

**Bay Area 2010 Draft Clean Air Plan  
April 2010 Workshops**

**Tuesday, April 6 – Petaluma**

1:30 pm-4:30 pm, 2010 Draft Clean Air Plan  
Petaluma Regional Public Library Community Meeting Room

**Wednesday, April 7 – Santa Clara**

1:30 pm-4:30pm, 2010 Draft Clean Air Plan  
City of Santa Clara, Council Chambers

**Thursday April 8 – Oakland**

1:30 pm-4:30pm, 2010 Draft Clean Air Plan  
County of Alameda, Room # 225

Workshop Overview

In April 2010, the Bay Area Air Quality Management District held public workshops on the Draft Bay Area 2010 Clean Air Plan (CAP) in three locations: Petaluma, Santa Clara and Oakland. Air District staff presented the draft CAP and received public comment on the plan. The CAP was presented in segments with opportunities for comment after each segment, as follows:

1. CAP Purpose and Scope
2. Bay Area Air Quality and Health Impacts
3. CAP Control Strategy
4. Socioeconomic Analysis, Draft EIR, and CAP Adoption Schedule

The Powerpoint presentation for the CAP workshops is available on the Air District website at <http://www.baagmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans/Workshops-and-Meetings.aspx>

Workshop attendees represented a variety of public agencies, environmental and public health organizations, business and industry, and community members. Below is a summary of public comments recorded at the workshop. Air District responses are provided in *italic font*.

**April 6, 2010 – Petaluma Workshop**

Comment #1

- Amy Cohen, Bay Area Environmental Health Collaborative (BAEHC): Please clarify your point that the greatest health effect from diesel PM 2.5 appears to be from heart attacks, strokes and cardiovascular disease.

*Our analysis for the CAP of overall Bay Area health burden from air pollution indicates that the premature mortality associated with air pollution is primarily related to cardiovascular impacts such as heart attacks and stroke Lung cancer appears to account for a small fraction of mortality related to air pollution. It is true that the Air District's analysis of air*

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*toxics risks for the Air District's CARE program indicates that diesel particulate matter (PM) accounts for the lion's share - approximately 85% - of the cancer risk from air toxics in the Bay Area. However, even if diesel PM were not a carcinogenic air toxin, it would still pose a health risk as a significant component of PM2.5. In fact, our analysis suggests that the primary mortality risk from diesel PM is related to its role as a component of PM2.5, rather than its role as an air toxin.*

Comment #2

- Jenny Bard, American Lung Association: Offers support for the draft CAP. Praises the Air District for demonstrating leadership by developing a comprehensive multi-pollutant plan. Supports focus on health outcomes, reducing health risks from exposure to air pollution, especially in the most impacted communities, and prioritizing control measure in order to achieve the greatest public health benefit. Also expresses appreciation that District staff has been willing to work with interested stakeholders and give serious consideration to suggestions offered.

*District staff greatly appreciates your support for the CAP. The CAP proposes an ambitious control strategy. The District cannot accomplish all this on its own, due to limited resources and authority, so it is going to require a lot of partnerships and actions by a wide range of agencies, organization, and individuals.*

Comment # 3

- Amy Cohen, BAEHC: Expresses overall support for the new directions that the District has taken in developing the 2010 CAP. In relation to the expanded scope of the CAP, she raises the question as to what is the appropriate role of the Air District in the area of energy efficiency and renewable energy. She suggests that District staff could potentially play a useful role by working with groups that are involved with energy efficiency programs and projects to help them quantify to air quality (criteria pollutant) co-benefits of energy measures that reduce greenhouse gases (GHGs).

