

May 17, 2019

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

**Subject: Placer County Air Pollution Control District's Comments on the Proposed Community Air Protection Incentive 2019 Guidelines (4-19-19)**

Thank you for the opportunity to provide comments on the California Air Resources Board's (CARB) proposed Community Air Protection Incentive Guidelines (Guidelines). The Placer County Air Pollution Control District (District) appreciates the changes and updates that CARB staff have already incorporated into the Guidelines based on previous comments. Our comments below identify additional minor changes that should be considered to further improve the District's ability to effectively program its allocation of Community Air Protection Program funds while meeting community needs.

- Item 5.C, Page 3-3: This item discusses procedures for project selection. The District recommends CARB consider revising this paragraph to read (changes in bold):

"Procedures for project selection, including cost-effectiveness or other criteria applied to rank projects, how community consultation will be considered in project selection (**when applicable**), and any procedures that vary by source category. Where the order of application receipt will be used to select projects, the policies and procedures will specify how community priorities for source categories and types of projects will be considered before projects are selected, **when applicable**."

This change recognizes that while not all air districts have designated Disadvantaged Communities, it is likely that all air districts have communities that are more impacted by air pollution as compared to other areas. Such a change will provide needed implementation flexibility to districts.

- Item H.1.(D).(2), Page 3-13, *Reporting*. The District recommends amending the language to read:  
"Priority population, when applicable. If no priority population, then explain why no priority population has been identified."

This change recognizes that each air district is unique and may not be able to identify a priority population.

- Item P.1, page 3-22: This requirement is unclear. The item discusses the approval of Case by Case (CBC) determinations are pending a determination by CARB that a project does not adversely affect air toxic contaminants. What mechanisms will be established to quantify toxic emissions and whether a project adds to them or not? If no mechanisms are outlined, then air districts may

not be able to be satisfy this statement. District staff believe CARB should clarify these requirements and criteria.

- Item A, page 5-1. The first paragraph reads that “Air districts may fund a project or projects at schools in disadvantaged communities (DACs) or low-income communities.” District staff have evaluated potential projects, and have identified several excellent projects at schools that would be ineligible under the proposed criteria. For example, Roseville High School in Placer County is located right outside and adjacent to a low-income community (census tract) and serves the students in that community. However, because it is not physically located in the community, projects at the school, such as high efficiency air filters, are not allowable under the Guidelines. To address this, District staff proposes the following revisions, “Air districts may fund a project or projects at schools which serves/benefits disadvantaged communities or low-income communities and households.” District staff believes this revision will allow schools not located in DACs or 1550’s, but whose students live in DACs or 1550s, to be eligible for projects.

Similarly, in regards to school bus replacement projects, if a school is not in a DAC or low-income community, but the school bus has a route which operates or transports students who live in such a community, then it also would not be eligible for funding based on the language in Item A on page 5-1. Therefore, District staff recommends revising the Guidelines to allow buses which operate or serve students which live in a DAC or low-income community to be eligible for funding. This would also be consistent with the current Guidelines and supplemental reporting form already in place in CARL which is more focused on where a bus is operated.

Thank you for allowing the District this opportunity to review and comment on the Guidelines. Please do not hesitate to contact me at (530) 745-2330, or at [ecwhite@placer.ca.gov](mailto:ecwhite@placer.ca.gov) if you have any questions.

Sincerely,



Erik C. White, APCO  
Placer County Air Pollution Control District