seleccione la comunidad.	What is your comment? ¿Cuál es su comentario?	Aclima Response Respuesta de Aclima
		<p>the South Modesto CAMP:</p> <p>Page 16: 2.3                      Community-specific motivations for air monitoring                      *Some concerns raised by South Modesto were beyond the scope of this SMMI.                      Replace Madera with Modesto.</p> <p>Page 20 &amp; 29: 2.1 Bret Harte Neighborhood is misspelled Brette Harte should be replaced with Bret Harte</p> <p>Page 30: 8.3 Targeted Area Monitoring - There are two periods at the end of the sentence.                      Some of the pollution source types identified as being important in this area include many sources, industrial and agricultural..</p>	<p>have been made.</p>
Edgar Garibay	West Stanislaus County	<p>VIP proposes the following changes to be incorporated in the West Stanislaus County CAMP:</p> <p>Page 13: 2.3                      Community-specific motivations for air monitoring                      VIP collaborates with the Central California Asthma Collaborative (CCAC) in the SJV Air App initiative to enhance access to real-time air quality data, with eight air monitors currently active in the West Modesto area.</p> <p>Replace with: VIP collaborates with the Central California</p>	<p>Thank you for VIP's review of the CAMPs! We've made all direct edit requests and want to respond to your question about targeted area monitoring. For West Stanislaus County, the targeted area driving indeed focuses on Patterson. Since we have resources to allocate one targeted area study per CNC, we had to select one area within the broader West Stanislaus area for this type of specialized study. Patterson was selected based on the specific concerns brought up for multiple pollution sources in the area.</p>

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		<p>Asthma Collaborative (CCAC) in the SJV Air App initiative to enhance access to real-time air quality data, with 12 air monitors currently active in the West Stanislaus County Communities.            Page 13: 2.3 Community-specific motivations for air monitoring            Electric buses are also in use in West Modesto. Remove this sentence.</p> <p>Page 30: 8.3 Targeted Area Monitoring            The City of Patterson was highlighted for targeted air monitoring. Will the additional communities of Grayson, Westley, and Turlock also be included in the target area monitoring?</p>	
Gisell Ceja	Van Nuys	Factories and freeways	<p>Thank you for your comment. Without additional information about the type of general location of the factories you are referring to, we cannot adequately respond to that aspect of your comment. In regards to freeways, they will generally be monitored even if they don't appear in the CAMP's broad area monitoring boundary, which you can view here:  <a href="https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=38.11082,-122.22881,12.83z">https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=38.11082,-122.22881,12.83z</a></p>
Shance taylor	Van Nuys	I am submitting this comment regarding the Koreatown	Thank you for your comment. In Section 3, enhancing green

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		Community Air Monitoring Plan and wish to highlight a critical related concern. Given Koreatown's high population density and existing air quality challenges, the scarcity of shade trees and accessible green spaces is particularly troubling. These vital natural elements are crucial for mitigating urban heat, filtering pollutants, and providing residents with healthier environments, especially for vulnerable populations experiencing high rates of respiratory illnesses. I urge the plan to consider how increasing green infrastructure can complement monitoring efforts and contribute to long-term air quality improvements and public health in our neighborhood.	spaces is currently listed as a potential action that urban planners and other stakeholders could pursue as a result of this data.
Sadie Wilson	Santa Rosa	Add in site-specific information to community concerns table from meeting notes for 1 and 2 (not reflected in their post-meeting reports)	The sites in these meeting notes were integrated into the community concerns of Santa Rosa's CAMP.
Jesus Alonso	Lost Hills	I believe a good summary of the community feedback back revolves around accessibility to data. In Meeting 2 residents shared that they would like to be able to have an introductory in person meeting/ Kick-off where residents and see the vehicle and equipment . Additionally they would want consistent updates, preferably in person, where they could ask questions. Finally, The final	Thank you for these comments. We are currently developing mechanisms for community organizations to request in-person demos of the vehicles for community members to ask questions. We will be providing project-related updates on our website, and will convey any key information through our Engagement Leads, who have the option of convening

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		<p>report must be followed up also with an inperson meeting where community members can ask questions about the results.</p>	<p>community members in person. The final meeting format, as described in our Community Engagement Plan, is online. The online format was the most realistic option given the volume of communities participating in this project. However, in the past, we've seen Engagement Leads hold in-person viewing and participation sessions of online meetings to be able to offer an in-person experience of an online meeting. That is certainly an option!</p>
<p>Arevalo Maybel</p>	<p>Van Nuys</p>	<p>Si la verdad en las mañanas el aire está muy contaminado aquí por la Sherman Way y Woodman amenece nublado y es de puro smoke</p>	<p>Esta intersección está incluida en la zona de monitoreo del plan.</p>
<p>Rosalba Estrada</p>	<p>Van Nuys</p>	<p>The air quality is bad in Van Nuys because we are near by so much factories and worksites that is affecting the quality of the air. I would like for the air monitor to be located at Van Nuys Middle School.</p>	<p>Thank you for your comment. Unfortunately, we are not able to monitor everywhere, and the area around Van Nuys Middle School was not identified by other community members as an area of priority concern.</p>
<p>Luisa Martinez</p>	<p>Van Nuys</p>	<p>Buenos días me gustaría que este programa se pueda implementar en los daycare</p>	<p>Gracias por su comentario. Aunque no diseñamos el estudio dirigido específicamente a los guarderías, lo más probable es que nuestra área de estudio incluya muchas guarderías. Puede explorar los límites del seguimiento aquí:  <a href="https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.18465,-118.44652,14z">https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.18465,-118.44652,14z</a></p>