*In developing the proposed Energy and Climate Measures for the CAP, one of the biggest challenges has been to define the most appropriate role for the Air District. We believe that there are potential opportunities here, but we want to determine where we can add value, rather than duplicate existing efforts.*

*In terms of helping to quantify air quality co-benefits of greenhouse gas reduction measures, we agree that the District can help in this area. We are currently engaged with U.S. EPA Region 9 to assist in a demonstration project to show how air quality co-benefits can be estimated for GHG reduction measures. The multi-pollutant evaluation method (MPEM) that the District has developed for the CAP may be of use in helping other entities, such as Bay Area cities that are developing climate action plans, to estimate the air quality*

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*co-benefits of these measures. This could be useful in helping to ensure that climate action plans provide the greatest overall benefit in reducing both GHGs and criteria air pollutants.*

*The District is also working on a GHG measure quantification study through the California Air Pollution Control Officers Association. This study is expected to provide quantification methodologies and estimated emission reductions from a wide variety of GHG mitigation measures. We expect this study to be done and the results to be available in the summer 2010 time frame. There are several other quantification studies going on right now; we want to assist in integrating the results of these studies and avoid potential duplication of effort.*

Comment # 4

- Jenny Bard, American Lung Association: In your revisions to the draft, you talked about adding text regarding Community Risk Reduction Plans to LUM 4 (Land Use Guidance). Is there going to be time for additional public comment to discuss what will be included in the plan? Could you discuss what your vision is for that and what control measures may come out of that as well as Best Practices Guidelines?

*District staff have been working intensively on both the draft CAP and the update to our CEQA Guidelines in recent months. The Community Risk Reduction Plan concept was developed after the District issued the draft CAP control strategy in August 2009. We see the Community Risk Reduction Plans as an important tool for protecting impacted communities, so we wanted to make sure that this concept is included in the CAP. Staff will continue to develop CRRP elements in consultation with the CARE Task Force, local governments, community and business groups, and other interested parties. [Note: Draft guidelines for Community Risk Reduction Plans were issued in May 2010. The draft guidelines are available on the District website: see <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Community-Risk-Reduction-Plans.aspx>.*

Comment #5

- Jenny Bard, American Lung Association: One recommended strategy that did not end up in the CAP was a local clean construction ordinance in CARE communities. This strategy might be a good thing to include in any Community Risk Reduction Plans that are developed pursuant to the District's revised CEQA guidelines.

*Air District staff is currently working to better define the Community Risk Reduction Plan concept. District staff will provide technical assistance to local agencies in developing CRRPs. Requiring the use of clean construction equipment is one of the potential emission reduction measures that could be included in a CRRP.*

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Comment # 6

- Jenny Bard, American Lung Association: The quantification study that the consultant is doing for the CEQA document, will that cover the four types of pollutants addressed in the CAP: ozone, PM, air toxics and greenhouse gases?

*Greenhouse gas reductions are the primary focus of the study, but we are asking the consultant to give us numbers for ROG, NOx, and PM as well, so it should cover them all.*

Comment #7

- Jenny Bard, American Lung Association: Pollution from wood burning continues to be an issue and there is a need for greater regulation. We are seeing a proliferation of restaurants that use wood burning or wood burning fire pizza ovens and charbroil operations that are currently unregulated. We continue to get complaints about residential exposure to smoke from nearby restaurants. When will this be addressed?

*As described in CAP Further Study Measure (FSM) #10, we do intend to look at the emissions from these types of restaurants. We are investigating the control technology, but we know that some of these places already have some type of control; for instance, barbeque type restaurants that use a lot of wood.*

Comment # 8

- Amy Cohen, BAEHC: Can you describe Land Use Measure 3 Enhanced, CEQA?

*Air District staff has been working to update our CEQA guidelines over the past year. In January 2010, the Air District Board directed staff to do more outreach to cities and counties and stakeholders, so we scheduled meetings and workshops on the updated guidelines in each county. The CEQA guidelines represent our advice to cities and counties on how to handle the air quality parts of CEQA documents. The updated guidelines include new Thresholds of Significance and benchmarks for determining when there is significant impact and how to mitigate those impacts. Staff will present the new Thresholds of Significance to our Board in June. If they are approved by the Board, District staff then will work with cities and counties to help them understand and apply the new guidelines in order to evaluate air quality impacts of development proposals and plans. [Note: The revised CEQA thresholds of significance were adopted by the Air District Board on June 2, 2010.]*

*Also, when the District receives CEQA documents related to new projects, we review them and write comment letters to make sure recommendations are being followed. This is another means that District staff will use to determine whether local agencies are applying the revised CEQA guidelines.*

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Comment # 9

- Amy Cohen, BAEHC: The title of LUM 5 is “Reduce Health Risk in Impacted Communities.” However, in the description of the measure it seems like the focus is on tracking cumulative risk in impacted communities. Can you please clarify this?

