Community Air Monitoring Plan Appendix J

California Statewide Mobile Monitoring Initiative (SMMI)
Public Comments and Responses

aclima

Prepared by Aclima

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The Statewide Mobile Monitoring Initiative is part of California Climate Investments, a statewide initiative that puts billions of Cap-and-Trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment — particularly in disadvantaged communities.

Public Comment Period for SMMI

A two-week public comment period was opened for most CAMPs on May 19, 2025. CAMPs for the communities of Salton City, Fairmead, Van Nuys, (North Sacramento, Del Paso Heights and Norwood), South Tulare and Matheny Tract, Le Grand, and Lanare opened for public review on May 28, 2025 and also had a two-week public review period. The following public comments were received during these respective periods and Aclima's responses are included in the table below.

First and Last Name Nombre y Apellido	Select the community. Seleccione la comunidad.	What is your comment? ¿Cuál es su comentario?	Aclima Response Respuesta de Aclima
Tom Edmunds	Tri-Valley	The CAMP document looks great. A lot of detail on how Aclima is going to take, process, curate, and communicate the measurements. I have three suggestions: 1) On page 9, Tom Edmunds (tomedmunds@tvagca.org) should be listed as the engagement lead, not Terry Chang as shown. 2) Figures 2 through 8 are fuzzy. Higher resolution images are available from TVAQCA. 3) There is no Figure 1 in the report. You could label the graphic on page 2 as Figure 1 and retain the rest of the figure numbers. Then the figure numbers in the CAMP would coincide with the figure numbers in TVAQCA's community profile report. Regards, Tom Edmunds	1) Changed email address 2) Figures 2-8 have been replaced with sharper images 3) All figure numbers have been updated

Ron Baskett	Tri-Valley	Best resolution TVAQCA original figures to be included in our CAMP have been uploaded to our shared folder	Figures 2-8 have been replaced with sharper images
Armond Bradford	Oak Park, Fruitridge (Sacramento)	Are you doing any personal monitoring?	We are conducting mobile air quality monitoring only. Personal monitoring devices are not being used as part of this initiative.
Sara Pacheco	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Si pudieran sembrar más arboles para qué mejore la calidad de aire	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Claudia Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality in the San Fernando Valley is in poor condition, especially in areas where toxic companies, waste dumps, and the Whiteman Airport are located. In addition, waste from recent fires has been dumped in communities like Sylmar and Sun Valley, further contributing to pollution and health concerns in these neighborhoods.	The Whiteman Airport is already the subject of a targeted area study. Additionally, both this source as well as waste management facilities along Glen Oaks Boulevard in Sun Valley will be monitored as part of the initiatives "broad area monitoring". While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP.
Maria Magana	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad and apart from us	While we likely will not be able to identify specifically whether waste

		they are bringing us all the debris from the fires that are going to make it worse for a more.	from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP.
Claudia Ramos	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	As a Sylmar resident, I'm devastated by the poor air quality our community continues to endure. We are being impacted by debris from recent fires that has been dumped in both Sylmar and Sun Valley. On top of that, many local fabrication shops that cut and grind quartz are releasing harmful crystalline silica into the air. These pollutants are severely affecting our health and quality of life, and something needs to be done to protect our communities.	Without having specific location information about these fabrication shops, we cannot say whether they would get covered by our monitoring plan. However, our vehicles will be measuring particulate matter (PM) throughout the community and it may be possible to identify locations where PM hot spots exist in the vicinity of these shops. We have added this to the list of concerns in the CAMP.
Isabel cabrera	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad and apart from us they are bringing us all the debris from the fires that are going to make it worse for a more.	While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP.

Nererida Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	As a concerned resident of Sun Valley , I'm deeply troubled by the ongoing air quality issues plaguing our community. The aftermath of recent fires has resulted in debris being dumped in both Sylmar and Sun Valley, worsening our already fragile environment. Additionally, the dust and crystalline silica released by nearby quartz fabrication shops pose a serious health risk. These combined pollutants are not only degrading our air but also endangering the well-being of our families. Immediate action is needed to address these environmental hazards and safeguard our communities.	While we likely will not be able to identify specifically whether waste from the recent fires is contributing to air quality problems in the community, we will be able to measure some key pollutants typically associated with landfills such as methane, particulate matter (PM), and volatile organic compounds (VOCs). These concerns are already listed in the CAMP. We have added the concern about crystalline silica to the community concerns table.
Sergio Magana	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad, we urgently need your help.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Claudio Arias	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The San Fernando Valley, a sprawling suburban region of Los Angeles, has long struggled with air pollution but recent days have seen air quality levels dip to particularly concerning lows. With a combination of rising temperatures, stagnant weather patterns, and high vehicle emissions, smog and particulate matter have become a serious health hazard for residents. Geographically, the Valley's	Thank you for your comment and for sharing your knowledge about your community.

		bowl-like shape traps pollutants, making it one of the most affected areas in the county when it comes to poor air quality. During warmer months, ozone levels frequently exceed safe thresholds, putting vulnerable populations especially children, the elderly, and people with respiratory conditions at risk. Residents have reported increased respiratory issues, eye irritation, and fatigue during days with high AQI (Air Quality Index) readings. Officials have advised people to limit outdoor activities, especially during peak smog hours in the afternoon. Experts emphasize the need for systemic solutions, including reducing emissions from vehicles, transitioning to clean energy sources, and increasing urban greenery. While individual actions like driving less or using air purifiers can help on a small scale, addressing the root causes requires collective effort and policy changes. The bad air quality in the San Fernando Valley is not just an environmental issue it's a public health crisis that demands immediate attention.	

Luisa Bedolla	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air here in the San Fernando Valley is very bad, we urgently need your help.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Fidel Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality in the San Fernando Valley is in bad condition and is affecting our communities.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Adrian Escobedo	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality is hell affecting us due to the White Man Airport.	Whiteman Airport will be the subject of targeted area monitoring as part of this study.
Manny Escobedo	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that the air quality is affecting us and I would like a air monitor by Whiteman airport.	Whiteman Airport will be the subject of targeted area monitoring as part of this study.
Crystal Lopez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that as a resident of Sylmar the air quality has been really bad and has been affecting my health. I been having asthma since I was a child and I been living in Sylmar for over 30 years.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Maria Ramos	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment as a resident of Sylmar I would like to say that I been having struggling with health issues due to the bad air quality that I have in my community and especially now that we are receiving the debris from the recent fire.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Vanessa Vasquez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	My comment is that as resident of Sun Valley we been getting affected by the waste dumpsters we have and all the landfills.	As part of broad area monitoring in this community, we will be monitoring in the Glenoaks Blvd area of Sun Valley with a focus on sources that include recycling and waste plants.
meryl siegal	West Berkeley	We are trying to ascertain what the	Thank you for your comment on

		plan is. At our meetings we discussed the need for a thorough look at San Pablo avenue as well as two blocks up from San Pablo on Cedar because of the Accordion Buses that emit not only diesel emmissions toxic fumes but also particles from the heavy tires. We need to see if this is influencing air quality . We also discussed University avenue and Dwight as well (Anywhere in west berkeley where these PPMs can co-conbine with industry to create ultra ppm's that harm children and the elderly in these areas.	West Berkeley's CAMP. The streets that you mentioned in your comment are included in the broad area monitoring plan, described in Section 8.2 of the plan. You are also welcome to explore the West Berkeley broad monitoring area through this link: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.86943,-122.3005,14.52z
Daniel Polk	Colton, Grand Terrace, San Bernardino	I'm with HARC. We did the community engagement for this CNC. The Targeted Area Monitoring for the San Bernardino/Colton/Grand Terrace CNC lists only one location, and it's a location that we recommended excluding in our Meeting 2 feedback—it's simply a new warehouse facility that only two community members had suggested in Meeting 1 (without high priority). (Apologies if this feedback wasn't clear and for our last-minute feedback submission). There are *five locations* that community members strongly recommended including. Could all or some of these locations be	After reviewing your list here, we are able to add the AIM recycling facility, Leemco Piping, and Copart as secondary monitoring objectives because thay are in the immediate vicinity of these new warehouses. We have added these secondary objectives to the CAMP. The BNSF railyard was in the area that Aclima monitored in 2021 and it was found that diesel particulate matter was impacting the communities directly to the northeast; this same area is part of the SMMI broad area monitoring boundaries and we can do comparisons with the original data set from 2021. The remaining concerns are all within the broad area monitoring boundaries, so the

		included for Targeted Area Monitoring? Here are the location is rough order of importance: 1. BNSF Intermodal Rail Yard 301 Flower St. San Bernardino, CA 92411 2. Condor Energy Storage Project (battery storage facility) 21658 Main Street Colton, CA 92313 3. (a) AIM Recycling facility 785 E M St, Colton, CA 92324 (b) Leemco Piping Solutions, Inc 360 S Mt Vernon Ave, Colton, CA 92324 [Note: AIM Recycling and Leemco Piping Solutions are across the street from each other--perhaps they can be included as a single targeting area] 4. Inland Regional Material Recovery Facility (operated by CR&R) 2059 E. Steel Road Colton, CA 92324 5. Copart - San Bernardino (the name of a car auction facility in Colton, CA) 1203 S Rancho Ave Bldg 1 Colton, CA 92324	Condor Energy Storage facility, for example, can be included as part of the broad area monitoring objectives; we can characterize locations where TVOCs are emitted, though we will not be able to characterize the specific air toxics being emitted.

Tom Edmunds	Tri-Valley	Figures 2-8 are not clear. Higher resolution figures have been placed in the TVAQCA-Aclima shared folder for your use.	Figures 2-8 have been replaced with sharper images.
Ashley Simon	South Natomas (Sacramento)	I may have misunderstood the report, but the community voted on Northgate having more specific monitoring. Northgate was identified as a specific area of concern.	Thank you for your comment on South Natomas' CAMP. Northgate Blvd will be a focus of a special monitoring study, as described in Section 8.3 of the plan.
STOP THE RIDERS FROM STIRRING ALL THE TOXIC DIRT!	Salton City	Clean up this toxic mess!	Thank you for your comment. We hope that the data produced by this project helps communities and other decision-makers to take actions for healthier air.
Agustina Rodriguez	Van Nuys	Me gustaria que hubiera mas Arboles en la comunidad.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Josefina	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Me gustarian mas arboles y mas espacios para los niños.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Mateo virves	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Arboles juegos con springols para los niños	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Silvia Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles y menos carros como que hubiera un dia de no circular.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto

			para abogar por este tipo de acciones.
Sam Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I would like to see more green spaces in my community for gatherings and better systems of transportation like a more efficient bus system.	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Silvia Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Close to the train rails, and all of the FWYS, especially along the 5, and the 118, all of them. There is a lot of contamination here in Pacoima. And along Sun Valley where the waste management site.	The waste management in Sun Valley is within the broad area monitoring. In addition, freeways will generally be monitored due to driver commuting, even if they don't appear within the broad area boundary in the CAMP.
Claudia Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles y calles mas limpias de basura y menos fabricas contaminantes.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Que las personas no tiraran tanta basura para que no contaminen.	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Emma Contreras	Gracias por su comentario.
Ramona Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y que las personas agan recoclage de basura.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Maria Guadalupe	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Muchos arboles y mucha limpieza en las calles que no contaminen.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Sergio Olivares	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas parques para los niños y calles mas limpias.	Gracias por su comentario. Le animamos a utilizar los datos de

			calidad del aire de este proyecto para abogar por este tipo de acciones.
Rosario Aguirre	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que no halla mas plastico en venta para qur no contamine el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Dominga Berdusco	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que hubiera mas arboles.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Yani cabrera	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Maa arboles menos basura que contamine el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Jesus de Santiago	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Maa jardines donde pueda haber una sona de descanzo con mucha vegetacion y relajarse.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Cindy Ortiz	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y parques y mas seguridad y menos basura en las calles.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Rafaela Peralta	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Que alla mas reforestaciones en los Arboles y cuidar de ellos y cuidar las plantas verdes.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.

Vanessa Sandoval	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Monitor air pollution around airports	Whiteman Airport will be the subject of targeted area monitoring as part of this study.
Sofia Maldonado	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Mas arboles y parques las calles mas limpias para que no contaminen el aire.	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Alejandra Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Cleaner air	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
melanie torres	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	cool pavement to cool the ambient air temperature!!!	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Erick Duran	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The air quality isn't that bad it's pretty good compare to other areas	Thank you for your comment.
Jovan sanchez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air needs to be good	Thank you for your comment.
Giovanni Hernandez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air quality improvement	Thank you for your comment.
Enrique soria	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Good	Thank you for your comment.
Serenity Flores	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Fix air please, thank you	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Cristian	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Bad air quality .	Thank you for your comment.

Leonel Meza	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I feel that the air quality here is ok not the best though.	Thank you for your comment.
Andrea Parra	Van Nuys	Fix plants and air . thank u	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
emireth gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	air. clean. now. thanks. :D	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Angel Morales	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Good	Thank you for your comment.
Fabian Torres	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	The pollution is bad from cars and planes .	Whiteman Airport will be the subject of targeted area monitoring as part of this study. Freeways will generally be included for monitoring as well. Please see the CAMP for other areas that we will be monitoring air quality in areas with vehicle traffic.
Gael Gonzalez	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air is clean in my opinion, i'm able to breath good with no problems that being that I have asthma.	Thank you for your comment.
Angel Garcia	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	I just hate how they never think about the near by community before dumping.	Thank you for your comment.
Stefan Strong	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Air quality could be improved especially in the economically poor areas	Thank you for your comment. We encourage you to use this project's air quality data to advocate for these types of actions.
Cesar Aguirre	North Bakersfield	I would like to add in a locations for priority in North Bakersfield. The	The TRICOR facility has been added to the CAMP as an area of

		TRICOR facility at 1134 Manor St, Bakersfield, CA 93308, has issues. We have received several IVAN reports on different instances of strong smells coming for this site. This site was also noted as a problematic facility in the second community meeting with CRPE. From testimonies gathered during community canvassing there is strong crude like smells that emanate from this site, usually during non operational hours. There was also a emission loss event earlier this year that covered the neighboring community in small asphalt globules. Residents mentioned that some asphalt has covered the community on several locations. Due to the consistent and strong smells coming from this facility and the high heavy truck traffic in to the facility I recommend adding this site to a priority monitoring.	community concern and will be included in the targeted area study conducted by Aerodyne.
Irma Camarena	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Me gustaría en el área de pacoima	Puede explorar el mapa de la zona de Pacoima en la que estamos llevando a cabo el monitoreo de la calidad del aire aquí: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.25761,-118.41925,14.32z
Rosa Ruiz	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Sheldon Arleta Park or Byrd Middle School	Byrd Middle School is within the broad area monitoring boundary.

			Unfortunately, we were not able to monitor everywhere and Sheldon Arleta Park is not within our monitoring area. However, it is adjacent to the monitoring border, as well as nearby freeways, where monitoring will occur. This means that you may be able to get a sense of pollution levels in the general vicinity of Sheldon Arleta Park even though monitoring will not occur on the streets directly surrounding it.
Luis Romero	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Panorama City	Panorama City was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf
Genrich Criste	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	1. Encourage Clear, Timely Communication with Residents Consider creating a simple, visual timeline or flyer to let residents know exactly when and where the monitoring will happen. Many in the community may not read a full CAMP report but would engage with accessible updates. 2. Prioritize Youth and School Engagement Given the high youth population and school-related pollution spikes, it	Thank you for your comments. Many of these ideas, such as the use of clear communication with residents about monitoring, youth engagement, use of StoryMaps, and cultural and language accessibility are laid out in our Community Engagement Plan (linked within the CAMP).

		might be powerful to partner with local schools for education, monitoring awareness, or student-led initiatives. 3. Leverage Past Monitoring for Continuity There's great value in connecting this project with past local efforts like PurpleAir and Pacoima Beautiful's earlier monitoring. Acknowledging that history could strengthen trust and continuity. 4. Push for Early Data Access & Public Use Tools Since no data has been collected yet, ensuring that the public can explore early findings (even in draft form) through StoryMaps or dashboards would build momentum and transparency. 5. Ensure Cultural and Language Accessibility It's great that engagement materials are multilingual. Consider also having community translators or local youth leaders help facilitate Q&A sessions or neighborhood canvassing. 6. Address Community Fatigue Proactively Because many community	

		members have engaged in environmental issues for years with few results, setting realistic expectations — and celebrating even small wins — will be crucial. 7. Push for Policy Follow-Up The plan outlines how data could support action, but it might help to have a clearer pathway or commitment to how findings will be escalated to city or state policy channels.	
Joaquin Castillejos	Bloomington, Fontana, Rialto	Add more monitoring above the 210 freeway in Rialto area.	The 210 freeway in this area is included in our broad area monitoring boundary.
Edgar Garibay	West Modesto	VIP proposes the following changes to be incorporated in the West Modesto CAMP: Page 6: List of Abbreviations Used in the Community Air Monitoring Plan Add "CDP" to the List of Abbreviations Used in the Community Air Monitoring Plan - Community Designated Place Page 11: 2.1 Community profile Write out CDP (Community Designated Place - US Census). Page 13: 2.3 Community-specific motivations for air monitoring VIP also participates in research	Thank you for these comments! All requested edits have been made.

		projects with the University of California, Merced, the University of California, Berkeley, and Santa Clara University.	
María Madrigal	Pacoima, North Hollywood, Sun Valley, San Fernando, Sylmar	Necesitamos más espacios co aire menos contaminado , gracias	Gracias por su comentario. Le animamos a utilizar los datos de calidad del aire de este proyecto para abogar por este tipo de acciones.
Edgar Garibay	South Modesto	VIP proposes the following changes to be incorporated in the South Modesto CAMP: Page 16: 2.3 Community-specific motivations for air monitoring *Some concerns raised by South Modesto were beyond the scope of this SMMI. Replace Madera with Modesto. Page 20 & 29: 2.1 Bret Harte Neighborhood is misspelled Brette Harte should be replaced with Bret Harte Page 30: 8.3 Targeted Area Monitoring - There are two periods at the end of the sentence. Some of the pollution source types identified as being important in this area include many sources, industrial and agricultural..	Thank you for these comments! All requested edits have been made.
Edgar Garibay	West Stanislaus County	VIP proposes the following changes to be incorporated in the West	Thank you for VIP's review of the CAMPs! We've made all direct edit

		Stanislaus County CAMP: Page 13: 2.3 Community-specific motivations for air monitoring VIP collaborates with the Central California Asthma Collaborative (CCAC) in the SJV Air App initiative to enhance access to real-time air quality data, with eight air monitors currently active in the West Modesto area. Replace with: VIP collaborates with the Central California Asthma Collaborative (CCAC) in the SJV Air App initiative to enhance access to real-time air quality data, with 12 air monitors currently active in the West Stanislaus County Communities. Page 13: 2.3 Community-specific motivations for air monitoring Electric buses are also in use in West Modesto. Remove this sentence. Page 30: 8.3 Targeted Area Monitoring The City of Patterson was highlighted for targeted air monitoring. Will the additional communities of Grayson, Westley, and Turlock also be included in the target area monitoring?	requests and want to respond to your question about targeted area monitoring. For West Stanislaus County, the targeted area driving indeed focuses on Patterson. Since we have resources to allocate one targeted area study per CNC, we had to select one area within the broader West Stanislaus area for this type of specialized study. Patterson was selected based on the specific concerns brought up for multiple pollution sources in the area.
Gisell Ceja	Van Nuys	Factories and freeways	Thank you for your comment.

			Without additional information about the type of general location of the factories you are referring to, we cannot adequately respond to that aspect of your comment. In regards to freeways, they will generally be monitored even if they don't appear in the CAMP's broad area monitoring boundary, which you can view here: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=38.11082,-122.22881,12.83z
Shance taylor	Van Nuys	I am submitting this comment regarding the Koreatown Community Air Monitoring Plan and wish to highlight a critical related concern. Given Koreatown's high population density and existing air quality challenges, the scarcity of shade trees and accessible green spaces is particularly troubling. These vital natural elements are crucial for mitigating urban heat, filtering pollutants, and providing residents with healthier environments, especially for vulnerable populations experiencing high rates of respiratory illnesses. I urge the plan to consider how increasing green infrastructure can complement monitoring efforts and contribute to long-term air quality improvements	Thank you for your comment. In Section 3, enhancing green spaces is currently listed as a potential action that urban planners and other stakeholders could pursue as a result of this data.

		and public health in our neighborhood.	
Sadie Wilson	Santa Rosa	Add in site-specific information to community concerns table from meeting notes for 1 and 2 (not reflected in their post-meeting reports)	The sites in these meeting notes were integrated into the community concerns of Santa Rosa's CAMP.
Jesus Alonso	Lost Hills	I believe a good summary of the community feedback back revolves around accessibility to data. In Meeting 2 residents shared that they would like to be able to have an introductory in person meeting/ Kick-off where residents and see the vehicle and equipment . Additionally they would want consistent updates, preferably in person, where they could ask questions. Finally, The final report must be followed up also with an inperson meeting where community members can ask questions about the results.	Thank you for these comments. We are currently developing mechanisms for community organizations to request in-person demos of the vehicles for community members to ask questions. We will be providing project-related updates on our website, and will convey any key information through our Engagement Leads, who have the option of convening community members in person. The final meeting format, as described in our Community Engagement Plan, is online. The online format was the most realistic option given the volume of communities participating in this project. However, in the past, we've seen Engagement Leads hold in-person viewing and participation sessions of online meetings to be able to offer an in-person experience of an online meeting. That is certainly an option!