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Nelia Rosas	Van Nuys	Van Nuys Street	Van Nuys is included in our broad area monitoring boundary.
Sergio Magana	Van Nuys	Me gustaria que hubiera un monitor de aire en el area del freeway 405 en Van Nuys hay mucha contaminacion.	Por lo general, se monitorizarán las autopistas aunque no estén incluidas en el mapa de monitorización de zonas amplias del plan.
Maria Guzman	Van Nuys	Between Roscoe Street and Van Nuys Blvd there is a lot of pollution.	Unfortunately, we could not monitor everywhere, and the intersection of Roscoe St and Van Nuys Blvd was not prioritized by other community members during previous meetings or surveys.
Michelle Rivas	Van Nuys	Creo que ponerlo hacia el aeropuerto o hacia el 405	El aeropuerto y la autopista 405 están incluidos en el plan de monitorización de la calidad del aire.
Julio Rodriguez	Van Nuys	Could you put the air quality monitor at the CHAMPS Charter High School of the Arts	The CHAMPS Charter High School of the Arts is included in our broad area monitoring boundary.
Carmen Hernandez	Van Nuys	Could you put the air quality monitor at CHAMPS Charter High School or the Arts?	The CHAMPS Charter High School of the Arts is included in our broad area monitoring boundary.
Ismael Lopez	Van Nuys	Between Roscoe Street and Van Nuys Blvd there is a lot of pollution and the freeway 405	Unfortunately, we could not monitor everywhere, and the intersection of Roscoe St and Van Nuys Blvd was not prioritized by other community members during previous meetings or surveys.
Brianna Garcia	Van Nuys	The air quality in the area of Van Nuys is in bad condition. I would like for the monitor to be in between Noble Ave and Raymer St.	This intersection is included in our broad area monitoring boundary.
Isaiah Garcia	Van Nuys	I would like for the air monitor to be in between Saticoy st and	This intersection is included in our broad area monitoring

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		Kester Ave.	boundary.
Claudia Alavarez	Van Nuys	The air quality in Van Nuys is not good and I would like for the monitor to be near by the Van Nuys Airport.	We will be conducting broad area monitoring near the Van Nuys Airport.
Priscilla Riestra	Van Nuys	I would like for the air monitor to be located near Kester Ave and Vanowen St.	This intersection is included in our broad area monitoring boundary.
Yaneli Vasquez	Van Nuys	For me it would be good to put the monitor on the Freeway 405 or at Van Nuys airport where there is a lot of pollution.	Both the 405 and the airport are included in our monitoring boundary.
Michelle Higaneda	Van Nuys	I would like for the air monitor to be between Van Nuys Blvd and Victory Blvd.	This intersection is included in our broad area monitoring boundary.
Marisela flores	Van Nuys	I would like the air monitor to put it off the streets of Van Nuys and Sherman way because there is a lot of pollution.	This intersection is included in our broad area monitoring boundary.
Abigail Gisell	Van Nuys	I would like for the air monitor to be located between Roscoe Blvd and Woodley Ave.	This intersection is included in our broad area monitoring boundary.
Taylor Gisell	Van Nuys	I would like for the air monitor to be in the freeway of the 405.	The 405 will be included in our broad area monitoring study.
Gisell fernandez	Van Nuys	I would like a monitor to be placed in the Van Nuys airport area because there is a lot of pollution.	We will be conducting broad area monitoring near the Van Nuys Airport.
Emma Abramyan	Van Nuys	I would like the air monitor to be next to the Van Nuys Airport.	We will be conducting broad area monitoring near the Van Nuys Airport.
Taylor Hernandez	Van Nuys	I would like for the air monitor to be between Kester Ave and Lull St.	This intersection is included in our broad area monitoring boundary.
Amanda Zaragoza	Le Grand	Sí o no pusieron letreros para indicar cuando y la hora del uso del gallinazo en los campos. Es importante saber	Gracias por su comentario. Lamentablemente, no disponemos de esa información.

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		esa información espacialmente cuando hay comunidades cercanas.	
Juan Salas	Le Grand	La orina de las vacas en las lecherías son el principal contaminante y no hacen nada por regularlas.	Gracias por su comentario. El estudio de la zona objetivo pretende abordar las preocupaciones sobre las lecherías.
Jose Hernandez	Le Grand	Mala Limpieza: Algunos trabajadores no limpian adecuadamente su equipo, lo que agrava el problema.	Gracias por su comentario.
Maria Navarro	Le Grand	Ojala y sea un estudio que nos de solucion sin importar lo poderoso de las empresas, porque nuestra salud esta afectandose cada dia mas con las alergias y problemas respiratorios.	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Martha Gonzales	Le Grand	Advertencias Inexistentes No hay avisos cuando hay gases contaminantes en la comunidad.	Gracias por su comentario. Le animamos a que utilice los datos sobre calidad del aire de este proyecto para abogar por una mejor comunicación en torno a esta cuestión.
Juan Becerra	Le Grand	Falta de Información Las agencias deben advertir a los compradores sobre el uso de químicos antes de aplicarlos	Gracias por su comentario. Le animamos a que utilice los datos sobre calidad del aire de este proyecto para abogar por una mejor comunicación en torno a esta cuestión.
Lorena samano	Le Grand	Max informacion	Gracias por su comentario. Encontrará más información sobre este proyecto en el sitio web de Aclima: <a href="http://www.aclima.earth/ca-smmi">www.aclima.earth/ca-smmi</a> .
Rosa Frías	Le Grand	Rosa Frías comento que está muy bien que se hagan esos análisis de detección de sustancias tóxicas porque mis hijos se enferman mucho del	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.

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		asma y otras enfermedades de vías respiratorias y esto puede ayudar a determinar si es por causa del ambiente o tóxicos que anden en ellos.	
Marina Acosta	Le Grand	El humo de las chimeneas en tiempo de invierno contamina porque por el aire se mete a las viviendas vecinas, en invierno calientan los vehículos por media hora y el dióxido de carbono también entra a las viviendas das al abrir puerta o ventanas. Esto es en la Jefferson Rd.	Gracias por su comentario. Jefferson Road está incluida en nuestra zona de monitorización para su comunidad.
Bessie castillo	Le Grand	Es que pass unos camiones de vacas Muertas dejando un fuerte Olor haste por 5 horas	Gracias por su comentario y su preocupación. Sin más información sobre la ubicación de esta preocupación, no podemos abordarla en el plan. Sin embargo, puede consultar nuestro mapa de seguimiento para ver si esta zona ya está incluida en nuestro plan: <a href="https://felt.com/map/EXTERN-AL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.22843,-120.25219,14z">https://felt.com/map/EXTERN-AL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.22843,-120.25219,14z</a>
Amanda Zaragoza	Le Grand	Muchas gracias por considerar nuestra comunidad para este estudio así nosotros vamos a estar informados y enterados de qué es lo que nos está enfermado, si nuestros hijos y nosotros padecemos esas enfermedades de las vías respiratorias por causa de la contaminación de nuestro aire o por alguna otra causa pero así ya podemos descartar esa posibilidad de qué sea el aire el que nos está enfermado o es	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.