*LUM 5 will not directly reduce emissions. The primary purpose of this measure is to develop a cumulative risk tracking system and we will use that to inform the efforts of the CARE Program and related programs.*

Comment #10

- Amy Cohen, BAEHC: What about LUM 6 which is enhanced AQ monitoring?

*LUM 6 specifically addresses air quality monitoring, in particular the need to develop better air quality monitoring data at the local scale.*

Comment # 11

- Pam Torliatt, BAAQMD Director: You mentioned economic benefits and that TCMs attract federal and state funds and will create jobs. What TCMs will attract those federal and state funds?

*The primary economic benefits in terms of job creation and attracting outside funding will come from the TCMs that involve major capital projects. These include TCM A-2 (regional commuter rail improvements), TCM B-3 (Bay Area express lane network), and TCM B-4 (goods movement improvements).*

Comment # 12

- Pam Torliatt, BAAQMD Director: So basically expansion of the transit system in nine Bay Area counties. This will cause stimulus.

*Expenditures on major infrastructure improvements, especially projects that attract outside funding, will provide an economic stimulus in the region.*

Comment # 13

- Janet Wittick, California Council for an Environmental and Economic Balance (CCEEB): I just want to tell the Air District that this is a good plan and I appreciate the inclusion of health outcomes and socio-economic benefits.

*Comment noted.*

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Comment #14

- Janet Wittick, CCEEB : I noticed that when we come to you for help with the drayage truck rule, the response is that it is not the Air District's rule, but that it is ARB's rule.

*The drayage truck rule was adopted by ARB, and ARB has primary responsibility to enforce the rule. However, the Air District has executed a Memorandum of Understanding with ARB to help enforce the ARB diesel air toxics control measures rules in the Bay Area.*

Comment #15

- Brent Cooper, City of American Canyon: Under CEQA Guidelines, if a project was an anticipated component of a climate plan could it go ahead?

*Yes, projects that are consistent with a qualified climate action plan or greenhouse gas reduction plan would thereby comply with the proposed threshold.*

Comment # 16

- Brent Cooper, City of American Canyon: What makes something a qualifying GHG strategy?

*More detailed guidance will be forthcoming. But the basic concept is that a qualifying plan would need to include all of the key elements identified by ICLEI:*

- *Community baseline inventory*
- *Forecast of future GHG emissions*
- *GHG emission reduction target consistent with AB 32 goals*
- *Quantified GHG reductions from policies / measures*
- *Implementation strategy*
- *Monitor progress over time*

Comment # 17

- Brent Cooper, City of American Canyon: Should I look to the State Office of Planning and Research (OPR) to determine the appropriate greenhouse gas threshold?

*District staff will clarify the expected elements of a qualified climate action plan, incorporating OPR guidance where appropriate.*

**April 7, 2010 – Santa Clara Workshop**

Comment # 1

- Unidentified Speaker: How often does the CAP need to be updated?

*The California Health & Safety Code calls for local air districts to update their state ozone plans on a triennial basis; i.e., every three years.*

Comment #2

- Ken Yeager, BAAQMD Director: Some pollutants have big benefit to reducing pollution, but not a benefit to industry. Is the Air District looking at a cost-benefit analysis?

