



Policy on Electronic Submission of Public Comments

Board of Directors Meeting

July 1, 2026

Victor Douglas
Director
Regulatory Development



Abbreviations

AI: Artificial Intelligence

NOx: Nitrogen Oxides

PII: Personally Identifiable Information

SCAQMD: South Coast Air Quality Management District

Activities Where Public Comment is Sought

- Rulemaking
 - Informal – Concept papers, etc.
 - Formal – Final Rulemaking Proposal prior to adoption hearing
- Air Quality Plans
 - Clean Air Plans
 - Community Emission Reduction Plans
- Permitting
- Budget

Current Pathways for Comment Receipt

- Electronic (emails)
- Hardcopy (letters)
- Oral (at a meeting or hearing)

Considerations for Electronic Comments

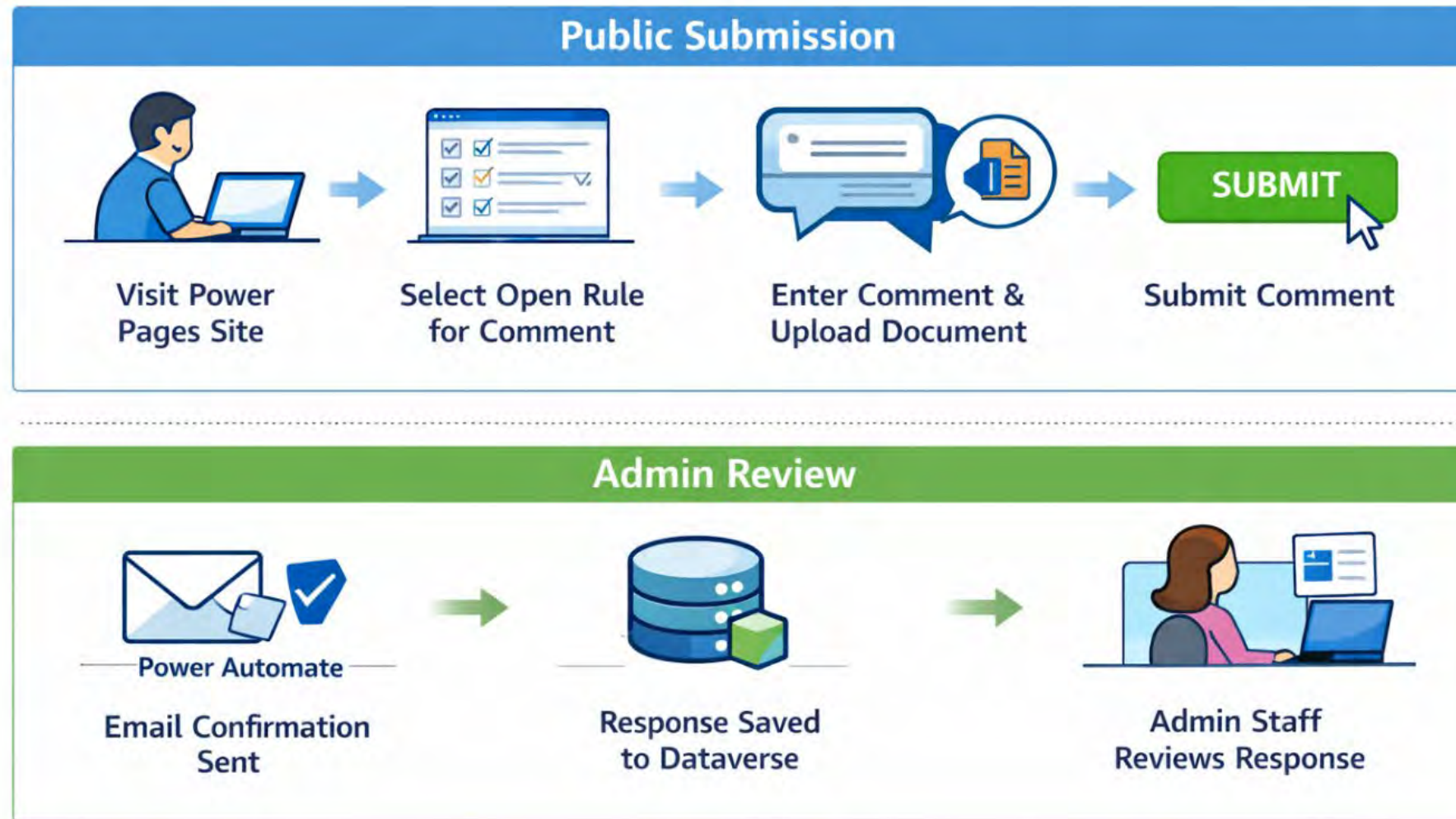
- AI-generated email comments
 - CivicClick
 - SCAQMD Zero-NOx Gas Appliance Rulemaking
- Ensuring receipt of emails through Air District security measures
- Requirements for protection of PII
- Manual processing
 - Impacts to staff resources and response time

Proposed Policy for Electronic Comments

Online Portal for Regulatory and Planning Matters

- Electronic comments must be submitted through the portal
 - Emailed comments will receive instructions for submittal through portal and will then be deleted
- Information accepted:
 - Name, affiliation, contact information, phone, and email address
 - Text of Comment
 - Attachments (if any)
 - PII protected through encryption in transit and at rest

Proposed Policy for Electronic Comments (cont.)