Arevalo Maybel	Van Nuys	Si la verdad en las mañanas el aire está muy contaminado aquí por la Sherman Way y Woodman amenece nublado y es de puro smoke	Esta intersección está incluida en la zona de monitoreo del plan.
Rosalba Estrada	Van Nuys	The air quality is bad in Van Nuys because we are near by so much factories and worksites that is affecting the quality of the air. I would like for the air monitor to be located at Van Nuys Middle School.	Thank you for your comment. Unfortunately, we are not able to monitor everywhere, and the area around Van Nuys Middle School was not identified by other community members as an area of priority concern.
Luisa Martinez	Van Nuys	Buenos días me gustaría que este programa se pueda implementar en los daycare	Gracias por su comentario. Aunque no diseñamos el estudio dirigido específicamente a los guarderías, lo más probable es que nuestra área de estudio incluya muchas guarderías. Puede explorar los límites del seguimiento aquí: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=34.18465,-118.44652,14z
Nelia Rosas	Van Nuys	Van Nuys Street	Van Nuys is included in our broad area monitoring boundary.
Sergio Magana	Van Nuys	Me gustaria que hubiera un monitor de aire en el area del freewey 405 en Van Nuys hay mucha contaminacion.	Por lo general, se monitorizarán las autopistas aunque no estén incluidas en el mapa de monitorización de zonas amplias del plan.
Maria Guzman	Van Nuys	Between Roscoe Street and Van Nuys Blvd there is a lot of pollution.	Unfortunately, we could not monitor everywhere, and the intersection of Roscoe St and Van Nuys Blvd was not prioritized by other community

			members during previous meetings or surveys.
Michelle Rivas	Van Nuys	Creo que ponerlo hacia el aeropuerto o hacia el 405	El aeropuerto y la autopista 405 están incluidos en el plan de monitorización de la calidad del aire.
Julio Rodriguez	Van Nuys	Could you put the air quality monitor at the CHAMPS Charter High School of the Arts	The CHAMPS Charter High School of the Arts is included in our broad area monitoring boundary.
Carmen Hernandez	Van Nuys	Could you put the air quality monitor at CHAMPS Charter High School or the Arts?	The CHAMPS Charter High School of the Arts is included in our broad area monitoring boundary.
Ismael Lopez	Van Nuys	Between Roscoe Street and Van Nuys Blvd there is a lot of pollution and the freewey 405	Unfortunately, we could not monitor everywhere, and the intersection of Roscoe St and Van Nuys Blvd was not prioritized by other community members during previous meetings or surveys.
Brianna Garcia	Van Nuys	The air quailty in the area of Van Nuys is in bad condition. I would like for the monitor to be in between Noble Ave and Raymer St.	This intersection is included in our broad area monitoring boundary.
Isaiah Garcia	Van Nuys	I would like for the air monitor to be in between Saticoy st and Kester Ave.	This intersection is included in our broad area monitoring boundary.
Claudia Alavarez	Van Nuys	The air quality in Van Nuys is not good and I would like for the monitor to be near by the Van Nuys Airport.	We will be conducting broad area monitoring near the Van Nuys Airport.
Priscilla Riestra	Van Nuys	I would like for the air monitor to be located near Kester Ave and Vanowen St.	This intersection is included in our broad area monitoring boundary.

Yaneli Vasquez	Van Nuys	For me it would be good to put the monitor on the Freewey 405 or at Van Nuys airport where there is a lot of pollution.	Both the 405 and the airport are included in our monitoring boundary.
Michelle Higaneda	Van Nuys	I would like for the air monitor to be between Van Nuys Blvd and Victory Blvd.	This intersection is included in our broad area monitoring boundary.
Marisela flores	Van Nuys	I would like the air monitor to put it off the streets of Van Nuys and Sherman way because there is a lot of pollution.	This intersection is included in our broad area monitoring boundary.
Abigail Gisell	Van Nuys	I would like for the air monitor to be located between Roscoe Blvd and Woodley Ave.	This intersection is included in our broad area monitoring boundary.
Taylor Gisell	Van Nuys	I would like for the air monitor to be in the freeway of the 405.	The 405 will be included in our broad area monitoring study.
Gisell fernandez	Van Nuys	I would like a monitor to be placed in the Van Nuys airport area because there is a lot of pollution.	We will be conducting broad area monitoring near the Van Nuys Airport.
Emma Abramyan	Van Nuys	I would like the air monitor to be next to the Van Nuys Airport.	We will be conducting broad area monitoring near the Van Nuys Airport.
Taylor Hernandez	Van Nuys	I would like for the air monitor to be between Kester Ave and Lull St.	This intersection is included in our broad area monitoring boundary.
Amanda Zaragoza	Le Grand	Sí o no pusieron letreros para indicar cuando y la hora del uso del gallinazo en los campos. Es importante saber esa información espacialmente cuando hay comunidades cercanas.	Gracias por su comentario. Lamentablemente, no disponemos de esa información.
Juan Salas	Le Grand	La orina de las vacas en las lecherias son el principal	Gracias por su comentario. El estudio de la zona objetivo pretende

		contaminante y no hacen nada por regularlas.	abordar las preocupaciones sobre las lecherías.
Jose Hernandez	Le Grand	Mala Limpieza: Algunos trabajadores no limpian adecuadamente su equipo, lo que agrava el problema.	Gracias por su comentario.
Maria Navarro	Le Grand	Ojala y sea un estudio que nos de solucion sin importar lo poderoso de las empresas, porque nuestra salud esta afectandose cada dia mas con las alergias y problemas respiratorios.	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Martha Gonzales	Le Grand	Advertencias Inexistentes No hay avisos cuando hay gases contaminantes en la comunidad.	Gracias por su comentario. Le animamos a que utilice los datos sobre calidad del aire de este proyecto para abogar por una mejor comunicación en torno a esta cuestión.
Juan Becerra	Le Grand	Falta de Información Las agencias deben advertir a los compradores sobre el uso de químicos antes de aplicarlos	Gracias por su comentario. Le animamos a que utilice los datos sobre calidad del aire de este proyecto para abogar por una mejor comunicación en torno a esta cuestión.
Lorena samano	Le Grand	Max informacion	Gracias por su comentario. Encontrará más información sobre este proyecto en el sitio web de Aclima: www.aclima.earth/ca-smmi.
Rosa Frías	Le Grand	Rosa Frias comento que está muy bien que se hagan esos análisis de detección de sustancias tóxicas porque mis hijos se enferman mucho del asma y otras	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.

		enfermedades de vías respiratorias y esto puede ayudar a determinar si es por causa del ambiente o tóxicos que anden en ellos.	
Marina Acosta	Le Grand	El humo de las chimeneas en tiempo de invierno contamina porque por el aire se mete a las viviendas vecinas, en invierno calientan los vehículos por media hora y el dióxido de carbono también entra a las viviendas das al abrir puerta o ventanas. Esto es en la Jefferson Rd.	Gracias por su comentario. Jefferson Road está incluida en nuestra zona de monitorización para su comunidad.
Bessie castillo	Le Grand	Es que pass unos camiones de vacas Muertas dejando un fuerte Olor haste por 5 horas	Gracias por su comentario y su preocupación. Sin más información sobre la ubicación de esta preocupación, no podemos abordarla en el plan. Sin embargo, puede consultar nuestro mapa de seguimiento para ver si esta zona ya está incluida en nuestro plan: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=37.22843,-120.25219,14z
Amanda Zaragoza	Le Grand	Muchas gracias por considerar nuestra comunidad para este estudio así nosotros vamos a estar informados y enterados de qué es lo que nos está enfermando, si nuestros hijos y nosotros padecemos esas enfermedades de las vías respiratorias por causa de la contaminación de nuestro aire o por	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.

		alguna otra causa pero así ya podemos descartar esa posibilidad de qué sea el aire el que nos está enfermando o es otra fuente para cuidarnos de ella.	
Maria Elena Alcazard tapia	Le Grand	Los Pesticidas que applican en las plantas lo haven muy Temprano y no Dejan suficiente tiempo para que se Valla el olor o desaparesca el fuerte olor.	Gracias por su comentario y su preocupación. El uso de pesticidas es una de las preocupaciones que el laboratorio móvil estudiará en su comunidad.
Juan Arellano	Le Grand	Ojalá y cuando el vehículo que va a venir a revisar nuestro aire sea en esos momentos cuando hay todos esos contaminantes de los químicos que le ponemos a las Huertas en el aire, eso nos sacaría de dudas si eso realmente nos está dañando la salud o si realmente no son dañinos, nos sacaría de dudas y pondríamos atención en lo que es dañino para nosotros que vivimos en esta Comunidad de Legrand.	Gracias por su comentario. Hemos considerado la posibilidad de ajustar nuestro calendario de monitorización si se nos informa de un día de fumigación, pero esto dependerá de la disponibilidad de nuestro laboratorio móvil asociado.
Juan Moreno	Le Grand	Me parece contaminado mi aire que respiro, entonces si está bien que hagan esos estudios , y que de esto resulte que se limpie un poco aunque sea la contaminación del aire porque ya mi esposa falleció de enfermedades respiratorias.	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Ignacio bedolla	Le Grand	Que bueno que lo hicieron por que hacia falta	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad.
Elias Lopez vera	Le Grand	Bueno que vinieron	Gracias por su comentario. Le

			agradecemos la oportunidad de trabajar en su comunidad.
Javier luna	Le Grand	Que esta bien que lo hagan pero que Manden los resultados en español y les den una junta	Gracias por su comentario. Le agradecemos la oportunidad de trabajar en su comunidad. Los resultados también estarán en español.
Nohemí Hurtado	Van Nuys	Down Town Los Angeles	Downtown Los Angeles was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: https://ww2.arb.ca.gov/sites/default/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf
Jennifer Hernandez	Van Nuys	LAX AirPort	Our monitoring in the Inglewood and Hawthorne areas will cover areas adjacent to LAX. You can review those boundaries here: https://felt.com/map/EXTERNAL-Broad-Area-Monitoring-boundaries-9CGLQn4fdSwuqKU316zrDrA?loc=33.94663,-118.41157,12.99z
Vicente Hernandez	Van Nuys	Van Nuys AirPort	Van Nuys is included in our broad area monitoring boundary.
Christopher Hernandez	Van Nuys	Lake Balboa	Lake Balboa was unfortunately not included in this study because it is not currently on CARB's Consistently Nominated Community list, which you can view here: https://ww2.arb.ca.gov/sites/defaul

			t/files/2023-10/2023%2008%20Consistently%20Nominated%20Communities_10.16.2023.pdf
Sarah bedolla	Van Nuys		No comment included.
Magana	Van Nuys	Creo Que el 405 freeway y tambien area de sun valley pacoima	Sun Valley y Pacoima serán monitorizados como parte de este estudio, al igual que la 405 y la mayoría de las autopistas.
Julia Danielsson- Salinas	Rodeo/Crockett	As a resident of Rodeo I am extremely grateful that this project exists. The team that has organized this has really brought together our community in such a wonderful way. Annie, Daphne, and Charlie, are awesome! I'd like to thank them, CARB, and ACLIMA for putting all this together for the citizens of Rodeo and Crockett. It means the world to me that my soon to be born daughter will have a chance at growing up in a more aware and accountable atmosphere here in Rodeo. What we have here in town is special and it's worth protecting for current and future generations. We can't undo what's been done but we can learn from it and do better. Thank you again and I hope Rodeo will always be blessed and highly favored!	Thank you for your comment. We are grateful for the opportunity to work in your community.
Marina Ramos	Rodeo/Crockett	Great initiative.	Thank you for your comment. We are grateful for the opportunity to work in your community.

EE Hallisy	Rodeo/Crockett	Go with the plan. Thank you.	Thank you for your comment. We are grateful for the opportunity to work in your community.
Lydia Fourmy	Rodeo/Crockett	Air monitoring is extremely necessary in this area. My plants are not healthy because of a white dust that settled on everything in the last couple of months. Seeing their degradation and shriveled leaves makes me wonder what is happening to me and those around me. I don't want to get cancer or have any other environmentally caused health issues due to toxic particles located in the air in this area. Help!!	Thank you for your comment. We look forward to being able to share air pollution data with community members.
Nancy Rieser	Rodeo/Crockett	Our community in the past has collected particulate matter stuck on our car windshields and had those samples tested at MacCampbell Analytical lab in Pittsburgh. We shared those test results with the County. I just pulled the 2/12/24 Cam 17 Metals + AL (aluminum). McCampbell analytical detected 8 metal elements that were not listed in the box of "reported pollutants" for the Phillips refinery in your report. Those elements were: Aluminum, Antimony, Barium, Chromium, Cobalt, Copper, Zinc, and Silver. 7 of those 8 elements exceeded the reporting level. The most dramatic was the Aluminum level. Standard	Thank you for your comment. Unfortunately, we are not able to measure amines as part of this study. Though some partner mobile labs do have the ability to measure heavy metals, this type of study was not planned for Rodeo and Crockett based on the priority community concerns expressed in community meetings.

		reporting level: 50. The test result: 530....I can share the report upon request. Please include these elements in the "reported pollutants". And of course, it goes without saying, you MUST include Amines a reported element. Please note that the metallic glitter is once again appearing on car windshields. We have collected a sample and will be using the same respected lab.	
Elizabeth Esquivel	Rodeo/Crockett	July 17, 2025 Mr. Walter Ham, Chief Monitoring and Laboratory Division California Air Resources Board 1001 I Street Sacramento, CA 95814 Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB's Statewide Mobile Monitoring Initiative. Dear Mr. Ham: CMTA and other business and industry organizations appreciate CARB's recognition of the many policy and technical deficiencies in Aclima's first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile Monitoring Initiative (SMMI), and CARB's willingness to facilitate a second	See responses to table below: "Aclima Responses to CMTA Comments - August 2025"

		public comment period on a subset of revised draft CAMPs. CARB's June 30 Project Update indicates that six CAMPs have been selected for this second comment period - Rodeo and Crockett, San Jose, Paramount and North Long Beach, North Bakersfield, West Stanislaus County, and Salton City – "based on geographic distribution, land-use types, and the range of pollutants to be monitored, to allow stakeholders to provide input on the updated material prior to further CAMP approvals." We further understand that the comments CARB and Aclima receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB's decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components. The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and	

		Aclima in developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial and industrial interests - Rodeo and Crockett, San Jose, Paramount and North Long Beach, and North Bakersfield. Ramboll developed a spreadsheet that consolidates comments into topic areas addressing several critical issues, including but not limited to: • Revised CAMPs contain newly identified sources (e.g., oil and gas sources in North Bakersfield, a medical device sterilizer in Paramount/North Long Beach, the San Jose airport), including some sources located outside of the designated community boundaries, and lack clarity regarding whether and how those sources will be addressed in targeted area monitoring. These and other changes raise new questions about the criteria used for prioritizing	

		monitoring routes and locations. • Lack of regulatory or source-specific validation of community-identified priorities (i.e., a determination of whether perceived sources are driving or significantly contributing to air quality conditions in the community). For example, some sources were identified based on historical incidents that no longer reflect current operations. • No guidance or process for reconciling potential conflicts between SMMI data and data from existing regulatory monitoring networks (e.g., explicit parameters governing use of SMMI or other data to guide further investigations, to inform source apportionment, or for regulatory purposes). It may not be appropriate to include certain locations in targeted area monitoring if regulatory-grade, stationary monitoring already occurs in those locations. • Lack of clarity regarding what findings would constitute an "actionable result," such as a threshold that would trigger notification to regulators or lead to public-facing conclusions. Further distinctions should be made between SMMI's role in supporting community understanding and its	

		limitations in driving regulatory or enforcement outcomes. • Inconsistent and insufficiently justified monitoring duration and mileage allocations among individual CAMPs introduces potential bias and is likely to produce results that are not representative of actual air quality conditions in a given community. More clarity is needed on how monitoring frequency, duration, and spatial coverage account for source variability, limited measurement windows, and potential environmental disruptions. • Lack of clarity regarding how partner mobile laboratory resources will be deployed to capture representative emissions from variable sources, and whether they could be redirected in response to initial monitoring results. The concept of "dynamic monitoring" introduces greater uncertainty regarding deployment of the mobile laboratories, and absent further explanation and a decision making framework in the CAMPs, has the potential to undermine public confidence in SMMI results. • No disclosure of mobile laboratory capabilities and limitations regarding measurement and quantification of priority toxic	

		air contaminants identified in each CAMP. • Lack of justification for, and multiple potential deficiencies in, proposed monitoring methodologies (e.g., infrequent quality assurance/quality control schedules, no oversight of sampling instrumentation, inconsistent equipment calibration, non-disclosure of method capabilities and limitations, etc.) raises concerns about data reliability. Data collected under variable field conditions may suffer from drift (gradual loss of sensor accuracy), bias, or calibration error, potentially compromising the utility of monitoring results. • Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized an released throughout the monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives. The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not	

		technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified concerns. It also includes comments that pertain to some of the already approved plan components, due in part to the inadequate timeframe for comments on the initial draft CAMPs and lingering uncertainty regarding opportunities for course corrections for these components. In addition to the attached comments, we offer the following observations and recommendations: 1. Affected sources should be provided the opportunity to comment on data interpretation, visualizations, and Aclima's draft report before they are finalized. The CAMPs state that outputs from the SMMI will include interpretations and visualizations of measurement data using various and unique combinations of approaches, such as storymaps, for the ultimate purpose of taking action to address a pollution concern (see for example Sections 8.3, 10.5, 13.2). However, there appears to be no opportunity for public comment or engagement in these steps or in	

		completing Aclima's report. This is a major process flaw that limits Aclima's accountability and erodes trust in Aclima's interpretation of SMMI data and decisions based on those interpretations. Data interpretation can help the public understand the meaning and significance of monitoring results, but it necessarily draws on the experiences, expertise, and values of those responsible for data interpretation. By limiting stakeholder engagement in this process, Aclima's interpretations and findings will not benefit from other relevant perspectives, including affected sources and businesses. This dynamic increases the likelihood of overlooking or dismissing blind spots in the data, inherent bias, and important contextual factors. CARB's decision to withhold approval of CAMP components related to targeted area monitoring and conduct a second public comment period is evidence of the unintended consequences of limiting stakeholder engagement in important aspects of SMMI implementation. For these reasons, we recommend that the CAMPs be revised to include a meaningful	

		process for public engagement and review of Aclima's data interpretations, visualizations, and final report before publication. 2. The work plans for conducting field measurements should only involve Aclima, CARB, or air district staff. The CAMP workplans (Section 11) appear to indicate that community members (if trained) may conduct field measurements or tasks in support of field measurements. Involving members of the public in any element of conducting field measurements introduces a substantial risk of bias that can compromise data integrity and QA/QC. Section 11 also fails to provide clarity regarding the type of tasks that members of the community may be invited to perform. To prevent such risks, the CAMPs should not involve community members in tasks related to the collection of field measurements, and should instead assign these tasks to regulatory agency staff with the necessary training, expertise, and understanding of the need for objectivity in the data gathering process. 3. "Alert thresholds" should	

		specify the form of the referenced standard. The CAMPs specify California Occupational Safety and Health Administration (Cal/OSHA) Permissible Exposure Limits (PEL) and Short-Term Exposure Limits (STEL) for several TACs as the basis for the alert and reporting thresholds listed in Table 10 of Section 14.1. Cal/OSHA PELs and STELs are typically time-weighted 8-hour averages. We recommend that Aclima revise Table 10 to include the form of the concentration limit. In determining whether a threshold has been exceeded, Aclima should only compare reported concentrations to the corresponding threshold when the data is reliable and presented in the same form as the threshold. Finally, while we welcome more definitive engagement by CARB to oversee Aclima's work, we continue to struggle with the lack of transparency in the SMMI implementation process. In the context of this second 14-day comment period, it was difficult to discern the changes between the initial draft CAMPs, dated May 19, 2025, and the revised draft CAMPs, dated July 1, 2025. As noted in the attached spreadsheet, both historical and current versions of	