*The CAP looks at the potential costs and benefits of the proposed control measures in several ways. Staff has performed the traditional estimates to determine cost-effectiveness of control measures based on reduction in ozone precursors (ROG and NOx). In addition, for purposes of the 2010 CAP, District staff has developed a new Multi-Pollutant Evaluation Method to estimate the value of health and climate protection benefits of control measures on a multi-pollutant basis. The intent is to provide policy-makers with estimates regarding both the costs and the benefits of CAP control measures. Finally, the District also commissioned the preparation of a socio-economic analysis of the CAP by an independent consulting firm.*

Comment # 3

- Unidentified Speaker: The Air District is also in the process of updating your CEQA guidelines. Are you coordinating the development of the CAP and the CEQA guidelines?

*Yes, staff is closely coordinating the CAP and the CEQA guidelines.*

Comment #4

- Ken Yeager, BAAQMD Director: Given that the Air District does not have authority on land use and energy and transportation, how will the agency implement measures such as the Transportation Control Measures and the Energy and Climate Measures?

*The Air District has direct authority only to implement the stationary source measures in the plan. Implementation of the other measures will be pursued by means of some combination of partnerships with public agencies and other stakeholders; grants and incentives; guidance documents; public outreach and education; and other tools, depending upon the specific measure.*

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Comment #5

- Ken Yeager, BAAQMD Director: How do you deal with a thing like Caltrain cutting back and changes in the economy since the draft plan? Will the cutbacks in transit service around the region affect the CAP control strategy?

*The Air District coordinated with MTC and ABAG in developing the transportation control measures for the CAP. Reductions in transit service certainly run counter to the objective in the CAP to reduce motor vehicle trips and emissions. However, although keenly aware of the plight that transit agencies are facing, the Air District does not have the financial resources to help resolve the funding shortfall. The Air District will lend its support to efforts by MTC and other agencies to protect transit service in the Bay Area. Since the District's state air quality plan is updated on a periodic basis, we will reexamine issues related to transit during the next update cycle.*

Comment #6

- Unidentified Speaker: What's being done for energy control measures? Is there some way we can step in and partner with agencies?

*Air District staff recognizes that energy generation is an important issue, especially since the CAP considers greenhouse gases in addition to criteria air pollutants. For that reason, we have defined the new category of Energy & Climate Measures for the 2010 CAP. However, it is important to bear in mind that 1) the District has little direct control over energy generation, especially for power plants located outside the Bay Area; 2) the energy sector is not currently an area of core expertise and experience for the District; and 3) there is already a well-defined effort on the part of the CEC, the CPUC and other entities to promote energy conservation and renewable forms of energy production. In this context, the challenge for the Air District is to identify a role in which we can add value, while avoiding duplication of existing efforts or programs.*

Comment #7

- Adam Montgomery, Silicon Valley Association of Realtors: Given the apparent success of the District's Winter Spare the Air campaign, why does Further Study Measure #12 include the idea of requiring an upgrade to fireplaces or wood stoves at the time that a home is sold? This measure was previously considered, but not pursued. Where is the Air District going with this?

*As discussed in the CAP, analysis indicates that exposure to fine particulate matter (PM2.5) poses the greatest health risk to Bay Area residents of any air pollutant. In addition, the Bay Area was recently (Dec. 2010) designated as non-attainment for the national 24-hour PM2.5 standard. The District is still evaluating the results of the first two seasons of its wood smoke*

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*regulation. However, it seems likely that we need additional reductions in emissions of wood smoke in order to attain PM2.5 standards. The purpose of FSM 12 is to identify potential enhancements to the District's existing wood smoke program that are worthy of further study. However, the fact that the point-of-sale idea is included in the list of potential enhancements in FSM 12 does not constitute a commitment to adopt such a measure. A decision about whether to pursue such a measure will be based upon further analysis. Any amendments to current wood smoke regulations would follow the Air District's normal rule development process which provides opportunities for public comment.*

Comment #8

- Frank James, Santa Clara Resident: We need to get light rail over Golden Gate Bridge to relieve congestion on 19<sup>th</sup> Avenue and rail going across the Dumbarton Bridge and make transportation recommendations in areas that will improve air quality.

