



# CHAPTER 8

## Public Process

- PM2.5 Plan development has been a multi-agency effort including the California Air Resources Board, Southern California Association of Governments and U.S. Environmental Protection Agency.
- The PM2.5 Plan was developed through a robust and transparent process. Specific outreach efforts included:
  - Convening the AQMP Advisory Group and the Scientific, Technical, and Modeling Peer Review Advisory Group;
  - Holding regional public hearings;
  - Briefing the South Coast AQMD Mobile Source Committee and Governing Board on PM2.5 Plan development;
  - Providing meeting materials in Spanish and conducting public meetings in both English and Spanish languages; and
  - Conducting public meetings in both in-person and virtual formats, scheduled during both regular business hours and evening hours.
- Two written comments were received on the Draft PM2.5 Plan

## Introduction

Development of the PM2.5 Plan has been a regional multi-agency effort including South Coast Air Quality Management District (South Coast AQMD), California Air Resource Board (CARB), Southern California Association of Governments (SCAG), U.S. EPA and other entities. Staff conducted robust public outreach efforts to engage the public and interested stakeholders, solicit feedback, and ensure transparency in the development of the Plan. The following describes specific outreach activities conducted by staff regarding the PM2.5 Plan.

## Outreach Program

As a public agency, South Coast AQMD is committed to transparency and public participation during the development of State Implementation Plan (SIP) revisions. Outreach for the PM2.5 Plan aimed to achieve multiple goals including ensuring greater transparency in the process, reaching a broader and more diverse audience, and facilitating participation and engagement. The outreach program has been designed to inform the policy discussion by helping to ensure that all stakeholders have access to a common set of facts. Public awareness of federal requirements for PM2.5 SIPs and having appropriate background information are vital to engaging in a meaningful dialogue on the PM2.5 Plan.

Clean air goals cannot be achieved solely by the decisions and actions of South Coast AQMD. Stakeholder engagement is critical to the development of a successful plan. Stakeholders include community groups, businesses, environmental organizations, academia, and local, regional, state, and federal government entities. Table 8-1 lists specific stakeholder groups participating in PM2.5 Plan development.

**TABLE 8-1  
STAKEHOLDERS PARTICIPATING IN PM2.5 PLAN DEVELOPMENT**

Stakeholder Category	Agency/Stakeholder Group
Public Agencies	<ul style="list-style-type: none"> <li>• CARB</li> <li>• U.S. EPA</li> </ul>
Local/Regional Government	<ul style="list-style-type: none"> <li>• SCAG</li> <li>• Councils of government/associated governments</li> <li>• Transportation commissions</li> </ul>
Special Districts	<ul style="list-style-type: none"> <li>• Sanitation districts</li> <li>• Water/power districts</li> </ul>
Community/Health/Environmental Groups	<ul style="list-style-type: none"> <li>• Public health departments/associations</li> <li>• Environmental justice organizations</li> <li>• Environmental advocacy groups</li> </ul>
Academia/Research	<ul style="list-style-type: none"> <li>• Universities</li> </ul>

Stakeholder Category	Agency/Stakeholder Group
	<ul style="list-style-type: none"> <li>• National laboratories</li> </ul>
General Public	<ul style="list-style-type: none"> <li>• Residents</li> <li>• Interested parties</li> </ul>
Business	<ul style="list-style-type: none"> <li>• Energy industry (electricity, petroleum production and refining, natural gas, biofuels, renewables, etc.)</li> <li>• Goods movement and logistics (warehousing, trucking, railroads, ports/shipping/freight)</li> <li>• Printing/coating industry</li> <li>• Airport/airline operations</li> <li>• Chambers of commerce/business councils</li> <li>• Trade associations</li> <li>• Labor organizations</li> <li>• Small businesses</li> </ul>

## Advisory Group Meetings

Staff convened the AQMP and Scientific, Technical, and Modeling Peer Review (STMPR) Advisory Groups to provide feedback and recommendations on the development of the PM2.5 Plan. Advisory Group meetings were conducted in a hybrid format with in-person participation required for Advisory Group members, while members of the public were allowed to provide comment in-person or remotely. Special accommodations were offered to those with disabilities or those requiring translation. Both Advisory Groups met periodically throughout PM2.5 Plan development as shown in Table 8-2.

