

Summary of Response to Comments

The Community Steering Committee (CSC), South Coast AQMD and CARB closely collaborated to develop the Eastern Coachella Valley (ECV) Community Emissions Reduction Plan (CERP). Development of the CERP occurred over a year-long process that included nine CSC Meetings, two Technical Advisory Group (TAG) Meetings, four CSC Charter Working Group Meetings, a Community Workshop, a Question and Answer Session and over 50 individual meetings. The South Coast AQMD staff received *comments* from community members and organizations for the CERP. The table summarizes each comment, where the comment was from, the commenter(s), and identifies if the commenter's request is included (●) or not included (◆) in the CERP. The table also provides a brief staff response that explains where requests that are included in the CERP can be found or why the request was not included. Any written comments that were submitted are included in Appendix 7: Bracketed Comments Letters of the ECV CERP.

Comment From	Summary of Comment	Commenter(s)	Included=● Not Included=◆	Staff Response
General Comments on the CERP				
1-1	The review period for the Discussion Draft CERP was shortened and CSC reserves the right to raise additional concerns prior to South Coast AQMD's planned Governing Board meeting on December 4, 2020. The CERP and CAMP are living documents that maintain the capacity to be revised beyond adoption and approval. The ECV CERP does not comply with AB 617 requirements. The commenter asks CARB reject approval of the CERP if recommendations are not included and additional time is not provided for input.	Rebecca Zaragoza, et al.	n/a	<p>The draft CERP that is brought to the Governing Board meets all statutory requirements. The discussion draft released in early November focused on the key components of the CERP where CSC input was most needed at that stage. Of note, staff has already committed to working with the CSC in the first two quarters of 2021 to add detail to the CERP and bring this back to the Governing Board by June 2021. Therefore, the CSC will have ample opportunity to develop additional details in the CERP.</p> <p>Regarding development of the discussion draft CERP, many of the actions included in the CERP were provided in the informational handouts to the CSC on October 2, 2020 to gather community input. Staff continued to discuss these actions with the CSC during the Question and Answer session and at CSC Meetings. Therefore, the CSC had many opportunities to comment on the CERP actions before portions</p>

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				<p>of the CERP were released November 5th. Staff explained to the CSC why the comment period could not be extended in order to provide the documents in time for the December Board meeting. Comments submitted after November 13th will be considered; however, once the Governing Board package is posted, it is difficult to incorporate additional changes into the CERP. The Governing Board may direct staff to incorporate additional changes at the Board Hearing. The CERP must be adopted by the South Coast AQMD Governing Board to begin implementation.</p> <p>After the CERP has been adopted by the Governing Board, any significant changes to the CERP will require Board consideration. AB 617 requires South Coast AQMD to seek approval of the CERPs from CARB and they may elect to reject the CERP, if it is not approvable. Air districts are allowed to resubmit for approval. If a CERP is not approvable, CARB is required to initiate a public process to discuss options to achieve an approvable CERP. Staff have repeatedly tried to move the process forward and explained timelines in order to allow more time for CERP and CAMP development; however, the CSC elected to focus more time on the charter instead of CERP and CAMP development. Staff will continue to work with the CSC in the first two quarters of 2021 to further refine the CERPs. The CERP implementation process is dynamic and certain action items have been written with built-in flexibility to allow adjustments as new information becomes available. The CAMP was developed with CSC input from CSC meetings and will not be ad is not required to be included as part of the Board Package.</p>

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1-2	<p>CERP development process was not a community-led process. South Coast AQMD pushed for a 1-strategy CERP until the CSC asked for more priorities to be addressed, resulting in lost time. South Coast AQMD did not provide fair consideration of CSC’s request to call special Stationary Source Committee and Governing Board Meetings. South Coast AQMD mismanaged the implementation of AB 617 and needs to improve its process and facilitation of CSC meetings, develop follow-up process for request and recommendations and allow the CSC to make decisions and govern itself.</p>	<p>Rebecca Zaragoza, et al.</p>		<p>Staff is open to making changes to improve the process. Throughout this past year, staff have worked hard to follow the CSC’s lead in three key areas: (1) topics of discussion at CSC meetings (e.g. charter, educational materials, CERP/CAMP development), (2) air quality priorities, and (3) meeting frequency/materials/logistics.</p> <p>(1) the CSC requested that staff allow the CSC to complete the charter before beginning to work on CERP development. Staff allowed the CSC to continue developing the charter, which was completed and approved by the CSC in September 2020. Staff discussed with the CSC the limited time remaining and suggested developing one AQ priority for the CERP for the December Board submittal and work on the remaining AQ priorities in 2021. The CSC requested staff include all 6 AQ priorities in the CERP, which staff has included in the CERP.</p> <p>(2) Staff began working with the CSC to discuss the Air Quality (AQ) priorities for the CERP in February 2020 and emphasized the one-year statutory requirement to complete CERP development. Staff presented the draft list of the top AQ priorities to the CSC over the course of multiple meetings and received no disagreement on this list. During the Q&A workshop held in October 2020, staff received many positive comments from CSC members regarding the potential CERP actions on the top AQ priorities.</p> <p>(3) The CSC requested staff hold additional meetings and include Spanish interpretation and translation of materials.</p>

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				<p>Staff has had Spanish interpretation and translated materials for 16 meetings (Kick-off, CSC, workshop/question and answer session, and Charter Working Group Meetings). Staff has also conducted over 50 one-on-one meetings with CSC members throughout this process through Zoom or on the phone.</p> <p>Regarding the request for special meeting, staff explained to the CSC the complexities of holding special meetings outside of the normally scheduled meetings. Regardless, rescheduling the Stationary Source Committee Meeting would have no impact on public comment deadlines because the deadlines were driven by the need to have the CERP adopted by the Governing Board within one year of community designation. Staff continues to work collaboratively with the CSC in the AB 617 process.</p>
1-3	Draft CERP should require monthly and quarterly progress reports to the CSC and allow new monitoring data to guide CSC decisions. The Draft CERP should provide a spreadsheet which identifies the annual criteria and toxic pollutants emitted from each facility. The Draft CERP should elevate the native and indigenous communities that live in the ECV in Chapter 3a.	Rebecca Zaragoza, et al.		The CERP metrics include regular updates to the CSC, so that the CSC would continue to be informed about the progress, and also continue to work with staff to implement the plans. For our 2018-designated communities, the CSCs have met quarterly and also receive newsletters that provide additional updates; staff would be able to have a similar schedule for the 2019-designated communities. Monitoring data will be publicly available on the website, in real-time or near real-time where possible. In addition, the CARB Blueprint requires South Coast AQMD provide an annual progress report to the Governing Board and CARB, so that report would also provide a summary of the progress made. Resources are limited and need to be divided amongst the five AB 617 communities.

