



September 24, 2018

Karen Magliano
Director Community Air Protection
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comment Letter re: Final Draft - Community Air Protection
Blueprint

Dear Director Magliano:

The California Small Business Alliance (Alliance) is a non-partisan coalition of California trade associations committed to providing small businesses with a single constructive voice to advocate on their behalf before all branches of government, including air quality management districts and other environmental regulatory agencies. The individual businesses belonging to these trade associations are generally found in commercial and industrial neighborhoods. Many of them have resided there for generations and have represented a constant source of good paying jobs with benefits that are convenient and available to the residents in these working-class communities. Over the decades thousands of these employees have been able to buy homes, send their children to college, and generally improve their quality of life.

For more than a year, the Alliance has followed the meetings of the Community Air Protection Program Consultation Group as they discussed various aspects of program development. We would have much preferred to have been active and legitimate participants, but we nor any representative of small business were not invited to be members of the group.

It is precisely because CARB's Blueprint for this program will require strict adherence by thousands of small business owners, and because the Alliance represents a broad range of manufacturing and specialty services businesses who are likely to be burdened with complex, costly and resource-intensive adherence compliance responsibilities under the threat of severe enforcement that we submit the following comments for your earnest consideration before proceeding any further with the implementation process:

II. NEW COMMUNITY-FOCUSED FRAMEWORK

Alliance members understand and accept that the intent of the Assembly Bill (AB) 617, is to serve as a significant step forward in addressing air pollution disparities at the neighborhood level and to reduce exposure to air pollution in disproportionately burdened communities throughout the State. Moreover, Alliance members concur that the best path forward to ensure

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success of these goals is one whereby ALL stakeholders work together toward common, realistic, objectives.

While we have stated our position of this subject, we are still unconvinced as to CARB's sincerity when stating that the most important underpinning in AB 617 is the understanding that community members must be active partners in envisioning, developing, and implementing actions to clean up the air in their communities. Small business owners and their employees are as much members of a community as the other residents.

Recommendation: As a demonstration of CARB's understanding of this inalterable fact, the Alliance urges CARB to add small business owners, trade associations, alliances, and organizations, to the roster of Community Air Protection Program Consultation Group members at the earliest possible time.

In the Blueprint, CARB maintains that: "*underpinning AB 617 is the understanding that community members must be active partners in envisioning, developing, and implementing actions to clean up the air in their communities.*" The Blueprint continues: "*As part of this process, we will align Program priorities and objectives with other CARB and air district actions to help achieve emissions reductions in disproportionately burdened communities, improve accountability and transparency, and promote collaborative partnerships between air districts, CARB, and community stakeholders.*"

Recommendation: Considering the omissions in the first and final draft of the Community Air Protection Program Blueprint, the Alliance considers it necessary to remind CARB to add the term "*small business and small business representatives*" to the content of the final document, and to include us in all the consultation groups and steering committees that currently exist, as well as those that are planned for implementation of the program.

Community-Focused AB 617 Elements

Targeted Community Actions: "*Community-specific emissions reduction programs that will target new local actions to reduce emissions directly from sources contributing to the cumulative exposure burden within and directly surrounding selected communities.*"

While we believe we understand CARB's objective for these programs, we're less certain what the term "*directly*" means and what it entails and what it excludes. For instance, is it meant to include "*point sources*"? Conversely, is it meant to exclude "*non-point sources*"? Just as important, will CARB establish minimum distance limits for emissions from all criteria pollutants and toxic air contaminants equally from direct sources within a community, or will they be treated individually by substance? Additionally, what will be the criteria for measuring the distance from a source "*directly*" surrounding a community?

In our earlier comment letter on CARB's First Draft of the Community Air Protection Blueprint, the Alliance urged CARB to act quickly and define the terms "*community*" and "*boundaries*" to preclude our having to raise questions such as these over and over in multiple forums.

In our letter, we recommended that CARB define these terms using city blocks. Again, we urge CARB to take the initiative and establish the criteria for defining communities by city blocks in lieu of deciding upon less precise administrative boundaries such as zip codes, historical markers, census tracts, and block groups. CARB should not abdicate this responsibility and relegate it to *individual air districts and Community Steering Committees (CSCs) to decide them on their own* where it is predictable that an infinite number of permutations of these critical definitions will be produced.