		Aclima documentation remain online but changes are not identified and some of the source materials are difficult to access. For future reference, we recommend posting clear version histories or redlined documents to enhance transparency and improve public trust in the SMMI implementation process. We appreciate CARB and Aclima's consideration of these comments, and we look forward to further changes to all 62 CAMPs to incorporate the recommended improvements. If you have any questions, please contact me at (916) 441-5420 or EEsquivel@cmta.net. Sincerely, Elizabeth Esquivel Vice President of Government Relations California Manufacturers and Technology Association cc: Liane Randolph, Chair – CARB Dr. Steven Cliff, Executive Officer – CARB Deldi Reyes, Division Chief – CARB Office of Community Air Protection	

		David Ridley – CARB MLD Katie George – CARB MLD Brian Moore – CARB OCAP Kevin Olp – CARB OCAP Adolpho Garcia – CARB OCAP	
Elizabeth Esquivel	Paramount/North Long Beach	July 17, 2025 Mr. Walter Ham, Chief Monitoring and Laboratory Division California Air Resources Board 1001 I Street Sacramento, CA 95814 Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB's Statewide Mobile Monitoring Initiative. Dear Mr. Ham: CMTA and other business and industry organizations appreciate CARB's recognition of the many policy and technical deficiencies in Aclima's first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile Monitoring Initiative (SMMI), and CARB's willingness to facilitate a second public comment period on a subset of revised draft CAMPs. CARB's June 30 Project Update indicates that six CAMPs have been selected for this second comment period - Rodeo and Crockett, San Jose, Paramount and North Long Beach,	See responses to table below: "Aclima Responses to CMTA Comments - August 2025"

		North Bakersfield, West Stanislaus County, and Salton City – "based on geographic distribution, land-use types, and the range of pollutants to be monitored, to allow stakeholders to provide input on the updated material prior to further CAMP approvals." We further understand that the comments CARB and Aclima receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB's decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components. The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and Aclima in developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities	

		with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are most relevant to commercial and industrial interests - Rodeo and Crockett, San Jose, Paramount and North Long Beach, and North Bakersfield. Ramboll developed a spreadsheet that consolidates comments into topic areas addressing several critical issues, including but not limited to: • Revised CAMPs contain newly identified sources (e.g., oil and gas sources in North Bakersfield, a medical device sterilizer in Paramount/North Long Beach, the San Jose airport), including some sources located outside of the designated community boundaries, and lack clarity regarding whether and how those sources will be addressed in targeted area monitoring. These and other changes raise new questions about the criteria used for prioritizing monitoring routes and locations. • Lack of regulatory or source-specific validation of community-identified priorities (i.e., a determination of whether perceived sources are driving or significantly contributing to air	

		quality conditions in the community). For example, some sources were identified based on historical incidents that no longer reflect current operations. • No guidance or process for reconciling potential conflicts between SMMI data and data from existing regulatory monitoring networks (e.g., explicit parameters governing use of SMMI or other data to guide further investigations, to inform source apportionment, or for regulatory purposes). It may not be appropriate to include certain locations in targeted area monitoring if regulatory-grade, stationary monitoring already occurs in those locations. • Lack of clarity regarding what findings would constitute an "actionable result," such as a threshold that would trigger notification to regulators or lead to public-facing conclusions. Further distinctions should be made between SMMI's role in supporting community understanding and its limitations in driving regulatory or enforcement outcomes. • Inconsistent and insufficiently justified monitoring duration and mileage allocations among individual CAMPs introduces potential bias and is likely to	

		produce results that are not representative of actual air quality conditions in a given community. More clarity is needed on how monitoring frequency, duration, and spatial coverage account for source variability, limited measurement windows, and potential environmental disruptions. • Lack of clarity regarding how partner mobile laboratory resources will be deployed to capture representative emissions from variable sources, and whether they could be redirected in response to initial monitoring results. The concept of "dynamic monitoring" introduces greater uncertainty regarding deployment of the mobile laboratories, and absent further explanation and a decision making framework in the CAMPs, has the potential to undermine public confidence in SMMI results. • No disclosure of mobile laboratory capabilities and limitations regarding measurement and quantification of priority toxic air contaminants identified in each CAMP. • Lack of justification for, and multiple potential deficiencies in, proposed monitoring methodologies (e.g., infrequent quality assurance/quality control	

		schedules, no oversight of sampling instrumentation, inconsistent equipment calibration, non-disclosure of method capabilities and limitations, etc.) raises concerns about data reliability. Data collected under variable field conditions may suffer from drift (gradual loss of sensor accuracy), bias, or calibration error, potentially compromising the utility of monitoring results. • Concerns about when and how SMMI data will be released (e.g., language implying that data may be finalized an released throughout the monitoring process rather than at one time following completion of monitoring in all 62 communities), how it will be interpreted, and how it will be characterized in public-facing communications and interactive tools in terms of its potential use to advance community air quality objectives. The spreadsheet cites specific language in relevant sections of the draft CAMPs that lacks clarity, is not technically supported, or is inconsistent with best practices in air quality monitoring plan design and implementation. It includes recommendations for revisions to the draft CAMPs to address the identified concerns. It also includes	

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Elizabeth Esquivel	North Bakersfield	July 17, 2025 Mr. Walter Ham, Chief Monitoring and Laboratory Division California Air Resources Board 1001 I Street Sacramento, CA 95814 Subject: Second 14-Day Comment Period on Draft Community Air Monitoring Plans for CARB's Statewide Mobile Monitoring Initiative. Dear Mr. Ham: CMTA and other business and industry organizations appreciate CARB's recognition of the many policy and technical deficiencies in Aclima's first draft Community Air Monitoring Plans (CAMPs) for the Statewide Mobile Monitoring Initiative (SMMI), and CARB's willingness to facilitate a second public comment period on a subset of revised draft CAMPs. CARB's June 30 Project Update indicates that six CAMPs have been selected for this second comment period - Rodeo and Crockett, San Jose, Paramount and North Long Beach, North Bakersfield, West Stanislaus County, and Salton City – "based on geographic distribution, land-use types, and the range of pollutants to be monitored, to allow stakeholders	See responses to table below: "Aclima Responses to CMTA Comments - August 2025"

		to provide input on the updated material prior to further CAMP approvals." We further understand that the comments CARB and Aclima receive on these six draft CAMPs, and the changes made in response to those comments, will be applied to all 62 CAMPs. We also support CARB's decision to postpone monitoring activities for unapproved components of all of the draft CAMPs related to targeted area monitoring and interpretation of results pending further review, revisions, and final approval of those components. The attached comments were developed by subject matter experts at the Ramboll Group to support our collective efforts to improve the draft CAMPs in the interest of generating valid, useful data. Our goal is to assist CARB and Aclima in developing monitoring protocols that will help fill gaps in existing monitoring data to guide the work of the Community Air Protection Program and further the purpose of AB 617 to improve air quality in California communities with high cumulative exposure burdens for toxic air contaminants (TAC) and criteria air pollutants. Ramboll scientists focused on four of the six communities that are	

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Elizabeth Esquivel	San Jose	July 17, 2025 Mr. Walter Ham, Chief Monitoring and Laboratory Division California Air Resources Board	See responses to table below: "Aclima Responses to CMTA Comments - August 2025"

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California Manufacturers & Technology Association (CMTA) Comments and Aclima Responses

Please see overarching responses pasted below the table.

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	4.0 Metrics for collection adequacy Aclima uses a dynamic sampling algorithm that is updated daily with the goal of collecting data that maximizes improvement in the characterization of air quality rather than specify a number of samples on any individual length of road. ... The driving algorithm is designed to complete an average of 20 repeat measurements distributed across all residential and major roads in all census block groups.	The description of the dynamic sampling algorithm lacks sufficient transparency regarding how adequacy of coverage is assessed and how sampling priorities are balanced across communities. The goal of "improving characterization" is abstract without clear thresholds, metrics, or criteria for adequacy. The additional details in Section 3.1 of the QA system do not fully explain how the algorithm ensures equitable spatial and temporal coverage or how adjustments are made in response to under-sampled areas.	Aclima should provide a clearer explanation of how the dynamic sampling algorithm evaluates and prioritizes coverage, including any minimum sampling thresholds per block group or community, and how sampling equity is maintained. Details should also include the parameters that influence daily updates to the algorithm and how performance against the 20-pass goal is monitored, validated, and reported.	See overarching response	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	7.2 Monitoring methods - broad area monitoring Aclima will conduct monitoring within the defined boundary such that the fleet will complete an average of 20 repeat measurements distributed across all residential and major roads in all census block groups to provide adequate coverage throughout the monitoring area.	The allocation of mileage and time-based dispersion of pass-throughs is not clearly detailed, particularly in how it varies from communities with <10 miles of allocated mileage when compared to those with >1000 miles. This is particularly noteworthy to understand the temporal variability of community exposure.	The time-based allocation of mileage should be further detailed, with particular focus on the variability between communities of different mileage allocations, sources, and densities. Detail should be included in how the potential temporal variability of community exposure is accounted for and leads to variable monitoring programs between CNCs.	See overarching response	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	11.1.3 Timeline: duration, frequency, milestones, and deadlines Broad area monitoring will be conducted by Aclima mobile platforms (AMPs) from June 2025 through the end of February 2026, for a total of approximately nine months of monitoring.	It is unclear how the time spent monitoring (June 2025- Feb 2026) will be distributed by community, particularly given the differences in community mileage. This is increased in relevance for the variability of sources in different communities, which may further bias monitoring results dependent on the distribution of time in a given community.	It is unclear how the monitoring time (June 2025-Feb 2026) will be distributed by community, particularly given the differences in community mileage. This is relevant because the monitoring duration may bias results low or high if certain sources are operating or not operating during certain monitoring days.	See overarching response	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	Evaluating Broad Area Monitoring Completeness: Aclima mobile monitoring campaigns are designed to repeatedly drive roads in a monitoring area such that the roads are visited 20 times on average. An automated drive planning system evaluates the amount of driving coverage throughout a region on a daily basis and directs drivers to prioritize visiting roads in relatively underdriven regions.	While the description of the automated drive planning system provides general insight into how road coverage is managed, it remains unclear how temporal and spatial variability in air pollutant concentrations is prioritized or integrated into this approach. The average of 20 visits per road segment focuses on repeat coverage but does not guarantee that measurements are distributed across different times of day or varying atmospheric conditions, each key components of the mobile monitoring approach as described by Aclima. This may limit the ability to fully characterize pollution patterns or capture episodic events.	Aclima should clarify how the drive planning algorithm incorporates both spatial completeness (e.g., across all census block groups or road types) and temporal variability, such as sampling during different times of day, days of the week, or meteorological conditions. This should also address differences in communities and CAMP development, such as how driving planning varies between CNCs of different size and mileage allocation.	See overarching response	
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	8.1 Community Mileage Allocation For Paramount and North Long Beach, the total road length (for residential and major roads only) within the community is 220 miles, and the allocated mileage is 203 miles, as determined through the process above.	It is unclear how the mileage will be allocated on a time-basis, and for the lower-mileage CNCs there is an elevated risk of measurement bias if this is not performed adequately.	Clarity should be added regarding low-mileage CNCs. This may include divergences from the otherwise- mentioned 6-8 week study periods and 20 road segment pass-through averages, particularly if Aclima plans to revisit the communities throughout the SMMI period.	See overarching response	
Rodeo and Crockett CAMP4	CAMP	Specific CNC CAMP	8.1 Community Mileage Allocation For Rodeo and Crockett, the total road length (for residential and major roads only) within the community is 47 miles, and the allocated mileage is 32 miles, as determined through the process above.	It is unclear how the mileage will be allocated on a time-basis, and for the low-mileage CNCs there is an elevated risk of measurement bias if this is not performed adequately.	Clarity should be added regarding low-mileage CNCs. This may include divergences from the otherwise- mentioned 6-8 week study periods and 20 road segment pass-through averages, particularly if Aclima plans to revisit the communities throughout the SMMI period.	See overarching response	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	3.1 Sampling Methods and Drive Plan Operations Functionally, this approach results in a different number of repeat measurements in different locations, with the sampling deliberately distributed to provide higher rates of repeat measurements in locations with higher observed variability. It helps ensure that the measurements generated via Aclima's mobile monitoring adequately and efficiently characterize the spatial and temporal variability in air quality in areas of concern during the monitoring time period.	It is unclear how this corresponds to the 20 average segment passes, and how the source-targeting vs. dynamic adjustments for characterization will be factored in during the SMMI.		See overarching response	
Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	Signal decomposition and reconstruction A statistical method is used to produce ambient concentration estimates based on correlations in the spatial and temporal measurements obtained during mapping. The method is designed to take a data set that is sparse in space and time and generate estimates of likely pollution levels in all locations and at all times, filling in the gaps.	Aclima's foundational message is that air pollution is highly variable in time and space, necessitating real-time mobile monitoring. This provides a challenging application for models to fill in gaps, particularly for less-well measured scenarios. Further, the data inputs listed (including background source adjustment) for model application do not include consideration of variable emission sources, which may range from vehicle traffic to large facility operation. As with all model efforts, there is concern of limitations and introduced bias, with are particularly elevated in this form of high-resolution complex scenario modeling.		See overarching response	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	7.2 Monitoring methods - broad area monitoring Rather than specify the number of samples on any specific length of road within each census block group, Aclima uses a dynamic mobile sampling algorithm that is updated daily with the specific goal of collecting data that will maximize improvement in the characterization of a location's air quality	The dynamic algorithm is not well described, and further description would be useful in understanding the process and aims.	Aclima should provide a clearer explanation of the parameters used by the dynamic planning algorithm, including how it accounts for spatial gaps, temporal variability, pollutant-specific goals, and community- defined concerns. This transparency is essential to evaluate whether the system meaningfully improves air quality characterization and avoids unintended biases in monitoring coverage.	See overarching response	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	5.2 Pre-deployment calibration Where possible, the Mobile Calibration Laboratories is deployed in the same areas where data collection is occurring in order to calibrate under similar environmental conditions as where the AMNs will be deployed. However, this is not always possible and assumptions must be made about performance of the AMNs under different conditions. ... This is particularly important for PM2.5 because chemical composition and size distribution of the particles often vary between geographic regions. ... 5.2.1 Collocation with Reference Instruments (O3, NO, NO2, and CO2) Pre-deployment calibration of the O3, NO, NO2, and CO2 sensors is achieved by collocating sensors with reference methods in one of Aclima's location-specific Mobile Calibration Laboratories. This ensures that these sensors are calibrated over a large dynamic range of analyte concentrations and measured under atmospherically relevant on-road conditions, including variations in pollutant gases and particle concentrations, and varying meteorological conditions.	5.2 and 5.2.1 provide potentially conflicting language in the current form, making it unclear if pre-deployment calibration with a Mobile Calibration Laboratory will be performed. Additionally, this is language from Aclima's prior documentation, before the SMMI, and is insufficient for the SMMI. It does identify clear sources of error and a need for robust measurement validation which, due to the volume of CNCs, may not be able to be completed. 2023 documentation available online as of 7/3/2025: https://7319524.fs1.hubspotusercontent-na1.net/hubfs/7319524/Aclima%20Mobile%20Platform%20Quality%20Assurance%20-%20V3.1%2c%20March%2010%2c%202023-1.pdf	Clarifying information should be added as to the frequency with which Aclima monitoring systems will be validated against Mobile Calibration Laboratories. CAMPs should provide an understanding of which CNCs will benefit from the Mobile Calibration Laboratories and how that decision will be made.	The "Where possible..." phrase may be causing confusion. This does not refer to pre-deployment calibrations in the Mobile Calibration Lab generally (every AMN deployed receives a pre-deployment calibration in the Mobile Calibration Laboratory and has passed the stated acceptance criteria); the phrase applies to the operation of the Mobile Calibration Lab being in the same region where the AMNs will ultimately be deployed. For SMMI we are operating calibrations in the Bay Area and in Southern California, but not every AMN calibrated in Southern California will be operating exclusively out of Southern California.	Section 5.2, added text: Where possible, the Mobile Calibration Laboratories ~~is~~are deployed in the same areas where data collection is occurring in order to calibrate under similar environmental conditions as where the AMNs will be deployed. However, this is not always possible (e.g. AMNs calibrated in northern California may end up being deployed in southern California) and assumptions must be made about performance of the AMNs under different conditions.

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Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	5.4 Mid- and Post-deployment recalibration At regular intervals during field deployment, mobile platforms are returned to one of Aclima's Calibration Facilities to receive updated calibrations. Each sensor is recalibrated using the same process as described for pre-deployment calibration (Section 5.2). ... For SMMI, the recalibration frequency will be about 6-8 weeks	The "regular intervals" are later described as 6-8 week intervals, and the issues standing from Section 5.2 are relevant here as well.	Clarifying information should be added regarding the procedures of data validation, adjustments made based on calibration, potential errors or drift identified, and systematic data correction plans.	This is discussed in Section 5.4.1 Sensor Drift. Adjustments to individual sensors are applied if post-deployment checks do not meet the acceptance criteria. This section discusses the strategy for this, most typically resulting in calibration parameters that vary linearly with time over the time between calibration events. For example, if the intercept of a linear fit was found to be 0 on day 1 and 4.5 on day 45, we would apply a varying intercept over this time period starting at 0 on day 1 and increasing each day by 0.1, ending up at 4.5 on day 45. The intercept going forward would then be set as 4.5 until the next calibration event. Systematic adjustments are addressed in other comments	
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	5.4.1 Drift correction Certain sensor types are more prone to drift over time (e.g., CO2 and CH4) and a linear calibration function is applied based on the pre- and post-deployment calibrations, whereas other sensors (e.g., NO2) have been found to occasionally experience fast step-changes in calibration during deployment.	The differences identified in instrument drift further the concerns raised previously as to the inadequate validation and calibration procedures.	Clarifying information should be added regarding the procedures of data validation, adjustments made based on calibration, potential errors or drift identified, and systematic data correction plans. This is particularly relevant for monitoring methods already identified by Aclima as presenting challenges in long-term utilization and those that require corrections to be made.	This is discussed in Section 5.4.1 Sensor Drift. Adjustments to individual sensors are applied if post-deployment checks do not meet the acceptance criteria. This section discusses the strategy for this, most typically resulting in calibration parameters that vary linearly with time over the time between calibration events. For example, if the intercept of a linear fit was found to be 0 on day 1 and 4.5 on day 45, we would apply a varying intercept over this time period starting at 0 on day 1 and increasing each day by 0.1, ending up at 4.5 on day 45. The intercept going forward would then be set as 4.5 until the next calibration event. Systematic adjustments are addressed in other comments	
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Approach Dr. Aja Ellis discussed approach, which was explained as: • Iterative and ongoing engagement with communities that is first and foremost and will include community, government, governance, and leadership. • Multiple feedback points and accessible meetings with day and evening meet times, language services, various feedback methods, and both virtual and in person offerings.	Given the "dynamic" approach, it is unclear what feedback will be incorporated into making what changes, particularly given the regimented planning necessary to accomplish the extent of the monitoring proposed for the "up to 9 month" period	Given the limitations raised regarding time duration and monitoring resources, further clarity should be added to the "dynamic" and other variability-indicating aspects of the monitoring plans, particularly where this may be driven by Aclima's non-public decision making, or based on public discussion of interim results through the program.	Comment refers to non-CAMP document. Theme is covered in other responses.	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Project Expert Group (PEG) It was stated that experts will be recruited from across the state to inform and guide the SMMI. These experts will include representation from technical experts from academia and research, community experts, government agencies, Native American tribes, local industry, and youth movement leaders.	It is unclear if industry was given an appropriate voice, particularly given their specific expertise regarding many of the targeted sources.	The level of industry or otherwise targeted-source engagement should be clarified, particularly in areas where it may guide CAMP development and/or the analysis of results and actionable programs following the SMMI.	Comment refers to non-CAMP document.	
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Participant Feedback – Breakout Whiteboarding Sessions Community partnering- making sure that there are clear roles and authority for the community to not only be involved, but also have substantial sway over the outcomes of the program; as well as making sure that the data is being directly applied and applicable towards action to improve the areas that they're monitoring was the key theme of discussion for one group.	Community engagement is a priority of the CAMPs and the SMMI, yet community priorities must be appropriately balanced against rigorous scientific monitoring practices and results development.	The "substantial sway over the outcomes of the program" from community organizations and members should be clarified in order to both uphold the rigor of the SMMI as well as set appropriate community expectations.	Comment refers to non-CAMP document. Theme is covered in other responses.	
Aclima SMMI RFP Proposal9	SMMI Supplemental Material	SMMI/CAMP General	2.2 Project Expert Group Composition One to two members of business, industry, or a CA-based foundation that is focused on air quality issues and solutions to these issues	The PEG page online also appears partially accessible but otherwise password protected for further access: e.g., https://aclima.earth/project-expert-group/ana- miscolta.		Comment refers to non-CAMP document, but we will look into this.	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Participant Feedback – Breakout Whiteboarding Sessions Looking into industries that are polluting the air, lowering those pollutants, and providing communities with financial resources to be able to conduct monitoring and other programs to advance community health was the main theme discussed. Proactive enforcement-seeing data be actionable and lead to local municipalities, county agencies, and state agencies being able to improve the environment with this data was a main discussion point. ... The need for enforcement as a follow up from data being collected was discussed	It is unclear what actionable steps will or may be taken based on these monitoring findings. Of note, how will these measurements and source contribution be compared with active regulatory efforts and goals? Is there a risk to disrupting ongoing regulatory-source/facility engagements? What are the specific steps proposed to lower the pollutants?	Further distinction should be made between indicative monitoring approaches (as performed by Aclima) and regulatory monitoring and action, particularly when addressing community concerns. This will maintain its relevance as results are shared and communities look for actionable results and next steps following the SMMI.	Comment refers to non-CAMP document. However, we will make clear this distinction in future discussions on data analysis and potential actions.	
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Participant Feedback – Breakout Whiteboarding Sessions Additionally, checks and balances with ensuring that investments are going to the right communities and that monitoring is ensuring that polluters are being held accountable and air emission standards are being met were discussed as priority.	The monitoring priorities raised here ("polluters held accountable and air emission standards are being met") are important goals but are regulatory and not SMMI/CAMP goals.	Further distinction should be made between indicative monitoring approaches (as performed by Aclima) and regulatory monitoring and action, particularly when addressing community concerns. This will maintain its relevance as results are shared and communities look for actionable results and next steps following the SMMI.	Comment refers to non-CAMP document. However, we will make clear this distinction in future discussions on data analysis and potential actions.	
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Data collection and what that looks like was a key theme discussed-emphasizing the need for a variety of data being collected that is scientifically valid and very accessible to a lot of different users. This group also discussed how data is useful in identifying the sources of pollution, the hotspots, and then being able to inform solutions and policy changes.	Given the conflation between high-quality measurements and lower-quality indicative monitoring, has the technical validity of each type of measurement been appropriately disclosed? Will that data quality be used to guide the application of findings? What does accessible data look like for Aclima and this program?	Regulatory, high-quality non-regulatory, and lower- quality "indicative" measurements should be further clarified in order for the SMMI applicability and potential results to be appropriately understood.	Comment refers to non-CAMP document. However, this is now covered in other responses and will be highlighted in any meetings on data interpretation.	