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				<p>Source attribution analysis includes criteria and toxic pollutant emissions information in Chapter and Appendix 3b. Permitted facilities exceeding the criteria pollutant thresholds (as specified in South Coast AQMD’s Rule 301) are required to report annual emissions and pay applicable fees. Emissions information for facilities within the ECV community that report emissions (Year 2019) to South Coast AQMD through the Annual Emissions Reporting (AER) program can be found here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/aer-data-2019.pdf?sfvrsn=8. The Spanish language version of this data is also available on the webpage. Appendix 3a identifies facilities under the AB 2588 program. The AB 2588 program requires districts to inventory air toxics from individual facilities. Additionally, public information about South Coast AQMD-regulated facilities (facilities required to have a permit) is available through the Facility Information Detail (F.I.N.D): https://www.aqmd.gov/nav/FIND.</p> <p>A section has been added to Chapter 3a to highlight the native and indigenous tribal communities in the ECV community.</p>
1-4	The Draft CERP should include the expedited Best Available Retrofit Control Technology (BARCT) evaluation of rules and sources.	Rebecca Zaragoza, et al.		Appendix 3a identifies rules being evaluated for BARCT and facilities in ECV subject to BARCT requirements.
1-5	The Draft CERP should be revised to state that CARB is responsible for resolving any disputes between South Coast AQMD and the CSC regarding CERP implementation, and that CSC members should be able to file a complaint with CARB if there are disputes	Rebecca Zaragoza, et al.		CARB is not authorized to resolve disputes between an air district and the CSC concerning implementation. There is nothing in AB 617 that provides such authority to CARB. AB 617 specifies: “In implementing the [community emissions reduction] program, the district and the state board shall be responsible for measures consistent with their respective

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				<p>authorities.”¹ AB 617 does not require that a CSC be established in the selected communities. Instead, AB 617 only requires that the CERP be developed in consultation with certain types of community stakeholders.² However, since the district has established a CSC as the main mechanism for community engagement in this process, any differences in interpretation or implementation regarding the CERP’s measures would best be resolved directly between the CSC and the South Coast AQMD. The letter cites Sections 39002 and 41500, but neither of these sections provides CARB with the authority to interfere with district implementation mentioned in this letter. Section 39002 is limited to providing CARB the ability to undertake “control activities” after holding public hearings if it determines after the hearing that the district has “failed to meet the responsibilities given to it by this division or by any other provision of law.” The statute does not give CARB the ability to tell the district what to do in the case of a dispute regarding implementation. Instead, if it finds a failure, CARB must step into the shoes of the district and actually undertake the necessary control activities itself. In other words, CARB must assume the district’s responsibilities itself and carry them out. Section 41500, cited in the letter, allows CARB to review the enforcement practices of the districts, which is reiterated in Section 41505. This is obviously a highly unusual and drastic action and would require a public hearing and additional requirements pursuant to Section 39002.</p>

¹ Health & Safety Code Section 44391.2(c)(6)

² Health & Safety Code Section 44391.2(c)(2)

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				South Coast AQMD staff are always willing to discuss issues with the CSC and others, including CARB, and resolve them directly.
1-6	<p>The Draft CERP should:</p> <ul style="list-style-type: none"> • Identify each permitted facility • Provide a summary of complaints as to each facility • Describe the inspection history of each facility • Detail all enforcement actions against each facility 	Rebecca Zaragoza, et al.	●	<p>Public information about South Coast AQMD-regulated facilities (including facilities required to have a permit) is available through the Facility Information Detail (F.I.N.D): https://www.aqmd.gov/nav/FIND.</p> <p>Appendix 4 identifies the compliance history for January 2017 through December 2019 in the ECV.</p> <p>Also, see Response to Comment 1-3 for facility emissions information.</p>
1-7	The CSC identified over 20 air quality priorities. Six of these issues are not addressed in the Draft CERP: off-roading vehicles and activities, the Thermal racetrack, the Thermal Airport, the freight train, land use, outreach, and education.	Rebecca Zaragoza, et al.	●	<p>An AQ prioritization activity was conducted at CSC Meeting #1 (February 2020). Off-roading, Thermal Airport and Thermal Racing Club were mentioned by the CSC; however, the top 7 AQ priorities were all ranked higher by the CSC as their top 3 choices. At CSC Meeting #3, the CSC requested to combine Open Burning with Illegal Dumping; resulting in 6 AQ priorities. Focusing on 6 AQ priorities uses resources more effectively and in past AB 617 communities 6 to 7 AQ priorities were written into each of the CERPs. The six issues have been included in the CERP. Staff included off-roading vehicles and activities into Chapter 5d. The Thermal racetrack and Thermal Airport are included in Chapter 5a. The freight train is included in Chapter 5f.</p> <p>Chapter 5a includes strategies to address land use and Chapters 5b and 5f include actions to work with land use agencies. The CERP contains actions in Chapters 5b through 5f to provide</p>

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				outreach and information to reduce emissions and/or exposure from the AQ priorities.
1-11	<p>South Coast AQMD should work with other land use agencies to support decisions that do not adversely affect the air quality and public health of ECV (e.g., land use strategies to prevent warehouse and diesel pollution). South Coast AQMD should add a separate section for land use strategies and incorporate land use strategies within each of the AQ Priority CERP chapters. The Draft CERP should include:</p> <ul style="list-style-type: none"> Working with the various jurisdictions to limit the approval and permitting of polluting land use projects in ECV. Become a partner in the implementation of the current City of Coachella, City of Indio, and County of Riverside Climate Action plans and programs, including the Transformative Climate Communities Program and the Regional Neighborhood Mobility Plans for the ECV unincorporated communities. Become a partner in the planning and implementation of SB 1000 in the City of Coachella, City of Indio, 	Rebecca Zaragoza, et al.		<p>South Coast AQMD is specifically prohibited by state law from making land use decisions; however, staff works with land use agencies through California Environmental Quality Act (CEQA). Through the CEQA process, staff has the opportunity to provide technical expertise and recommendations to mitigate air quality impacts. South Coast AQMD has a robust Intergovernmental Review (IGR) program, in which staff reviews and comments on hundreds of CEQA documents per year, focusing on the adequacy of air quality analyses. South Coast AQMD CEQA comments are meant as guidance for lead agencies, including local land use agencies or entities, to ensure a reasonable air quality analysis is conducted to estimate air quality impacts, and significant air quality impacts are mitigated to the extent feasible. Local land use agencies often consult with South Coast AQMD staff during preparation of an environmental analysis and staff provides mitigation measures to ensure they are incorporated into projects early in the development process. Staff will review the plans mentioned in the comment to provide support, where needed. Staff will also provide updates to the CSC on future development projects as discussed in Chapter 5a.</p>