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		otra fuente para cuidarnos de ella.	
Maria Elena Alcazard tapia	Le Grand	Los Pesticidas que aplican en las plantas lo hacen muy temprano y no dejan suficiente tiempo para que se valla el olor o desaparesca el fuerte olor.	Gracias por su comentario y su preocupación. El uso de pesticidas es una de las preocupaciones que el laboratorio móvil estudiará en su comunidad.
Juan Arellano	Le Grand	Ojalá y cuando el vehículo que va a venir a revisar nuestro aire sea en esos momentos cuando hay todos esos contaminantes de los químicos que le ponemos a las Huertas en el aire, eso nos sacaría de dudas si eso realmente nos está dañando la salud o si realmente no son dañinos, nos sacaría de dudas y pondríamos atención en lo que es dañino para nosotros que vivimos en esta Comunidad de LeGrand.	Gracias por su comentario. Hemos considerado la posibilidad de ajustar nuestro calendario de monitorización si se nos informa de un día de fumigación, pero esto dependerá de la disponibilidad de nuestro laboratorio móvil asociado.
Juan Moreno	Le Grand	Me parece contaminado mi aire que respiro, entonces si está bien que hagan esos estudios , y que de esto resulte que se limpie un poco aunque sea la contaminación del aire porque ya mi esposa falleció de enfermedades respiratorias.	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Ignacio bedolla	Le Grand	Que bueno que lo hicieron por que hacia falta	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Elias Lopez vera	Le Grand	Bueno que vinieron	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Javier luna	Le Grand	Que esta bien que lo hagan pero que Manden los resultados en español y les den una junta	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad. Los resultados también estarán en español.

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Nohemí Hurtado	Van Nuys	Down Town Los Angeles	Downtown Los Angeles was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: <a href="https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf">https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf</a>
Jennifer Hernandez	Van Nuys	LAX AirPort	Our monitoring in the Inglewood and Hawthorne areas will cover areas adjacent to LAX. You can review those boundaries here: <a href="https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=33.94663,-118.41157,12.99z">https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=33.94663,-118.41157,12.99z</a>
Vicente Hernandez	Van Nuys	Van Nuys AirPort	Van Nuys is included in our broad area monitoring boundary.
Christopher Hernandez	Van Nuys	Lake Balboa	Lake Balboa was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: <a href="https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf">https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf</a>
Sarah bedolla	Van Nuys		No comment included.
Magana	Van Nuys	Creo Que el 405 freeway y tambien area de sun valley pacoima	Sun Valley y Pacoima serán monitorizados como parte de este estudio, al igual que la 405 y la mayoría de las autopistas.

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Julia Danielsson-Salinas	Rodeo/Crockett	<p>As a resident of Rodeo I am extremely grateful that this project exists. The team that has organized this has really brought together our community in such a wonderful way. Annie, Daphne, and Charlie, are awesome! I'd like to thank them, CARB, and ACLIMA for putting all this together for the citizens of Rodeo and Crockett. It means the world to me that my soon to be born daughter will have a chance at growing up in a more aware and accountable atmosphere here in Rodeo. What we have here in town is special and it's worth protecting for current and future generations. We can't undo what's been done but we can learn from it and do better. Thank you again and I hope Rodeo will always be blessed and highly favored!</p>	<p>Thank you for your comment. We are grateful for the opportunity to work in your community.</p>
Marina Ramos	Rodeo/Crockett	Great initiative.	<p>Thank you for your comment. We are grateful for the opportunity to work in your community.</p>
EE Hallisy	Rodeo/Crockett	Go with the plan. Thank you.	<p>Thank you for your comment. We are grateful for the opportunity to work in your community.</p>
Lydia Fourmy	Rodeo/Crockett	<p>Air monitoring is extremely necessary in this area. My plants are not healthy because of a white dust that settled on everything in the last couple of months. Seeing their degradation and shriveled leaves makes me wonder what is happening to me and those</p>	<p>Thank you for your comment. We look forward to being able to share air pollution data with community members.</p>

First and Last Name Nombre y Apellido	Select the community. Seleccione la comunidad.	What is your comment? ¿Cuál es su comentario?	Aclima Response Respuesta de Aclima
		around me. I don't want to get cancer or have any other environmentally caused health issues due to toxic particles located in the air in this area. Help!!	
Nancy Rieser	Rodeo/Crockett	Our community in the past has collected particulate matter stuck on our car windshields and had those samples tested at MacCampbell Analytical lab in Pittsburgh. We shared those test results with the County. I just pulled the 2/12/24 Cam 17 Metals + AL (aluminum). McCampbell analytical detected 8 metal elements that were not listed in the box of "reported pollutants" for the Phillips refinery in your report. Those elements were: Aluminum, Antimony, Barium, Chromium, Cobalt, Copper, Zinc, and Silver. 7 of those 8 elements exceeded the reporting level. The most dramatic was the Aluminum level. Standard reporting level: 50. The test result: 530....I can share the report upon request. Please include these elements in the "reported pollutants". And of course, it goes without saying, you MUST include Amines a reported element. Please note that the metallic glitter is once again appearing on car windshields. We have collected a sample and will be using the same respected lab.	Thank you for your comment. Unfortunately, we are not able to measure amines as part of this study. Though some partner mobile labs do have the ability to measure heavy metals, this type of study was not planned for Rodeo and Crockett based on the priority community concerns expressed in community meetings.
Elizabeth Esquivel	Rodeo/Crockett	July 17, 2025	See responses to table below: "Aclima Responses to CMTA Comments - August 2025"