*The CAP is not a regional transit plan. The transportation control measures in the CAP that address transit enhancement and expansion are based on MTC's Regional Transit Expansion Program pursuant to MTC Resolution 3434.*

Comment #9

- Unidentified Speaker: Regarding transportation control measures (TCMs) that relate to pricing strategies, is the Air District looking at imposing a greenhouse gas fee?

*The Air District does not have the authority to impose a GHG fee on mobile sources. Any such fee would likely require state legislation, and/or a vote by Bay Area residents. If such a fee were proposed, the Air District would consider supporting it, depending upon the specific provisions of the proposal.*

**April 8, 2010 – Oakland Workshop**

Comment # 1

- Zachary Runningwolf, Berkeley resident: Opposes bus rapid transit (BRT) in the Telegraph Avenue corridor in Berkeley. Opposes efforts to promote infill development in downtown Berkeley.

*The CAP is regional in scope and is not intended to directly address land use and transportation planning in the City of Berkeley. TCM A-1 in the CAP does include BRT on Telegraph Avenue as one of the recommended improvement to the regional bus network. The Air District and the Clean Air Plan do support the concept of infill development in areas*

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*that are well-served by transit (e.g., downtown Berkeley), provided that this is done in a manner that protects public health.*

Comment #2

- Wayne Huber, Civil Engineer: Has the Air District run a minimal impact scenario for climate change along with a maximal impact scenario?

*The Air District does not have the resources to analyze a problem of global scale with a tremendous range of potential impacts. The Clean Air Plan does provide a discussion of the potential impacts of climate change on Bay Area air quality: see pp. 18-22 in CAP Volume I. While it is difficult to predict the impact of climate change on air quality, particularly in one specific region, analysis to date suggests that higher temperatures associated with climate change could greatly complicate efforts to attain and maintain air quality standards in the Bay Area in years to come.*

Comment #3

- Mike Vukelich, Richmond resident: Why no focus on indoor air pollution? Recommends a greater focus on indoor air pollution. Is it not true that indoor air quality is worse than outdoor air quality?

*The Air District has no clear legal authority or mandate to regulate indoor air quality. Although the degree to which outdoor pollution contributes to indoor air quality problems varies based on local circumstances, reducing outdoor pollution should contribute to better indoor air quality. It is difficult to make any general conclusion in comparing indoor and outdoor air quality, because so many factors impact each. Indoor air quality will depend upon factors such as building location and site design, consumer products used in the home, materials used in furniture and carpeting, use of fire place or wood stove, tobacco smoking, the heating and ventilation system, etc.*

Comment #4

- Greg Karras, Communities for a Better Environment (CBE): Supports the Air District's decision to pursue a multi-pollutant approach in developing the 2010 CAP.

Comment #5

Guy Bjerke, Western States Petroleum Association (WSPA): What are the changes in the revised multi-pollution methodology? Mr. Bjerke expressed concerns over the release of the revised methodology 20 days into a 45-day comment period.

*The Air District posted an updated version of the Multi-Pollutant Evaluation Method (MPEM) Technical Document on its website on April 5, 2010. The District has not made any*

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*substantive changes to the MPEM. None of the MPEM values have been changed; the results of all MPEM calculations remain the same. The June 2009 version of the MPEM Technical Document (the narrative description of the methodology) has simply been revised to better explain the methodology and key assumptions.*

Comment #6

- Liz Brisson, San Francisco County Transportation Agency (SFCTA): (In response to slide showing regional sources of PM2.5) – What percentage of on-road PM2.5 is diesel PM?

*The District's emissions inventory classifies vehicles by weight class, rather than by fuel type. Assuming that the vast majority of vehicles with a gross vehicle weight of 14,000 lbs. or more are diesel-powered, then it appears that diesel PM accounts for roughly one-third of PM2.5 from on-road vehicles. Light-duty gasoline vehicles emit very little PM2.5 on a per-mile basis. However, light-duty vehicles collectively emit at least 60% of total PM2.5 from the on-road category because they account for such a large proportion of total vehicle travel.*

Comment #7

- Andy Katz, Breathe California: 1) The monetary values for asthma and all health effects should be shown in the "Valuation of Health Effects" section in the CAP. 2) Suggests that the value of greenhouse gas reductions used in the Multi-Pollutant Evaluation Method is too low. Given the perceived low value, he questions the usefulness of calculating the cost-effectiveness of CO2 reductions. 3) Suggests showing more detailed inventories for the CARE communities to provide comparisons to the ambient conditions in the rest of the region.