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	and Riverside County and engage in general plan updates			
1-12	<p>The Draft CERP should include actions for outreach and education that are appropriate and safe to be conducted during a pandemic. The Draft CERP should contain actions and strategies that include:</p> <ul style="list-style-type: none"> • Creating a public participation and outreach plan • Adopting a resolution or ordinance committing to providing all the requested material, resources, websites, and apps in Spanish • Partnering with the Desert Mirage High School (DMHS) and Coachella Valley High School (CVHS) green academies and other youth groups (e.g., Sierra Club Youth Group) to do education and community service programs to improve air quality 	Rebecca Zaragoza, et al.		<p>The CERP includes commitments for outreach in Chapters 5b through 5f. The examples in the outreach actions are appropriate during a pandemic (e.g., Zoom meetings, digital newsletters, Public Service Announcements (PSAs), informational handouts, etc.). Staff has added a commitment in Chapter 2 to work to develop an outreach plan. Staff is making every effort to provide Spanish translation and interpretation for materials, meetings, and the website to the extent possible and will continue to make every effort to do so where needed and as resources allow. An Outreach Plan will be developed to support the strategies and actions of the CERP. Staff hopes to find creative, mutually beneficial ways to partner with the CSC, community organizations and local community members. As part of the Outreach Plan, staff will work with the CSC to determine how CERP actions will help increase awareness, gain community recognition, and encourage action among the ECV community.</p> <p>Language has been added to Chapters 5b, 5d, and 5e to extend outreach to include schools and other youth groups, such as Sierra Club Youth Group.</p>
1-13	The CERP does not set health-based and quantifiable emission reduction targets. The Draft CERP relies on “outreach” and “incentives” to achieve emissions reductions and includes vague commitments that do	Rebecca Zaragoza, et al.		The CERP uses a combination of strategies to achieve emission reductions including enforcement, collaboration/partnerships with other entities, and monitoring. Emission reduction targets have been identified, where quantifiable, and are included in Chapter 5a. Actions utilizing outreach, monitoring and/or

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	<p>not meet AB 617 requirements. The Draft CERP should be revised to include emission reduction targets for all toxic air contaminants and criteria air pollutants identified in Chapter 3b, as well as for pesticides.</p>			<p>enforcement strategies will result in emission reductions; however, they are not quantifiable at this time. Emission reduction targets for pesticides cannot be determined until further data is gathered. Chapter 5c includes an action to gather data about pesticides use, evaluate community impacts, and identify opportunities to reduce pesticide emissions and exposures. Once these actions are implemented, emission reductions will be quantified where possible.</p> <p>Reducing air pollution will have public health benefits and the most direct method to measure CERP progress is to evaluate what emission reductions have been achieved. Emission reductions in the CERP will provide long-term benefits for public health.</p>
<p>1-20</p>	<p>Chapter 5 should include quantifiable measures and drive enforcement. The Draft CERP should incorporate CARB’s role and responsibility over mobile source emissions. South Coast AQMD should not rely solely on external funding sources to implement the draft actions and identify how it plans on using its own internal budget and allocated funding for this program. Additional actions and strategies can be found in the Draft CERP Edits (renamed as Comment Letter #2).</p>	<p>Rebecca Zaragoza, et al.</p>		<p>See Response to Comment 1-13. Actions in the CERP are also intended to drive enforcement of South Coast AQMD air quality regulations, as well as support enforcement efforts of other agencies. For example, outreach efforts for reporting dust complaints would help to drive focused enforcement efforts to address fugitive dust. Another example is using monitoring to identify hotspots to determine if enforcement is needed to address an ongoing issue. For additional information on CARB’s role and responsibility over mobile source emissions, please see Chapter 4.</p> <p>While state AB 617 funding is the primary source of funding for many AB 617 program efforts, including CERP development and implementation, several CERP actions commit South Coast AQMD staff to pursuing additional funding opportunities from many other sources. Note that the funding received for AB 617</p>

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			◆	is consistently less than what it costs South Coast AQMD to implement this state law, so South Coast AQMD supplements such funding by using its other funds to help support some of the activities needed for CERP implementation, such as many of the rule development and enforcement commitments. South Coast AQMD continues to seek additional sustained funding to support the AB 617 program, including support for CERP and CAMP implementation. Staff can provide additional implementation and incentive budget details in future CSC meetings. Please see Responses 2-1 through 2-20.
1-21	<p>South Coast AQMD should review, facilitate coordination and implementation with the following plans:</p> <ul style="list-style-type: none"> • The Regional and Neighborhood Mobility Plan for the Eastern Coachella Valley (Thermal, Oasis, Mecca and North Shore) • The Eastern Coachella Valley’s Action Plan for Climate Resilience (Coachella, Thermal, Oasis, Mecca, and North Shore) • The City of Indio’s Transformative Climate Communities Plan • Dust Suppression Action Plan • Salton Sea Management Program • Coachella Valley Extreme Ozone State Implementation Plan <p>Mitigation and other types of strategies, actions, and projects identified in these</p>	Rebecca Zaragoza, et al.	◆	<p>See Response to Comment 1-11 and Chapter 5a. Specific mitigation and other types of strategies, actions, and projects identified in the plans will be addressed through CEQA comments and other appropriate action such as collaboration with other agencies. Plans or projects submitted to the South Coast AQMD are identified as projects in AB 617 communities. Projects identified in AB 617 communities are reviewed to include comments, as applicable, with a nexus to CERP actions (see Chapter 5a for more information on land use strategies).</p> <p>Regarding the Coachella Valley Extreme Area Plan for the 1997 8-Hour Ozone Standard, this plan shows that the Coachella Valley is expected to achieve the 1997 8-hour ozone standard by the end of 2023 through continued implementation of existing rules and regulations. In addition, recently adopted regulations by South Coast AQMD and CARB will provide further reductions to ensure that the Coachella Valley will attain the standard in or before 2023. Staff will provide updates</p>

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	plans should be included in the Draft CERP, specifically the ECV's Action Plan for Climate Resilience			<p>to the CSC on the status of the ozone attainment in the Coachella Valley during the CERP implementation process.</p> <p>Chapter 5b includes actions to collaborate with other entities (e.g., Imperial Irrigation District (IID)) to work to implement dust suppression projects. Dust suppression projects are currently written into the Dust Suppression Action Plan and Salton Sea Management Program.</p> <p>In the first two quarters of 2021, staff will review the specified community plans listed in this comment and identify appropriate areas for coordination and collaboration with the lead agencies to help reduce emissions and/or exposures to air pollution within the air quality priorities addressed in the CERP.</p>
1-23	The Draft CERP falls short of expectations and does not reflect community input. Incorporate comments and edits into the Draft CERP and develop a review and response mechanism to manage public comments, questions, and requests moving forward. All public comments and feedback received on the Draft CERP should be made publicly available. The CSC should have the right to make additions or changes to the CERP in the future.	Rebecca Zaragoza, et al.	n/a	<p>Staff has received and incorporated CSC input throughout the CERP development process through multiple mechanisms. One such mechanism is the AB 617 email, which staff receive input and respond to inquiries. Other mechanisms include gathering input during CSC and one-on-one meetings with Zoom or phone calls.</p> <p>Comments submitted on the online portal can be seen here: http://onbase-pub.aqmd.gov/publicaccess/DatasourceTemplateParameter.aspx?MyQueryID=257&OBKey__1409_1=ECV. Written comments received on the Discussion Draft CERP prior to the posting of the Governing Board package will be included in Appendix 7: Bracketed Comment Letters. Responses to the Comments received are in the Executive Summary - Response to Comments. Additionally, the CERP must be adopted by the South Coast AQMD Governing Board to begin implementation.</p>