First and Last Name Nombre y Apellido	Select the community. Seleccione la comunidad.	What is your comment? ¿Cuál es su comentario?	Aclima Response Respuesta de Aclima
		<p>Mr. Walter Ham, Chief Monitoring and Laboratory Division                      California Air Resources Board                      1001 I Street Sacramento, CA 95814</p> <p>Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB’s Statewide Mobile Monitoring Initiative.</p> <p>Dear Mr. Ham:                      CMTA and other business and industry organizations appreciate CARB’s recognition of the many policy and technical deficiencies in Aclima’s first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile Monitoring Initiative (SMMI), and CARB’s willingness to facilitate a second public comment period on a subset of revised draft CAMPs. CARB’s June 30 Project Update indicates that six CAMPs have been selected for this second comment period - Rodeo and Crockett, San Jose, Paramount and North Long Beach, North Bakersfield, West Stanislaus County, and Salton City – “based on geographic distribution, land-use types, and the range of pollutants to be monitored, to allow stakeholders to provide input on the updated material prior to further CAMP approvals.” We further understand that the comments CARB and Aclima</p>	

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		<p>receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB's decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components.</p> <p>The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and Aclima in developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial and industrial interests - Rodeo and Crockett, San Jose, Paramount and North Long Beach, and North Bakersfield. Ramboll developed a spreadsheet that consolidates</p>	

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		<p>comments into topic areas addressing several critical issues, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Revised CAMPs contain newly identified sources (e.g., oil and gas sources in North Bakersfield, a medical device sterilizer in Paramount/North Long Beach, the San Jose airport), including some sources located outside of the designated community boundaries, and lack clarity regarding whether and how those sources will be addressed in targeted area monitoring. These and other changes raise new questions about the criteria used for prioritizing monitoring routes and locations.</li> <li>• Lack of regulatory or source-specific validation of community-identified priorities (i.e., a determination of whether perceived sources are driving or significantly contributing to air quality conditions in the community). For example, some sources were identified based on historical incidents that no longer reflect current operations.</li> <li>• No guidance or process for reconciling potential conflicts between SMMI data and data from existing regulatory monitoring networks (e.g., explicit parameters governing use of SMMI or other data to guide further investigations, to</li> </ul>	

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		<p>inform source apportionment, or for regulatory purposes). It may not be appropriate to include certain locations in targeted area monitoring if regulatory-grade, stationary monitoring already occurs in those locations.</p> <ul style="list-style-type: none"> <li>Lack of clarity regarding what findings would constitute an “actionable result,” such as a threshold that would trigger notification to regulators or lead to public-facing conclusions. Further distinctions should be made between SMMI’s role in supporting community understanding and its limitations in driving regulatory or enforcement outcomes.</li> <li>Inconsistent and insufficiently justified monitoring duration and mileage allocations among individual CAMPs introduces potential bias and is likely to produce results that are not representative of actual air quality conditions in a given community. More clarity is needed on how monitoring frequency, duration, and spatial coverage account for source variability, limited measurement windows, and potential environmental disruptions.</li> <li>Lack of clarity regarding how partner mobile laboratory resources will be deployed to capture representative emissions from variable sources, and whether they</li> </ul>	

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		<p>could be redirected in response to initial monitoring results. The concept of “dynamic monitoring” introduces greater uncertainty regarding deployment of the mobile laboratories, and absent further explanation and a decision making framework in the CAMPs, has the potential to undermine public confidence in SMMI results.</p> <ul style="list-style-type: none"> <li>• No disclosure of mobile laboratory capabilities and limitations regarding measurement and quantification of priority toxic air contaminants identified in each CAMP.</li> <li>• Lack of justification for, and multiple potential deficiencies in, proposed monitoring methodologies (e.g., infrequent quality assurance/quality control schedules, no oversight of sampling instrumentation, inconsistent equipment calibration, non-disclosure of method capabilities and limitations, etc.) raises concerns about data reliability. Data collected under variable field conditions may suffer from drift (gradual loss of sensor accuracy), bias, or calibration error, potentially compromising the utility of monitoring results.</li> <li>• Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized and released throughout the</li> </ul>	

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		<p>monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives.</p> <p>The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified concerns. It also includes comments that pertain to some of the already approved plan components, due in part to the inadequate timeframe for comments on the initial draft CAMPs and lingering uncertainty regarding opportunities for course corrections for these components.</p> <p>In addition to the attached comments, we offer the following observations and recommendations:</p> <ol style="list-style-type: none"> <li>Affected sources should be provided the opportunity to comment on data interpretation, visualizations, and Aclima’s draft report before they are finalized. The CAMPs state that outputs from</li> </ol>	

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		<p>the SMMI will include interpretations and visualizations of measurement data using various and unique combinations of approaches, such as storymaps, for the ultimate purpose of taking action to address a pollution concern (see for example Sections 8.3, 10.5, 13.2). However, there appears to be no opportunity for public comment or engagement in these steps or in completing Aclima’s report. This is a major process flaw that limits Aclima’s accountability and erodes trust in Aclima’s interpretation of SMMI data and decisions based on those interpretations.</p> <p>Data interpretation can help the public understand the meaning and significance of monitoring results, but it necessarily draws on the experiences, expertise, and values of those responsible for data interpretation. By limiting stakeholder engagement in this process, Aclima’s interpretations and findings will not benefit from other relevant perspectives, including affected sources and businesses. This dynamic increases the likelihood of overlooking or dismissing blind spots in the data, inherent bias, and important contextual factors. CARB’s decision to withhold approval of CAMP components related to</p>	

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		<p>targeted area monitoring and conduct a second public comment period is evidence of the unintended consequences of limiting stakeholder engagement in important aspects of SMMI implementation. For these reasons, we recommend that the CAMPs be revised to include a meaningful process for public engagement and review of Aclima’s data interpretations, visualizations, and final report before publication.</p> <p>2. The work plans for conducting field measurements should only involve Aclima, CARB, or air district staff. The CAMP workplans (Section 11) appear to indicate that community members (if trained) may conduct field measurements or tasks in support of field measurements. Involving members of the public in any element of conducting field measurements introduces a substantial risk of bias that can compromise data integrity and QA/QC. Section 11 also fails to provide clarity regarding the type of tasks that members of the community may be invited to perform. To prevent such risks, the CAMPs should not involve community members in tasks related to the collection of field measurements, and should instead assign these tasks to regulatory agency</p>	