The AQMP Advisory Group represents a diverse cross-section of stakeholders, such as large and small businesses, labor associations, government agencies, environmental and community groups, and academia. Together, the Advisory Groups reviewed the overall aspects of the PM2.5 Plan and made recommendations concerning emissions inventories, modeling, control measures, and socioeconomic impacts, including:

- Reviewing and providing comments on: (a) studies relevant to advancing scientific and technical knowledge in support of AQMP preparation; (b) emissions inventory development and modeling approaches; (c) the development of new and revised control measures; and (d) socioeconomic data and evaluations;
- Fostering coordinated approaches toward overall attainment strategies; and
- Assisting in resolving key technical issues.

The STMPR Advisory Group consists of experts in the field of socioeconomic modeling, air quality modeling, and atmospheric science. The duties of this advisory group included reviewing and providing

feedback on air quality modeling, socioeconomic modeling techniques and making recommendations for and comments on proposed modeling approaches for attainment demonstration, precursor analysis, near-road attainment approach and emissions inventory.

**TABLE 8-2  
ADVISORY GROUP MEETINGS FOR THE PM2.5 PLAN**

Date	Meeting
5/25/2023	AQMP Advisory Group Meeting
7/13/2023	AQMP Advisory Group Meeting
8/3/2023	STMPR Advisory Group Meeting
10/11/2023	STMPR Advisory Group Meeting
11/8/2023	AQMP Advisory Group Meeting

### South Coast AQMD Governing Board Meetings

Before South Coast AQMD makes decisions that affect local residents and businesses, ideas and comments from the public must be considered. The opportunity to comment begins weeks prior to public workshops and ends with a public hearing by the South Coast AQMD Governing Board, where the Governing Board may vote to adopt a plan as proposed or with changes. Anyone may testify or present written comments. Holding public workshops, recording oral and written comments, responding to those comments, publishing draft plans, holding public hearings and voting publicly are all based on set procedures. Documenting the process is necessary to ensure public participation, fairness, and an accurate account to which interested parties can refer to in the future. The Governing Board meets at South Coast AQMD's Diamond Bar headquarters on the first Friday of each month. In addition, select members from the South Coast AQMD Governing Board are also members of the Mobile Source Committee, which periodically reviewed PM2.5 Plan development. South Coast AQMD released the Draft PM2.5 Plan on March 22, 2024. Table 8-3 lists the South Coast AQMD Governing Board and Mobile Source Committee meetings in which PM2.5 Plan development was or will be discussed.



**TABLE 8-3**  
**SOUTH COAST AQMD GOVERNING BOARD ACTIVITIES FOR THE PM2.5 PLAN**

Date	Meeting
3/17/2023	South Coast AQMD Mobile Source Committee
10/20/2023	South Coast AQMD Mobile Source Committee
3/15/2024	South Coast AQMD Mobile Source Committee
4/5/2024	South Coast AQMD Governing Board Meeting
6/7/2024	South Coast AQMD Governing Board Meeting

## Regional Public Hearings

Regional public hearings are held prior to taking a proposed plan or other significant action to the South Coast AQMD Governing Board to allow public input before Governing Board members vote on plans. Regional public hearings for the PM2.5 Plan ~~will be~~ held in April – May 2024 as shown in Table 8-4. Meeting materials for the regional public hearings ~~will be~~ translated to Spanish and ~~there will be one all meeting hearings that features~~ were provided with live Spanish translation.