Recommended Action

Adopt a policy requiring electronic comments to be submitted via an online portal only. Comments submitted via email would not be considered or retained. This policy would apply to comments regarding new regulations, changes to existing regulations, and regional and local clean air plans and related required planning documents.

Questions & Discussion

For more information:

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Remote Teleconferencing Meeting Policy for Board and Committee Meetings

Board of Directors Meeting

July 1, 2026

Alexander Crockett, General Counsel



Recommended Action

Amend the Remote Teleconferencing Meeting Policy to:

- (i) Remove the requirements that remote meeting locations must be in public buildings within California; and
- (ii) Add a provision for the Board to consider revoking remote meeting hosting provisions for members who fail to adhere to Policy requirements;

with an effective date of August 1, 2026.

Recent Policy Amendments

June 2026 amendments to Remote Teleconferencing Meeting Policy:

- Requirement to post all translated agendas
- Additional lead time for staff to accommodate remote locations
- Streamlining process to reduce burdens on Board members & their staff
- Remote locations must be in publicly accessible areas in public buildings
- Remote meetings must be within California

Finance & Admin. Committee Discussion

Consensus from June 17, 2026 Committee Discussion:

- Requirement for public buildings within California too restrictive
- Ensuring compliance with all Policy requirements is vitally important
- Need for a mechanism to identify non-compliance to Board Chair

Proposed Further Amendments

- Remove requirements for locations to be in public buildings within California
- Add requirement for APCO to provide Chair with quarterly compliance report
 - If member has more than one violation of any individual Policy requirement
 - Chair may agendize Board discussion of revocation of hosting privileges
- Effective August 1, 2026

Recommended Action

Amend the Remote Teleconferencing Meeting Policy to:

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- (ii) Add a provision for the Board to consider revoking remote meeting hosting provisions for members who fail to adhere to Policy requirements;

with an effective date of August 1, 2026.

Questions & Discussion

For more information:

Alexander Crockett | General Counsel | acrockett@baaqmd.gov



Bay Area Regional Evaluation of Air Toxics and Health Effects (BREATHE) Study Update

Board of Directors Meeting

July 1, 2026

Andrea Polidori, PhD
Deputy Executive Officer of Science



Recommended Action

None; the Board of Directors will discuss this item, but no action is requested at this time.

Outline

- Criteria and Air Toxic Pollutants
 - Definitions and Measurements
- South Coast Air Quality Management District (AQMD) Multiple Air Toxics Exposure Study (MATES)
 - Overview and Main Results
- Proposed Bay Area Regional Evaluation of Air Toxics and Health Effects (BREATHE) Study
 - Scope and Objectives
 - Study Components
 - Timeline
 - Strengths and Benefits