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		<p>staff with the necessary training, expertise, and understanding of the need for objectivity in the data gathering process.</p> <p>3. “Alert thresholds” should specify the form of the referenced standard. The CAMPs specify California Occupational Safety and Health Administration (Cal/OSHA) Permissible Exposure Limits (PEL) and Short-Term Exposure Limits (STEL) for several TACs as the basis for the alert and reporting thresholds listed in Table 10 of Section 14.1. Cal/OSHA PELs and STELs are typically time-weighted 8-hour averages. We recommend that Aclima revise Table 10 to include the form of the concentration limit. In determining whether a threshold has been exceeded, Aclima should only compare reported concentrations to the corresponding threshold when the data is reliable and presented in the same form as the threshold.</p> <p>Finally, while we welcome more definitive engagement by CARB to oversee Aclima’s work, we continue to struggle with the lack of transparency in the SMMI implementation process. In the context of this second 14-day comment period, it was difficult to discern the changes between the initial draft CAMPs, dated</p>	

**Community Air Monitoring Plan: Appendix J**  
 Statewide Mobile Monitoring Initiative

<b>First and Last Name</b> <b>Nombre y Apellido</b>	<b>Select the community.</b> <b>Seleccione la comunidad.</b>	<b>What is your comment?</b> <b>¿Cuál es su comentario?</b>	<b>Aclima Response</b> <b>Respuesta de Aclima</b>
		<p>May 19, 2025, and the revised draft CAMPs, dated July 1, 2025. As noted in the attached spreadsheet, both historical and current versions of Aclima documentation remain online but changes are not identified and some of the source materials are difficult to access. For future reference, we recommend posting clear version histories or redlined documents to enhance transparency and improve public trust in the SMMI implementation process. We appreciate CARB and Aclima’s consideration of these comments, and we look forward to further changes to all 62 CAMPs to incorporate the recommended improvements. If you have any questions, please contact me at (916) 441-5420 or EEsquivel@cmta.net.</p> <p>Sincerely,</p> <p>Elizabeth Esquivel          Vice President of Government Relations          California Manufacturers and Technology Association</p> <p>cc: Liane Randolph, Chair – CARB          Dr. Steven Cliff, Executive Officer – CARB          Deldi Reyes, Division Chief – CARB Office of Community Air Protection          David Ridley – CARB MLD</p>	

**Community Air Monitoring Plan: Appendix J**  
 Statewide Mobile Monitoring Initiative

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		Katie George – CARB MLD Brian Moore – CARB OCAP Kevin Olp – CARB OCAP Adolpho Garcia – CARB OCAP	
Elizabeth Esquivel	Paramount/North Long Beach	<p>July 17, 2025</p> <p>Mr. Walter Ham, Chief            Monitoring and Laboratory            Division            California Air Resources Board            1001 I Street Sacramento, CA            95814</p> <p>Subject: Second 14-Day            Comment Period on Draft            Community Air Monitoring            Plans for CARB’s Statewide            Mobile Monitoring Initiative.</p> <p>Dear Mr. Ham:            CMTA and other business and            industry organizations            appreciate CARB’s recognition            of the many policy and            technical deficiencies in            Aclima’s first draft Community            Air Monitoring Plans (CAMPs)            for the Statewide Mobile            Monitoring Initiative (SMMI),            and CARB’s willingness to            facilitate a second public            comment period on a subset of            revised draft CAMPs. CARB’s            June 30 Project Update            indicates that six CAMPs have            been selected for this second            comment period - Rodeo and            Crockett, San Jose, Paramount            and North Long Beach, North            Bakersfield, West Stanislaus            County, and Salton City –            “based on geographic            distribution, land-use types,            and the range of pollutants to</p>	<p>See responses to table below:            “Aclima Responses to CMTA            Comments - August 2025”</p>

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		<p>be monitored, to allow stakeholders to provide input on the updated material prior to further CAMP approvals.” We further understand that the comments CARB and Aclima receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB’s decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components.</p> <p>The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and Aclima in developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial</p>	

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		<p>monitoring results.</p> <ul style="list-style-type: none"> <li>Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized and released throughout the monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives.</li> </ul> <p>The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified concerns. It also includes comments that pertain to some of the already approved plan components, due in part to the inadequate timeframe for comments on the initial draft CAMPs and lingering uncertainty regarding opportunities for course corrections for these components.</p> <p>In addition to the attached comments, we offer the following observations and recommendations:</p> <ol style="list-style-type: none"> <li>Affected sources should</li> </ol>	

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		<p>be provided the opportunity to comment on data interpretation, visualizations, and Aclima’s draft report before they are finalized. The CAMPs state that outputs from the SMMI will include interpretations and visualizations of measurement data using various and unique combinations of approaches, such as storymaps, for the ultimate purpose of taking action to address a pollution concern (see for example Sections 8.3, 10.5, 13.2). However, there appears to be no opportunity for public comment or engagement in these steps or in completing Aclima’s report. This is a major process flaw that limits Aclima’s accountability and erodes trust in Aclima’s interpretation of SMMI data and decisions based on those interpretations.</p> <p>Data interpretation can help the public understand the meaning and significance of monitoring results, but it necessarily draws on the experiences, expertise, and values of those responsible for data interpretation. By limiting stakeholder engagement in this process, Aclima’s interpretations and findings will not benefit from other relevant perspectives, including affected sources and businesses. This dynamic increases the likelihood of</p>	

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		<p>overlooking or dismissing blind spots in the data, inherent bias, and important contextual factors. CARB's decision to withhold approval of CAMP components related to targeted area monitoring and conduct a second public comment period is evidence of the unintended consequences of limiting stakeholder engagement in important aspects of SMMI implementation. For these reasons, we recommend that the CAMPs be revised to include a meaningful process for public engagement and review of Aclima's data interpretations, visualizations, and final report before publication.</p> <p>2. The work plans for conducting field measurements should only involve Aclima, CARB, or air district staff. The CAMP workplans (Section 11) appear to indicate that community members (if trained) may conduct field measurements or tasks in support of field measurements. Involving members of the public in any element of conducting field measurements introduces a substantial risk of bias that can compromise data integrity and QA/QC. Section 11 also fails to provide clarity regarding the type of tasks that members of the community may be invited to perform. To prevent such</p>	