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				Once the CERP has been adopted by the Governing Board, any significant changes to the CERP will require Board consideration. South Coast AQMD will continue to work with the CSC during CERP implementation.
2-1	Commenters requested language changes in the Executive Summary chapter.	Rebecca Zaragoza, et al.		The majority of these language changes have been added to the Executive Summary chapter. South Coast AQMD does not have land use jurisdiction and therefore supports the implementation of mitigation projects by lead agencies that improve air quality. Staff works with lead agencies preparing CEQA analyses to provide technical expertise on the air quality analysis and to ensure projects mitigate significant air quality impacts to the extent feasible. Staff also provides recommendations on ways to further reduce community member exposure to project emissions, however, South Coast AQMD does not have the discretionary authority to require a project to implement these measures. For example, staff may recommend the lead agency to require a project to establish a vegetative barrier or buffer zone between an emission source and nearby residents to reduce exposure. However, this is the discretionary authority of the lead agency under CEQA, which is usually a city or county with land use jurisdiction.
2-2	Commenters requested language changes in Chapter 1 and indicated that this Chapter does not depict an accurate or meaningful depiction of ECV.	Rebecca Zaragoza, et al.		The language changes have been incorporated. Chapter 1 provides an introduction to the AB 617 and the ECV community. Chapter 3a includes the Community Profile which provides a description of the ECV community.
2-3	Commenters requested language changes in Chapter 2, to:	Rebecca Zaragoza, et al.		The language changes have been incorporated. The Draft CERP incorporated information about the Spanish recordings becoming available in October 2020, the roster update, and

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	<ul style="list-style-type: none"> • Include the updated roster in the write-up • Specify that Spanish recordings were not provided until requested by CSC • Provide context to the CSC Charter Working Group section, and noted that there was a full month delay in approving the charter because it was not provided in Spanish • Include the name of community organizations and filmmakers that organized past community meetings and emphasized that the Chapter 2 should better acknowledge the work residents and community organizations have put into the program 			<p>identified that the CSC Charter was provided in Spanish following the August CSC meeting. The names of the local filmmakers that produced "Estamos Aquí" have been included in the Draft CERP. Additional community organizations were acknowledged in the Draft CERP to recognize the work that residents have done in the community. Residents and community organizations have provided recommendations to staff to create educational workshops and informational handouts on air quality priorities and draft CERP actions and strategies. Staff will continue work with the CSC in the first half of 2021 to determine additional information to include in Chapter 2 to better acknowledge the work residents and community organizations have put into the program.</p>
2-4	Commenters requested language changes in Chapter 3a and asked to include the list of about 20 priorities that the CSC first compiled.	Rebecca Zaragoza, et al.		The language changes have been incorporated and a link to the list of air quality priorities that the CSC first compiled has been added.
2-5	Commenters requested a language change in Chapter 3b.	Rebecca Zaragoza, et al.		The language change has been incorporated.
4-1	An update should be provided to each affected city in the Eastern Coachella Valley of the major milestones planned and achieved by the CERP, in order to determine	Anetha Lue		South Coast AQMD staff will pursue collaborative partnerships with the Cities in ECV as well as the County of Riverside to address several actions written in the CERP. Updates will be provided to the CSC as noted in the metrics of the actions. In addition, the Cities or County (or any collaborative entities) will

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	methods by which the efforts of the cities can support the actions in the CERP			be invited to attend the CSC meetings where quarterly updates will be provided.
4-2	The CERP should also consider an imposing cap on dust emissions from stationary sources and requiring new sources of dust to offset significant new/increased sources of emissions	Anetha Lue		Such a cap on dust emissions may not be effective in reducing PM emissions in ECV given the relatively small number of industrial facilities in this community. However, new and redevelopment projects may provide opportunities to mitigate air quality impacts, therefore, staff commits to present an overview of the South Coast AQMD CEQA – IGR program to the CSC and recommended mitigation measures staff generally provides for new and redevelopment projects within the second quarter of 2021. This information has been added to Chapter 5a. Refer to response 1-14.
Community Air Monitoring Plan (CAMP) (including Air Monitoring Network)				
CSC Meeting #8	Expand monitoring network to include additional pollutants beyond H2S and PM and all monitoring data should be provided in real-time	Rebecca Zaragoza		Near real-time monitoring for these and other air pollutants is being pursued to supplement existing monitoring efforts, as noted in Chapter 6 and the CAMP to conduct and evaluate CERP priorities. All near real-time data from South Coast AQMD monitors will be shown in the AB 617 data display tool. Results from the laboratory analysis of time-integrated samples will not be available in real-time but will also be displayed on South Coast AQMD air monitoring website for the AB 617 program. Progress reports to summarize all monitoring results will be posted periodically. This supplemental data will also be used to evaluate the long-term air monitoring network strategy.
CSC Meeting #8	Work with the CSC (e.g., survey) or other entities (e.g., University of California	Ryan Sinclair, María		Staff will work with the CSC to identify high priority locations for air monitors and/or sensors during CAMP implementation.

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	Riverside (UCR) to develop air monitoring station/sensor locations	"Conchita" Pozar		
1-22, 2-21	The CSC has not had the time to discuss the development of the Community Air Monitoring Plan (CAMP) in any meaningful way during the past year and the South Coast AQMD has not prioritized it. The Draft CERP and CAMP should identify ways in which South Coast AQMD will conduct or enhance air monitoring. South Coast AQMD should utilize additional air monitoring data and environmental justice work recently done in the ECV to inform the Draft CERP. South Coast AQMD has not invested in the ECV in the past to properly conduct comprehensive air monitoring.	Rebecca Zaragoza, et al.		The draft CERP and the CAMP include actions to supplement existing air monitoring activities and identify ways South Coast AQMD will conduct additional air monitoring in ECV to address each air monitoring priority through targeted actions. A specific action has been added to gather available data from the Imperial County Air Pollution Control District air monitoring network. Staff will work with the CSC to identify additional detail regarding the air monitoring efforts in ECV.
Salton Sea				
CSC Meeting #8	Collaborate with following agencies to address concerns about the Salton Sea: <ul style="list-style-type: none"> The Salton Sea Authority (SSA) and Torres-Martinez Desert Cahuilla Indians (TMDCI) to address Salton Sea emissions United States Green Building Council and Southern California Gas Company on home weatherization projects 	Miguel Vasquez, Sienna Thomas, Deborah McGarrey		The SSA works in consultation and cooperation with the State of California to oversee the restoration of the Salton Sea. It has representatives from the Coachella Valley Water District, Imperial Irrigation District, Riverside County, Imperial County, and the Torres Martinez Desert Cahuilla Indians. The tables in Chapter 5b specifies the entity(ies) that the South Coast AQMD will pursue collaboration with to address Salton Sea emissions. Chapter 5b includes the CSC suggested collaborating agencies, where applicable. Responsible entities include collaborating