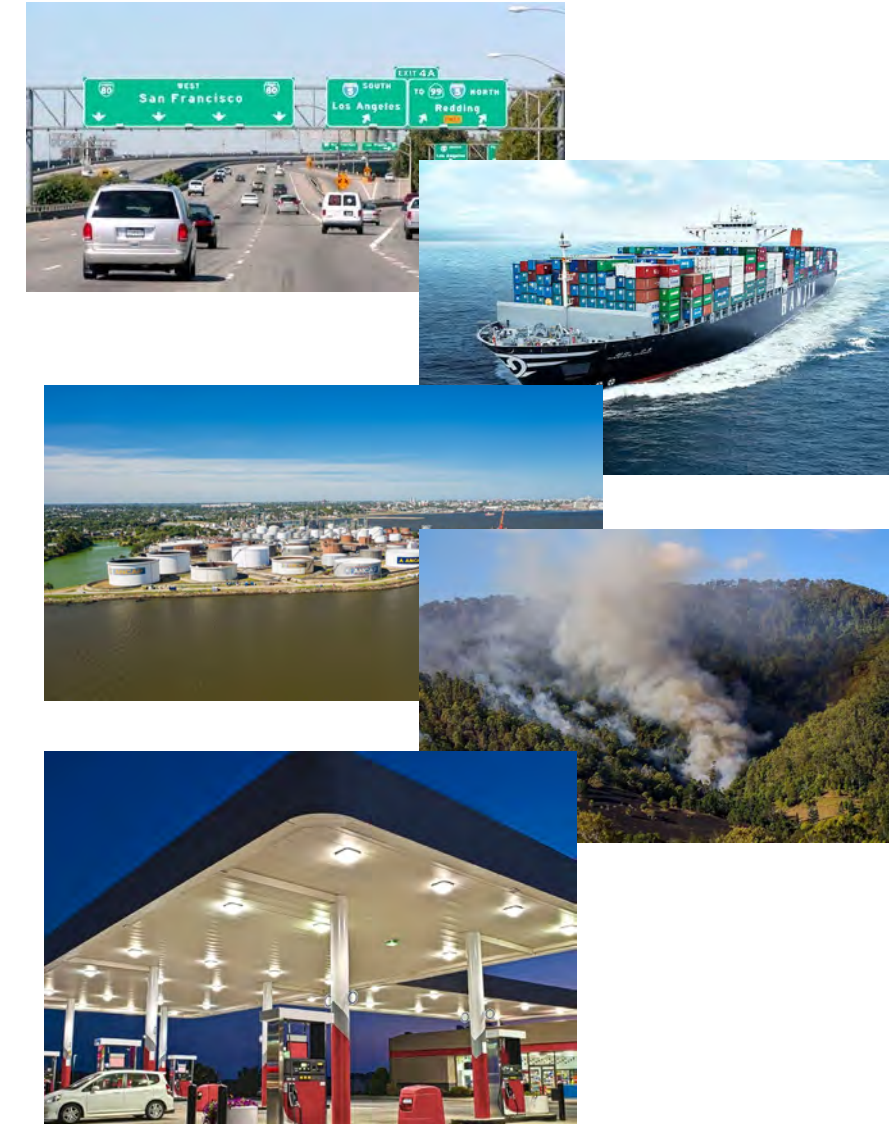
Criteria Pollutants

- Six criteria pollutants designated by the US EPA:
 - Carbon Monoxide (CO)
 - Ozone (O₃)
 - Particulate Matter (PM_{2.5} and PM₁₀)
 - Nitrogen Dioxide (NO₂)
 - Sulfur Dioxide (SO₂)
 - Lead (Pb)
- They have National Ambient Air Quality Standards (NAAQS) to protect human health and welfare
- State, local, and tribal governments monitor these pollutants to determine if NAAQS are met
- In nonattainment areas, local and state agencies are required to take action to meet standards



Air Toxics Pollutants

- The US EPA lists 188 Hazardous Air Pollutants (**HAPs**), including diesel PM, benzene, and other Volatile Organic Compounds (VOCs), and metals
- California identified over 200 Toxic Air Contaminants (**TACs**)
- HAPs and TACs can cause cancer or other serious health effects
- No NAAQS, but health-based thresholds are often available
- Multiple biogenic/anthropogenic and indoor/outdoor sources
- Exposure to HAPs/TACs is generally localized and not evenly distributed; higher impacts along transportation corridors, industrial areas, and Environmental Justice (EJ) communities

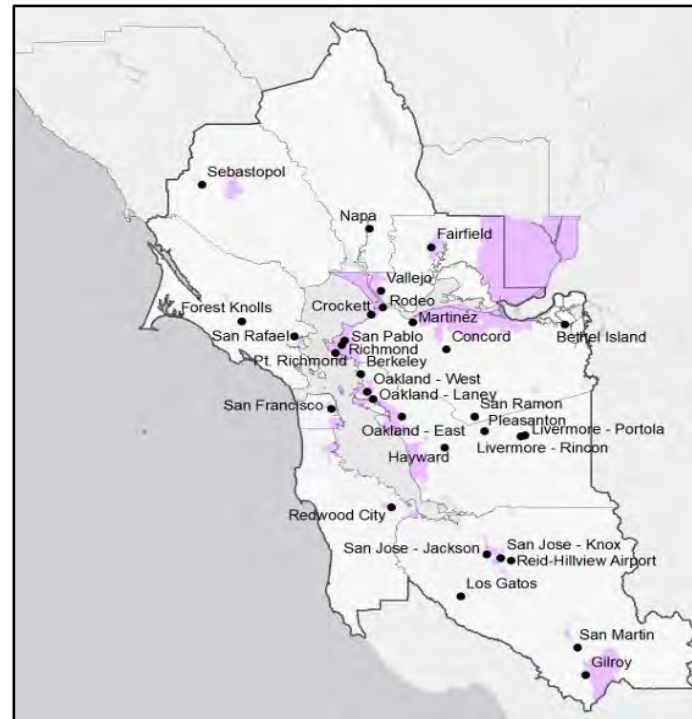


Photos courtesy of bing via Creative Commons license

Ambient Air Monitoring

Criteria

- Measured at multiple network locations
- Use of well-established, but relatively old technology



Air Toxics

- Typically, measured as part of national programs (e.g., National Air Toxics Trends Stations (NATTS), at/near specific sources, and in communities)
- Use of recently available state-of-the-art and research-grade technology



Air Toxics Efforts in the Bay Area

- Existing programs include:
 - Assembly Bill (AB) 617 community monitoring (e.g., mobile monitoring surveys) and exposure modeling
 - Refinery-focused monitoring (e.g., Rule 12-15)
 - Facility- and neighborhood-scale investigations
 - Compliance investigations
 - Incident response and special projects
 - BREATHE will be highlighted in future Annual Reports
- Current challenges and key limitations:
 - Air toxic gradients are typically localized with episodic peaks
 - Persistent disparities in overburdened communities
 - Sporadic air toxic measurements (limited spatial and temporal coverage)