Incentive investments: In Figure 2, Pg. 3 – New Actions under the Community Air-Protection Program states in part: *“Incentive investments to help purchase cleaner vehicles and equipment (and emissions capture and treatment technologies), with a focus on advancing zero emission technologies within and directly surrounding high cumulative burdened communities.”*

The Alliance believes it is both appropriate and important to remind CARB that for decades small businesses (stationary sources) have adopted new, improved, business practices and invested heavily in cleaner technologies which were consistent with the times and more rigorous competition, as well as to comply with ever more stringent rules and regulations. In many instances these investments were for emission control equipment, not for equipment that would enhance or reduce the cost of production and increase their competitiveness and profitability. While regulatory mandates for small businesses to invest in this costly equipment may have been intended to improve air quality, they often had the effect of impeding production, increasing production costs, and adding to the debt owed by small businesses.

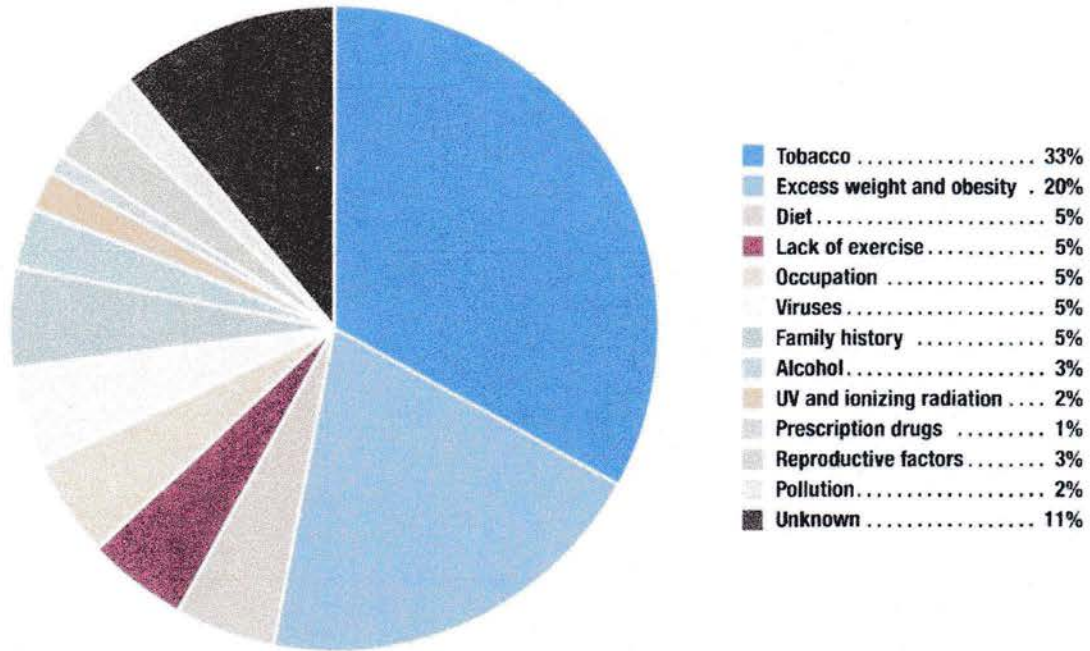
It should come as no surprise that Alliance members, when reading some of the stakeholder comments were heartened to see comments supporting the inclusion of *“...incentives for small businesses that are part of the community to support efforts to reduce emissions”* and that outreach efforts be enhanced *“...to connect small business owners to available resources and funding opportunities.”*

In our earlier comment letter, Alliance members expressed their appreciation that CARB has thought to consider the use of incentive funding programs for advanced technologies to help ensure the success of the program. As active, invited, participants and contributors in the development of previous air quality management and state implementation plans – mostly involving the South Coast Air Quality Management District - Alliance members know that the consistent investments in better business practices and cleaner technologies which were made by regulated businesses for decades are the reason that emissions from stationary sources no longer pose the threat to residents and workers as they did in earlier times.