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		<p>risks, the CAMPs should not involve community members in tasks related to the collection of field measurements, and should instead assign these tasks to regulatory agency staff with the necessary training, expertise, and understanding of the need for objectivity in the data gathering process.</p> <p>3. “Alert thresholds” should specify the form of the referenced standard. The CAMPs specify California Occupational Safety and Health Administration (Cal/OSHA) Permissible Exposure Limits (PEL) and Short-Term Exposure Limits (STEL) for several TACs as the basis for the alert and reporting thresholds listed in Table 10 of Section 14.1. Cal/OSHA PELs and STELs are typically time-weighted 8-hour averages. We recommend that Aclima revise Table 10 to include the form of the concentration limit. In determining whether a threshold has been exceeded, Aclima should only compare reported concentrations to the corresponding threshold when the data is reliable and presented in the same form as the threshold.</p> <p>Finally, while we welcome more definitive engagement by CARB to oversee Aclima’s work, we continue to struggle with the lack of transparency in</p>	

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		<p>the SMMI implementation process. In the context of this second 14-day comment period, it was difficult to discern the changes between the initial draft CAMPs, dated May 19, 2025, and the revised draft CAMPs, dated July 1, 2025. As noted in the attached spreadsheet, both historical and current versions of Aclima documentation remain online but changes are not identified and some of the source materials are difficult to access. For future reference, we recommend posting clear version histories or redlined documents to enhance transparency and improve public trust in the SMMI implementation process.</p> <p>We appreciate CARB and Aclima’s consideration of these comments, and we look forward to further changes to all 62 CAMPs to incorporate the recommended improvements. If you have any questions, please contact me at (916) 441-5420 or EEsquivel@cmta.net.</p> <p>Sincerely,</p> <p>Elizabeth Esquivel          Vice President of Government Relations          California Manufacturers and Technology Association</p> <p>cc: Liane Randolph, Chair –</p>	

Community Air Monitoring Plan: Appendix J  
 Statewide Mobile Monitoring Initiative

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		CARB Dr. Steven Cliff, Executive Officer – CARB Deldi Reyes, Division Chief – CARB Office of Community Air Protection David Ridley – CARB MLD Katie George – CARB MLD Brian Moore – CARB OCAP Kevin Olp – CARB OCAP Adolpho Garcia – CARB OCAP	
Elizabeth Esquivel	North Bakersfield	July 17, 2025  Mr. Walter Ham, Chief Monitoring and Laboratory Division California Air Resources Board 1001 I Street Sacramento, CA 95814  Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB’s Statewide Mobile Monitoring Initiative.  Dear Mr. Ham: CMTA and other business and industry organizations appreciate CARB’s recognition of the many policy and technical deficiencies in Aclima’s first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile Monitoring Initiative (SMMI), and CARB’s willingness to facilitate a second public comment period on a subset of revised draft CAMPs. CARB’s June 30 Project Update indicates that six CAMPs have been selected for this second	See responses to table below: “Aclima Responses to CMTA Comments - August 2025”

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		<p>California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial and industrial interests - Rodeo and Crockett, San Jose, Paramount and North Long Beach, and North Bakersfield. Ramboll developed a spreadsheet that consolidates comments into topic areas addressing several critical issues, including but not limited to:</p> <ul style="list-style-type: none"> <li>Revised CAMPs contain newly identified sources (e.g., oil and gas sources in North Bakersfield, a medical device sterilizer in Paramount/North Long Beach, the San Jose airport), including some sources located outside of the designated community boundaries, and lack clarity regarding whether and how those sources will be addressed in targeted area monitoring. These and other changes raise new questions about the criteria used for prioritizing monitoring routes and locations.</li> <li>Lack of regulatory or source-specific validation of community-identified priorities (i.e., a determination of whether perceived sources are driving or significantly contributing to air quality conditions in the community).</li> </ul>	

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		<p>community. More clarity is needed on how monitoring frequency, duration, and spatial coverage account for source variability, limited measurement windows, and potential environmental disruptions.</p> <ul style="list-style-type: none"> <li>• Lack of clarity regarding how partner mobile laboratory resources will be deployed to capture representative emissions from variable sources, and whether they could be redirected in response to initial monitoring results.</li> </ul> <p>The concept of “dynamic monitoring” introduces greater uncertainty regarding deployment of the mobile laboratories, and absent further explanation and a decision making framework in the CAMPs, has the potential to undermine public confidence in SMMI results.</p> <ul style="list-style-type: none"> <li>• No disclosure of mobile laboratory capabilities and limitations regarding measurement and quantification of priority toxic air contaminants identified in each CAMP.</li> <li>• Lack of justification for, and multiple potential deficiencies in, proposed monitoring methodologies (e.g., infrequent quality assurance/quality control schedules, no oversight of sampling instrumentation, inconsistent equipment calibration, non-disclosure of method capabilities and</li> </ul>	

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		<p>limitations, etc.) raises concerns about data reliability. Data collected under variable field conditions may suffer from drift (gradual loss of sensor accuracy), bias, or calibration error, potentially compromising the utility of monitoring results.</p> <ul style="list-style-type: none"> <li>Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized and released throughout the monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives.</li> </ul> <p>The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified concerns. It also includes comments that pertain to some of the already approved plan components, due in part to the inadequate timeframe for comments on the initial draft CAMPs and lingering uncertainty regarding</p>	

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		<p>opportunities for course corrections for these components.</p> <p>In addition to the attached comments, we offer the following observations and recommendations:</p> <ol style="list-style-type: none"> <li>1. Affected sources should be provided the opportunity to comment on data interpretation, visualizations, and Aclima’s draft report before they are finalized. The CAMPs state that outputs from the SMMI will include interpretations and visualizations of measurement data using various and unique combinations of approaches, such as storymaps, for the ultimate purpose of taking action to address a pollution concern (see for example Sections 8.3, 10.5, 13.2). However, there appears to be no opportunity for public comment or engagement in these steps or in completing Aclima’s report. This is a major process flaw that limits Aclima’s accountability and erodes trust in Aclima’s interpretation of SMMI data and decisions based on those interpretations.</li> </ol> <p>Data interpretation can help the public understand the meaning and significance of monitoring results, but it necessarily draws on the experiences, expertise, and values of those responsible for data interpretation. By limiting</p>	