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SMMI Frequently Asked Questions7	SMMI Supplemental Material	SMMI/CAMP General	What are Aclima's monitoring capabilities and capacity? Aclima will work with its subcontractors (UC Berkeley, UC Riverside, and Aerodyne) to conduct mobile monitoring using 42 mobile platforms and 3 mobile laboratories.	It is unclear how Aclima's 42 mobile platforms will be allocated to the different communities throughout the monitoring period to ensure equitable and representative monitoring and capture of capture of temporal and spatial variability.	Aclima should provide a detailed allocation plan outlining how the 42 mobile platforms will be distributed across the participating communities over the course of the monitoring period.	Comment refers to non-CAMP document. Clarification has been provided on the broad area monitoring.	
SMMI Frequently Asked Questions7	SMMI Supplemental Material	SMMI/CAMP General	When will monitoring occur? The monitoring coverage is proposed to occur simultaneously across all communities for up to 9 months	It is unclear how this will be performed "simultaneously" based on Aclima's 42 vehicles and 64 communities to monitor. Given the differences in mileage allocation listed in Appendix B, it is likely time spent will differ between CNCs assigned <10 miles and those assigned higher mileage.	Recommend the language be modified to more accurately describe the monitoring	Comment refers to non-CAMP document. Clarification has been provided on the broad area monitoring.	
Aclima SMMI RFP Proposal9	SMMI Supplemental Material	SMMI/CAMP General	5.2.2 Targeted Area Monitoring Coverage Table 5.12 PMLs Dedicated 32 AMPs Flexible 30-40 Total Weeks 62-72 … Targeted area monitoring phase 2 Follow-up mobile monitoring Phase 2 will identify additional locations of interest from Aclima's broad area monitoring coverage monitoring after three to six months of collection.	Given the limited mileage allocation, complete community coverage not possible. It is unclear how much time Aclima vehicles will be dedicating to targeted monitoring (vs. the broader mobile monitoring).Clarification may be useful to add in terms of time and mileage allocation.	Provide greater clarity on the anticipated time and mileage allocation between targeted area monitoring and broader mobile monitoring. This may include an estimated breakdown of the vehicle usage (e.g., number of miles or percentage of time) that will be allocated to targeted monitoring versus broad-area coverage. Clarify whether the "32 PMLs" and "30–40 flexible AMPs" represent dedicated resources for targeted monitoring, or whether they may also be used for broader monitoring activities. Expand the description of Phase 2 to include an explanation of how locations of interest will be prioritized, and how often those sites will be revisited, particularly in areas where full coverage is not feasible due to mileage constraints.	Comment refers to non-CAMP document. Clarification has been provided on the broad area monitoring.	

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Aclima SMMI RFP Proposal9	SMMI Supplemental Material	SMMI/CAMP General	5.3.3 Fleet management Aclima estimates that 91 new, high quality jobs will be created to operate the Mobile Platform fleet of 42 vehicles. All drivers in Aclima's core fleet are Aclima employees, not contractors. ... Aclima offers both full time and part time (late shift) positions, making a potential fit for more work-life schedules. Aclima drivers work independently in the field, exercising a high degree of personal judgment and responsibility.	The use of newly-hired community-member drivers was featured in the RFP and PR following the Aclima SMMI announcement. However, due to the reliance on drivers for the minimal maintenance and quality assurance prescribed by Aclima (based on CAMP documents), the role of a driver is also critical in proper measurement procedures and instrumentation operation, and it is unclear what the training protocols are in place to ensure these technical needs are fulfilled. The "Training" section appears to focus primarily on safe driving, while instrument operation also appears to be a key role played by drivers. e.g., https://abc7news.com/videoClip/15976879/ https://investorshangout.com/revolutionizing-air-quality-aclimas-mobile-monitoring-initiative-313984-/	Expand the "Fleet Management" or "Training" sections to clearly describe the technical training protocols provided to Aclima drivers, particularly related to instrument operation, handling, and basic troubleshooting, routine quality assurance/quality control (QA/QC) procedures expected of drivers in the field, and protocols for identifying and reporting anomalies in measurement data or equipment function. Given the critical role drivers play not only in data collection but also in maintaining data quality, including this information would strengthen confidence in the consistency and reliability of mobile monitoring operations. In addition, clarify whether technical training is standardized and recurrent, and how performance in these areas is tracked or supported.	Comment refers to non-CAMP document. The driver duties are now clarified in the responses.	
Aclima Mobile Platform Quality Assurance - V3.1, March 10, 202310	Aclima Prior Material	Aclima General Material	"Therefore, we cannot guarantee any specific maximum confidence interval (or precision) around individual atmospheric concentration estimates"	There is a clear limitation identified regarding the measurement capabilities and potential for error, and this is not adequately discussed in the CAMP - in either the potential impacts or the steps taken by Aclima to reduce the risks or effects.	Further clarity and detail should be added regarding Aclima's use of lower-quality data, as well as Aclima's procedures to maximize data quality and minimize the potential for error.	Comment refers to non-CAMP document. Theme is covered in other responses.	
Aclima Mobile Platform Quality Assurance - V3.1, March 10, 202310	Aclima Prior Material	Aclima General Material	The TVOC sensor may drift outside of the acceptable range based on the MQOs in Table 4; however, since the TVOC sensor is only partially quantitative, given its wide range of sensitivities to different VOC species (over 2 orders of magnitude differences), the TVOC sensor calibration values are typically not adjusted after the fact. It is assumed that other uncertainties are much higher than the sensitivity of the sensor.	There is a clear limitation identified regarding the measurement capabilities and potential for error, and this is not adequately discussed in the CAMP - in either the potential impacts or the steps taken by Aclima to reduce the risks or effects.	Further clarity and detail should be added regarding Aclima's use of lower-quality data, as well as Aclima's procedures to maximize data quality and minimize the potential for error.	Comment refers to non-CAMP document. Theme is covered in other responses.	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
Aclima Mobile Platform Quality Assurance - V3.1, March 10, 202310	Aclima Prior Material	Aclima General Material	Table 5: Ambient concentration data product - Typical In-field Performance	Clear bias and drift during field deployment is identified, although Aclima's adjustments to minimize these impacts are not clear.	Further clarity and detail should be added regarding Aclima's use of lower-quality data, as well as Aclima's procedures to maximize data quality and minimize the potential for error.	Comment refers to non-CAMP document. Theme is covered in other responses.	
Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance Plan - V1.2, March 10, 202311	Aclima Prior Material	Aclima General Material	Figure 6. Comparison of the baseline annual mean segment concentration within 250 m from the regulatory site annual median for each site for which a comparison was possible	Some pollutant measurements (e.g., CO) exhibit very poor correlation (in slope and R^2) vs. the established monitoring station, and raise concerns regarding the data quality and reliability to which Aclima does not address thoroughly.	Further clarity and detail should be added regarding Aclima's use of lower-quality data, as well as Aclima's procedures to maximize data quality and minimize the potential for error.	Comment refers to non-CAMP document. Theme is covered in other responses.	
Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance Plan - V1.2, March 10, 202311	Aclima Prior Material	Aclima General Material	References, e.g., Williams (2014)	Aclima references EPA guidance materials that recommend applying corrections to lower-quality sensor data to improve accuracy. However, it remains unclear whether Aclima will implement such corrections in practice, and if so, what methods or calibration procedures will be used. This lack of clarity raises concerns about the validity and comparability of the resulting data.	Aclima should clarify whether sensor corrections will be applied as recommended in the cited guidance and, if so, provide a general description of the correction or calibration approach used. If corrections are not planned, a justification should be provided, along with an explanation of how data accuracy and comparability will be maintained.	Comment refers to non-CAMP document. Theme is covered in other responses.	
SMMI Frequently Asked Questions7	SMMI Supplemental Material	SMMI/CAMP General	What actions do we expect from SMMI? SMMI is intended to generate a high-quality dataset that can be used to support many potential actions. Community engagement and continued discussions with air districts and divisions within CARB will be conducted to best leverage SMMI data. Potential actions may include: < Identify fugitive emissions (e.g., pipeline leaks) < Support community emission reduction plan development and upcoming rulemaking activities < Inform future monitoring (e.g., community air grant funded monitoring, follow-up mobile monitoring) < Notify relevant entities of air pollution emergencies	While the section outlines several impactful uses of SMMI data (including support for CERP development and regulatory action) it does not address whether the data quality, resolution, and QA/QC practices are sufficient to meet the technical standards typically required for these applications. Without such clarification, it is unclear whether the dataset can reliably inform decision-making at that level.	Clarify the expected data quality and whether it will meet the technical rigor necessary to support the proposed outcomes, including regulatory decision-making, CERP development, or rulemaking activities. If the data are intended to be indicative rather than regulatory-grade, this distinction should be made clear to set appropriate expectations for their use.	Comment refers to non-CAMP document. However, Section 3 in the CAMPs clarifies that data may be used to support but wont directly lead to those actions.	

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SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Some actions will be taken during SMMI. For example, the air districts and related entities (e.g., facility operators) will be notified if concerning concentrations of air pollutants are detected.	It is not clear what emission levels would result in notification to a regulatory agency. Given that the mobile monitoring is not performed using "regulatory grade" instrumentation it would not likely be sufficient on its own to implicate a source.	The CAMPs should clarify what results would be considered actionable, and whether notification to agencies would be tracked as part of the SMMI results. This clarification would further support understanding of the direct results of the SMMI, and minimize concerns with lower data quality applied in mobile monitoring.	Comment refers to non-CAMP document. However, this is covered in the updated Section 14.1 on the notification process.	
SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	The data will be publicly available at the completion of SMMI. The data visualization will be determined through community engagement depending on how communities want the data to be presented. In terms of pesticide monitoring, the monitoring techniques employed by SMMI are not optimized for measurements of pesticides. ... The data will be available for CARB four months after the start of the mobile monitoring. The data will be publicly available at the completion of SMMI. The data analysis to identify the sources of concern and the overburdened area by specific air pollutants and sources will be carried out during SMMI and results will be publicly available at the completion of SMMI. ... Results won't be real time as data analysis and QA/QC will be needed to achieve results.	Mobile monitoring data is difficult to interpret and so the tradeoff between live data release or longer-delayed but more deeply translated data is understood. However, Aclima and the CAMP documents include significant variability and potential divergence from the CAMPs (as- written) which raise concern if no communication is provided.	Given the CAMP language indicating the potential for modification throughout the SMMI, providing data through the SMMI (as data is reviewed and approved by CARB) may improve the transparency of the process.	Comment refers to non-CAMP document.	

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Appendix E: Hyperlocal Enhancement-Based Data Products Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	4.2 Limitations ? Not ideal for catching sporadic emissions sources. ? Variations in wind direction make precise source location identification challenging. ? Emission rates may not scale directly with the enhancement concentration. ? Sensitivity to time window for baseline definition.	The limitations provided are in not adequately captured in the main CAMPs, which primarily highlight the benefits of mobile monitoring for capturing variability (spatial and temporal) and dynamic conditions	These limitations should be more adequately addressed in the CAMPs themselves as well as public sessions and reporting to support the correct interpretation of reported results	The appendix documents are considered part of the CAMPs and are the most appropriate place for describing these limitations (alongside detailed descriptions of the enhancement-based data products) to ensure readability of the CAMPs. These limitations are taken into account at the stage of producing appropriate visualizations. Limitations will be included in documentation that accompanies the visualizations.	Section 13.2: For the concerns assigned specific monitoring objectives in this monitoring plan, the analysis approaches are specified in Table X, in Section 4.3. Appendices D and E provide more detailed descriptions of how different analyses are performed and the different implementations of the approaches that are possible. These appendices also list important limitations that will be taken into account at the analysis stage and will be communicated in the public presentation of results. The specific implementation of these approaches will be determined after the data is collected and evaluated. Data from both Aclima platforms and the [PML Team] PML will be analyzed according to the general approaches outlined above.

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
Appendix E: Hyperlocal Enhancement-Based Data Products Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	4.2 Limitations ? Variations in wind direction make precise source location identification challenging. While wind data can be used to improve location identification, there may still be challenges to precisely identifying source locations and the location the enhancements are detected may not reflect the location of the responsible source. ? Emission rates may not scale directly with the enhancement concentration. Quantitative properties of the peaks and clusters can be used to prioritize certain emissions sources for mitigation or further investigation, but these metrics should be interpreted as only qualitative or, at best, semi-quantitative and cannot be used to directly infer emission rates. In some cases, the sensor may also be a large source of uncertainty in the calculation of the concentrations present during an enhancement event (e.g. TVOCs). However, even in cases where the true concentrations are accurately measured, plume dispersion dynamics are a large source of uncertainty in estimating emission rates from concentrations.	The clear "cannot be used to" language here should be clarified for the CAMP application of different measurements.	The CAMP should clearly specify, for each pollutant or metric reported, whether the data are intended to support quantitative, semi-quantitative, or qualitative interpretation, and identify key uncertainties that limit use for emission estimation or regulatory action	The appendix documents are considered part of the CAMPs and are the most appropriate place to list detailed limitations on specific sensors. These limitations are taken into account at the stage of producing appropriate visualizations. Relevant limitations will be included in documentation that accompanies the visualizations. SMMI data will not be used for emissions estimation or for direct regulatory action. The description of primary monitoring objective #1 (in Section 4.1): "Identification and characterization of air pollutant emission sources" has been updated to make it clear that source characterization will not include emissions rate estimation. Language in Section 2 has also been updated.	Section 13.2: For the concerns assigned specific monitoring objectives in this monitoring plan, the analysis approaches are specified in Table X, in Section 4.3. Appendices D and E provide more detailed descriptions of how different analyses are performed and the different implementations of the approaches that are possible. These appendices also list important limitations that will be taken into account at the analysis stage and will be communicated in the public presentation of results. The specific implementation of these approaches will be determined after the data is collected and evaluated. Data from both Aclima platforms and the [PML Team] PML will be analyzed according to the general approaches outlined above. Section 2: Stationary source monitoring - measuring air pollutants near specific stationary emission sources (e.g. industrial facilities) ~~so the emissions from the source can be characterized and the impact of the emissions on the local community can be assessed~~ to better understand and characterize the air within the vicinity of these known or suspected sources. Section 4.1: This objective seeks to better understand and characterize the air within the vicinity of known, suspected, or unknown sources, which can include the following goals: -Understand what locations in communities are impacted by pollution near sources -Understand how concentrations of key pollutants can vary directly downwind of a given source -Understand how concentrations of key pollutants near a given source may vary by time of day
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	1.4 Engagement during and after monitoring Continued communication: receive email updates on monitoring progress (if contact information was provided during the engagement process).	The data availability is described elsewhere as to be released following SMMI and data finalization, it is unclear what results may be communicated during the SMMI monitoring or if this is solely information, such as regarding completion of a given CNC's monitoring plans.	Clarity regarding what information may be shared while the SMMI is ongoing (including interim results) would be helpful.	The intent here is to share information about monitoring progress (for example a map of pass counts), not results of air quality data.	Section 1.4: Continued communication: receive email updates on ~~monitoring~~ progress towards monitoring completion (if contact information was provided during the engagement process). For example, monthly event notifications summaries (see Section 14.1), broad area monitoring progress, and locations where PMLs have completed monitoring.