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	<ul style="list-style-type: none"> Imperial County Air Pollution Control District (ICAPCD) for monitoring station data to address emissions CSC requested adding a “Supporting Agency” column to the action table			agencies that have jurisdictional authority and/or supporting entities to implement the actions.
1-14	<p>The Draft CERP should be revised to include more enforceable measures such as implementing dust reduction measures to reduce pollution from the Salton Sea, rather than proposing a monitoring program and only pursuing collaborations. The Draft CERP should contain actions and strategies that include:</p> <ul style="list-style-type: none"> Improve monitoring timelines for installing and making data available to the community Collaborate with CNRA and the Imperial Irrigation District (IID) to expedite this process by starting in the 1st quarter of 2021 Conduct a thorough review and update of Rules 403 and 403.1 by the 3rd quarter of 2021 Any member of the public should not be required to make a formal request in order to access real-time data, air quality data should be made fully available, including health care providers 	Rebecca Zaragoza, et al.	●	<p>The Salton Sea Authority in consultation and cooperation with the State of California oversees the restoration of the Salton Sea. The California Natural Resources Agency (CNRA) Salton Sea Management Program (SSMP) addresses the urgent public and ecological health issues resulting from the drying and shrinking of the Salton Sea. The primary authority to address Salton Sea emissions is with other entities. Accordingly, South Coast AQMD staff must pursue collaborations to reduce emissions from the Salton Sea.</p> <p>All near real-time data from South Coast AQMD monitors will be shown publicly in the AB 617 data display tool. South Coast AQMD will also conduct baseline monitoring to look at the chemical composition of PM10 (including particulate air toxics and sea spray indicators) in the ECV community by collecting time-integrated samples and performing chemical analysis. Results from the laboratory analysis of samples will not be available in real-time but will also be displayed publicly on South Coast AQMD air monitoring website for the AB 617 program. Public records requests are part of the South Coast AQMD's policy and may be required for certain cases. South Coast AQMD will work with health care providers to provide the data they are trying to access. Chapter 5c includes actions to develop a monitoring strategy for key pesticides that contribute to community impact (e.g., toxicity) and address pesticide drift</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= 	Staff Response
	<ul style="list-style-type: none"> Include toxics in monitoring network and address other pollutants, (e.g., pesticide drift and agricultural runoff, various contaminants in sea spray blowing to nearby communities) 			<p>through reporting and enforcement. Chapter 5b pursues collaboration to identify opportunities to mitigate pesticide run-off into the Sea.</p> <p>In the first two quarters of 2021, staff will work with the CSC to identify the specific fugitive dust concerns, and evaluate whether Rule 403 and/or 403.1 amendments, and/or enhanced enforcement of existing provisions, are needed to address these concerns. This has been added to Chapter 5d.</p>
2-6	<p>Commenters requested language changes in Chapter 5b and inquired about what occurs when the H2S state standard is exceeded.</p>	<p>Rebecca Zaragoza, et al.</p>		<p>The language changes have been added.</p> <p>South Coast AQMD has a notification system in place that alerts community members when the H2S levels exceed the state standard. In addition to these alerts, South Coast AQMD issues odor advisories when H2S levels are forecasted to exceed the state standard and they have information about the potential effects H2S might cause. At that level, most individuals can smell the odor and some may experience symptoms such as headaches and nausea. However, the symptoms associated with this level of exposure are temporary and are not expected to cause any long-term health effects. People can detect H2S odors at extremely low concentrations, down to a few parts per billion. No enforcement action takes place in this case because the H2S is caused by naturally occurring anaerobic digestion in the Sea.</p> <p>South Coast AQMD Advisory updates can be found at the following link: http://www.aqmd.gov/advisory</p> <p>To subscribe to air quality alerts, advisories and forecasts by email, go to http://AirAlerts.org.</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
				Visit http://saltonseaodor.org for current H2S monitored values in the Salton Sea area or to sign up for H2S alerts.
2-7	Commenters requested partnering with UCR School of Medicine on the soil chemical and microbiome composition study and to expand the study to include adult populations in ECV (Table 1, Action E)	Rebecca Zaragoza, et al.	●	Language changes have been added to the action to reflect UCR School of Medicine as a responsible entity and to work with the project team to expand the project to adult populations in ECV.
2-8	<p>Commenters requested in Chapter 5b, Table 2:</p> <ul style="list-style-type: none"> Implementing community-identified dust suppression projects, adding Salton Sea Authority and Riverside County as responsible entities, partnering with residents to identify locations for projects, and including community-supported projects (in the Dust Suppression Action Plan (DSAP) and Salton Sea Management Program (SSMP) along the Northern shore of the Sea) (Action C) Mitigating pesticide runoff into the Sea by developing alternative disposal options of agricultural runoff and developing water treatment facilities and filtration systems at all Salton Sea tributary entryways by collaborating with responsible entities Regional Water Quality Control Board (RWQCB) 	Rebecca Zaragoza, et al.	●	Suggested language has been added within Chapter 5b. Staff will provide CSC with updates on ongoing Salton Sea efforts with AB 617 implementation; however, since the Salton Sea Authority and California Natural Resources Agency are leading efforts to address the Salton Sea and hold public stakeholder meetings, rather than duplicating those efforts, staff encourages interested CSC members to attend those meetings. Appendix 4, Table 4-2 provides a list of all complaints received in ECV between January 2017 and December 2019 and the outcome (e.g., Notice of Violation and referrals to other agencies) of the complaints. Additionally, Chapter 5b – Salton Sea, Action H has been added to the ECV CERP to work with the Coachella Valley Environmental Justice Task Force to request monthly updates from South Coast AQMD, CNRA, the Salton Sea Authority, community organizations, and other agencies.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= 	Staff Response
	<p>Region 7 and State Water Regional Control Board (SWRCB) (Action D)</p> <ul style="list-style-type: none"> • Including the development of a list of potential responses or solutions that AQMD will pursue in response to dust complaints (Action G) • Establishing ongoing public stakeholder meetings between South Coast AQMD, CNRA, the Salton Sea Authority, community organizations, and other agencies 			
2-9	<p>Commenters requested language changes and additions in Chapter 5b, Table 3 including:</p> <ul style="list-style-type: none"> • All actions should identify steps that AQMD to utilize internal, budgeted, and allocated funding • Add filtration (including all schools (e.g., adult) within the boundary) and weatherization projects to all air quality priorities • Making all air quality data available in real time to the public • Collaborate with CNRA, Riverside County and the Salton Sea Authority to implement vegetation barriers on dry lakebed along the northern shore of the Sea and urban greening projects by collaborating with 	Rebecca Zaragoza, et al.		<p>See Response to Comment 1-20 regarding budgeted and allocated funding. Vegetation on the dry playa will be used as a strategy for the dust suppression projects that CNRA and IID are currently implementing around the Salton Sea (additional language was made to Action C) Air filtration and weatherization projects were added to all of the Air Quality Priorities chapters. During CERP implementation, the CSC will develop criteria to determine which schools receive air filtration systems. See Response to Comment 1-14 for real-time data. Urban greening action has been included in Table 3.</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
	Riverside County, City of Indio and the City of Coachella			
Pesticides				
1-15, 2-10	<p>The Draft CERP should address the following in Chapter 5c:</p> <ul style="list-style-type: none"> Require comprehensive monitoring for toxic pesticide emission. Require that monitors are placed at residential areas and sensitive receptors (such as schools, nursery homes, and daycares) located near fields where toxic pesticide exposures occur. Draft CERP must do more than commit to attempting to work with other agencies to reduce pesticide exposures Adopt a similar process as Shafter Pilot Notification System project in the 1st quarter of 2021 in the ECV Require setbacks for pesticide applications near residences and sensitive receptors and identify the target amount of contaminants and 	Rebecca Zaragoza, et al.	◆	<p>South Coast AQMD has limited jurisdiction when it comes to pesticides. Health and Safety Code Section 39655(a) provides that the regulation of pesticides in their pesticidal use is reserved to the Department of Pesticide Regulation. Collaborations with CARB, DPR, the Riverside County Agricultural Commissioner, and local farmers are critical to reduce emissions from this source. South Coast AQMD lacks the authority to require notification actions and buffer zones since we lack authority over land uses³. Finally, South Coast AQMD can impose air pollution requirements on sources of pollution, but lacks the authority to require farmers to apply for the Healthy Soils Program or to provide PPE for their workers. Nevertheless, the CERP includes several commitments to collaborate with agencies with the appropriate authority and/or expertise to implement actions to reduce pesticide exposures in the community.</p> <p>The Department of Pesticide Regulation (DPR) is initiating efforts to develop a statewide pesticide application notification system. The CERP includes an action to provide the CSC an annual update on statewide efforts to develop a pesticide</p>