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		<p>stakeholder engagement in this process, Aclima’s interpretations and findings will not benefit from other relevant perspectives, including affected sources and businesses. This dynamic increases the likelihood of overlooking or dismissing blind spots in the data, inherent bias, and important contextual factors. CARB’s decision to withhold approval of CAMP components related to targeted area monitoring and conduct a second public comment period is evidence of the unintended consequences of limiting stakeholder engagement in important aspects of SMMI implementation. For these reasons, we recommend that the CAMPs be revised to include a meaningful process for public engagement and review of Aclima’s data interpretations, visualizations, and final report before publication.</p> <p>2. The work plans for conducting field measurements should only involve Aclima, CARB, or air district staff. The CAMP workplans (Section 11) appear to indicate that community members (if trained) may conduct field measurements or tasks in support of field measurements. Involving members of the public in any element of conducting field</p>	

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		<p>measurements introduces a substantial risk of bias that can compromise data integrity and QA/QC. Section 11 also fails to provide clarity regarding the type of tasks that members of the community may be invited to perform. To prevent such risks, the CAMPs should not involve community members in tasks related to the collection of field measurements, and should instead assign these tasks to regulatory agency staff with the necessary training, expertise, and understanding of the need for objectivity in the data gathering process.</p> <p>3. “Alert thresholds” should specify the form of the referenced standard. The CAMPs specify California Occupational Safety and Health Administration (Cal/OSHA) Permissible Exposure Limits (PEL) and Short-Term Exposure Limits (STEL) for several TACs as the basis for the alert and reporting thresholds listed in Table 10 of Section 14.1. Cal/OSHA PELs and STELs are typically time-weighted 8-hour averages. We recommend that Aclima revise Table 10 to include the form of the concentration limit. In determining whether a threshold has been exceeded, Aclima should only compare reported concentrations to the corresponding threshold when</p>	

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		<p>the data is reliable and presented in the same form as the threshold.</p> <p>Finally, while we welcome more definitive engagement by CARB to oversee Aclima’s work, we continue to struggle with the lack of transparency in the SMMI implementation process. In the context of this second 14-day comment period, it was difficult to discern the changes between the initial draft CAMPs, dated May 19, 2025, and the revised draft CAMPs, dated July 1, 2025. As noted in the attached spreadsheet, both historical and current versions of Aclima documentation remain online but changes are not identified and some of the source materials are difficult to access. For future reference, we recommend posting clear version histories or redlined documents to enhance transparency and improve public trust in the SMMI implementation process.</p> <p>We appreciate CARB and Aclima’s consideration of these comments, and we look forward to further changes to all 62 CAMPs to incorporate the recommended improvements. If you have any questions, please contact me at (916) 441-5420 or EEsquivel@cmta.net.</p> <p>Sincerely,</p>	

**Community Air Monitoring Plan: Appendix J**  
 Statewide Mobile Monitoring Initiative

<b>First and Last Name</b> <b>Nombre y Apellido</b>	<b>Select the community.</b> <b>Seleccione la comunidad.</b>	<b>What is your comment?</b> <b>¿Cuál es su comentario?</b>	<b>Aclima Response</b> <b>Respuesta de Aclima</b>
		<p>Elizabeth Esquivel            Vice President of Government Relations            California Manufacturers and Technology Association</p> <p>cc: Liane Randolph, Chair – CARB            Dr. Steven Cliff, Executive Officer – CARB            Deldi Reyes, Division Chief – CARB Office of Community Air Protection            David Ridley – CARB MLD            Katie George – CARB MLD            Brian Moore – CARB OCAP            Kevin Olp – CARB OCAP            Adolpho Garcia – CARB OCAP</p>	
Elizabeth Esquivel	San Jose	<p>July 17, 2025</p> <p>Mr. Walter Ham, Chief Monitoring and Laboratory Division            California Air Resources Board            1001 I Street Sacramento, CA 95814</p> <p>Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB’s Statewide Mobile Monitoring Initiative.</p> <p>Dear Mr. Ham:            CMTA and other business and industry organizations appreciate CARB’s recognition of the many policy and technical deficiencies in Aclima’s first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile</p>	<p>See responses to table below: “Aclima Responses to CMTA Comments - August 2025”</p>

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		<p>Monitoring Initiative (SMMI), and CARB’s willingness to facilitate a second public comment period on a subset of revised draft CAMPs. CARB’s June 30 Project Update indicates that six CAMPs have been selected for this second comment period - Rodeo and Crockett, San Jose, Paramount and North Long Beach, North Bakersfield, West Stanislaus County, and Salton City – “based on geographic distribution, land-use types, and the range of pollutants to be monitored, to allow stakeholders to provide input on the updated material prior to further CAMP approvals.” We further understand that the comments CARB and Aclima receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB’s decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components.</p> <p>The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and</p>	

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		<p>Aclima is developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial and industrial interests - Rodeo and Crockett, San Jose, Paramount and North Long Beach, and North Bakersfield. Ramboll developed a spreadsheet that consolidates comments into topic areas addressing several critical issues, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Revised CAMPs contain newly identified sources (e.g., oil and gas sources in North Bakersfield, a medical device sterilizer in Paramount/North Long Beach, the San Jose airport), including some sources located outside of the designated community boundaries, and lack clarity regarding whether and how those sources will be addressed in targeted area monitoring. These and other changes raise new questions about the criteria used for prioritizing monitoring routes and locations.</li> </ul>	

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		<ul style="list-style-type: none"> <li>• Lack of regulatory or source-specific validation of community-identified priorities (i.e., a determination of whether perceived sources are driving or significantly contributing to air quality conditions in the community). For example, some sources were identified based on historical incidents that no longer reflect current operations.</li> <li>• No guidance or process for reconciling potential conflicts between SMMI data and data from existing regulatory monitoring networks (e.g., explicit parameters governing use of SMMI or other data to guide further investigations, to inform source apportionment, or for regulatory purposes). It may not be appropriate to include certain locations in targeted area monitoring if regulatory-grade, stationary monitoring already occurs in those locations.</li> <li>• Lack of clarity regarding what findings would constitute an “actionable result,” such as a threshold that would trigger notification to regulators or lead to public-facing conclusions. Further distinctions should be made between SMMI’s role in supporting community understanding and its limitations in driving regulatory or enforcement outcomes.</li> <li>• Inconsistent and</li> </ul>	