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	12.1 Evaluating effectiveness during the monitoring period: Data Verification: A thorough data verification process will be conducted on an ongoing basis throughout the monitoring period in order to produce finalized data in monthly increments with a 3 month lag time.	Data availability is discussed elsewhere as released following the SMMI, although this language would suggest that data is finalized throughout the CAMP. It is unclear if this interim data or summarized results may be shared or discussed while the SMMI is ongoing.	The timeline of data release or distribution, or public meetings discussing interim findings, should be clarified.	There is a distinction between finalized (verified) data transferred by Aclima to CARB (which occurs monthly with a 3 month lag from the time of data collection) and the public release of all data by CARB that will occur at the conclusion of the project. Section 14.2 discussing the details of the public data release. We have also added Section 10 in the data management plan (appendix F) that describes the public data release. The only interim results that will be shared publicly will be progress towards completion of the monitoring (i.e. as a map of pass/visit counts)	Added the following text to Section 12 first paragraph: "Additional details about the public data release can be found in Section 14.2 and Section 10 of Appendix F."
Appendix F: Aclima's Data Management Plan (v3.0)6	CAMP Supplemental Material	SMMI/CAMP General	(Overall comments)	While this content is useful to demonstrate the data management has been thoroughly planned, it is primarily internal to Aclima or between Aclima and CARB and so does not answer public questions about the data accessibility timeline and format, and processes in place to communicate the findings and extent of the data collected.	Aclima and CARB should provide a public-facing summary of the data accessibility timeline, formats for release, and planned communication strategies to ensure findings are transparent and accessible to communities. While certain processes may remain proprietary, a clear explanation of those limitations and how they will be addressed in public communications would improve trust and support meaningful community engagement.	Text has been added to the data management plan as a new section 10 which states the plan for public data release and the format. The limitations described in the CAMP appendices will remain public and will be available for reference to users of the data.	10. Public Data Release At the conclusion of SMMI, CARB will release the finalized level 2a data through AQview. The file format of this data will follow the same format as that transferred from Aclima to CARB and described in this document. This document, the CAMPs, and Aclima's and the PMLs QA documentation will accompany the publicly available data set to provide important details on the data schema, processing, data quality, limitations, and appropriate use cases.
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	2.3 Gaps in air quality information that SMMI will address The Aclima Mobile Platform includes an expanded suite of pollutants that support improved characterization of sources including the use of black carbon to diesel particulate matter and TVOCs to indicate areas where toxic air contaminants may be located.	As is discussed in the Appendices comments, Aclima does not adequately identify differences in data quality across pollutants within the CAMPs, which may imply that all data is of similar quality.	Data quality, and the potential actionable results obtainable from different data sources, should be clearly identified in the CAMPs, particularly for more complex pollutants which may be used for source identification and the targeted sources of community concern.	Limitations of different sensors and use are covered in detail in Appendices C (5.6), D (5) , and E (3). Data quality metrics for Aclima and PML measurement methods are included in Appendices C (5.5) and G (Various sections throughout). Additionally, in order to clarify the description of the "characterizing sources" monitoring objective, the text in Sections 2 and 4.1 have been updated to clarify that we are characterizing the air around sources.	Section 2: Stationary source monitoring - measuring air pollutants near specific stationary emission sources (e.g. industrial facilities) so ~~the emissions from the source can be characterized and the impact of the emissions on the local community can be assessed~~ to better understand and characterize the air within the vicinity of these known or suspected sources. Section 4.1: This objective seeks to better understand and characterize the air within the vicinity of known, suspected, or unknown sources, which can include the following goals: -Understand what locations in communities are impacted by pollution near sources -Understand how concentrations of key pollutants can vary directly downwind of a given source -Understand how concentrations of key pollutants near a given source may vary by time of day

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	6. Data quality objectives More specifically, this means that the spike measurement must have a signal to noise ratio of at least 3.	This approach suggest more qualitative monitoring approaches are in place for certain measurements or identification procedures.	The use of qualitative or quantitative reporting or identification thresholds should be clearly distinguished.	Enhancement detections are largely qualitative, indication location and persistence of hot spots. There are quantitative metrics produced that can be indicative. We have included this information in Appendix E and additional information is included in Section 14.1 on measurement thresholds.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	6. Data quality objectives Aclima will monitor and track the performance of each underlying measurement using the following key data quality indicators: gain drift and limit of detection	Aclima QA/QC is only performance every 6-8 weeks at the start and end of a monitoring cycle for a CNC. It is unclear if this is an appropriate level of data and operations review, given the measurement techniques and applications in use.	Further detail regarding instrumentation QA/QC programs and how this will be reported (particularly where data concerns are identified or changes are made) should be provided to ensure that data is fully validated and supportive of results.	Section 12.2 details the QA/QC information that will be included in the final report.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	9.1 Aclima's Quality Assurance and Quality Control Procedures Our trained drivers perform daily visual inspections of the monitoring system, including checking sample lines and performing PM zero checks to ensure the system is operating correctly. They also monitor data connectivity and clean the black carbon sensor inlet.	The description of daily QA/QC procedures relies heavily on visual inspections by drivers, but it is unclear whether this approach is sufficient given the complexity and sensitivity of the monitoring equipment used. Additionally, more detail is needed on the training process for these drivers, especially if they are not technical staff.	Aclima should provide more detail on the training protocols for drivers responsible for QA/QC, including how they are qualified to identify and respond to issues beyond basic visual checks. The CAMP should also evaluate whether visual inspections alone are adequate for ensuring data integrity across all deployed sensor types to support the technical rigor of the SMMI.	Aclima drivers are not responsible for QA/QC. Driver duties are discussed in Section 9.1 and include basic visual inspection and troubleshooting in the field.	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	9.1 Aclima's Quality Assurance and Quality Control Procedures Collocation of Aclima AMN at Regulatory Sites Aclima AMNs will be installed at between 1 and 3 regulatory monitoring sites operated by CARB or local air districts across California for long term intercomparisons in order to directly compare Aclima's measurements to regulatory measurements.	Will these results be posted? How are these sites being chosen, and are they representative of all conditions for mobile monitoring deployment? Will the mobile monitoring systems collocate with nearby monitoring stations already present in CNCs for this same purpose, and to review unit-specific potential for error?	The CAMPs should clarify that this data will be provided to the public, and how the sites will be chosen. CAMPs should describe what will happen if there are differences between the AMN and the regulatory site, including how the discrepancy will be addressed during data analysis. Recommend that the AMLs be collocated with monitoring stations present in the CNCs for a period of time in order to evaluate consistency of data.	Text has been added to Section 9.1. The sites were selected based on availability of space and a desire to collect AMN vs FEM PM2.5 measurements in the Central Valley where Aclima has less past monitoring experience than in the Bay Area and Los Angeles Basin. Specific planned collocations at regulatory sites of the AMP are not planned because mobile to stationary collocation (i.e. while performing broad area monitoring) is sufficient in our experience for identifying systematic bias of regionally distributed pollutants like PM2.5 - which is the primary focus of these collocations. See Appendix D and Whitehill et al, (2024), for example. Mobile monitoring near stationary sites happens under the same collection strategy as all other broad area monitoring driving (no specific adjustment to drive plans are made to collect extra data near regulatory sites). Corrections may be made based on collocation results if a systematic bias is discovered to be significant enough (expectation is that this may happen for PM2.5 given the challenge of aligning different measurement principles for PM2.5 measurements). We will consult with CARB to decide on the approach if this is the case. The monitoring procedure is independent of these correction processes.	Section 9.1: These intercomparisons will be evaluated and quantified using various Data Quality Indicators (DQIs) (e.g. bias, precision, mean bias error, R2, etc). As of the publication of this CAMP, an AMN has been installed at a regulatory site in Sacramento (Downtown Sacramento – T Street, 1309 T Street, Sacramento, CA) and in Fresno (Fresno – Garland, 3727 N. 1st Street, Ste. 104, Fresno, CA). These sites were selected based on availability of space as well as the desire to collect AMN data in the Central Valley for characterizing regional differences in PM2.5. This data will be included in the data set released to the public at the conclusion of SMMI and the results of the intercomparison will be summarized in the final report.
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	13.2 Aclima analysis, interpretation, and visualization of data Clusters of enhancement detections on a map	It is unclear what is being reported in some monitoring scenarios, as quantitative metrics vs. "enhancements" are both raised within the Plans.	It would be beneficial to clarify what data will be reported, how it will be reported, and if quantitative metrics or more qualitative "enhancements" will be reported, particularly if this is to utilize lower-quality data which would otherwise be difficult to apply.	Appendix E discusses the data that will be reported including the quantitative metrics that will be associated with enhancements (e.g. see the discussion of persistence metrics and magnitude metrics in Section 2.3 of Appendix E).	Added following text to second paragraph of 13.2. "Appendix E Section 2.3 discusses the additional data that will be reported including the quantitative metrics that will be associated with enhancements."
San Jose CAMP5	CAMP	Specific CNC CAMP	Figure 9: Map of San Jose's final community Broad Area Monitoring selection and Auris Health, a nearby ethylene oxide (EtO)-emitting commercial sterilization facility.	The ethylene oxide sterilization facility is a clear community concern, and the chemical is a clear concern nationally. However, the focus on this source is unclear here as the methodology for monitoring ethylene oxide has already been determined to not be available here. What resources are being dedicated to this source, if any?	Clarifying if or how ethylene oxide will be measured would improve the CAMP, as the current version suggests that ethylene oxide is a source of concern and to be targeted for measurement, but the measurement methodology from the Aerodyne PML is not presently assigned.	The UC Berkeley platform is unable measure this (Section 4.3) and therefore EtO is not included as a monitoring objective in San Jose. This will be clarified in all CNC CAMPs where there is a EtO source and either Aerodyne or Houston/Baylor/Riverside is not assigned.	

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Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	3.1 Mobile Fleet Maintenance and Diagnostics 2 Aclima's internal SOPs are for internal use only as they include specific details related to Aclima's operations and are, therefore, considered proprietary. ... Drivers are trained and guided by Aclima staff to make simple repairs.	Aclima SOPs are currently not provided but are necessary information to interpret the reliability of (in some cases) already lower-quality sensor data. The partner labs made extensive SOPs available to improve the confidence in the reliability of data, and the same should be expected of Aclima. The lack of confidence in Aclima's data is also impacted by the low frequency of Aclima system evaluations as described in the CAMP (6- 8 week intervals, between CNC deployments), and the risk of instrument maintenance being done by minimally-trained drivers.	Aclima should prepare and release SOP and QA/QC documents, following the rigorous model provided by the partner labs.	Aclima's SOPs are proprietary. Transparency about our process is provided in extensive QA documentation included as appendices and in the QA results included in the final report. Appendix C is the relevant document to refer to processes around calibration.	
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	4.1.1 Precision and Bias For CO, TVOC, and PM2.5, precision and bias are based on regression analysis, where the test sensor (x-axis) is collocated in the Mobile Calibration Laboratory with an ensemble of sensors of the same type (make and model; y- axis). The average of the ensemble of sensors is referred to as a relative reference. While the regression is usually linear, it also may be based on a nonlinear function depending on the pollutant and sensor.	While useful, a single (not used in field) system is not sufficient to address potential error and drift over time from in-use monitoring systems. Beyond that, it is unclear if or how this evaluation will be applied to in-use monitors	Direct evaluations (e.g., calibrations) of the in-use monitoring systems will be most applicable in understanding potential measurement error, and would be most useful in providing summarized data QA/QC. Any systematic corrections made to monitor data should also be identified, as a clear procedure does not appear in the current documentation.	We believe this is addressed in responses to other comments. Aclima's data quality operations are documented in the appendices (as well as in the CAMPs). In use monitoring systems are calibrated on a 6-8 week cadence for SMMI. Adjustments are applied at the individual sensor level based on the results of these calibrations. Systematic bias (as described in Appendix D) is evaluated at the system level through mobile-to-stationary comparisons as well as the regulatory site collocations.	
Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	1.0 Introduction The mobile mapping method is not a reference method designed to support the National Ambient Air Quality Standards (NAAQS), which are supported by a network of stationary reference monitors. Thus, data products from the mobile method do not support assessment of compliance with NAAQS.	This limitation is appropriately considered, as NAAQS regulatory monitoring follows specified methods and procedures, and is subject to the most stringent requirements. Aclima would also not meet the standards for a further range of regulatory monitoring requirements (such as those used for site inspections to identify permit violations).	Further clarity on the different monitoring applications and requirements should be identified in order to clarify what Aclima's SMMI monitoring results can be applied to	The CAMP monitoring objectives (Section 4.1) and data quality objectives (Section 6) address this, as well as within Appendix D (Section 1) and E (Sections 1 and 4), where specific use cases are discussed.	

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SMMI Kickoff Meeting Summary8	SMMI Supplemental Material	SMMI/CAMP General	Mapping strategy for pollution Dr. Aja Ellis reviewed air pollution sources with pollutants measured by SMMI, organized into the table below.	There is an ongoing conflation of the Aclima monitoring capacity vs. the partner labs. The measurement capabilities and data quality should be made more distinct.	It should be clarified what measurements are indicative and which are technically reliable to establish a basis for action. Results must be accurately interpreted for the community. CAMPs should provide additional differentiation between the data quality of the AMP and PML measurements.	This comment references a non-CAMP document. Data quality metrics for Aclima's sensors and PML analyzers are included in the Appendices (C, Sec. 5.5, and G in various sections throughout).	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	3. Scope of Actions Regulatory investigation: where these data identify hotspots that can be statistically attributable to a given source, local and state agencies may decide to do further investigative work that can lead to compliance and enforcement actions (e.g. fines, new emissions control requirements)	The procedures proposed here, such as thresholds for Aclima to report a source or hotspot to a regulatory agency, are not clearly defined and it is unclear if this goal will be tracked.	It would be helpful to clarify if these are actionable results, and would be tracked as part of the SMMI results, and what result would lead to an agency notification by Aclima.	We have removed this language "that can be statistically attributable to a given source" to make sure there is no implication that we'd be doing individual source attribution across the state. No regulatory action will happen directly as a result of SMMI, but agencies may decide to do further investigative work after seeing hot spots on our maps. Section 14.1 has been updated to clarify the notification protocols.	Regulatory investigation: where these data identify hotspots ~~that can be statistically attributable to a given source~~, local and state agencies may decide to do further investigative work that can lead to compliance and enforcement actions (e.g. fines, new emissions control requirements)
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	3. Scope of Actions Corporate action: individual companies may be able to use these data to adjust their transportation routes and schedules, or facility operations, to reduce emissions and health impacts	It is unclear how the translation to corporate action is intended to be driven. Is it by regulatory action, public pressure, or voluntary decision making? See Section 5, indicating that industry experts are minimally or not included in the project.	Further clarity regarding the intent of "corporate action" should be provided, particularly if this is intended to be driven through Aclima/SMMI public meetings where results are shared and discussed, regulatory action (e.g., through air districts or CARB), or direct engagement with industry.	We intentionally use the word "may" in relation to companies that may voluntarily take action as a result of this data. Aclima's scope is to provide hyperlocal air quality data. Afterwards, the data will be made public, allowing users to leverage the data in a way that is most helpful to them.	
San Jose CAMP5	CAMP	Specific CNC CAMP	8.1 Community Mileage Allocation For San Jose, the total road length (for residential and major roads only) within the community is 2206 miles, and the allocated mileage is 1037 miles, as determined through the process above.	The allocated mileage is less than half of the total community road length, leaving potentially critical gaps in geographic coverage that limit the completeness and strength of conclusions. Further discussion as to the practices in place to minimize negative impacts is necessary to understand biases, and address community monitoring with less mileage allocation. Notably, this is more severe than other communities (e.g., N. Bakersfield, 320 of 325 miles) and thus warrants this level of detail, even if the practices are similar across communities.	Recommend that the CAMP provide further detail as to how mileage allocation was determined in areas where the mileage is less (and in this case, significantly less) than the total CNC road length in order to understand limitations and bias.	Section 8.1 has been revised between drafts 1 and 2 to expand the description of how broad area mileage allocation was determined. Appendix B was also revised. "Individual census tracts within CNCs were successively selected based on this customized ranking until the total road miles available for monitoring in each air district was exhausted. The road mile length of the census tracts selected is added up for each CNC, and that total is the number of miles available for monitoring for that CNC. The total number of miles assigned to each community by this method is presented in Appendix B."	

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Appendix B: Methodology for Allocation of Broad Area Monitoring Miles6	CAMP Supplemental Material	SMMI/CAMP General	A customized prioritization metric for each census tract across all CNCs was defined to rank CNCs according to various socioeconomic and environmental indicators. This prioritization method was defined in consultation with the PEG. … Individual census tracts within CNCs were then successively selected based on this customized ranking until the total road miles available for monitoring in each air district was exhausted.	Given the variability of communities, and the bias inherent in any ranking methodology, the ranking results of the communities considered here should be made available for improved transparency.	Given the variability of communities, and the bias inherent in any ranking methodology, the ranking results of the communities considered here should be made available for improved transparency.	Individual census tract rankings will be added to appendix B.	Table added to Appendix B
Appendix B: Methodology for Allocation of Broad Area Monitoring Miles6	CAMP Supplemental Material	SMMI/CAMP General	Individual census tracts within CNCs were then successively selected based on this customized ranking until the total road miles available for monitoring in each air district was exhausted. The road mile length of the census tracts selected is added up for each CNC, and that total is the number of miles available for monitoring for that CNC.	While the ranking system is understood, it is unclear how exactly this was applied to develop final mileage allocations. Was the ranking converted into a percent-based share of mileage within the CNC? Particularly for the 27 communities allocated <100 miles (6 with <10 miles), how will this impact the frequency of the mobile monitoring? How do these allocated mileages compare to the total identified mileage within a community, and how were mileage exclusions determined?	Recommend that the CAMPs fully describe how the ranking was used to develop final mileage allocations. Of particular interest are how the allocated mileage compares to the total mileage within a community, and how mileage exclusions were determined	Section 8.1 has been revised between drafts 1 and 2 to expand the description of how broad area mileage allocation was determined. Appendix B was also revised. "Individual census tracts within CNCs were successively selected based on this customized ranking until the total road miles available for monitoring in each air district was exhausted. The road mile length of the census tracts selected is added up for each CNC, and that total is the number of miles available for monitoring for that CNC. The total number of miles assigned to each community by this method is presented in Appendix B."	

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Rodeo and Crockett CAMP4	CAMP	Specific CNC CAMP	2.3 Community-specific motivations for air monitoring Key pollution sources in the community include historic emissions from the Phillips 66 refinery (recently having limited petroleum refining) and other historical incidents, such as the prolonged 16-day toxic release following the 1994 Catacarb event. There was also pollution from the recently shuttered Petroleum Coke calcining operation, subject to previous lawsuits, that has yet to be dismantled and remediated, and a major spill from the refinery's Marine Terminal in 2017 that sent 120 people in south Vallejo to the emergency room with respiratory distress. These pollution sources have adversely impacted local health by exacerbating respiratory conditions and contributing to other environmental health risks.	Much of the community concern is anchored to historical incidents and exposure.	Clarify if the sites of historical concern will be identified as sites of interest for closer monitoring in order to identify if residual effects exist, or if this is solely for community background.	Section 2 contains an overview of the community for background purposes. Section 4 identifies the specific concerns included in monitoring objectives. Residual effects from historical events are not part of identified monitoring objectives.	
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	Top pollution sources identified via emission inventories Paramount Petroleum Corporation, a large refinery, emits substantial quantities of combustion-related pollutants and greenhouse gases.	It is surprising to see the source listed for only "CH4, PM2.5, NOx, PM10, SOx, N2O" in Table 3, whereas other CNCs/CAMPs with oil & gas facilities (such as refineries) emphasize VOCs and air toxics. Further, this is not listed as a targeted facility, but does appear in Figure 12 as a large source.	The discussion of Paramount Petroleum Corporation as a top pollution source appears incomplete and inconsistent with the treatment of similar oil and gas facilities in other CAMPs and CNCs based on the pollutant characteristics.	Thank you for pointing this out. We looked into this and discovered that emissions for certain air toxics may be listed as null or zero in the database if data is not reported by the facility for this database year. We used the 2021 version of this database and no air toxics from this facility have been reported since 2017. We will clarify the reporting year in the table caption and add an asterisk noting that air toxics have not been reported for 2021.	Section 2.3: Table X: Major polluting facilities (from CARB Pollution Mapping Tool v2.6, reporting year 2021) located within the monitoring area boundary (up to 200 m outside the boundary). (Footnote) * Note that air toxics emissions have not been reported from this facility for the 2021 reporting year.
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	6. Data quality objectives Achieving data quality objectives relies on more than just individual indicators, as real-world challenges (e.g., driver absences) and external events (e.g., wildfires) can affect data quality despite a robust QA plan.	It is unclear how these events will be accounted for. For example, if there is a disruptive wildfire season during the limited 9 month monitoring period, how will adjustments be made to ensure goals are met with robust data collection and analysis practices?	Real-world challenges should be addressed, as throughout the SMMI period it is reasonable that issues may arise. It is unclear of resources may be reallocated to resolve those challenges, or to what extent data may be limited due to those impacts.	This will have to be evaluated on a case by case basis and in consultation with CARB. The extent of the impact will be analyzed in the final report. Aclima will be constantly evaluating effectiveness (as defined in Section 12) and will add driving resources (or shift from other locations) where gaps in completion are identified.	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	8.2 Broad Area Monitoring Coverage Broad area monitoring will occur consistently across a 9 month period from June to March, with repeat frequency in all locations (at the census block level) on average approximately once every 2 weeks	The specifics provided are important to understand Aclima's operating procedures to ensure robust and variable conditions are captured, although it is unclear why this specificity is not included in other CAMPs (including other 7-1-2025 revisions, e.g., San Jose).	This specificity as to measurement planning and re-visiting of a CNC should be added to other CAMPs, particularly low-mileage CAMPs where it is of significant concern.	Thank you for spotting this. First off, this should read "... (at the census block group level) ...". Second, this detail was left out entirely in some CAMPs.	Make sure "... (at the census block group level) ..." is included in all CAMPs.
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	Figure 9: Map of the North Bakersfield broad area monitoring boundary and local air quality community concerns.	Given that mobile monitoring mileage is limited and already does not provide complete community coverage, what level of time of monitoring resources will be dedicated to the Tricor Refinery, Concrete/Cement/Asphalt Facility, and other sources which are located outside the boundaries of the community and are not included in roadway route of the "Broad Area Monitoring Selection" mapping?	Further clarification should be added regarding the Aclima allocation of time and monitoring resources for broad monitoring vs. targeted source surveying. This is especially relevant for communities with allocated mileage less than the total CNC road length, and where the targeted sources suggest that additional mileage may be applied outside of the CNC boundary to survey other identified sources.	The Tricor refinery and targeted area monitoring is addressed in section 8.3. Broad area monitoring won't cover these sources in this case, except to the extent that potential emissions from these sources impact air downwind within the broad area monitoring boundaries. The mileage allocation is exclusively for broad area monitoring and refers to the road length (not the odometer distance driven) covered by broad area monitoring. Resources for Targeted area monitoring area quantified instead by time spent within a specific identified area of interest. No monitoring outside the boundary is expected except in the case of specified targeted area studies (such as in the case of North Bakersfield for reasons identified in responses to other comments).	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	8.3 Targeted Area Monitoring Aerodyne will be located near the communities of North Bakersfield for a total of 12 days, including mandated down- days and calibration days... We will attempt independent visits to high priority point sources on at least 50% of the days allocated to a given CNC, and each visit will attempt to collect 3-5 mobile plumes. If the source is a VOC or dust/metals source, a stationary measurement in the plume enhancement will be attempted... 11.2.3 Timeline: duration, frequency, milestones, and deadlines The Aerodyne Mobile Laboratory will conduct monitoring in North Bakersfield for a duration of approximately 1 week in a time period to be determined between August 4th, 2025 and September 20th, 2025.	It is unclear how this time will be allocated, and if it will be continuous or distributed throughout the study period to capture source variability. Other CAMPs (e.g., San Jose, Rodeo and Crockett) include language with a different level of specificity such as the statement below. Why is similar specificity not included in those sections? "8.3 Targeted Area Monitoring A drive plan will be constructed such that each targeted area/road is able to be measured within approximately 8 hours. This drive plan will be repeated at least 5 times between June 2025 and February 2026 with the starting location and pathing staggered such that repeat measurements of sources are completed at different times of the day to build up statistics."	Recommend including a standard level of specificity to describe the targeted area monitoring that includes the number of days and the number of plumes to be collected.	Because of logistics, this must be considered on a case by case basis with the PML teams. Different approaches taken by different labs and in different CNCs are for logistical reasons. UC Berkeley is local and can spread monitoring out over time. Aerodyne and Houston/Baylor/Riverside (where the lab is travelling from Houston) monitoring needs to happen in a discrete time period.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	12.2 Evaluating effectiveness at the end of the Monitoring Period	In CNCs where there is existing monitoring data, it is unclear to what extent corrections to SMMI data may be made, if these data sources are solely for comparative purposes, and how any disagreements between the data will be communicated to the communities and public.	Recommend that Aclima provide further detail regarding existing monitoring data, changes that have been implemented, and trends in these local measurements as a result. This is particularly relevant for communities already subject to stringent monitoring and which have realized significant benefits, such as the hexavalent chromium (and general metals) example for the Paramount and N. Long Beach community.	It is beyond the scope of the CAMPs to do a detailed analysis of previous monitoring efforts and historical trends in data. We have provided information in the CAMPs where possible on relevant past air quality monitoring efforts within each of the 62 CAMPs. For QA purposes, comparisons will be made to monitoring data that overlap (both spatially and temporally) with SMMI data, as detailed in Sections 9 and 12 and in Appendix D.	
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	8.2 Broad Area Monitoring Coverage Broad area monitoring will occur consistently across a 9 month period from June to March, with repeat frequency in all locations (at the census block level) on average approximately once every 2 weeks.	This specifying language is important to understand Aclima's operating procedures to ensure robust and variable conditions are captured. It is unclear why this specificity is not included in other CAMPs (including other 7-1-2025 revisions, e.g., San Jose).	This specificity as to measurement planning and re-visiting of a CNC should be added to other CAMPs, particularly low-mileage CAMPs where it is of significant concern.	Thank you for spotting this. First off, this should read "... (at the census block group level) ...". Second, this detail was left out entirely in some CAMPs.	Make sure "... (at the census block group level) ..." is included in all CAMPs.

