



September 16, 2026

Ms. Edie Chang
Deputy Executive Officer
Planning, Freight, & Toxics
California Air Resources Board
1001 I Street, Sacramento, CA 95814

Re: Comments on California Air Resources Board's Draft 2026 Roadmap to Reduce Air Toxics

Electronic submittal to: <https://ww2.arb.ca.gov/public-comments/public-comments-draft-roadmap-reduce-air-toxics>

Dear Ms. Chang,

The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on CARB's Draft 2026 Roadmap to Reduce Air Toxics (Draft Roadmap). We understand the Draft Roadmap is meant to guide CARB's actions on toxic air pollution for the next 20 years and beyond, which requires broad coordination across regulatory agencies at the federal, state and local levels, including the regulated entities.

CASA represents more than 150 public agencies and municipalities across California that engage in wastewater collection, treatment, recycling, and resource recovery. Our vision is to advance sound public policy and shape programs that empower the clean water community to drive sustainability, protect public health, and advance circular water solutions.

Having a shared mission of protecting public health and the environment, CASA's members appreciate and support CARB's intent to further identify and mitigate potential risks to the public related to air toxics. The significant expansion of air toxics reporting in response to updates made to both the Criteria Air Pollutants and Toxic Air Contaminant Reporting (CTR) Regulation and the Emissions Inventory Criteria and Guidelines (EICG). As summarized in the Draft Roadmap and CARB's presentation on August 25, 2026, CARB staff are seeing a proportionate increase in reports and an expanded list of compounds being reported as a result. Whether this increase in compounds reported translates to an increase in risk depends on the relative toxicity of those compounds, most of which do not have a toxicity potential defined. However, CARB has recommended further expanding the emissions monitoring network as well as public access to data before there is a basic scientific understanding of what the new data means. It is critical that CARB engage with the regulated entities directly to provide context for these emissions and their sources, to scientifically justify whether there is a need to further expand monitoring and reporting at a very high cost to ratepayers, as well as inform feasible mitigation strategies. Sound science underpins good policy and regulatory decision-making.

We appreciate the opportunity to provide input and further appreciate your willingness to consider our comments as you work to finalize the Roadmap. Please contact me if you have any questions at (925) 705-6404 or via email at sdeslauriers@casasweb.org.

Sincerely,

A handwritten signature in black ink, reading "Sarah A. Deslauriers". The signature is fluid and cursive, with the first name "Sarah" and last name "Deslauriers" clearly legible.

Sarah A. Deslauriers, P.E., ENV SP
Director of Air, Climate, & Energy Programs

Cc: Mr. Adam Link, Executive Director, CASA