To illustrate this point, we have provided a chart by the American Association for Cancer Research, showing the estimated percentage of cancer cases caused by identifiable and/or potentially preventable factors for your information.

An Ounce of Prevention is Worth a Pound of Cure.

Estimated Percentage of Cancer Cases Caused by Identifiable and/or Potentially Preventable Factors



American Association for Cancer Research Clin Cancer Res 2012;18:S1-S100

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**Clinical
Cancer Research** AACR

Looking to the future, Alliance members are acutely aware of the outcomes that CARB hopes to achieve with this program, not the least of which are to:

- To reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants, and...
- To show real, quantifiable, enforceable reductions at the earliest possible time

Alliance members hope that in accomplishing these goals existing small businesses, which are operating within the parameters of their lawful permits, are not forced out of the communities that desperately need their employment and economic contributions.

Recommendations:

- 1) The Alliance urges CARB and the local air districts to approach technology solutions, and any associated incentives, based on commercial availability and general acceptance by industry. On balance, all proposed technologies should be reviewed and thoroughly discussed with the small business “experts” in the businesses for which they are intended.

Important decisions like which technologies a business should purchase and install should not and cannot be left to anyone who does not have an equity interest in a business.

- 2) Alliance members are very concerned by any blanket endorsement of a single technological pathway (e.g. zero emission versus ultra-low NOx), and instead believes that community emission reduction plans should maximize local health benefits within the existing regulatory framework. At a minimum, CARB and the air districts should publicly provide all stakeholders with estimated emission reductions for different alternatives, being honest about the cost and air quality tradeoffs between zero emission strategies and those that prioritize ultra-low NOx or PM strategies.
- 3) Finally, both CARB and the local air districts should act responsibly and assume a fuel-neutral position in the development and implementation of AB 617 as they strive for early, cost-effective emission reductions.

III. BUILDING THE COMMUNITY AIR PROTECTION PROGRAM

As stated earlier in this letter, the Alliance supports CARB's goal of addressing air pollution burdens in communities that have been disproportionately impacted, and to find solutions to improve air quality. Also, as previously stated, the Alliance stands ready to both support the effort and to contribute to evaluating and recommending sound, science-based solutions, based on the broad experience and expertise of our membership.

Alliance members, however, continue to be stunned and stymied at CARB's persistent refusal to commit, in writing, to include and involve *small business* and small business organizations in the building of the Community Air Protection Program.

For example, on Page 4 of the final draft of the Community Air Protection Program, the text read: "*CARB and air districts will work with local residents to identify individual communities where focused reductions are needed to address disproportionate air pollution impacts. CARB and the air districts will work with community members and community-based organizations to develop new actions to reduce emissions and exposure. CARB and air districts will also work with other State, regional, and local agency partners to include community-level benefits in the development and implementation of all statewide and regional programs to reduce air pollution.*"

While Alliance members concur that improving air quality and reducing health risk for all Californians, including those who reside in disproportionately burdened communities, is a worthy enterprise, we feel compelled to reiterate our long-standing position that small business owners ARE much of any community – including disproportionately burdened communities – as any other resident. Small business owners have made significant investments of capital (either borrowed from lenders or from personal savings) to establish their businesses in these communities. Small business owners generally hire residents from within the communities in which they do business. Many of the jobs they offer come with health and retirement benefits.

Small business owners pay wages and taxes that bolster the economic vitality of the communities in which they reside.

We would also like to remind CARB, and the air districts, that the owners, employees, and families of these small businesses attend the same churches and schools as other residents of these communities. Many of the Alliance small business members support community youth programs. Some have even run for, and been elected to, public office. In short, CARB and the air districts MUST acknowledge the commitment to community by these business owners. It would indeed be shortsighted to ignore the vast experience and expertise of these entrepreneurs who have run successful businesses for generations in all discussions and planning of the Community Air Protection Program.