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Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	Figure 10: Map of the Paramount and North Long Beach broad area monitoring boundary and a nearby ethylene oxide (EtO)-emitting commercial sterilization facility, Parter Medical Products.	The ethylene oxide sterilization facility is a clear community concern, and the chemical is a clear concern nationally. However, the focus on this source is unclear here as it is beyond the CNC boundary and the methodology for monitoring ethylene oxide is not available. What resources are being dedicated to this source, if any?	Detail should be added as to if and how ethylene oxide emissions will be measured, as UC Riverside is not identified as having this capability (refer to Appendix H, and the UC Riverside measurement suite). Additional detail (as raised elsewhere) should be provided regarding the inclusion/exclusion decision making for sources outside of CNC boundaries.	Ethylene oxide is measured by the Houston/Baylor/Riverside mobile lab (see appendix G). This pollutant was mistakenly left out of the pollutant list in Appendix I. It will be added to the final version.	Line added to Appendix I
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	4.2 Define mobile monitoring methods to support objectives Targeted area monitoring for Paramount and North Long Beach will be conducted by Riverside, ...includes ... ethylene oxide	Refer to Appendix B: Only Aerodyne has the capacity to measure EtO, so this is either a clear error or a misunderstanding and poor planning of resources to accomplish community goals of EtO monitoring without the correct partner lab. This further contradicts language in 4.3 "These concerns were translated into specific high-level monitoring objectives and sub-objectives, which in turn allowed the selection of appropriate mobile monitoring methods and data analysis plans to collect the type of data needed to address gaps in prior monitoring efforts and to address specific community concerns."	This should be corrected, either to Aerodyne as the partner lab making ethylene oxide measurements or, add a statement similar to that in the San Jose CAMP where ethylene oxide is a pollutant of concern but not able to be measured by the partner lab: "In some cases it is because the measurement methods for monitoring the sources are not available to address the specific pollution sources (for example, the Berkeley mobile laboratory does not have Ethylene Oxide measurement capabilities to make useful measurements around the Auris Health site)." (Section 4.3).	Ethylene oxide is measured by the Houston/Baylor/Riverside mobile lab (see appendix G). This pollutant was mistakenly left out of the pollutant list in Appendix I. It will be added to the final version.	Line added to Appendix I
Appendix H: Targeted Area Monitoring Assignment Approach6	CAMP Supplemental Material	SMMI/CAMP General	Aclima vehicles conducting targeted area studies can collect data at higher frequency around a single source of air pollution to get more detailed information in time (to see time of day differences, for example). Generally the Aclima vehicles will have the ability to conduct targeted area studies around the clock, while the Partner Mobile Labs will be limited to daytime and some evening hours.	While this highlights the technical strengths of Aclima's targeted monitoring, it is unclear how time and resources will be allocated between these intensive studies and the broader mobile monitoring needed for full community coverage. Additional detail is needed on how the targeted area studies will be prioritized and balanced across communities to ensure both equity and consistency.	Clarify how the CAMP will balance the use of Aclima vehicles for targeted studies versus general community-wide mobile monitoring, and explain how decisions will be made to ensure that high-frequency data collection does not come at the expense of adequate spatial coverage across the full monitoring area.	Aclima's targeted area monitoring is less than 5% of total monitoring resources. There is enough buffer in our resourcing to allow for the additional time spent in CNCs executing the targeted area studies. Completion metrics over time (as outlined in Section 12) will be monitored to make sure adequate spatial coverage occurs.	

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Appendix H: Targeted Area Monitoring Assignment Approach6	CAMP Supplemental Material	SMMI/CAMP General	Strengths and limitations of Labs for Targeted Area Studies: Strengths Aclima: Ability to drive at different hours of the day and days of the week	In contrast to the partner labs (e.g., "not available during overnight hours"), is the Aclima monitoring plan distributed to repeat source/road segment measurements 24 hours a day and 7 days a week equally, or will further effort be directed toward "regular business hours" or given periods of activity?	In prior projects, Aclima has operated the AMPs during a limited number of hours (e.g. "cars left garages ... at around 9:00 AM local time and drove ... for ?6–8 h of driving" (from Apte et al., 2017)) and used stationary monitoring stations during off-hours. Based on language in the CAMPs, it appears that Aclima intends to capture complete temporal variability. Recommend that the CAMP materials clarify the hours during which monitoring by Aclima will take place, including whether source/road segment measurements will be evaluated for each hour of the day and each day of the week. (Apte et al, 2017) https://pubs.acs.org/doi/10.1021/acs.est.7b00891	Section 7.1 includes how shift schedules are staggered to cover different times of day and days of week. Sampling is conducted on a complete cross section of times of day and days of week, rather than meaning they are active at all hours and days in all locations.	
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	2.1 Aclima Mobile Measurements A NafionTM dryer is placed inline for each, just inside the window, to help control the water content in the sampled air for PM2.5 and BC. The BC sample line includes a cyclone (sharp-cut 2.5 ?m at 150 mL/min) in order to keep larger particles from depositing inside the sensor and deteriorating performance. ... The PM2.5 sensor reports particle counts in six size ranges based on optical scattering. Aclima uses a standard mass conversion model assuming spherical particles and constant particle density across the different size ranges to convert particle counts to particle mass.	Both Nafion dryers and PM2.5 cyclones will impact particle measurements and impact PM2.5. In addition to the use of an optical scattering particle counter, PM2.5 measurements may be highly unreliable, as discussed elsewhere in Aclima documents.		Any bias due to nafion on the PM2.5 sampling line is incorporated into our model for translating counts to PM2.5 (which is derived empirically). Systematic bias in PM from this or other sources will be evaluated using mobile to stationary comparisons as discussed in responses to other comments. Using cyclones with a PM2.5 cut point are a common practice in front of BC monitors and was recommended by the sensor manufacturer. Cyclones are not used on the PM sensor sampling line.	

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Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	2.2 Data cleaning We identify a vehicle as stationary when there are more than 75 seconds of data in a single road segment. The intent is not to remove typical idling situations found at stop lights/signs, but instead to remove a prolonged stay in a single location that may be due to a driver stopping for one reason or another.	This may be appropriate for urban driving as Aclima's primary experience, but it is unclear if these exact methodologies will be applicable for the range of all CNCs within the SMMI.	Clarifying the potential differences in methodology across CNCs would be useful, particularly for differences which may arise when comparing highly urbanized CNCs to those which are less urban in character.	The road segment length is the same (100 m or less) whether in a rural or urban area, thus we are able to apply the same methodology statewide.	
Appendix I: List of Pollutants and Methods6	CAMP Supplemental Material	SMMI/CAMP General	PM2.5 - Aclima Mobile Node PM2.5 - Optical Particle Counter	The optical particle counter, following the PM2.5 cyclone and Nafion dryer, counts 0.3 - 2.5 um particles and determines an estimated mass based on estimated density for spherical particles, a method that is identified in Aclima's own documentation as unreliable in many measurement scenarios. Combined with methodological concerns (e.g., the use of the Nafion dryer) PM2.5 measurements would be better applied as indicative rather than accurate/"true" quantitative measurements.	Clarifying data quality and its intended utilization (i.e., indicative measurements) based on the measurement methods applied would improve the specificity of the aims planned for the SMMI.	Any bias due to nafion on the PM2.5 sampling line is incorporated into our model for translating counts to PM2.5 (which is derived empirically). Systematic bias in PM from this or other sources will be evaluated using mobile to stationary comparisons as discussed in responses to other comments. Using cyclones with a PM2.5 cut point are a common practice in front of BC monitors and was recommended by the sensor manufacturer. Cyclones are not used on the PM sensor sampling line.	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	12.3 End of monitoring To determine of the appropriate time to end monitoring in support of this CAMP (within the contractual and resource constraints of the SMMI project), the monitoring team will evaluate whether: ? Monitoring coverage has exceeded the required minimum percentage coverage requirement for priority communities within the SMMI-wide monitoring areas (i.e. across all CNCs, not just North Bakersfield) ? Data gathered is sufficiently representative of the seasonal, time of day, and day of week variation across the monitored area (i.e. not biased by data collection at one specific time), such that they can support the objectives, sub-objectives and presentation plans as uniquely defined in this monitoring plan ? Data gathered is sufficiently representative of the spatial variation in air quality across the monitored area, such that they can support the objectives, sub-objectives and presentation plans as uniquely defined in this monitoring plan	It is unclear what completion of each metric will be compared against to determine it has been met.	The CAMPs should provide specific metrics for determination of end of monitoring. For example, what is the minimum percentage coverage? How will it be determined that data gathered is sufficiently representative? Any planned variance in metrics or targets between communities should also be clearly outlined and justified.	Given the fixed time constraint for SMMI, the monitoring will end after 9 months of monitoring time in order to allow time for the final data analysis and generation of the final report. This was not made clear in the current version of the document, but has now been updated.	Section 12.3 Monitoring ends when deployments for all vehicles (AMPs and PMLs) are complete. Given the fixed time constraints for the SMMI final report to be completed by May of 2026, the broad area monitoring period will end after 9 months of data collection. In order to determine successful completion at the end of 9 months~~To determine of the appropriate time to end monitoring in support of this CAMP (within the contractual and resource constraints of the SMMI project),~~ the monitoring team will evaluate whether: ...

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	Table 10: Pollutants that will be included and the assessment protocol and reporting structure Aclima: ? Alert Detection ? Detection above threshold TBD	It is unclear what these thresholds are, and if they have already been established as they are "agreed on with CARB." It is also unclear what processes a "viable" alert is determined by.	Recommend adding clarity to what is considered a "viable" alert and the established thresholds .	The "Threshold TBD" was leftover from an earlier draft of the document and is now removed. The threshold for methane in listed in Table 14.1. The thresholds for air toxics are now listed separately in its own Table (Table 14.2) and are equivalent to the California OEHHA acute RELs. We have added additional detail on the process in between detecting an alert based on these thresholds and the point at which a decision is made to report an event. There is a footnote to the table in Section 14.1 that explicitly says that the thresholds triggering investigation does not mean that an established health threshold has been exceeded. We have also added language at the top of the section as well. We will commit to also making this clear in any publicly released reports of events and in the final public facing visualizations. Additionally, we have added language in section 14.1 stating that the intent of communicating with local regulators about observed high concentrations is to protect public health and that no regulatory action will occur as a direct result of data collected by SMMI. Local regulators, however, may decide to conduct additional monitoring or other investigations based on our findings. For air toxics, we have updated the thresholding to use exclusively the California OEHHA acute RELs as both the initiation event trigger as well as the follow-up investigation to determine whether the event should be reported.	[In addition to text added at the top of Section 14.1 below, we have added additional details on the process for investigating initial triggering observations] Section 14.1: The intent of the SMMI is not for real-time alerting. However, during data collection, there may be instances where pollutant concentrations significantly exceed expected levels. To address these situations, a response protocol has been established to ensure that such anomalies are promptly reviewed, assessed, and, where necessary, mitigated in coordination with relevant agencies and community stakeholders. If concentrations exceed thresholds defined below and that alert is deemed viable after analysis and assessment by Aclima or a Partner Mobile Lab, Aclima will inform the local Air Districts or other relevant local authorities. Not every alert will trigger a report. Only after in depth investigation by scientists in the field or remotely via data analysis will an alert event be deemed viable for reporting. Table 14.1 provides the overall framework of the assessment process and reporting structure. The purpose of reporting observed high concentrations is to protect public health, and while no regulatory action will occur as a direct result of data collected by SMMI, local regulators, may decide to conduct additional monitoring or other types of investigations based on these reports. Additionally, while health-based thresholds are used in the notification framework, it should be emphasized that this process will not definitively determine whether a health threshold has been officially exceeded.

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	14.2 Public Data Access Upon completion of the contract, CARB will make the finalized monitoring data available for public access through the CARB AQview website. Data for each region and pollutant will be provided in standardized, comma-separated values (CSV) format to ensure broad compatibility with commonly used data analysis tools and software. This approach supports transparency, encourages independent analysis, and facilitates community and academic engagement with the air monitoring results.	It is unclear what continuing work will be in place following the "completion of the contract"	Recommend that the CAMPs provide clarity on how data will be reviewed prior to release and what continued reporting or communication will be ongoing following the contract end to ensure transparency.	As stated in Section 3, SMMI staff will be working with internal and external partners to help leverage the data for their needs. The structure of this is dependent on the available resources and will be laid out in more detail in 2026. Data will not be shared with the public until CARB releases the final data at the end of SMMI. Any public facing visualizations made available prior to the end of the contract will be generated using only verified finalized (and QA'd) data.	
Appendix J: Public Comments and Responses6	CAMP Supplemental Material	SMMI/CAMP General	4. Push for Early Data Access & Public Use Tools Since no data has been collected yet, ensuring that the public can explore early findings (even in draft form) through StoryMaps or dashboards would build momentum and transparency.	While this section encourages early data access and public-facing tools, it is inconsistent with other sections of the documentation that indicate no data will be shared until the program is complete. This creates confusion around the expected timeline for public data availability and limits clarity on when community stakeholders can begin engaging with findings.	Clarify the data release timeline across all sections to ensure consistency, and specify whether any preliminary or draft data products (e.g., dashboards or StoryMaps) will be made available during the monitoring period - and, how that may be present (e.g., a public release, community meeting). Where draft results are to be shared, any data shared should be fully vetted through a QA/QC procedure prior to being shared publicly. If no early access is planned, revise this section accordingly to manage expectations or propose alternative forms of interim engagement.	This was a public comment received during the CAMP review, but not incorporated into the CAMPs. As we have clarified in other responses, the finalized data will not be shared with the public until CARB releases the final data at the end of SMMI. Any public facing visualizations made available prior to the end of the contract will be generated using only verified finalized (and QA'd) data. Section 14.3 updated to clarify that only QA'd and finalized data will be incorporated into public facing visualizations.	Section 14.3: Aclima will deploy the finalized raw data and appropriately-selected data analyses (described in Sections 13.2 and 13.3) in accessible online, public, interactive and free-to-use visualizations built on the Esri platform. These visualizations will be in the format of a customized platform built with Esri StoryMaps and hosted by CARB. A range of analyses are available to identify potential sources and to identify locations of disproportionate impact, drawing on data collected through both targeted area monitoring conducted by [PML or Aclima] and broad area monitoring conducted by Aclima. Only finalized quality assured data will be incorporated into public facing visualizations.
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	2.1 North Bakersfield community profile The community is also surrounded by numerous active oil wells and petroleum processing facilities, making exposure to volatile organic compounds (VOCs) a significant concern… North Bakersfield's proximity to oil fields and gas infrastructure increases exposure to hazardous air pollutants such as benzene, formaldehyde, and hydrogen sulfide.	The general notes regarding oil and gas operations are new additions to the July revised CAMP. The Tricor Refinery and Crimson Resource Management Corp. are both identified as targeted sources, but it is unclear if mobile or targeted monitoring will probe the newly listed oil and gas operations ("numerous active oil wells and petroleum processing facilities" which are referred to in "making exposure to [VOCs] a significant concern.").	Clarify the monitoring objectives and scope in relation to the newly introduced reference to "numerous active oil wells and petroleum processing facilities." Specifically, explicitly state whether mobile monitoring routes and/or targeted monitoring activities will be designed or adjusted to characterize air pollution from these oil and gas operations.	Section 2 provides background about air quality issues in the community. The monitoring plans are clearly defined in later sections. Aside from the Tricor facility, no specific targeted monitoring is planned around these additional oil and gas operations. Any sources present within the broad area monitoring boundary, however, may be subject to analysis from the broad area monitoring data; but only some of the community identified concerns are a priori assigned specific monitoring objectives.	

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Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	Table 6: Community-defined concerns, objectives, and analysis plans Parter Medical Products - *Contingent Study	It is unclear how prioritization decisions will be made, as this is listed as a facility 1) outside the boundaries of the CNC, 2) to be included "if time allows", and 3) the PML (UC Riverside, Baylor, and Houston) does not include a measurement method for ethylene oxide and would not be able to monitor this source. This is addressed in the comment associated with Figure 10.	We recommend that CARB clarify the prioritization criteria and decision-making process for contingent studies, such as the one proposed for Parter Medical Products. Define the criteria under which "if time allows" becomes actionable or warrants the allocation of monitoring time and resources to the site. Including a brief justification or ranking framework (e.g., based on community input, emissions potential, health risk, or data gaps) that explains how this site compares to other monitoring priorities within the community would be useful in understand the allocation of resources and what is included or excluded.	The amount of time required to adequately characterize a pollution source and to commute from location to location is unpredictable, and thus we have conservatively assigned only a small number of monitoring objectives for each lab in each community in order to not over promise. There may be circumstances where additional time is available on certain days or that some of the listed sources are on the way from one target to another and it is convenient to add into the monitoring plan. These are the types of considerations that the highly trained and experienced PML teams will make while in the field. We have included additional detail in the overarching response on targeted area monitoring regarding site selections.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	4.2 Define mobile monitoring methods to support objectives Targeted area monitoring: a subset of monitoring vehicles focuses on specific air pollution concerns (sources or impacted areas) at smaller spatial scales and shorter time periods. This measurement strategy involves monitoring over a relatively small area over a shorter time period with more intensive driving (i.e. more samples in a specific area on any single day).	Due to the language introducing targeted area monitoring, it is unclear if Aclima will also be performing targeted area monitoring, or it will be only partner labs (i.e., "Targeted area monitoring for North Bakersfield will be conducted by Aerodyne").	Clarifying the extent of targeted monitoring to be performed by Aclima would be useful, particularly where this diverges from the full community mileage allocation otherwise proposed by Aclima's monitoring.	Targeted area monitoring will be conducted by Aclima only in the communities where PMLs are not assigned. This is detailed in Section 8.3 of the CAMPs. The targeted area monitoring resources are in addition to the milage allocation for each community.	