³ Health and Safety Code Section 40414
Eastern Coachella Valley (ECV) – Draft CERP

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
	<p>toxic pesticide exposures that will be reduced by the CERP strategies</p> <ul style="list-style-type: none"> • Pesticide use information should be posted on a publicly accessible website in real time • Improve the timelines in Chapter 5b of the CERP <p>Commenters requested language additions in Chapter 5c, Table 2, including:</p> <ul style="list-style-type: none"> • Requiring growers to provide physical announcements at agricultural sites that warn about future pesticide application events as well as after application occurs • Creating and implementing a pesticide application notification system across the ECV • Requiring farmers to apply for the Healthy Soils Program every application cycle • Implementing vegetation barriers between agricultural fields and sensitive receptors • Requiring farmers and employers to provide free Personal Protective Equipment (PPE) to all farmworkers • Establishing 24/7 buffer zones of 1 mile for all pesticide TACs for all sensitive sites 			<p>application notification system based on the Shafter Pilot Project. Staff expects to begin consulting with DPR and providing annual updates to the CSC beginning in the 1st quarter of 2022.</p> <p>South Coast AQMD will work with CARB, DPR and the CSC to develop a comprehensive, effective and feasible monitoring strategy to address pesticide emissions. Staff will also work with the CSC in the first two quarters of 2021 to discuss specific CSC priorities related to the Salton Sea and to evaluate the feasibility of accelerating the timelines.</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
	Collaborating with Growing Coachella Valley Local Farmers and Growers			
Fugitive Road Dust				
CSC Meeting #8	Collaborate with Southern California Gas Company on home weatherization projects	Deborah McGarrey	●	Staff will pursue collaboration with Southern California Gas Company to implement home weatherization projects. See Chapter 5d.
1-8	South Coast AQMD should identify additional actions, monitoring, and strategies to address off-roading emissions in Chapters 5d and 5g	Rebecca Zaragoza, et al.	●	Staff incorporated off-roading in Chapter 5d.
1-16	<p>The Draft CERP should identify enforceable mitigation measures, including the following:</p> <ul style="list-style-type: none"> • Include a requirement that South Coast AQMD increase its efforts to enforce its fugitive dust rules, Rules 403 and 403.1 • Equip all mobile home parks and Polanco Parks in the ECV with air monitors for particulate matter and specific toxics that are identified to be of concern 	Rebecca Zaragoza, et al.	●	Staff incorporated in Chapter 5d, Table 2, to evaluate and identify opportunities to improve enforcement of Rules 403 and 403.1. It should be noted that a sensor library program is being developed and staff will consider deploying additional sensors at specific locations of interest after consulting with the CSC, if appropriate and pending resource availability.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
3-1	Specify a plan for paving projects to reduce fugitive dust at mobile home parks. Consider using the example timeline and identified locations provided. Also, consider adding a landscaping element to paving projects.	Pueblo Unido CDC/Unión De Polancos	●	Staff will consider entities beyond homeowner’s associations, including mobile home park owners, for the implementation of paving projects. Staff outlined steps to develop a plan for paving projects (e.g., evaluate landscaping component to paving projects). The suggested timeline and identified locations will be considered during CERP implementation. See Chapter 5d.
2-11	Commenters explained that the section does not address the off-roading concerns raised by the CSC.	Rebecca Zaragoza, et al.	●	This comment is addressed in Chapter 5d.
2-12	Commenters requested to improve the resolution and regional reporting ability that the regulatory sensors currently have (Table 1, Action B)	Rebecca Zaragoza, et al.	●	As indicated in the draft CERP and CAMP a sensor network will be developed to supplement existing air monitoring activities in the ECV community. These sensors are capable of providing near real-time air quality information with spatial and temporal resolution that is often greater than what can be achieved by other, more established and more expensive monitoring technologies. All sensor data will be reported in near-real time in the South Coast AQMD data display tool that was created specifically for the AB 617 program. This will provide easy access to air quality data for CSC members and the public. South Coast AQMD staff are also working to implement a new method to use data from some air pollution sensors to help inform the Air Quality Index map. This method will provide much higher resolution information to the public in a way that is scientifically sound.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= 	Staff Response
2-13	<p>Commenters requested to:</p> <ul style="list-style-type: none"> • Install speed limit signs within mobile home parks and other communities (Table 2, Action B). • Collaborate with Riverside County and CVAG to actively pursue funding opportunities to pave Polanco Parks, mobile home parks, and other unpaved roads identified by the community • Work to pass legislation to support the paving of Polanco parks (following the steps of AB 1318 with added climate resilient co-benefits). • Require all commercial landscapers, including City and County landscapers, to use electric and zero emission gardening equipment within the next 5 years of this plan’s implementation period <p>Commenters also asked whether the collaborative partnership with homeowners’ associations will benefit mobile home park communities, and mentioned that funds from the Greenleaf Power Plant mitigation program should stay within ECV</p>	Rebecca Zaragoza, et al.		<p>The collaboration between South Coast AQMD and homeowners’ associations will benefit mobile home park communities since both parties will pursue reducing emissions by paving unpaved roads and mobile home parks. Mobile home parks cannot be paved without permission from the homeowners’ associations that may own the parks. South Coast AQMD does not have the authority to require installing speed limit signs within mobile home parks and other communities. The comment about the Greenleaf Power Plant is addressed in Chapter 5g, Table 1, Action B. South Coast AQMD is preempted from requiring all commercial landscapers to use electric and zero emissions garden equipment. We are prohibited from adopting or enforcing emission standards for nonroad engines, including lawn and garden equipment.⁴ While gasoline-powered lawn and garden equipment has air pollution emissions, using zero-emission models of this equipment will not help reduce fugitive dust.</p> <p>The paving of Polanco Parks was specified as an example in Table 1, Action A. Prioritization of paving projects will be determined with the CSC during CERP implementation. See additional language added to outline the process for paving projects. Community Air Protection Program (CAPP) guidelines would allow AB 617 funds for community identified projects (e.g., road paving) through the AB 617 incentive funds. Also,</p>