Recommendation: Alliance members reiterate their request for being added to the roster of all consultation groups and steering committees formed for the purpose of providing key input for the development and implementation of this program

IV. COMMUNITY-DRIVEN ACTION

The Alliance generally agrees with CARB's proposition that "*Community members have intimate familiarity with their neighborhoods and a vision for what they want their communities to become.*" To the same extent, we are supportive of CARB's proposal to "*...create new, and foster existing, local partnerships, air districts will convene community steering committees composed primarily of individuals who live, work, or own businesses within communities designated for focused action through community emissions reduction programs and community air monitoring.*"

Alliance members would be completely supportive of CARB's proposal for air district's creating community steering committees, IF there was a requirement to include fair and equal representation by business organizations, alliances, trade associations, economic development organizations, and chambers of commerce. Entities such as these possess a vast and valuable knowledge base of economic, technological, environmental and regulatory issues that apply to individual communities and to entire segments of industry, which can help to ensure that the vision for a community is realistic and achievable.

V. TIMELINE FOR ACTION

The Alliance appreciates the changes, made by CARB staff, in the final draft of the Community Air Protection Blueprint which now reads: "*CARB must set the overall requirements for the Program in consultation with the Scientific Review Panel on Toxic Air Contaminants, 10 air districts, OEHHA, environmental justice organizations, affected industry, and other interested stakeholders, in a statewide strategy and monitoring plan by October 1, 2018.*"

Recommendation: Continuing with our underlying objection to the Blueprint, Alliance members would much prefer to see *small business* included in parity with the other entities that CARB must engage in consultation.

VI. PUBLIC ENGAGEMENT

Alliance members are encouraged to read that CARB acknowledges that coordination with a wide variety of stakeholder is essential, and that they received written comments from stakeholders to that effect. We support the establishment of a CSC in each community selected for air monitoring and Community Emission Reduction Plans. Broad participation by communities, affected sources, local government, and other interested groups in the planning stage should help foster collaborative and innovative approaches, leverage local knowledge about sources of emissions and sensitive receptors, and minimize uncertainties or challenges later during implementation phases. It is important for the long-term success of AB 617 that initial community programs are seen as inclusive, effective, fair, and equitable, with the greatest degree of buy-in among all community stakeholders.

Recommendation: The Alliance believes the steering committees should be inclusive advisory bodies where CARB, the air districts and other responsible parties can discuss ideas and proposals. Conversely, the Alliance strongly believes that decision-making authority can and must rest solely with the governing boards of the air districts, which will ultimately be accountable for the success of community plans, and CARB in its oversight of air district AB 617 programs.

VII. STRATEGIES TO DELIVER NEW REDUCTIONS IN IMPACTED COMMUNITIES STATEWIDE

The Alliance noticed that this is a new section in the Community Air Protection Blueprint that discusses, among other things, CARB's authority under AB 617 *"to assess and develop measures to reduce air pollution in disproportionately burdened communities across the State. Identifying effective solutions will require multiple strategies and measures at both the statewide and local level to deliver emissions and exposure reductions directly within these communities, as well as the steps necessary to avoid decisions that have the potential to create new burdened communities (e.g., new or expanded warehouses that place warehouses or truck routes next to homes and result in large volumes of truck traffic through communities)."*

Alliance members also noticed another paragraph in Section VII that states: *"As part of implementing the air quality and climate plans described above, CARB staff are already developing a number of regulations to deploy next generation technologies on vehicles and equipment that are concentrated within heavily impacted communities."*

The Alliance believes that identifying strategies for reducing criteria air pollutants and toxic air contaminants at the community level is critical for establishing a strong statewide framework for action. However, we also believe that it is impossible to design an effective emissions reduction program that satisfies the requirements of Health and Safety Code § 44391.2(b)(3) without first understanding which sources are contributing to air quality impacts in any of the selected communities, the significance of their contributions, and how their contributions compare to those of other sources impacting a community. In cases where this information is unavailable, the first step should be to implement a monitoring program that is designed to fill the data gaps that preclude accurate and reproducible source attribution.

Recommendations:

- 1) While the Alliance recognizes that AB 617 confers some new authority on CARB, and that it is or is planning to take steps necessary to avoid decisions that have the potential to create new burdened communities, we are naturally concerned about the lack of clarity in the statement, and are anxious to know that it portends for a successful small businesses who wants to expand their operations in a community or a new successful business who wants to site their operations in a community and contribute to its economic growth.