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Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	Background model For example, when modeling pollutants in a small dense urban area, a high percentile for ozone concentrations represents background, as local emissions on top of the background result in dips in the ozone concentration.	It is reasonable but not confirmed to assume that this is referring to ozone titration (local NOx sources reducing ozone concentrations through chemical reactions). However, this raises the issue of the complexity of air pollution and atmospheric interactions; multiple complicating factors are involved in urban ozone, including regional transport and chemical/photochemical reactions. Given the ambitious nature of the SMMI, will Aclima be reasonably supported in order to analyze and appropriately communicate results to communities? This may raise a serious concern of localized "low pollutant measurements" (e.g., this example of localized lower ozone) disguising elevated concerns of other pollutants and sources.		Aclima's technical staff have communicated complex air quality topics with the public in previous projects, including the sometimes counter-intuitive (for non experts) behavior of ozone in urban areas. Additionally, CARB will review all public presentation materials.	
Appendix I: List of Pollutants and Methods6	CAMP Supplemental Material	SMMI/CAMP General	HR-ToF-AMS Mass-to-charge ratio (m/z) 27, 28, 43, 44, 57 Ozone measured by chemiluminescence and UV absorption	Will the partner lab measurements be subject to the same data availability as the Aclima directly-operated mobile monitoring? How will this data (e.g., AMS fragments indicative of aerosol aging) be presented to the public? How will differing measurements of the same pollutant (e.g., ozone by two methods) be reported?	Clarify whether data collected by partner labs will follow the same public release timeline and accessibility standards as Aclima's mobile monitoring data. Additionally, describe how advanced measurements (e.g., AMS aerosol fragment data) will be communicated to the public in a meaningful and interpretable way. Where multiple methods are used to measure the same pollutant, provide an explanation of how these data will be harmonized, distinguished, or reported to avoid confusion and ensure transparency in interpretation.	This is further clarified now in Appendix F (section 8.2.4) and in CAMP section 10.4. Inter-comparisons between PMLs are planned and Aclima AMNs will be installed in the PMLs while collecting data for SMMI. Text has been added to Section 9.2	Appendix F (Section 8.2.4): Finalized data will be transferred to CARB on a monthly basis beginning four months after monitoring has commenced. Data from the PMLs and from Aclima will be transferred on the same cadence. Section 10.4: Finalized L2a data from Aclima and the PMLs will be transferred to CARB via secure cloud storage, following a defined schema compatible with EPA's AQS where applicable. The delivery cadence of finalized data to CARB with by monthly beginning 4 months after data collection. File formatting and other details ~~and delivery cadence~~ are specified in Appendix F. Section 9.2: An Aclima AMN will be installed in the PML for intercomparisons of PML measurements with Aclima measurements. Additionally inter-comparison exercises are planned between different PML teams participating in SMMI, which are expected to include cross-comparisons of reference gases and parked collocations.

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Rodeo and Crockett CAMP4	CAMP	Specific CNC CAMP	Table 2: Specific concerns identified through community engagement Residents pointed out specific instances of pollution releases and flaring at refineries. Some residents commented that it has historically been worse at night / overnight, and suspected that poor practices occurred overnight so people wouldn't notice. Hydrogen plant noted as having a bad track record for dangerous practices and concern about working over capacity Fuel or chemical storage facility noted as having a bad track record and business practice, and having experienced a major explosion.	The CAMP references community concerns of "poor practices" which should be reviewed in context with regulatory understanding of (and any actions against) the facilities and their operations. Further engagement from local regulators and the industry/facility operators themselves may provide value.	The CAMP references community concerns of "poor practices" which should be reviewed in context with regulatory understanding of (and any actions against) the facilities and their operations. Further engagement from local regulators and the industry/facility operators themselves may provide value. This may include comparing SMMI data against existing facility monitoring (e.g., fenceline) data.	This was a direct quote taken from community meeting reports. We have included language from these reports verbatim.	Updated caption to Table in Section 2.2: Specific concerns identified through community engagement. Details about community concerns are direct quotes from the community member concern submissions.
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	Past and ongoing air quality measurements and studies	If (or when) SMMI measurements conflict with active 1) regulatory monitoring, 2) petroleum refining monitoring, 3) community monitoring, 4) PSE Healthy Energy, and/or 5) NASA Ames monitoring results, how will the appropriate results and actionable conclusions be communicated?	Extensive monitoring has been or is actively being performed in the community. How will this be incorporated into the understanding of the SMMI results? Clarity would be useful in understanding how the SMMI results will 1) add to the understanding of air pollution sources and impacts to the community, and 2) ensure that the results are communicated effectively, particularly if differing results are identified.	It is out of scope for a CAMP to put SMMI results in context with previous monitoring efforts or to predict how the results might or might not align with previous monitoring (outside of the described QA-focused comparisons to regulatory monitoring that will occur). However, this can be discussed in the final report and analysis following the contract.	

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Appendix G: Partner Mobile Laboratory Quality Assurance and Data Management Plan6	CAMP Supplemental Material	SMMI/CAMP General	1.1 Roles and Responsibilities Project management and reporting to Aclima Data Manager, organizing other Data PI's and ensuring complete dataset, formatting and upload 8.1. DELIVERABLES Preliminary Data: Preliminary data will be delivered to Aclima on a schedule which may be Daily, Weekly, Bi-weekly, or Monthly and will be determined through discussions amongst the field teams and Aclima and based on project needs, data processing requirements, and workloads.	No technical comments on the partner labs. These are groups using high-quality research-grade instrumentation, with a history of executing this type of work effectively, and demonstrate that here. Concerns to consider include the availability of data as it is reported to, synthesized, and applied by Aclima and CARB.		PML data will be integrated and provided to CARB in the same format.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	9.1 Aclima's Quality Assurance and Quality Control Procedures Calibration checks will occur approximately once every 6-8 weeks over the 9 month monitoring period.	This low frequency of calibration checks during challenging mobile monitoring deployments is insufficient for reliable instrument operation, and risks reducing confidence in Aclima's reported results, including the potential to disregard collected data based on potential technical errors.	Recommend that instrument calibration be performed pursuant to manufacturer specifications.	Aclima has established best practices for calibration operations based on prior mobile monitoring at scale and the intended monitoring objectives and use cases. The QA documentation provided as appendices provide detailed data quality metrics on sensor performance pursuant to these established operations. This documentation also provides a detailed analysis of the implications of drift on the types of analyses that will be included as part of SMMI.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	12.1 Evaluating effectiveness during the monitoring period: In addition to calibration prior to the start of monitoring, all AMNs will receive calibration checks (and subsequent recalibrations) on a 6-8 week basis over the 9 month monitoring period, including at the end of monitoring.	This low frequency of calibration checks during challenging mobile monitoring deployments is insufficient for reliable instrument operation, and risks reducing confidence in Aclima's reported results, including the potential to disregard collected data based on potential technical errors.	Recommend that instrument calibration be performed more frequently	Aclima has established best practices for calibration operations based on prior mobile monitoring at scale and the intended monitoring objectives and use cases. The QA documentation provided as appendices provide detailed data quality metrics on sensor performance pursuant to these established operations. This documentation also provides a detailed analysis of the implications of drift on the types of analyses that will be included as part of SMMI.	
San Jose CAMP5	CAMP	Specific CNC CAMP	Past and ongoing air quality measurements and studies This site serves as an US EPA NCORE site that integrates several advanced measurement systems for particles, pollutant gases, and meteorology and measures O3, CO, NO2, SO2, NOy, PM10, PM10-2.5, PM2.5, speciated PM2.5, and air toxics.	The monitoring capacity in place is a useful addition to the July revised CAMP. However, it could be better leveraged by explaining for community-readers what the findings are, what the meaning is (e.g., NOy is not referred to elsewhere), and how this work will be leveraged by Aclima through the SMMI.	The findings of recent or active monitoring would be useful to include within the CAMP, particularly if it may be used in guiding Aclima's monitoring program decision making, or as a point of comparison to better interpret SMMI findings.	Thank you, the meaning of NOy has been clarified. It is out of scope for the purposes of the SMMI CAMPs (particularly given the number of CAMPs required for monitoring to take place in 62 different communities) to do an in depth analysis of past monitoring efforts. However, this will be considered in subsequent analysis.	NOy is specified in San Jose CAMP

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
SMMI Frequently Asked Questions7	SMMI Supplemental Material	SMMI/CAMP General	How can community members participate in SMMI? Also, Aclima will provide local job opportunities by hiring community members to drive mobile platforms.	Given that drivers are responsible for the daily instrument maintenance and operations, and standard calibration checks are only performed every 6-8 weeks, it is critical that operators are adequately trained and it is unclear if this is a community engagement priority at the potential cost of measurement rigor.		Non-CAMP comment. Aclima is proud to provide jobs to local community members without needing to sacrifice measurement rigor. Aclima drivers are not responsible for QA/QC and do not need deep technical training.	
Rodeo and Crockett CAMP4	CAMP	Specific CNC CAMP	Past and ongoing air quality measurements and studies In addition to these regulatory sites, the Phillips 66 Rodeo refinery has fenceline monitoring installed to provide the public with near-real time data about the compounds measured around the boundary of the site.	As addressed previously, engagement with the facilities and existing monitoring operations would provide benefits to the SMMI results; avoiding engagement leaves potential limitations.	Engaging with regulators and facilities conducting regulatory monitoring will be useful in supporting SMMI results. This is particularly relevant for already-scrutinized sources which apply higher-quality monitoring methods than Aclima, and may support Aclima's SMMI source apportionment efforts.	Aclima has been deeply engaged with air districts, particularly through the air district representation on the PEG. Additional engagement to assist with interpretation of the results can be addressed after data has been collected.	
Overall Note on Appendices6	CAMP Supplemental Material	SMMI/CAMP General	Overall note on appendices	The existing appendices files names were updated with the 7-1-2025 CAMP revisions (appendices file names now end in 20250701-01). The previous and current CAMP versions are both present online, it is unclear if revisions were made to appendices. Similarly, the historical 2022-2023 Aclima documentation (from which much of the CAMP and appendices text is directly produced from) appear to still be hosted online but are not easily found through Aclima's website.	Clearly identifying document/version histories and changes in a public manner would improve the perception of transparency and trust. "Redlined" versions of documents to demonstrate changes made could also improve this public demonstration of transparency as significant revisions are made.	Responses to all public comments will be published in the final CAMPs as well as the final versions of the CAMPs. Overarching responses will include tracked changes for the key edits that have been made.	

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Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	5.4.1 Drift correction Certain sensor types are more prone to drift over time (e.g., CO2 and CH4) and a linear calibration function is applied based on the pre- and post-deployment calibrations, whereas other sensors (e.g., NO2) have been found to occasionally experience fast step-changes in calibration during deployment.	The data quality concerns (such as here, with the TVOC measurements) are not well established within the CAMP documents themselves. Data quality requirements should be more formally established such that it is understood how the data may be used to draw conclusions.	Data quality concerns should be fully described in the CAMPs. Data quality requirements should be established in the CAMPs	Because of the large amount of detailed information that is required for the CAMPs in addition to that required to describe complicated data quality and QA/QC operations for Aclima as well as the PMLs, we made the decision to attach the QA details as appendix documents and not embed this information within an already extremely long document. Certain choices needed to be made on what information is summarized directly in the CAMPs. We acknowledge that sensor specific limitations are important to include in the CAMPs, but is too detailed to include specifically in the CAMPS. Instead we have added a specific reference to appendix C in the discussion of Data Quality Objectives (Section 6).	Section 6: These data quality objectives are largely qualitative goals that provide the foundation for the types of insights that mobile monitoring is designed to support. A critical aspect of quality assurance underlying these objectives is characterizing and maximizing the measurement quality of the air pollution measurements, particularly for the sensors. However, confidence in these data products will depend on a number of additional factors such as mobile monitoring strategy, the number of samples collected for features of interest (i.e. road segment or other spatial length scale), magnitude and variability in pollution concentrations, and meteorology over the contract period. Different sensors in Aclima's Mobile Platform have varying levels of data quality and limitations to consider, which are outlined in Appendix C.
Appendix C: Aclima Mobile Platform Quality Assurance System (v4.1)6	CAMP Supplemental Material	SMMI/CAMP General	5.6 Important Limitations for Specific Sensors (Entire section) e.g., Aclima does not recommend using C2H6 in the typical use cases for the ambient concentration data product. … As a result, when sampling real-world mixtures of ambient VOCs, the agreement from sensor to sensor can vary depending on the exact mixture, and therefore the sensor-to-sensor variability during deployments can be large (-50% to +100%) in some cases.	As with the above, this section is critical to the correct interpretation of data and the development of conclusions drawn from the SMMI; this information should be clarified in the CAMP and communicated with any reported data/results.		The visualizations will only highlight appropriate sensor specific use cases. For example, ambient concentration estimates of TVOCs will not be included because of the limitations of that sensor.	

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Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	1.0 Introduction The TVOC sensor has two characteristics that make data from the sensor unsuitable to support ambient concentration estimates; (1) the sensor is sensitive to a wide range of VOCs with the sensitivity to different classes of VOCs varying by multiple orders of magnitude, (2) the sensor is prone to baseline drift. For more information, see Appendix C, Section 5.6.5.	Aclima appropriately identifies limitations with the TVOC monitoring method used, although this is not well translated to the CAMPs themselves. It should be made clear that the monitoring results should only be used to prompt further investigation.	Recommend that the TVOC limitations be included in the CAMPs with a description of how such data could be used	Because of the large amount of detailed information that is required for the CAMPs in addition to that required to describe complicated data quality and QA/QC operations for Aclima as well as the PMLs, we made the decision to attach the QA details as appendix documents to aid in readability. We acknowledge that sensor specific limitations are important to include in the CAMPs, but are too detailed to include specifically in the CAMPS. Instead we have added a specific reference to appendix C in the discussion of Data Quality Objectives (Section 6).	These data quality objectives are largely qualitative goals that provide the foundation for the types of insights that mobile monitoring is designed to support. A critical aspect of quality assurance underlying these objectives is characterizing and maximizing the measurement quality of the air pollution measurements, particularly for the sensors. However, confidence in these data products will depend on a number of additional factors such as mobile monitoring strategy, the number of samples collected for features of interest (i.e. road segment or other spatial length scale), magnitude and variability in pollution concentrations, and meteorology over the contract period. Different sensors in Aclima's Mobile Platform have varying levels of data quality and limitations to consider, which are outlined in Appendix C.
Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	5.1.1 Time resolved comparison of mobile sensor measurements to regulatory measurements Excellent daily average temporal agreement (R2 > 0.9) with little bias (<8%) is observed for PM2.5 and O3. Agreement for NO2 and CO is slightly reduced (R2 >0.65) with a bias of less than 20% for both.	Given the identified data bias, is collocation planned daily? That potential scheduling is unclear from this text, only using the past tense in 5.1.1 for prior daily collocation. Following collocation, are corrections to the data made? To what extent? Further, given the 6-8 week sensor calibration time referenced in the CAMPs, are regular data validation (and corrections) incorporated into the Aclima monitoring procedures?	The CAMPs should provide information on: (1) Whether daily collocation is planned (2) Whether corrections to data are made based on collocation results (3) whether regular data validation/corrections are incorporated into the monitoring procedures. If so, will information on corrections be made public	Monitoring near stationary sites happens under the same collection strategy as all other broad area monitoring driving (no specific adjustment to drive plans are made to collect extra data near regulatory sites). Corrections may be made based on collocation results if a systematic bias is discovered to be significant enough (expectation is that this may happen for PM2.5 given the challenge of aligning different measurement principles for PM2.5 measurements). We will consult with CARB to decide on the approach if this is the case. The monitoring procedure is independent of these correction processes. As we state in Section 9.1, the data collected by AMNs installed at stationary sites will be included in the final data release. The in situ mobile to stationary collocation data will be available for independent analysis using data in the final data release.	

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Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	5.1.2 Time integrated comparison of ambient concentration estimates to regulatory measurements Table 2: Performance metrics for comparison of map segment aggregates within 250 m of a regulatory site to that site for all regulatory site locations and baselines periods.	The performance metrics identified do not clarify the use of these monitoring systems for the "hotspot identification and characterization" they are being proposed for. Poor measurement correlations may be better suited for education or "indicative" measurements. The discussion on p. 20-21 that the variability "is relatively small" does not minimize concerns, as the total presence of many ambient air pollutants is very low, and large (relative) magnitudes of error at these low measurements levels make ambient monitoring unreliable. Further, the use of "best fit" trendlines (rather than trendlines beginning at the origin; 0,0) in Figures 5 and 6 use non-zero intercepts, indicating inherent measurement bias which allow for measurement correction but elevate concern of erroneous measurements at low concentrations. Comparisons are not provided for CH4, CO2, C2H6, BC, and other pollutants Aclima plans to measure (e.g., TVOC), which raises further concern regarding the reliability of measurements for pollutants which are known to be more challenging to measure with monitoring instrumentation, such as that used by Aclima.	Aclima should clarify whether the data are suitable for hotspot identification and characterization, or if they should be treated as indicative or educational in nature. The CAMP should address the limitations of low-concentration measurements, explain the rationale for using non-zero intercept trendlines, and discuss whether and how bias corrections are applied. Additionally, Aclima should expand performance comparisons to include other measured pollutants, or clearly justify their exclusion. This would provide transparency on measurement reliability and inform appropriate interpretation of results for community and regulatory purposes.	These are included in the QA documentation as examples of past data collection efforts that illustrates the types of analyses that are performed at the conclusion of our monitoring initiatives. For the pollutants included in ambient concentration estimate maps for communities, we will perform and publish these analyses (at least where a corresponding stationary data set is available - for example, CO2 measurements are typically not available and BC is not monitored at a large number of sites). To clarify, all references to hotspots in various sections of the CAMPs have been changed to "persistent elevated concentrations".	Reference to "hotspots" in various sections in the CAMPs changed to "persistent elevated concentration"

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Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	5.2 Accounting for Systematic Measurement Bias Sensors in the platform not routinely compared directly to a reference method (CO, PM2.5, and Black Carbon) as part of its standard calibration procedure may be particularly prone to systematic bias.	As with the above discussion on 5.1.2, the bias being "relatively low" does not remove these concerns, and Aclima's reporting of pollutants identified as difficult to verify must be reported appropriately to demonstrate the potential error inherent in these measurements. This is also represented in Aclima's peer-reviewed journal publications, where only minimal measurements are discussed (i.e., more reliable O3, NO2, and NO, which themselves also indicate poor measurement quality - see Figure 2, notably the poor correlation of NO to reference measurements available in Whitehill et al, 2024: https://amt.copernicus.org/articles/17/2991/2024/). The lack of formal reporting of the other pollutants proposed to be measured by Aclima also leaves gaps in understanding, communication, and expectation of actionable results. "Indicative" measurements have been used by other large-scale and nationally- recognized monitoring programs such as Love My Air in Denver, CO, which include these less-well-validated measurement technologies. This should be more seriously addressed, particularly in public communications where the reliability of this data to make conclusions and lead to community, regulatory, and higher-level policy action should be fully understood and demonstrated.	Aclima should clearly disclose the expected uncertainty, limitations, and verification status for each pollutant measured, especially for those not well-validated or difficult to verify, within both technical documentation and public-facing materials. Where measurements are considered “indicative,” that designation should be explicitly stated, along with guidance on appropriate interpretation and use. Additionally, Aclima should consider publishing performance summaries or independent validation comparisons (e.g., with regulatory-grade monitors) for the full suite of pollutants measured, and clarify how these limitations are accounted for when informing community decisions or policy recommendations.	These are included in the QA documentation as examples of past data collection efforts that illustrates the types of analyses that are performed at the conclusion of our monitoring initiatives. For the pollutants included in ambient concentration estimate maps for communities, we will perform and publish these analyses (at least where a corresponding stationary data set is available - for example, CO2 measurements are typically not available and BC is not monitored at a large number of sites). This analysis is out of scope for the CAMPs but will be included as part of the final report.	