**TABLE 8-4**  
**SOUTH COAST AQMD REGIONAL PUBLIC HEARINGS SCHEDULE FOR THE PM2.5 PLAN**

Date	Meeting
4/23/2024	PM2.5 Plan Regional Public Hearing – San Bernardino County
4/24/2024	PM2.5 Plan Regional Public Hearing – Riverside County
4/25/2024	PM2.5 Plan Regional Public Hearing – Orange County
5/1/2024	PM2.5 Plan Regional Public Hearing – Los Angeles County

## Language Accommodations

According to the U.S. Census Bureau, almost 51% ~~–~~ percent of the population in the counties under South Coast AQMD jurisdiction speaks a language other than English.<sup>1</sup> The Spanish language is the second most common language spoken after English, where about 35% ~~–~~ percent of the population in the counties under South Coast AQMD jurisdiction speaks Spanish.<sup>2</sup> To facilitate greater participation and engagement of the public, including Spanish-speaking community members, South Coast AQMD staff posts a Spanish

<sup>1</sup> 2022 American Community Survey:

<https://data.census.gov/table?q=language&g=050XX00US06037,06059,06065,06071>

<sup>2</sup> Ibid.

version of meeting notices, agendas, and presentations for key public meetings on the South Coast AQMD meeting webpages. Key public meetings include Regional Public Hearings and Governing Board meetings. Live Spanish translation will be provided at these meetings. Translation services are offered upon request for all other public meetings. In addition, most meetings are conducted via videoconferencing and closed captioning is available for deaf audiences.

## Written Comments and Responses to Comments

Two written comments were received on the Draft PM2.5 Plan. Responses to these comments are provided below.

### Comment Letter #1

**From:** Dave Hall <bittermelondave@gmail.com>

**Sent:** Sunday, March 24, 2024 9:14 PM

**To:** AQMPTeam <AQMPteam@aqmd.gov>

**Subject:** [EXTERNAL] Draft Plan Comments-South Coast Air Basin Attainment Plan for the 2012 Annual PM2.5 Standard

Dear AQMD:

After reviewing the Environmental Justice Plan, Chapter 7 of the Draft document, I was dismayed that only a few examples of ways to reduce emissions in West Long Beach where I live were suggested. Primarily the document only focused on reducing school bus emissions in Chapter 7. Couldn't many other methods be used to reduce air pollution in the port communities and other areas with high emissions. Chapter 7 is lacking real tangible ways to address environmental justice and is cursory at best.

Comment  
1-1

Respectfully,

DAVE HALL

1047 Chestnut Avenue

Long Beach, CA 90813-2921

Response to Comment 1-1: South Coast AQMD recognizes the importance of reducing pollution in port communities and has designated the area of Wilmington, Carson, and West Long Beach (WCWLB) as an AB-617 community. AB-617 is a state program that addresses the disproportionate impacts of local air pollution in disadvantaged communities. South Coast AQMD is implementing a Community Emission

Reduction Plan for WCWLB and is committed to prioritizing incentives and rulemaking efforts to reduce pollution in these communities.<sup>3</sup>

While Chapter 7 of this Plan describes air quality impacts experienced in environmental justice communities and outlines some of the steps South Coast AQMD is taking to address localized impacts, Chapter 4 and Appendix IV-A present the specific emission reduction measures that will be needed to attain the 2012 annual PM2.5 standard by 2030. Control measure MOB-01: Emission Reductions at Commercial Marine Ports seeks to reduce emissions from port-related sources through a rule, incentives, and/or other voluntary programs. MOB-01 seeks to reduce air pollution from some or all port-related sources (e.g., on-road heavy-duty trucks, cargo handling equipment, harbor craft, marine vessels, locomotives, and stationary equipment), to the extent that cost-effective and feasible strategies are available. The goal of this measure is to assist in achieving the committed emission reductions described in the State Implementation Plan Strategy related to on-road heavy-duty vehicles, off-road equipment, and federal and international sources that operate in and out of the Ports of Los Angeles and Long Beach. South Coast AQMD encourages all interested stakeholders to participate in the public process associated with MOB-01.<sup>4</sup>

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<sup>3</sup> <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/ceqp/final-cep-wcwlb.pdf?sfvrsn=8>

<sup>4</sup> <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-2304>

## Comment Letter #2



Ontario International Airport Administration Offices

1923 E. Avion Street, Ontario, CA 91761

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Chief Executive Officer

**LORI D. BALLANCE**  
General Counsel

**May 6, 2024**

Dr. Sang-Mi Lee, Planning and Rules Manager  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765-4178

Dear Dr. Lee,

The Ontario International Airport Authority (OIAA) has submitted this comment letter on the Draft South Coast Air Basin Attainment Plan for the 2012 Annual PM<sub>2.5</sub> Standard (Draft PM<sub>2.5</sub> Plan) to request that the Draft PM<sub>2.5</sub> Plan be updated to accurately reflect Ontario International Airport's (ONT) forecasted aviation-related activity data and corresponding emissions.