Alliance members wonder if these steps to avoid decisions that have the potential to create new burdened communities might be considered a form of “redlining.”

The Alliance is aware of a study by the National Community Reinvestment Coalition which shows that the vast majority of neighborhoods in the United States marked “hazardous” in red ink on maps drawn by the federal Home Owners’ Loan Corp. from 1935 to 1939 are today much more likely than other areas to comprise lower-income, minority residents. It’s as if some of these places have been trapped in the past, locking neighborhoods into concentrated poverty.

The Alliance strongly recommends that CARB, and the air districts, proceed cautiously if they are contemplating to promote the creation of legal barriers designed to restrain or prohibit lawful small businesses from conducting business in poor and disadvantaged communities.

- 2) Recognizing that Alliance members have not been invited to join any of the current consultation group and committees, and we do not have the benefit of reading the Minutes or earlier meetings, we are very concerned to learn that CARB staff is well underway in developing new regulations to deploy next generation technologies on vehicles and equipment that are concentrated within heavily impacted communities without our knowledge or opportunity to provide input. As such, the Alliance reiterates its request to be added to the roster of all consultation groups and steering committees formed for the purpose of providing key input for the development and implementation of this program.

VIII. SELECTION OF COMMUNITIES FOR ADDITIONAL FOCUSED ACTION

The Alliance is generally supportive of CARB’s approach to recommend communities for consideration. Moreover, we are encouraged that the CARB staff will update annually, a broad list of communities for inclusion in the Program, drawing from recommendations from air districts, communities, consultation with the Office of Environmental Health Hazard Assessment, as well as their own.

Step 2 – Assessment of the Cumulative Air Pollution Exposure Burden in Each Community

- **Exposure to Air Pollution:** Alliance members have some misgivings about the methodology by which CARB and the air districts will use to assess the exposure burden in each community. To the reader, it appears that all determinations about the severity of pollution and the degree of health risk to the population will be premised on:

- Concentrations of ozone, particle pollution, and toxic air pollutants from measurements, air quality modeling, or other information quantifying air pollution exposure burden.
- Density of air pollution sources and the magnitude of emissions within the community from mobile and stationary pollution sources.
- Cancer risk estimates based on existing or new air quality modeling that characterizes the burden faced by the community.

To the reader, it seems that no effort will be made to determine the extent of the contribution to the pollution dilemma in a community by individual sources. For example, if air monitoring detects the presence of formaldehyde in a community that is bounded by a freeway and several major thoroughfares, but also has a wood furniture manufacturer, cosmetics manufacturer, and a printing company as occupants, some effort should be made to determine the degree to which these sources contribute to the problem incrementally.

Having to comply with a mandate, such as this, is especially concerning to the small businesses in these communities who have air quality permits since it is our understanding that all of them would be required, as a minimum, to implement rigorous recordkeeping and reporting procedures in accordance with the Program and CARB's proposed Regulation for Criteria Pollutant and Toxic Air Contaminant Emissions Reporting, even for the smallest amount of emissions.

The Alliance would like to remind CARB, and the air districts, that small businesses lack the staff and operational flexibility that "big businesses" enjoy and can afford. To the average small business owner there is nothing "small" about his or her business, and their commitment to that business or to their employees.

Owning and operating a small business consumes every hour in a day, and often the hours when others are resting or recreating.

Recommendations:

- 1) On behalf of all the Alliance members, we ask that CARB and the air districts include in their methodology for assessing the exposure burden in each community a metric for measuring and reporting the actual emissions from each stationary source in these target communities to determine the relevancy of their emissions contributions to the cumulative impacts of air pollution.
- 2) Alliance members request that CARB, and the air districts, seriously consider establishing a de minimis level for emissions releases from smaller stationary sources which would exempt from the added burden of monitoring, reporting, and recordkeeping.

Step 2 – Assessment of the Cumulative Air Pollution Exposure Burden in Each Community – Other measures of vulnerability to air pollution: Alliance members are supportive of CARB's concern about the incidence or worsening of disease related to air quality such as the

prevalence of cancer, asthma, heart disease, low birth weights, and premature mortality. Moreover, we agree that the staff's annual list of recommendations for selecting communities to participate in the Program should show not only the relationship of certain diseases found in a community to "air quality", but the relationship between specific pollutants and specific diseases which are also present in the community.