There is a need for an integrated basin-wide exposure and risk framework for air toxics

South Coast AQMD's MATES Program

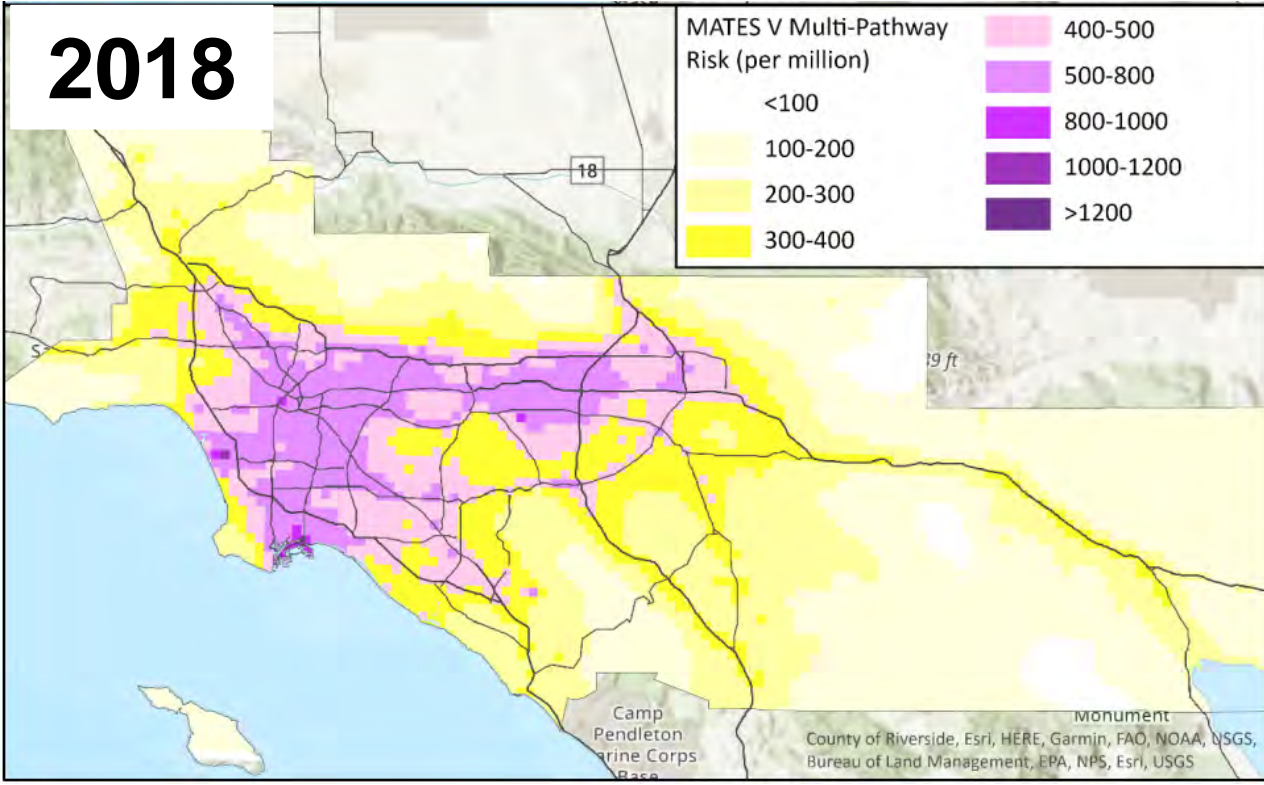
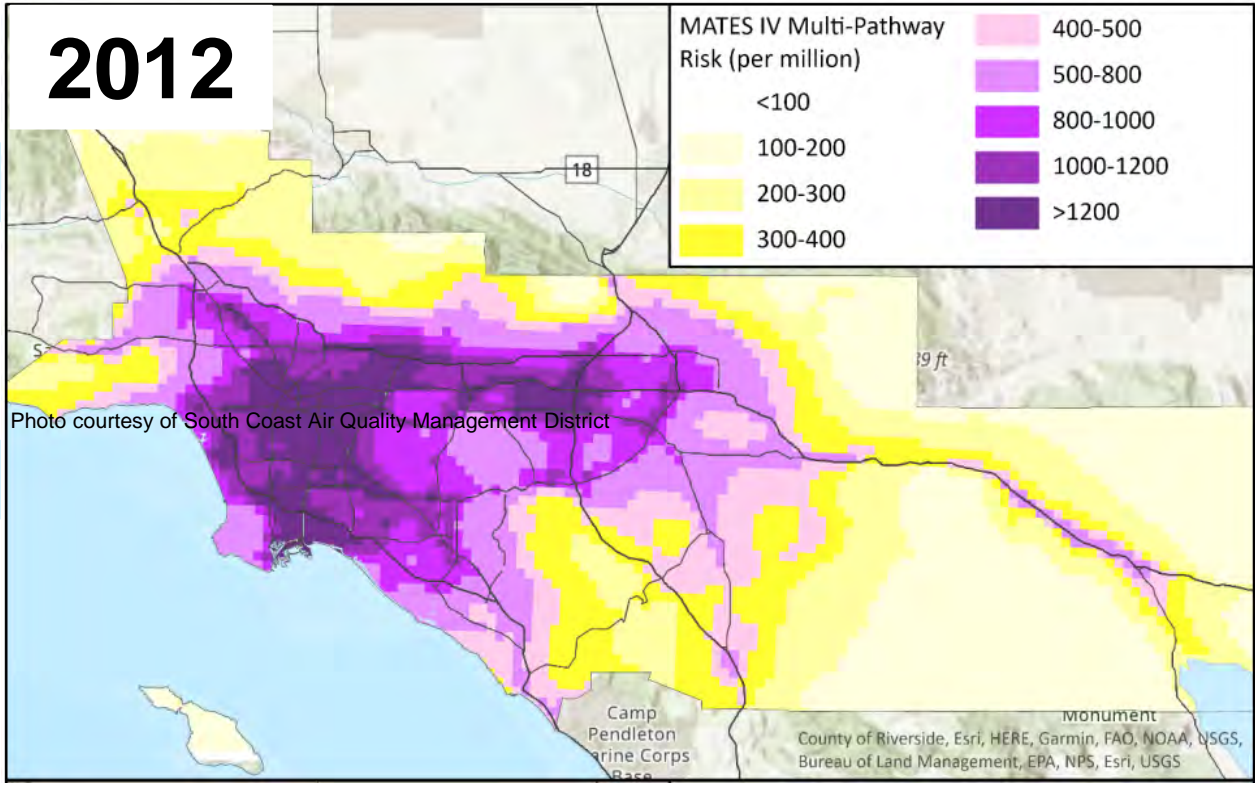
- **MATES:** Multiple Air Toxics Exposure Study
- Broad EJ initiative
- National benchmark for regional air toxics exposure studies
- Demonstrated ability to:
 - Quantify cancer and chronic risk drivers
 - Track progress over time
 - Identify major sources and hotspots
- Started in 1986; conducted every 5-10 years (MATES VI is underway)
- Resource-intensive
 - Sample collection (every 6 to 12 days) and laboratory analysis
 - Limited continuous or real-time data