⁴ 42 United States Code (U.S.C.) Section 7543(e). A fleet purchase requirement would be a preempted emission standard. Engine Manufacturers Assn. v. South Coast AQMD, 541 US 246 (2004)

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
			●	staff can provide technical information for the community's legislative efforts.
2-14	<p>Commenters requested additions in Table 3 from Chapter 5d and suggested that there are GGRF programs for weatherization projects. Language additions include:</p> <ul style="list-style-type: none"> Applying for state funds for urban greening and forestry to improve tree cover in the community Requiring all facilities identified in the technical assessment and emissions inventory to incorporate mitigation measures such as planting shrubs, greenery, trees, and other native plants around the perimeter of their facilities 	Rebecca Zaragoza, et al.	◆	As part of ongoing efforts, staff continues to explore and identify additional funding opportunities to reduce emissions in AB 617 communities as noted in Chapter 5a. Staff will evaluate the efficacy and feasibility of requiring planting of shrubs and other vegetation around facility perimeters.
Open Burning and Illegal Dumping				
CSC Meeting #8	<p>Collaborate with following agencies to address concerns about the Open Burning and Illegal Dumping:</p> <ul style="list-style-type: none"> Coachella Valley Association of Governments (CVAG) Torres Martinez Desert Cahuilla Indians 	Sienna Thomas	●	Staff will pursue a collaborative partnership with CVAG and Torres Martinez Desert Cahuilla Indians to pursue opportunities to address open burning and illegal dumping. See Chapter 5e.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
CSC Meeting #8	Include Public Service Announcements (PSA) (i.e., news, radio, social media) for outreach	Sienna Thomas	●	Staff included PSAs as outreach in Chapter 5e, Table 4.
CSC Meeting #8	Consider using camera and/or drone technology to identify potential illegal dumping sites and investigate potential illegal burning	Miguel Vasquez, Sienna Thomas, George Tudor	●	Staff will explore opportunities to use drones equipped with cameras to identify the location(s) of illegal dumping sites. The implementation of this potential solution will be dependent upon resource availability and the feasibility of specific deployments where the use of drone technology is deemed to be more effective than the implementation of more traditional ground-based methods. Additional language was incorporated in Chapter 5e, Table 4, Actions A and C.
1-17	<p>Commenters requested the CERP:</p> <ul style="list-style-type: none"> ● Discuss the Open Burn Program and increase enforcement of Rule – 444 to reduce open burning of materials ● Specify a quantifiable emission reduction target ● Identify feasible alternatives to agricultural burning by: <ul style="list-style-type: none"> ○ Enforcing agricultural burning rules and identifying alternatives to agricultural burning ○ Requiring agricultural companies and growers to comply with such rules by the end of 2025 ○ Developing and implementing a plan to phase out agricultural burning entirely 	Rebecca Zaragoza, et al.	●	<p>Staff provided information on the Open Burn Program at CSC Meeting #4 and provided a handout on the Open Burn Program in the May Newsletter sent to the CSC on May 8th, 2020. This handout can be accessed here: http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/agricultural-burning.pdf?sfvrsn=14 and is included in Appendix 5. Additional actions for enforcement of Rule 444, (e.g., unannounced inspections, focused enforcement) have been added to Table 2, Action A of Chapter 5e, in response to this comment. Further refinements of these actions will be discussed with the CSC in the first half of 2021 as we work toward adding more details to the CERP. Staff will reach out to staff at San Joaquin APCD to seek additional information.</p> <p>Alternatives to burning will be identified during CERP implementation. Agricultural companies and growers who are subject to Rule 444 are required to comply with provisions of the rule. The suggested action to phase out agricultural burning</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included=  	Staff Response
	<ul style="list-style-type: none"> ○ Seeking guidance from similar actions by the San Joaquin Valley Air Pollution Control District 			entirely is prohibited by State regulation. As written in Title 17 of the California Code of Regulations, Section §80102(b), "...no local or regional authority may ban agricultural or prescribed burning." When staff develops a list of available technologies, best practices, and alternatives and assesses the feasibility of new requirements (Chapter 5e, Table 2, Action A) staff will identify feasible opportunities used in other air districts to address open burning.
2-15	Commenters requested language additions to Chapter 5e and provided additional information about unpermitted and uncontrolled open burning	Rebecca Zaragoza, et al.		Additional language was incorporated.
2-16	<p>Commenters requested actions in the CERP to:</p> <ul style="list-style-type: none"> ● Provide support to small farmers and farmers of color (Table 2, Action C) ● Develop a public outreach campaign in hotspots (especially around Tribal lands) with signage on the harms and consequences of illegal dumping and burning ● Collaborate with the Congressman's Office, Riverside County Torres Martinez, and the Desert Healthcare District (DHCD) to develop an emergency response to collectively respond to fires within Tribal land 	Rebecca Zaragoza, et al.		<p>Staff is evaluating additional language on providing support to small farmers and farmers of color and public outreach campaigns was listed as an example and providing information on the harms and consequences of illegal dumping and burning was incorporated in Table 2. Outreach efforts such as public information strategies can be further discussed with the CSC in the first half of 2021. South Coast AQMD currently has a response plan with other entities to respond to fires on tribal lands.</p> <p>South Coast AQMD was part of the inter-agency response to the Martinez Fire at the Sun Valley Recycling Center in the fall of 2019, and staff are willing to participate in the Congressman's and DHCD's efforts to develop the emergency response plan to respond to fires on Tribal land. See Chapter 5e, Table 2, Action B.</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= 	Staff Response
2-17	<p>Commenters requested language changes and additions to Table 4, including:</p> <ul style="list-style-type: none"> Collaborate with Growing CV, farmers and Riverside County to identify alternative solutions for farmers to dispose of green waste that are environmentally friendly Fine entities that are dumping illegally on tribal land, implement a security system in partnership with Torres Martinez and others, and identify existing waste disposal sites Collaborate with CCV and Coachella Valley Environmental Justice Task Force (CVEJETF) to create and implement an outreach campaign for the IVAN reporting system for illegal dumping Collaborate with Riverside County, Community Councils, and Waste Management to create and implement an ongoing community clean-up and trash disposal program 	Rebecca Zaragoza, et al.		South Coast AQMD regulations do not apply on tribal lands, California v. Cabazon Band of Mission Indians, 480 U.S. 202 (1987). Therefore, South Coast AQMD lacks the authority to enforce illegal dumping on tribal lands. Riverside Code Enforcement is responsible for addressing illegal dumping on non-tribal lands. Additional language has been incorporated in Table 4, Action A..
Diesel Mobile Sources				
1-8	South Coast AQMD should identify additional actions, monitoring, and strategies to address off-roading emissions in Chapters 5d and 5g.	Rebecca Zaragoza, et al.		Off-roading has been added to Chapter 5d.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
1-9	Regarding the Thermal Club and the Jacqueline Cochran Regional Airport, South Coast AQMD should identify the type of contaminants being emitted, conduct air monitoring at these sites, and engage in land-use discussions with the community and Riverside County to deter projects like the aforementioned from being placed in an already disadvantaged community.	Rebecca Zaragoza, et al.	●	See Responses to Comment 1-3 and 1-7. See Chapter 5a.
1-10	The Draft CERP should include actions and strategies to address the freight train in ECV, including coordination with federal agencies with jurisdiction over freight emissions	Rebecca Zaragoza, et al.	●	Freight trains have has been added to Chapter 5f.
1-18	The Draft CERP must be revised to specify diesel emission reductions targets. The Draft CERP should address the Thermal Club and airport. The Draft CERP should include strategies from CARB's Freight Handbook Concept Paper. Address the DTSC's Air Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines.	Rebecca Zaragoza, et al.	●	The Thermal Club and Airport have been added to Chapter 5a under Land Use. See Chapter 5a for emission reduction targets. Staff will work with the CSC to continue addressing the concerns of diesel mobile sources (e.g., trucks, trains) in 2021 as outlined in Table 1 of Chapter 5f. Staff will also collaborate with CARB to identify opportunities for additional actions to address diesel mobile sources, since they have primary jurisdiction on mobile sources. Table 1, Action A outlines the process to address the diesel mobile sources including providing an informational workshop on diesel mobile sources and prioritizing actions. Information on strategies from CARB's Freight Handbook Concept Paper, CARB's Air Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines, and South Coast AQMD rules (such as Rule 1110.2) may be considered during CERP implementation.