Recommendation: None

Step 3 – Selecting Communities

Alliance members were extremely disappointed when reading that the CARB staff have decided not to define or recommend a definition of a "community." Our disappointment was compounded when reading that CARB has delegated this task to the air districts and the CSCs to finalize community geographic boundaries.

The Alliance believes that CARB, by standing on the sidelines as this key pillar of the Program is decided in a profusion of designs without guidance by the state is a recipe for greater confusion, conflict and delays in the AB 617 implementation process.

Community boundaries should be clearly defined before any work begins on a community emissions reduction program, and those boundaries should include all sources that contribute materially to the cumulative emissions burden in the community. This approach would have the dual benefit of ensuring that all sources potentially impacted by the emissions reduction program have an opportunity to participate in program development and eliminating the need to extend program requirements to sources "directly surrounding" the community. If the community boundaries cannot be clearly defined at the onset of this process, then the community is not sufficiently well-characterized to support an emissions reduction program and should begin with a monitoring program to fill identified data gaps.

Recommendation: CARB should not shirk from the authority and responsibility conferred upon them by the Legislature when passing AB 617. Rather, CARB should add language setting forth design standards for "*communities*" and "*boundaries*" and requiring designation of final community boundaries before any work begins on a community emissions reduction program. CARB should also remove all language proposing application of program requirements to sources "directly surrounding" selected communities.

The Alliance would also like to refer you to the comments about "communities" and "boundaries" which we made earlier in this letter, in Section II, Community-Focused AB 617 Elements Targeted Community Actions.

IX. REQUIREMENTS FOR COMMUNITY EMISSIONS REDUCTION PROGRAMS

When reading this section near the end of the Community Air Protection Blueprint, specifically Figure 6 (Community Steering Committee – Technical Foundation) Alliance members are encouraged to learn that the community emissions reduction programs will include a technical

assessment that characterizes the community-specific air pollution challenges and identifies key pollutants to be addressed in the community emissions reduction program, and contributing stationary, mobile, and area-wide sources. And, additionally, that this technical assessment will provide a community profile of baseline pollution, public health, and socioeconomic factors that affect the community.

Until recently, Alliance members has cause to believe that the intermediate and necessary step of identifying what the problem is in each community in terms of the presence and amount of criteria pollutants and toxic air contaminants, the sources emitting them, and the health risk they present to the public, had been purposely ignored.

The Alliance noted that AB 617 specifies that, “[t]he [community emission reduction] programs shall result in emissions reductions in the community based on monitoring or other data,” and that, “[i]n implementing the [community emission reduction] program, the district and the state board shall be responsible for measures consistent with their respective authorities.” [H.&S.C. Section 44391.2(c)(4) and (5) and (6)].

In contrast, however, when reading about the way in which CSCs are to be structured, Alliance members are concerned that it is envisioned that CARB staff will only act as “observers,” and that air district staff will limit their participation to “conveners.”

Given the legacy of distrust that has evolved over the years between environmental activists and those in the business community, we fear that these meetings have the potential of being less productive than anticipated.

Recommendation: The Alliance suggests engaging the services of professional meeting facilitators who will guide the discussions, maintain order and add structure to these meetings. CARB and air district staff should assume their proper role and represent their respective agencies in whatever discussions ensue.

When reading the section on Measurable Targets, Alliance members again noticed that CARB uses the term “*directly*” when describing that “the community emissions reduction programs will be designed to focus on health-based air quality objectives for reducing emissions and exposure caused by local sources within and *directly* surrounding the selected communities.”

Recommendation: The Alliance refers CARB to our comments earlier in this letter under Section II. NEW COMMUNITY-FOCUSED FRAMEWORK - Community-Focused AB 617 Elements / Targeted Community Actions where we discussed our concerns about the term “*directly*” and asked CARB to clarify and consider taking the action we recommended.