Photos courtesy of South Coast Air Quality Management District (AQMD) website

MATES V: Summary of Results

(2021 Report)



Total air toxics cancer risk decreased by ~50% from 2012 to 2018, but risks are still high

All results refer to conditions experienced in the South Coast Air Basin / Photo courtesy of South Coast Air Quality Management District

MATES V: Summary of Results

(2021 Report)



Photo courtesy of bing via Creative Commons license

Diesel PM is the largest contributor to cancer risk. Benzene, 1,3 butadiene, carbonyls, and arsenic are also major contributors



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Highest air toxics cancer risk in/around the ports, but also along goods movement corridors, and major freeways

All results refer to conditions experienced in the South Coast Air Basin



Photo by Rick Loomis of the Los Angeles Times

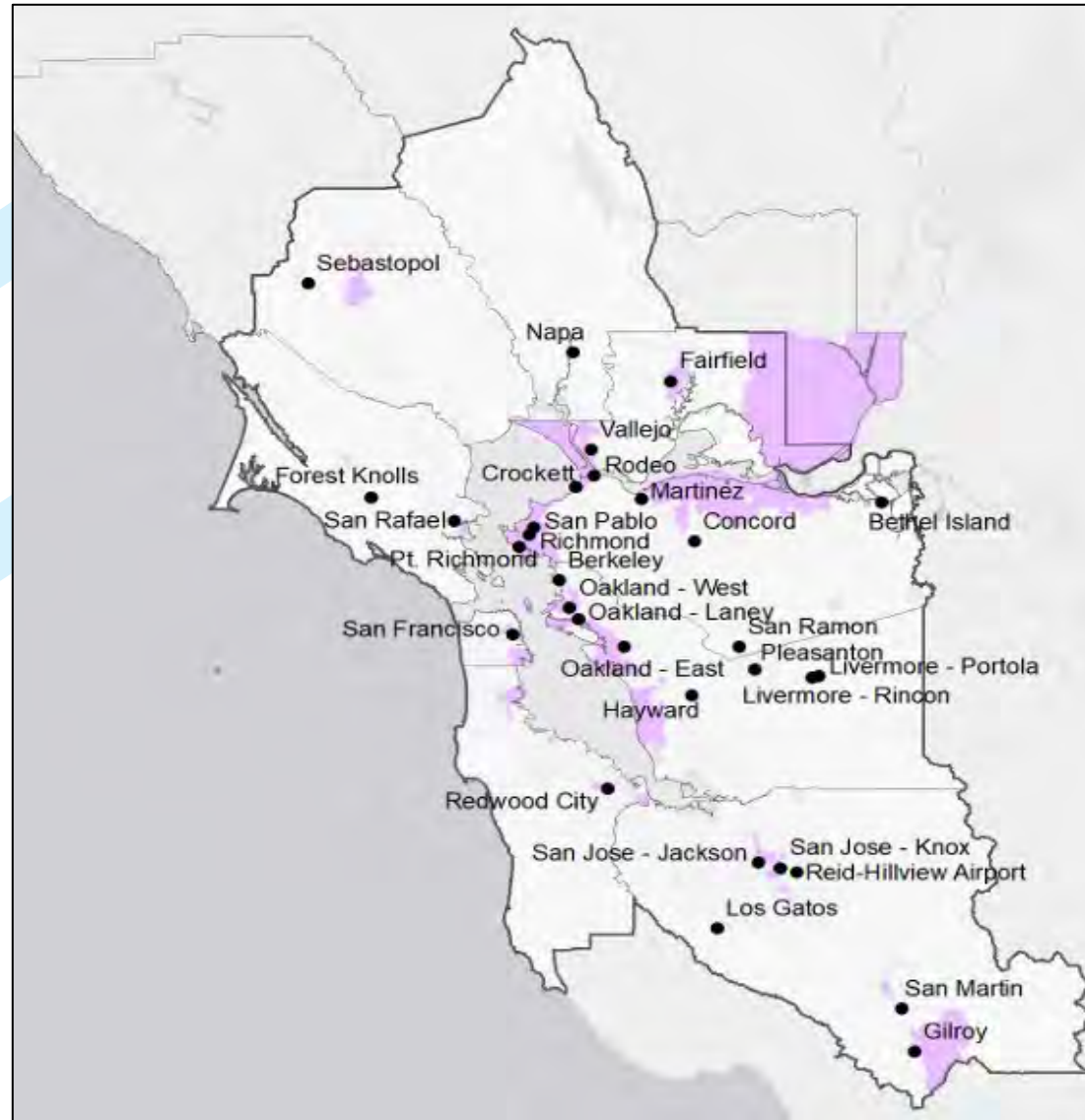
Air toxics levels in EJ communities were higher compared to Basin averages