*1) Asthma and other health effects are included in the Multi-Pollutant Evaluation Method calculations. All values are shown in Table 5.1 of the MPEM Technical Document. The values shown in the "Valuation of Health Effects" section in the CAP are a subset showing the health effects with the highest per incidence values. [Note: Per this suggestion, monetary valuations for all health endpoints included in the MPEM will be shown in the final version of the CAP.] 2) There is no consensus as to the value of reducing a ton of greenhouse gases. However, District staff reviewed the literature and chose a value that is well within the range of values found in the analyses performed to date. It is possible that a higher value for GHG reductions may be used in a future iteration of the MPEM, based upon future research. District staff believes that, for purposes of the 2010 CAP, the most important contribution is to establish the precedent of incorporating GHG reduction benefits in a multi-pollutant plan, rather than worrying too much as to the precise value to use. 3) The CAP already provides a great deal of technical information and analysis in Volume I, Chapter 2. This information is presented for the region as a whole because the CAP is regional in scope. Emissions inventories for CARE communities are available from the CARE program.*

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Comment #8

- Zachary Runningwolf, Berkeley Resident: Expresses support for programs that increase usage of biodiesel and other renewable fuels.

Comment #9

- Anna Lee, CBE: Is Air District staff aware of work by Professor Jacobson, Stanford University, regarding the creation of CO<sub>2</sub> domes over urban areas? In light of Professor Jacobson's work, she recommends that the Air District apply a higher economic benefit factor for each ton of CO<sub>2</sub> reduced through measures in the CAP.

*District staff has reviewed Professor Jacobson's work on CO<sub>2</sub> domes in urban areas and will continue to monitor research on this topic. Staff analysis indicates that if the CO<sub>2</sub> dome effect were incorporated into the MPEM, this would have a very minor impact on the outcome.*

Comment #10

- Anna Lee, CBE: The Air District should provide a clearer discussion on how the 2010 CAP incorporates environmental justice.

*The CAP addresses environmental justice by emphasizing the need to protect public health as one of the key goals of the CAP, with a focus on the need to reduce emissions and population exposure in the most impacted communities. This theme is thoroughly integrated into the CAP and the CAP control strategy.*

Comment #11

- Betsy Morris, UC Berkeley Labs: Why isn't the Air District using the statewide methodology to measure changes in health benefits from 2010 CAP? Suggests a comparison between the Bay Area and the rest of the State will be useful.

*The Air District's Multi-Pollutant Evaluation Method is based on existing studies. It draws heavily on OEHHA studies, as well as US EPA's BenMap program for key inputs such as concentration-response functions, risk factors, and valuation of health effects, as explained in the MPEM Technical Document which is available on the District website.*

Comment #12

- Greg Karas, CBE: Encourages the Air District to increase focus on indoor air quality, especially in regards to the contribution of outdoor pollution to indoor air quality.

*See response to comment from Mike Vukelich above.*

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Comment #13

- Josh Mulchapadhyay, Goldfarb & Lipman LLP: Will the Air District be providing guidance to local cities on how to incorporate 2010 CAP measures into local climate action plans?

*Yes, this will be provided as part of the District's CEQA guidelines update.*

Comments #14

- Dr. Ken Klock, Bay Area Environmental Health Collaborative: The 2010 CAP goals for PM2.5 reductions are too modest; they should be stronger. The Air District should strengthen the general PM limits in its regulations on stationary sources. The limits should be based on local risk data, rather than relying on limits adopted by other California air districts. The Air District should also consider revising regulations to cover sources currently exempt under "grandfather" clauses.