When reading the section: “Who Has The Authority To Implement Actions?” Alliance members were elated to read that CARB acknowledges that: “*Cities, counties, and other local agencies are responsible for land use planning and zoning, which cover siting, design, and permitting for*

new or modified facilities. Zoning codes can include design requirements to mitigate exposure (e.g., mandatory setbacks, buffers, barriers). Any given development project may require permits or approvals from multiple agencies. For example, land use planners provide zoning permits, air districts are responsible for permitting allowable emissions from facilities, and transportation agencies approve projects like roadway expansions.”

Recommendation: None

When reading the section: “How Will Enforcement Strategies Support Program Implementation?”

It is unclear to the Alliance what CARB intends when writing that they and the air districts will work together to implement *new* enforcement strategies.

It is unclear to the Alliance what, if any, new authority the Legislature has given to CARB that warrants the enactment of new enforcement rules, and to the extent it differs from their current powers to enforce against the sources within their jurisdiction.

Moreover, the Alliance strongly disagrees that notice of violations (NOVs) are in and of themselves useful data, since many NOVs result from ministerial or minor errors that do not result in excess emissions. The Alliance believes that the ratio of these “*paper*” errors compared to emissions-related violations is quite high. Additionally, overreliance on the use of NOVs would likely add a *de facto* bias against small businesses – who should be presumed to be operating within their permit conditions unless proven otherwise – for no other reason than they reside in communities with high concentrations of area and mobile sources. To many in the business community a large number of enforcement actions could be indicative of retaliatory enforcement designed to force them out of a community rather than a component of a program whose goal it is to balance improvements in air quality and economic vitality in impoverished communities that hope to achieve both.

Recommendation: At a minimum, CARB and the air districts should have wide latitude when considering new enforcement action, relying on the compliance history of affected small businesses (stationary sources) and compliance trends for the source types most commonly found in a given community. Raw data on the number of NOVs issued or enforcement actions taken does not paint an accurate picture of enforcement issues within a community, or whether those enforcement issues are driving high exposures burdens.

X. DEVELOPING ACTION-ORIENTED COMMUNITY AIR MONITORING PLANS

The Alliance generally agrees with CARB that community air monitoring will enhance their understanding of pollution impacts within selected communities and support effective implementation of community emissions reduction programs.

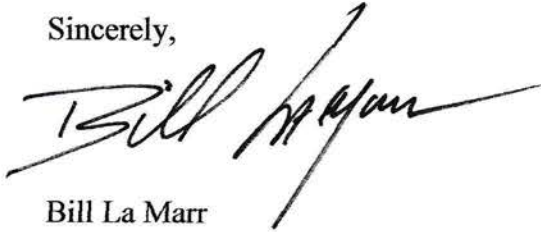
The Alliance also believes that different approaches to air monitoring will require different standards for data and result in different quality data. Additionally, poorly designed studies or

systems, the use of substandard equipment, inadequate or inappropriate data collection and data management, and other issues related to quality control and quality assurance could arise. To ensure data integrity, the Alliance recommends that staff work with stakeholders and technology experts to develop clear standards and quality assurance/quality control (QAQC) protocols for all *AB 617 community monitoring systems*, and that these systems be operated by air districts that can regularly conduct QAQC audits and provide accountability that all QAQC steps are being properly taken.

Recommendation: As CARB develops the statewide plan for community air monitoring, the Alliance hopes to work with their staff and other stakeholders to identify and define appropriate technologies and techniques to achieve the various objectives of each community. We suggest that staff develop a simple framework or matrix that describes how different monitoring approaches match different objectives.

The Alliance appreciates the commitment of the CARB staff, the air districts, and other public stakeholders to an open and transparent public process for developing the Community Air Protection Program, and the Blueprint for guiding the process. Further, we are appreciative of the opportunity to provide our comments. Should you or your staff have questions or wish to discuss our comments in greater detail, please contact Bill La Marr at (714) 778-0763 or by Email at: BillLaMarr@MSN.com

Sincerely,

A handwritten signature in black ink, appearing to read "Bill La Marr", with a long horizontal flourish extending to the right.

Bill La Marr
Executive Director

cc: Richard Corey, CARB
Veronica Eday, CARB
La Ronda Bowen, CARB
Wayne Nastri, SCAQMD
Alliance board