BREATHE Study



- Form a Technical/Community Advisory Group (TAG) to guide study design and provide technical oversight
- Use advanced technology
 - Continuous air monitoring (year-round) at existing air monitoring locations

BREATHE Study – Site Selection



- Start at **five (5)** air monitoring locations representative of a basin-wide population exposure
- Prioritize areas with known or suspected elevated air toxics risk
- Leveraging existing or planned Air District air monitoring infrastructure
- Potential site locations: Redwood City, Bayview Hunters Point (BVHP), San Jose-Jackson, West Oakland, East Oakland, Vallejo, and others

BREATHE Study – Continuous Monitoring



Images represent instruments typically used for air toxics monitoring and do not necessarily depict the exact equipment proposed for this study

Photos courtesy of air quality monitoring vendors' websites

- High time resolution (1-min to 1-hour)
- Low detection limit for all relevant air toxic pollutants
- Ability to measure **diesel PM, Benzene, other VOCs, Carbonyls, Metals, and other risk drivers** continuously and in real/near-real time
- Higher capital costs, but no sample collection and lab analysis costs
- Ability to capture episodic peaks missed by traditional sampling/analysis methods
- Combined with meteorological data, it can be used for source attribution and a more refined characterization of air toxics exposure

BREATHE Study – Emission Inventory, Modeling, and Health Effects



Emissions

(Emission Inventory)



Ambient Concentrations

(Modeling, Validated by Monitoring)



Exposure

(Cancer Risk & Chronic Non-Cancer Health Impact)