According to the Draft PM<sub>2.5</sub> Plan, the emissions inventory for all sources was derived from the emissions inventory developed for the 2022 Air Quality Management Plan (2022 AQMP).<sup>1</sup> The primary differences in the emissions inventories between the 2022 AQMP and the Draft PM<sub>2.5</sub> Plan are: (1) the switch from EMFAC2017 to EMFAC2021 for on-road sources, and (2) a small change in construction equipment emissions for off-road sources.<sup>2</sup> As we understand it, there have been no updates to the aircraft emissions in the Draft PM<sub>2.5</sub> Plan (i.e., none since the 2022 AQMP).

As discussed in our prior comment letter (dated July 5, 2022) on the then-draft 2022 AQMP, the aircraft emissions analysis in that regional planning document was not indicative of future operations at ONT. Indeed, the aircraft fleet mix

<sup>1</sup> South Coast Air Quality Management District. 2022. Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>

<sup>2</sup> The Draft PM<sub>2.5</sub> Plan states that "after the development of the 2022 AQMP, an error was discovered in the emission allocations for in-use emissions from off-road construction equipment in Riverside County. This error only affected future year emissions and is now corrected in this Draft PM<sub>2.5</sub> Plan."

www.flyontario.com

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Comment  
2-1



used in the 2022 AQMP's analysis is not indicative of the aircraft fleet mix using ONT today. Since the aircraft emissions assumptions remain unchanged from the 2022 AQMP to the Draft PM<sub>2.5</sub> Plan, the Draft PM<sub>2.5</sub> Plan erroneously continues to underrepresent the potential emissions at ONT for future years.

OIAA began a review of ONT's activity forecasts in late 2021, due to the ongoing COVID recovery trends and anticipated projects at ONT. In the process of that review, OIAA discovered that aviation forecast data for ONT previously provided to AQMD was inaccurate and outdated. These inaccurate assumptions led to a significant underrepresentation of aircraft emissions for ONT in the 2022 AQMP. In order to align the Draft PM<sub>2.5</sub> Plan with the anticipated future aviation-related operations at ONT, OIAA is requesting the forecast and fleet mix assumptions for ONT be updated in the Draft PM<sub>2.5</sub> Plan. OIAA is happy to provide more accurate aircraft fleet mix data for ONT, both current and forecast, for your use.

OIAA looks forward to working with AQMD to resolve this issue that currently exists in the Draft PM<sub>2.5</sub> Plan. We believe it is imperative that AQMD's regional plans more accurately reflect ONT's forecasted aviation activity data and related emissions for purposes of addressing both air quality issues in the South Coast Air Basin and ONT's continued ability to operate to provide important services for the benefit of the region. Please do not hesitate to contact me to facilitate further discussions on this important topic.

Sincerely,



Karen Kavanagh  
Interim Chief Capital Development Officer  
Ontario International Airport

Comment  
2-1 Con't

Response to Comment 2-1: South Coast AQMD appreciates Ontario International Airport Authority's (OIAA) concerns regarding the aircraft emissions inventory for Ontario Airport. Please refer to response to comment 61-1 for the 2022 Air Quality Management Plan (AQMP).<sup>5</sup> The 2022 AQMP aircraft emissions inventory was developed through an extensive public process that began in May 2020 and included multiple Aircraft Mobile Source Working Group Meetings. The PM2.5 Plan emissions inventory is based on that of the 2022 AQMP with only minor changes and updates reflected. Although the PM2.5 Plan does not revise the aircraft emissions inventory, South Coast AQMD anticipates that the next major emissions inventory update will occur during development of the attainment plan for the 2024 annual PM2.5 standard. OIAA is encouraged to participate in the public process for that plan and work with staff to incorporate changes in the fleet mix and growth projections at Ontario Airport.

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<sup>5</sup> <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/responses-to-comments-volume-i.pdf?sfvrsn=6>