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		<p>insufficiently justified monitoring duration and mileage allocations among individual CAMPs introduces potential bias and is likely to produce results that are not representative of actual air quality conditions in a given community. More clarity is needed on how monitoring frequency, duration, and spatial coverage account for source variability, limited measurement windows, and potential environmental disruptions.</p> <ul style="list-style-type: none"> <li>• Lack of clarity regarding how partner mobile laboratory resources will be deployed to capture representative emissions from variable sources, and whether they could be redirected in response to initial monitoring results. The concept of “dynamic monitoring” introduces greater uncertainty regarding deployment of the mobile laboratories, and absent further explanation and a decision making framework in the CAMPs, has the potential to undermine public confidence in SMMI results.</li> <li>• No disclosure of mobile laboratory capabilities and limitations regarding measurement and quantification of priority toxic air contaminants identified in each CAMP.</li> <li>• Lack of justification for, and multiple potential deficiencies in, proposed</li> </ul>	

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		<p>monitoring methodologies (e.g., infrequent quality assurance/quality control schedules, no oversight of sampling instrumentation, inconsistent equipment calibration, non-disclosure of method capabilities and limitations, etc.) raises concerns about data reliability. Data collected under variable field conditions may suffer from drift (gradual loss of sensor accuracy), bias, or calibration error, potentially compromising the utility of monitoring results.</p> <ul style="list-style-type: none"> <li>Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized and released throughout the monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives.</li> </ul> <p>The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified</p>	

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		<p>concerns. It also includes comments that pertain to some of the already approved plan components, due in part to the inadequate timeframe for comments on the initial draft CAMPs and lingering uncertainty regarding opportunities for course corrections for these components.</p> <p>In addition to the attached comments, we offer the following observations and recommendations:</p> <ol style="list-style-type: none"> <li>1. Affected sources should be provided the opportunity to comment on data interpretation, visualizations, and Aclima’s draft report before they are finalized. The CAMPs state that outputs from the SMMI will include interpretations and visualizations of measurement data using various and unique combinations of approaches, such as storymaps, for the ultimate purpose of taking action to address a pollution concern (see for example Sections 8.3, 10.5, 13.2). However, there appears to be no opportunity for public comment or engagement in these steps or in completing Aclima’s report. This is a major process flaw that limits Aclima’s accountability and erodes trust in Aclima’s interpretation of SMMI data and decisions based on those interpretations.</li> </ol>	

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		<p>Data interpretation can help the public understand the meaning and significance of monitoring results, but it necessarily draws on the experiences, expertise, and values of those responsible for data interpretation. By limiting stakeholder engagement in this process, Aclima’s interpretations and findings will not benefit from other relevant perspectives, including affected sources and businesses. This dynamic increases the likelihood of overlooking or dismissing blind spots in the data, inherent bias, and important contextual factors. CARB’s decision to withhold approval of CAMP components related to targeted area monitoring and conduct a second public comment period is evidence of the unintended consequences of limiting stakeholder engagement in important aspects of SMMI implementation. For these reasons, we recommend that the CAMPs be revised to include a meaningful process for public engagement and review of Aclima’s data interpretations, visualizations, and final report before publication.</p> <p>2. The work plans for conducting field measurements should only involve Aclima, CARB, or air district staff. The CAMP</p>	

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		<p>workplans (Section 11) appear to indicate that community members (if trained) may conduct field measurements or tasks in support of field measurements. Involving members of the public in any element of conducting field measurements introduces a substantial risk of bias that can compromise data integrity and QA/QC. Section 11 also fails to provide clarity regarding the type of tasks that members of the community may be invited to perform. To prevent such risks, the CAMPs should not involve community members in tasks related to the collection of field measurements, and should instead assign these tasks to regulatory agency staff with the necessary training, expertise, and understanding of the need for objectivity in the data gathering process.</p> <p>3. “Alert thresholds” should specify the form of the referenced standard. The CAMPs specify California Occupational Safety and Health Administration (Cal/OSHA) Permissible Exposure Limits (PEL) and Short-Term Exposure Limits (STEL) for several TACs as the basis for the alert and reporting thresholds listed in Table 10 of Section 14.1. Cal/OSHA PELs and STELs are typically time-weighted 8-hour averages. We recommend that</p>	

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		<p>Aclima revise Table 10 to include the form of the concentration limit. In determining whether a threshold has been exceeded, Aclima should only compare reported concentrations to the corresponding threshold when the data is reliable and presented in the same form as the threshold.</p> <p>Finally, while we welcome more definitive engagement by CARB to oversee Aclima’s work, we continue to struggle with the lack of transparency in the SMMI implementation process. In the context of this second 14-day comment period, it was difficult to discern the changes between the initial draft CAMPs, dated May 19, 2025, and the revised draft CAMPs, dated July 1, 2025. As noted in the attached spreadsheet, both historical and current versions of Aclima documentation remain online but changes are not identified and some of the source materials are difficult to access. For future reference, we recommend posting clear version histories or redlined documents to enhance transparency and improve public trust in the SMMI implementation process.</p> <p>We appreciate CARB and Aclima’s consideration of these comments, and we look forward to further changes to all 62 CAMPs to incorporate</p>	

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		<p>the recommended improvements. If you have any questions, please contact me at (916) 441-5420 or EEsquivel@cmta.net.</p> <p>Sincerely,</p> <p>Elizabeth Esquivel            Vice President of Government Relations            California Manufacturers and Technology Association</p> <p>cc: Liane Randolph, Chair – CARB            Dr. Steven Cliff, Executive Officer – CARB            Deldi Reyes, Division Chief – CARB Office of Community Air Protection            David Ridley – CARB MLD            Katie George – CARB MLD            Brian Moore – CARB OCAP            Kevin Olp – CARB OCAP            Adolpho Garcia – CARB OCAP</p>	