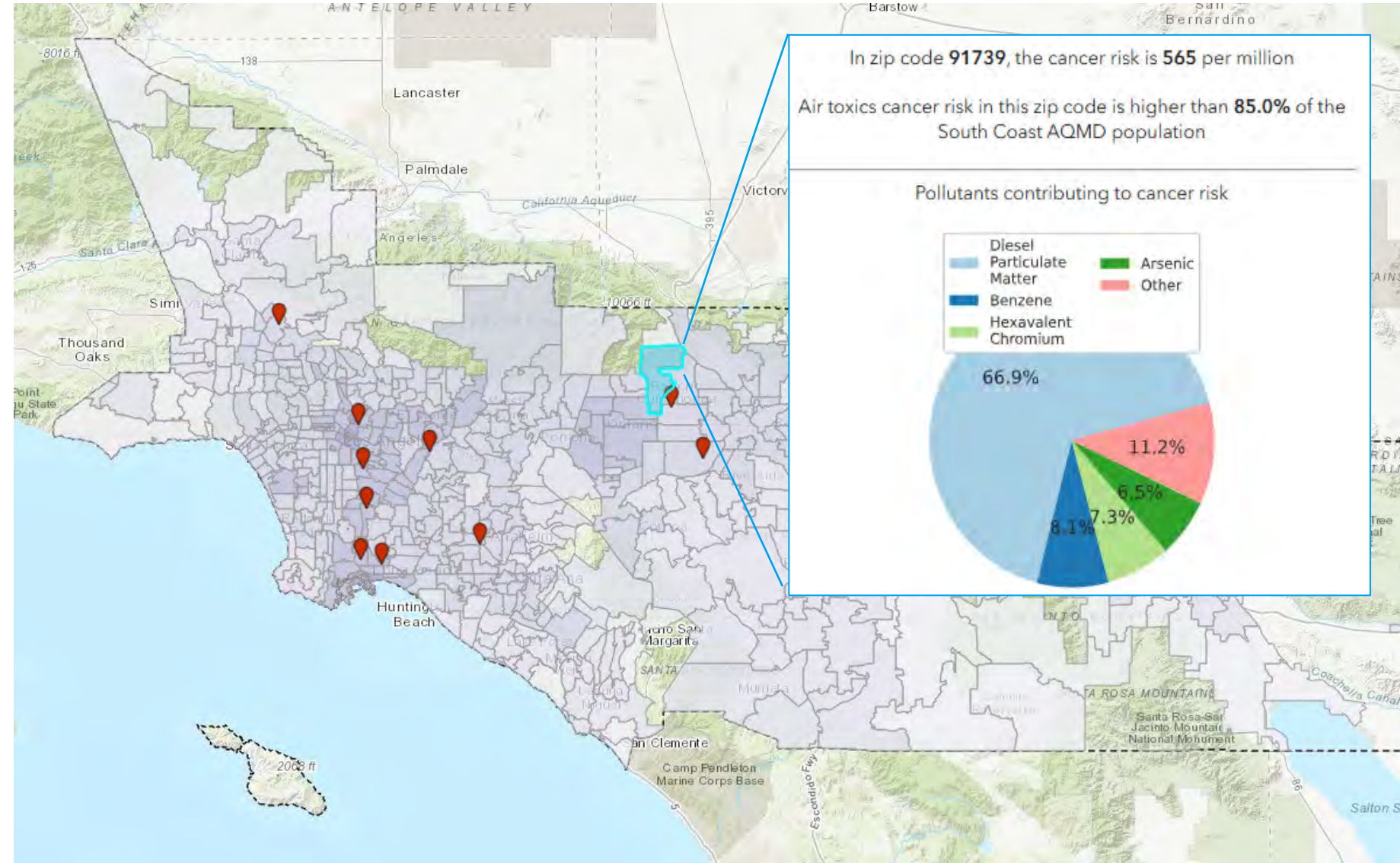
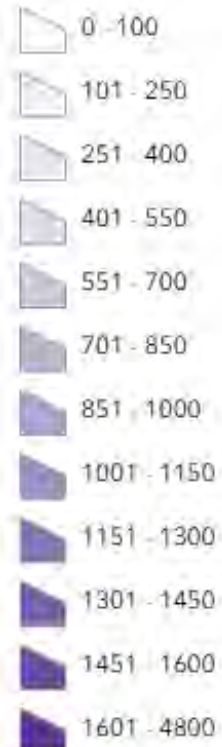
Health Effects

- Updated air toxics emissions inventory to support modeling and risk assessment
- Regional (basin-wide) modeling of all key air toxic pollutants (based on continuous data)
- Exposure and health risk assessment to characterize cancer risk and chronic hazard indices
- Assess new methodologies for estimating cumulative impact

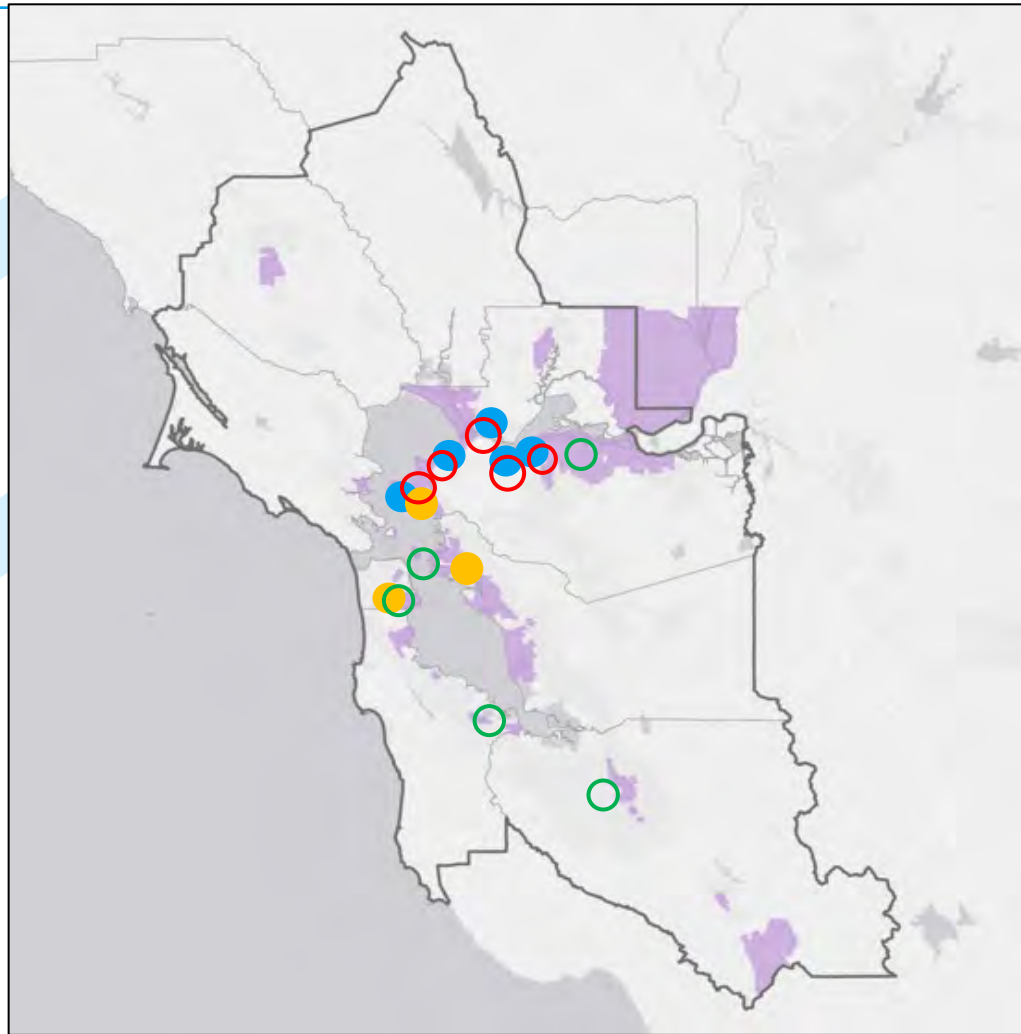
Data Visualization – Cancer Risk (MATES Example)