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= 	Staff Response
2-19	<p>Commenters requested including the following in Chapter 5f:</p> <ul style="list-style-type: none"> • Include the freight train, Thermal racetrack, and the Thermal airport in the Chapter • Outline existing funds and incentives that will be used for Table 1, Action C • Collaborate with The City of Indio, City of Coachella, County of Riverside, and to apply to state funding sources to mitigate pollution and climate impacts and improve livability • Collaborate with the City of Indio, City of Coachella, and Riverside County to implement vegetative barriers around the railroad that passes through communities in the ECV • Review models produced by South Coast AQMD (2019 TAG) on I -10 traffic and the potential PM2.5 from diesel traffic in ECV 	Rebecca Zaragoza, et al.		<p>Staff included off-roading vehicles and activities in Chapter 5d. The Thermal racetrack and Thermal Airport are included in Chapter 5a. The freight train has been added to Chapter 5f. As discussed in the October 15, 2020 AB 617 Incentives Strategies meeting, staff will be developing an overall strategy based on the community input received and statutory requirements, and will be providing this draft strategy to each of the CSCs in the AB 617 designated communities for feedback before bringing the recommendations to the Board. Additionally, South Coast AQMD staff will provide the CSC with updates on incentive funding opportunities and projects as this information becomes available. Staff appreciates the suggestion for the Technical Advisory Group (TAG) on I-10 traffic emissions information and will share it with the staff developing information for TAG meetings. Heavy-duty truck traffic from the I-10 contributes to ECV's diesel particulate matter (DPM) and is incorporated in the emissions inventory. As part of ongoing efforts, staff continues to explore and identify additional funding opportunities to reduce emissions in AB 617 communities. Collaboration with land use agencies (e.g., City of Indio, City of Coachella, and Riverside County) to implement vegetative barriers around the railroad has been added to Chapter 5f, Table 1, Action A. See Response to Comment 1-20 regarding budget allocation.</p>
Greenleaf Desert View Power Plant				
1-19	<p>Fenceline monitors for criteria and toxic air pollutants should be installed on the facility. Ten or more monitors should be strategically placed near homes and sensitive receptors</p>	Rebecca Zaragoza, et al.		<p>As discussed during one of the CSC meetings (in the CAMP breakout group), the South Coast AQMD is planning to conduct PM monitoring upwind and downwind of the power plant to identify potential emissions from the facility and assess the</p>

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	<p>near the facility. Mobile monitoring should take place to identify and quantify pollutants that occur at this facility.</p>			<p>potential impact on the community. After consulting with the CSC, the South AQMD will deploy an appropriate number of PM sensors at strategic locations to gather the necessary information to fully address this air quality concern under variety of wind condition. In this particular situation a fixed monitoring strategy is preferred to one which includes the use of a mobile platform, as emissions from the power plant may occur during different times of the day (e.g., at night) when mobile measurements cannot be taken. It should be noted that air monitoring can only quantify the ambient concentration of PM and not the emission rate from the facility.</p> <p>Currently, South Coast AQMD operates one fixed monitoring site (Mecca air monitoring station) near the Greenleaf Power Plant; this site is located within the perimeter of Saul Martinez Elementary School and approximately one mile southeast to the power plant. An analysis of the wind direction gathered during the last three years shows that the air monitoring station in Mecca was downwind of the power plant more than 50% of the time and, hence, this is a suitable site for exploring the impact of Greenleaf emissions on the surrounding community. South Coast AQMD will conduct baseline measurements (including certain air toxic pollutants) at this site.</p>

Comment From	Summary of Comment	Commenter(s)	Included= Not Included= ◆	Staff Response
2-20	<p>Commenters requested changes in Chapter 5g, Table 1, which include:</p> <ul style="list-style-type: none"> • Requiring all allocations of funds from the Greenleaf Desert View Power Plant be used to reduce emissions and exposures in the ECV • Collaborating with CVAG, Riverside County, Greenleaf Power Plant, and Cabazon Band of Mission Indians to deploy mobile monitoring in key locations • Requiring Greenleaf Power Desert View Plant to incorporate mitigation measures such as planting shrubs, greenery, trees, and other native plants around the perimeter of the facility • Add a land use, and outreach and education section 	Rebecca Zaragoza, et al.	◆	<p>While South Coast AQMD cannot require CVAG to use all its funds from the Greenleaf Desert View Power Plant for ECV, staff will pursue a collaboration with CVAG to consider using these funds in the ECV.</p> <p>As for the idea of conducting mobile monitoring at key locations, it should be noted that, in this particular situation, a fixed monitoring strategy is preferred to one which includes the use of a mobile platform, as emissions from the power plant may occur during different times of the day (e.g., at night) when mobile measurements cannot be taken. As detailed in the Response to Comment 1-19, the South Coast AQMD is planning to conduct PM monitoring upwind and downwind of the power plant to identify potential emissions from the facility and assess the potential impact on the community.</p> <p>Greenleaf Desert View Power Plant is on tribal land, staff lacks the authority to require the facility to plant shrubs around the perimeter to limit access. Staff will work to develop strategies to reduce emissions and exposure from the facility. An action to reduce exposure has been included in the table to identify funding for air filtration system installation and maintenance and weatherization project implementation. A land use section was added in Chapter 5a and includes mitigation measures through the CEQA process. Outreach and education actions are already incorporated within the actions of each Air Quality Priority.</p>