*The PM2.5 performance objective in the CAP is based on the estimated reduction in ambient PM2.5 concentrations needed to achieve the federal 24-hour PM2.5 standard. Air District staff believes that this health-based standard is the most appropriate benchmark to use as the basis for the PM2.5 performance objective. However, analysis performed for the CAP does point to PM2.5 as the air pollutant that poses the greatest health risk to Bay Area residents. Furthermore, research suggests that there may be health effects from PM2.5 levels below the current federal standards. Therefore, we recognize the need to make all feasible efforts to reduce PM emissions and exposure to the greatest extent possible. District staff analyzed emission reduction potential from "grandfathered" sources in preparing the CAP control strategy. Staff believes that the current approach based upon reviewing other air districts' rules and emissions limits, and identifying specific sources where emission reductions can be achieved is the best approach to further reduce emissions from these sources.*

Comment #15

- Mike Vukelich, Richmond Resident: Recommends that the 2010 CAP focus on the building of more roadways to eliminate congestion.

*Expanding roadway capacity may help to reduce emissions in specific corridors in the short term. However, over the long term, building more roads is likely to encourage development on the fringes of the region and lead to more driving, and thus increased vehicle emissions. In terms of land use and transportation policy, the CAP control strategy is based on the premise that we need to encourage focused, mixed-use development where people have a variety of transportation options, including public transit, walking, and bicycling, in order to reduce motor vehicle travel and traffic congestion.*

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Comment #16

- Liz Brisson, SFCTA: Requested more details on the timeline and methodology for the Air District's independent analyses of high-occupancy toll (HOT) lanes and ferry service expansion.

*Additional analysis regarding the air quality impacts of HOT lanes and ferry service expansion will be performed after the final CAP is approved by the Air District Board of Directors.*

Comment # 17

- Greg Karras, CBE: Asserts that Air District databases are not available, which prevents effective public participation. To produce more effective public comments, database should be available. Currently the public cannot access source-specific operations, in order to know which sources undergo new source review (NSR), and whether permitted sources have sufficient control or abatement. What would it take to give universal access to transit?

*Permitting and access to permit data is not directly addressed in the CAP. In terms of access to transit, the measures in the CAP control strategy that address transportation and land use are intended to expand access to transit and increase transit use.*

Comment #18

- Corrine Dutra-Roberts, 511ContraCosta: For the implementation of the transportation control measures (TCMs), will the Air District provide clear guidance on which pollutant to value more per ton of reduction, especially between PM2.5 and CO2?

*Most control measures provide co-benefits in reducing multiple pollutants. However, there can be trade-offs between reducing criteria pollutants at the expense of an increase in CO2 emissions. For example, some retrofit devices to reduce emissions of PM and/or NOx from heavy-duty diesel engines cause a slight reduction in fuel economy (perhaps 3%); this could lead to a comparable increase in CO2 emissions. There is no easy answer to this question, especially since the geographic scope, range of impacts, and timeframe for climate change are very different than the impacts related to criteria pollutant. However, the analysis performed for the CAP suggests that, in most situations, a modest increase in CO2 emissions would be an acceptable trade-off for a reduction in criteria pollutants. This is especially true in the case of particulate matter, which poses the most serious health risks.*

Comment #19

- Santa Clara Silicon Valley Board of Realtors: Why is a possible point-of-sale regulation for fireplaces or wood stoves mentioned in the wood smoke measure (Further Study Measure 12)? Suggests dialogue if further regulatory measures are considered.

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*Please see response to comment from Adam Montgomery, Silicon Valley Association of Realtors (comment #7 from the Santa Clara workshop).*

- Comment #20

Jennifer Ahiskog, ConocoPhillips: In developing transportation control measures (TCMs) for the CAP, how does the Air District work with MTC? Which agency takes the lead?

*Staff from both MTC and the Air District work together to develop TCMs that provide the greatest benefit for air quality. Both agencies took an active role in crafting the TCMs for the 2010 CAP, building upon the most recent regional transportation plan (Transportation 2035) and the TCMs in the 2005 Ozone Strategy.*