Residential Air Toxics Cancer Risk Calculated from Model Data

Cancer Risk [per million]



Continuous Air Toxic Measurements – Present and Future



Note: air toxic samples are also being collected and analyzed in the lab by Air District staff at ~20 locations

- Fenceline Refinery Monitoring (Rule 12-15)
 - Benzene, other VOCs, and Hydrogen Sulfide (H₂S)
 - 5 facilities (2016-present)
 - Measurements conducted by refineries with Air District oversight
- Mobile Monitoring
 - Diesel PM, benzene and other VOCs
 - AB 617 and other Bay Area communities (2022-present)
 - Measurements conducted by Air District staff
- Community Monitoring Near Refineries
 - Diesel PM, Benzene, other VOCs, and Carbonyls
 - 3 sites by the end of 2026 (San Pablo and Benicia already up and running); 2 additional sites by mid/late 2027
 - Measurements conducted by Air District staff
- BREATHE Sites
 - Diesel PM, Benzene, other VOCs, Carbonyls, and Metals
 - 5 sites by mid/late 2027
 - Measurements conducted by Air District staff

BREATHE Study – Timeline

<p><u>2026-2027 (Planning and Preparation)</u></p> <ul style="list-style-type: none"> • \$4M in Designated Reserve Funds (Approved by the Board of Directors in June 2026) • Budget approval (September Board of Directors meeting) • Form and consult with the TAG • Procuring equipment / preparing sites / deploying instruments 	<p><u>2028-2029 (Data Analysis and Report Writing)</u></p> <ul style="list-style-type: none"> • Measured and modeled data comparison • Cancer and chronic risk calculation • Source apportionment • Assessment of new cumulative impact methodologies • Draft and final report • Public outreach
<p><u>2027-2028 (Measurements and Modeling)</u></p> <ul style="list-style-type: none"> • Baseline year • Quality Assurance / Quality Control as data is collected • Quarterly updates on measured data • Emission inventory preparation • Air toxics modeling 	<p><i>BREATHE is a <u>scalable</u> project that can be expanded over time as resources allow. Instruments can be redeployed to other priority communities. This long-term investment will support ongoing risk and cumulative impact assessment efforts.</i></p>

BREATHE Study – Strengths and Benefits

- First comprehensive air toxics exposure study in the Bay Area (first ever to use continuous air toxic measurements year-round)
- Improved air monitoring capabilities for air toxics pollutants
- Continued modernization of the existing air monitoring network (additional BREATHE sites can be added over time)
- Will provide context for localized community monitoring (e.g., AB 617), near-source measurements (e.g., Rule 12-15), and past, present, and future air toxics studies

BREATHE Study – Strengths and Benefits (cont.)

- Short- mid- and long-term benefits
 - Will help identify unknown air toxics sources, and address public questions on air toxics impacts
 - Will provide defensible science for future policy and control strategies, including cumulative impact considerations)
 - Will support EJ and strategic planning priorities
 - Strategy 1.1 – Change Approach to Air Quality
 - Strategy 2.2 – Collect Community Data
 - Strategy 2.4 – Community Health Data
 - Strategy 2.7 – Understand Local Air Pollution
 - Strategy 2.11 – Cumulative Health Impacts
 - Strategy 4.4 – Improve Air Monitoring

Recommended Action

None; the Board of Directors will discuss this item, but no action is requested at this time.

Questions & Discussion

For more information:

Andrea Polidori, PhD | Deputy Executive Officer of Science |

apolidori@baaqmd.gov