

Comments to:

Draft Community Air Protection Blueprint For Selecting Communities, Preparing Community Emissions Reduction Programs, Identifying Statewide Strategies, and Conducting Community Air Monitoring

Submitted by: Naval Facilities Engineering Command Southwest, EV1 Environmental - Air Program

The Naval Facilities Engineering Command Southwest, EV1 Environmental - Air Program, appreciates the opportunity to provide comments to the ARB Draft Community Air Protection Blueprint For Selecting Communities, Preparing Community Emissions Reduction Programs, Identifying Statewide Strategies, and Conducting Community Air Monitoring (Blueprint). We have reviewed the draft Blueprint and offer the following comments for ARB's consideration.

1. To develop solutions to environmental challenges, ARB typically follows a deliberate process, involving scientific data and stakeholder input. Given the accelerated pace of the AB 617 program and relying on only nine months of data to develop action plans, there is a concern that the selected approach may not be comprehensive or feasible. Another concern is that anecdotal versus factual information may be presented and used as the basis for important regulatory decisions. Unless there is an "off-ramp" or a method to re-evaluate approaches as more data become available, there is a possibility of expending resources without realizing environmental benefits and emission reductions. We recommend that ARB consider including provisions in the program to re-evaluate emissions controls and monitoring plans as the program matures and more information becomes available.
2. The document mentions air districts developing Indirect Source Rule. As mobile sources are acknowledged to be the greatest source of the health issues, and air districts is not chartered to regulate mobile sources, what is the mechanism for developing these rules?
3. Identifying the specific sources of diesel particulate emissions is a challenge. Maybe the use handheld particle counters can help with data collection, but specificity, calibration, and operator proficiency must be addressed and enforced to obtain reliable data.
4. The use of hand-held ultrafine particulate counters and the results should be scrutinized to make sure they valid, especially if the results are used to set policy and develop action plans and regulations. The local Air Districts enforce strict protocols when environmental samples are obtained, similar protocols should be developed and enforced for the use of hand-held monitoring devices.
5. Please create an ARB training course that specifically addresses AB 617 and its requirements and specifications. The courses created by ARB that address its rules (ATCM, Boilers, Gas Stations, etc.) have all been excellent. An AB 617 training module that explains the ins and outs of this program to the public would help educate the stakeholders to help understand the data and information and make more informed contribution to the process.
6. Fast-Pass transponders are used on many freeways to read when cars are using the passes and measure how many more trips are available. Are there plans to develop receivers that can detect whether the pollution control equipment is working as they pass by? Putting such technology in affected Communities may provide a picture of how clean the traffic is in the area.