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Appendix F: Aclima's Data Management Plan (v3.0)6	CAMP Supplemental Material	SMMI/CAMP General	Table 2.1: Aclima's Data Processing Levels. Temperature and humidity corrections to sensor estimates using empirically derived relationships rather than basic physical principles.	These corrections are not addressed elsewhere (such as, for example, the appendices discussing data analysis and assurance), and it is unclear to what extent Aclima is anticipating making adjustments to as-measured data based on collocation, calibrations, meteorological conditions, interferences, etc.	The CAMPs should fully describe to what extent Aclima may make adjustments to as-measured data based on collocation, calibrations, meteorological conditions, interferences, etc.	Aclima's data quality operations are documented in the appendices (as well as in the CAMPs). In use monitoring systems are calibrated on a 6-8 week cadence for SMMI. Adjustments are applied at the individual sensor level based on the results of these calibrations. Systematic bias (as described in Appendix D) is evaluated at the system level through mobile-to-stationary comparisons as well as the regulatory site collocations. This is also discussed in Section 5.4.1 Sensor Drift. Adjustments to individual sensors are applied if post-deployment checks do not meet the acceptance criteria. This section discusses the strategy for this, most typically resulting in calibration parameters that vary linearly with time over the time between calibration events. For example, if the intercept of a linear fit was found to be 0 on day 1 and 4.5 on day 45, we would apply a varying intercept over this time period starting at 0 on day 1 and increasing each day by 0.1, ending up at 4.5 on day 45. The intercept going forward would then be set as 4.5 until the next calibration event.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	7.3 Monitoring methods - targeted area monitoring Aerodyne will conduct targeted area monitoring that focuses on specific air pollution concerns at smaller spatial scales. This involves monitoring over a relatively small area over a shorter duration in time (approximately 1 to 2 weeks) and is designed to complement the broad area monitoring coverage by providing more in-depth information about a specific area of concern.	Approximately 1 week is allocated to each CNC by PMLs. The limited measurement schedule provides the potential for non-representative results for a given source. This may be due to activity or operation of the source itself, or meteorological conditions that result in intraday or day-to-day variability, and may be further varied across larger time scales (i.e., monthly, seasonally).	Further detail regarding the determination of PML scheduling to capture representative source characterization, and most effectively use the PML resources, while avoiding potential bias or non-representative measurements would be useful.	Please see the overarching response which addresses this comment	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	8.3 Targeted Area Monitoring Aerodyne is able to visit about two point sources per day, including repeats to top-priority sources. Daily wind conditions and downwind road access will dictate which day(s) a source or concern is visited. Clusters of sources with favorable sampling conditions can often be visited together, maximizing our sampling time. Repeat visits (multiple days) to the top priority sources will be attempted. We will attempt independent visits to high priority point sources on at least 50% of the days allocated to a given CNC, and each visit will attempt to collect 3-5 mobile plumes. If the source is a VOC or dust/metals source, a stationary measurement in the plume enhancement will be attempted.	For the approximately 1 week allocated for each CNC by PMLs, the limited measurement schedule provides the potential for non-representative results for a given source. This may be due to activity or operation of the source itself, or modifying meteorological conditions that result in intraday or day-to-day variability, and may be further varied across larger time scales (i.e., monthly, seasonally).	Further detail should be added as to how PMLs will conduct targeted monitoring plans to be representative and information regarding the source measured, particularly where sources may be variable due to operating conditions.	Please see the overarching response which addresses this comment	
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	8.3 Targeted Area Monitoring We will attempt independent visits to high priority point sources on at least 50% of the days allocated to a given CNC, and each visit will attempt to collect 3-5 mobile plumes. If the source is a VOC or dust/metals source, a stationary measurement in the plume enhancement will be attempted. Riverside will spend approximately 1 week (either contiguous or spread across a wider time window while alternating visits across multiple SMMI communities) monitoring in Paramount and North Long Beach.	For the approximately 1 week allocated for each CNC by PMLs, the limited measurement schedule provides the potential for non-representative results for a given source. This may be due to activity or operation of the source itself, or modifying meteorological conditions that result in intraday or day-to-day variability, and may be further varied across larger time scales (i.e., monthly, seasonally).	Providing detail as to how PMLs will best utilize limited time availability to reduce the potential for bias or capture of non-representative measurements would be beneficial.	Please see the overarching response which addresses this comment	

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Appendix H: Targeted Area Monitoring Assignment Approach6	CAMP Supplemental Material	SMMI/CAMP General	Strengths and limitations of Labs for Targeted Area Studies: Limitations UC Riverside/Houston/Baylor: Generally not available during overnight hours and limited to about 8 weeks from September - November. UC Berkeley: Generally not available during overnight hours and limited to 16 weeks of monitoring between June and February Aerodyne Research: Generally not available during overnight hours and limited to ~7 weeks in August and September.	With only limited single-seasonal availability (7 and 8 weeks for UC Riverside/Houston/Baylor and Aerodyne, respectively to cover multiple communities and sources), and constrained hours of operation, will the targeted partner lab monitoring fully address community concerns with respect to the sources? How will the partner lab time be distributed? UC Riverside is assigned 5 communities, UC Berkeley is assigned 17 communities, and Aerodyne is assigned 7 communities. Will each PML be spending approximately one week at each community, or revisiting communities?	The CAMP documentation should add detail as to how PMLs are being utilized to ensure representative measurements for targeted sources, particularly given the low resource availability of the PMLs.	Please see the overarching response which addresses this comment	
Appendix H: Targeted Area Monitoring Assignment Approach6	CAMP Supplemental Material	SMMI/CAMP General	Approach: Step 2: Identify a handful of common pollutant source types that are well suited to Partner Mobile Lab studies and assign 3- 4 Partner Mobile Lab studies per source type across different air districts/regions. We identified airports, refineries, landfills, and concrete/cement/asphalt sources as commonly identified sources across the state. The monitoring approach for these studies will be facility specific - generally using a fenceline approach to characterize the sources. The motivation for this is that communities concerned about these source types that do not get a Partner Mobile Lab study may benefit from data collected in other communities about similar types of concerns.	Similar source types may have similar pollutants. However, it is not accurate to ascribe pollution found in one community to another. There may be operational, temporal, or meteorological variations that would cause variation in emissions amongst different communities. Caution should be used when presenting results for these common pollutant source types amongst the various communities.	Recommend that results of PMLs are clearly stated to be only applicable to the community in which the data is gathered.	The intent is to draw parallels and make comparisons between the chemical make-up of emissions from facilities of the same source type in different locations. There will not be parallels drawn about the magnitude of emissions from one facility to another and no assumptions made about operations of one facility being true about another.	

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Appendix F: Aclima's Data Management Plan (v3.0)6	CAMP Supplemental Material	SMMI/CAMP General	9.3.3. Enhancement-based data layer, derived from PML instruments (Tables 9.2 and 9.3)	The summaries in Tables 9.2 and 9.3 list highly-detailed results from the measurement of targeted sources. Given the limited measurements prescribed for each based on the CAMP description (approx. 2-3 days for each targeted source or for all targeted sources within a CNC, based on 50% of a PML lab's time in each CNC) it is unclear if this level of detail can be obtained and reported while accounting for source variance and other temporal and spatial variability.		Please see the overarching response regarding temporal representativeness of PML targeted area studies.	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	2. State the community-specific purpose for air monitoring The CAMPs will define where mobile air monitoring takes place, what the monitoring objectives are, and where focused pollution studies are needed, all directed by community voices.	Community engagement is a priority of the CAMPs and the SMMI, yet community priorities must be appropriately balanced against rigorous scientific monitoring practices and results development. This should also be considered in the as-written potentially evolving nature of the CAMPs based on ongoing findings and Aclima's stated plans to consider modifying focus areas.	In connection to other comments, the procedures for modifying a CAMP-designated program during the SMMI should be more clearly stated, given the intention for transparency and a limitation of resources to serve community needs. The direction of the community organizations and members should also be clarified in order to both uphold the rigor of the SMMI as well as set appropriate community expectations.	Please see the overarching response which addresses this comment	
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	2.2 North Bakersfield community-specific motivations for air monitoring The top emitters include multiple hospitals and medical facilities such as Dignity Health – Bakersfield Memorial, Adventist Health, and Kern County Hospital Authority, which report emissions of a wide range of pollutants including diesel particulate matter (PM), formaldehyde, benzene, acrolein, and polycyclic aromatic hydrocarbons (PAHs). These facilities contribute to localized air toxics burdens, especially in densely populated areas with vulnerable populations.	This text states that the largest known air toxics emitters are healthcare or medical facilities. How will data be communicated to community members when these same pollutants (formaldehyde, benzene, PAHs) are also being attributed as a major community concern regarding oil & gas operations (which, unlike these facilities, are specified as a community concern)?	Community concerns are a major driver of CAMP development; however, the results of air toxics emitted from healthcare facilities may raise different community responses than the identification of the same air toxics identified from oil & gas operations. Care and clarity should be included as to both the measurement approaches to ensure accurate source apportionment, and the communication of those results.	Please see the overarching response which addresses this comment	

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Rodeo and Crockett CAMP4	CAMP	Specific CNC CAMP	Table 5: Community-defined concerns, objectives, and analysis plans Crockett is generally impacted by refineries both locally and in neighboring communities like Martinez and Benicia.	Other CAMPs include targeted sources outside the boundaries of the community, although it is unclear here if these sources are being listed for informative purposes or to consider for targeted monitoring.	Clarity should be added regarding the decision to target sources outside of CNC boundaries in some CAMPs, while listing notable sources that will not be monitored in other CAMPs. Further clarification should be added when sources are discussed as to if they will be monitored, why or why not, and if that is possible to change based on Aclima's description of a "dynamic" monitoring program that may cause sources to be added as a new focus.	Not all sources listed in Section 2 will be included as priorities in the monitoring plan. Sections 4 and 8 indicate which sources will be the primary targets. In the case of N Bakersfield, it is true that the sources outside the community boundary are included in the monitoring plan. The reason for this is that these sites were identified by the community as priority sources of concern and sources outside the boundaries of the CNC may still impact air quality within the CNC. We have given communities control over the priority targets and in some cases the concerns are outside of the boundaries of the CNC, as was the case in N Bakersfield. In some specific cases, where there are potential ethylene oxide sources close to communities (but not immediately within CNC boundaries), these are included as possible targets even if not explicitly identified by the communities in order to take advantage of the unique PML capabilities of Aerodyne and Riverside/Houston/Baylor and given the importance of ethylene oxide as a health hazard.	
Appendix A: Community Engagement Plan6	CAMP Supplemental Material	SMMI/CAMP General	3. Community Air Monitoring Plan Development The process of developing a Community Air Monitoring Plan must reasonably defer to community knowledge and experience, while also making space for data that don't always align with community assumptions.	One of the most significant aspects of the CAMP is balancing community knowledge and engagement with accurate and rigorous scientific processes. Aclima appears aware of and prepared for committed community engagement, but it should be made clear that the CAMP will be performed in a rigorous manner and communicated effectively to ensure that the scientific findings are both well guided and can be applied effectively. This is particularly relevant to N. Bakersfield, where the CAMP identifies oil & gas operations and medical centers as major contributors to VOCs, and both community and emission reduction focuses may be biased to one category over the other.	Recommend that the CAMP clearly state that community bias will not outweigh the scientific findings of the analysis.	Please see the overarching response which addresses this comment	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	2. State the community-specific purpose for air monitoring Stationary source monitoring - measuring air pollutants near specific stationary emission sources (e.g. industrial facilities) so the emissions from the source can be characterized and the impact of the emissions on the local community can be assessed.	The allocation of time and monitoring resources for stationary sources is unclear, particularly in the context of community goals. This is of particular note for variability of sources, balancing community concerns against scientific rigor of the monitoring plan, and ensuring full community coverage by mobile monitoring.	The allocation of time and monitoring resources should be better clarified, particularly when balancing community concerns regarding specific sources against a programmatic need to ensure complete community monitoring coverage. Community concerns may prompt an over-allocation of time/resources where high pollutant concentrations are not being identified through mobile monitoring.	Please see the overarching response which addresses this comment	
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	4.3 Community-defined concerns, objectives, and analysis plans TRICOR Refinery - Characterizing Sources	Given the limited availability of measurements, i.e., 2-3 days through the entire CAMP (see Section 8.3), what is the intended distribution of monitoring efforts to ensure that the source characterization is representative of actual and complete facility operation?	Further detail should be added regarding the partner mobile lab targeted source monitoring in order to confirm that a robust source identification and characterization program is in place, particularly when accounting for the variability present in many sources based on operating conditions or meteorological conditions affecting off-site measurements.	Please see the overarching response which addresses this comment	
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	8.1 Community Mileage Allocation For North Bakersfield, the total road length (for residential and major roads only) within the community is 325 miles, and the allocated mileage is 320 miles.	It is unclear how the mileage will be allocated on a time-basis, and for the lower-mileage CNCs there is an elevated risk of measurement bias if this is not performed adequately.	Clarity should be added regarding low-mileage CNCs. This may include divergences from the otherwise- mentioned 6-8 week study periods and 20 road segment pass-through averages, particularly if Aclima plans to revisit the communities throughout the SMMI period.	Please see the overarching response which addresses this comment	
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	8.3 Targeted Area Monitoring Conversely, new or unknown hotspots flagged by Aclima as requiring additional characterization will be added to Aerodyne's list (e.g. which specific compounds are in a plume of VOCs).	The limited time allocated to targeted monitoring by PMLs is already limited for reliable source characterization. It is unclear when or how the resource allocation decisions will be made during monitoring to alter targeted monitoring plans with new sources or modified focus areas.	Aclima should describe the criteria and data signals it will use to flag new or unknown hotspots in real time, including whether specific VOCs or compound classes can be identified with their instrumentation. Additionally, the CAMP should explain the process for reallocating targeted monitoring resources in response to emerging findings, such as who makes these decisions, how quickly they can be implemented, and whether the detection of episodic or severe events will trigger changes to existing monitoring plans.	Please see the overarching response which addresses this comment	

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North Bakersfield CAMP2	CAMP	SMMI/CAMP General	11.2.3 Timeline: duration, frequency, milestones, and deadlines The Aerodyne Mobile Laboratory will conduct monitoring in North Bakersfield for a duration of approximately 1 week in a time period to be determined between August 4th, 2025 and September 20th, 2025.	As discussed in other comments, this is a limited period of time to address the targeted sources identified in the CAMP, and it is unclear how prioritization or direction of resources will be made (particularly, as under 8.3, new hot spots or targeted areas are identified to monitor). This will be highly relevant to CNC community and non-community stakeholder groups if focus areas are altered without adequate understanding or communication.	Recommend that the CAMP make clear the impact of the limited monitoring to results interpretation. Clarity should also be added on the determining factors for a change in focus.	Please see the overarching response which addresses this comment	
San Jose CAMP5	CAMP	Specific CNC CAMP	Figure 8: Map of San Jose's final community Broad Area Monitoring selection and local air quality community concern types.	Given that mobile monitoring mileage is limited and already does not provide complete community coverage, what level of time or monitoring resources will be dedicated to the San Jose airport as it is located outside the boundaries of the community and is not included in roadway route of the "Broad Area Monitoring Selection" mapping?	Further detail should be added to the CAMPs regarding the decision to include or exclude sources outside of CNC boundaries. Clarity regarding this decision making process may help reduce concern as to why the CAMPs appear to inconsistently identify and target, or solely comment on and do not suggest plans to monitor, sources outside of a CNC.	Not all sources listed in Section 2 will be included as priorities in the monitoring plan. Sections 4 and 8 indicate which sources will be the primary targets. In the case of N Bakersfield, it is true that the sources outside the community boundary are included in the monitoring plan. The reason for this is that these sites were identified by the community as priority sources of concern and sources outside the boundaries of the CNC may still impact air quality within the CNC. We have given communities control over the priority targets and in some cases the concerns are outside of the boundaries of the CNC, as was the case in N Bakersfield. In some specific cases, where there are potential ethylene oxide sources close to communities (but not immediately within CNC boundaries), these are included as possible targets even if not explicitly identified by the communities in order to take advantage of the unique PML capabilities of Aerodyne and Riverside/Houston/Baylor and given the importance of ethylene oxide as a health hazard.	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
San Jose CAMP5	CAMP	Specific CNC CAMP	8.3 Targeted Area Monitoring A drive plan will be constructed such that each targeted area/road is able to be measured within approximately 8 hours. This drive plan will be repeated at least 5 times between June 2025 and February 2026 with the starting location and pathing staggered such that repeat measurements of sources are completed at different times of the day to build up statistics.	Given the large geographic range of the San Jose CNC and the dispersion of the identified targeted areas / community concerns, it is unclear how prioritization decisions will be made to allocate monitoring time for a "general survey" and "top 10 air toxic hot spots" as described in text.	The proposed dynamic nature of the monitoring should be further clarified, particularly given the concerns of limited time and monitoring resources as any changes will be a redirection of currently proposed or understood efforts, including those addressed through these comment periods.	Please see the overarching response which addresses this comment	
San Jose CAMP5	CAMP	Specific CNC CAMP	Figure 12: Map showing general area for the targeted area study. Green circles show locations of community concerns while yellow circles show Air Toxics Hot Spots. Actual drive plan and extent of monitoring is to be determined based on conditions experienced during the monitoring period.	As raised in prior comments, it is unclear how resources will be allocated based on competing language and mapping of allocated mileage, community concerns, identified toxic hotspots, and exact specifications of the monitoring plan.	The potential variability based on Aclima's cited "dynamic" route planning and "[a]actual drive plan" should be further addressed in order to reduce CNC community or other stakeholder concerns regarding potential disparities in results based on modified plans, or changes made through a non-public process. This should be clarified to avoid issues stemming from the potential neglect of or over-focus on certain sources, which could conversely come from spending excess time on "targeted" sources from which low emission contributions are identified.	Please see the overarching response which addresses this comment	
Appendix H: Targeted Area Monitoring Assignment Approach6	CAMP Supplemental Material	SMMI/CAMP General	Aclima targeted area studies will be approximately 1-2 week studies focused on a small area with high frequency monitoring in that area during that time period	The duration and scope of targeted studies are defined, but the criteria for selecting these areas are not. It is unclear whether these studies are prioritized based on community concerns, emission potential, prior screening results, or operational convenience, and how that aligns with program objectives.	Provide clear selection criteria and justification for targeted study locations, and explain how this approach aligns with community priorities, emission source patterns, or other equity and programmatic goals. Additionally, address how time-limited deployment in small areas fits within the broader monitoring framework.	Please see the overarching response which addresses this comment	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
North Bakersfield CAMP2	CAMP	SMMI/CAMP General	6. Data quality objectives Make sure that we have high confidence in the locations where pollution emissions sources are detected. In other words, we want to minimize the presence of “false positives” in the resulting data. This is done by making sure that multiple detections of emissions sources occur in the same location before identifying it as a likely source of pollution. This can be quantified as the number of detections per visit to a particular location.	The procedures proposed for source identification are challenging within the context of already-limited mobile monitoring data.	Further detail regarding the procedures of source identification, particularly in potentially politically- driven source targeting based on strong community action, should be included in order to ensure that the scientific rigor is present.	Please see the overarching response which addresses this comment	
Appendix D: Hyperlocal Ambient Concentration Estimate Validation and Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	5.2 Accounting for Systematic Measurement Bias While this approach may be applied to any pollutant, a typical scenario where this is expected to be necessary is for PM2.5. The parameters used in the sensor model that converts Aclima’s particle count measurements to PM2.5 have been found to vary across different geographies, attributed to differences in size distribution and chemical composition of the ambient aerosol in these locations.	Same comment as above		Aclima's data quality operations are documented in the appendices (as well as in the CAMPs). In use monitoring systems are calibrated on a 6-8 week cadence for SMMI. Adjustments are applied at the individual sensor level based on the results of these calibrations. Systematic bias (as described in Appendix D) is evaluated at the system level through mobile-to-stationary comparisons as well as the regulatory site collocations. This is also discussed in Section 5.4.1 Sensor Drift. Adjustments to individual sensors are applied if post-deployment checks do not meet the acceptance criteria. This section discusses the strategy for this, most typically resulting in calibration parameters that vary linearly with time over the time between calibration events. For example, if the intercept of a linear fit was found to be 0 on day 1 and 4.5 on day 45, we would apply a varying intercept over this time period starting at 0 on day 1 and increasing each day by 0.1, ending up at 4.5 on day 45. The intercept going forward would then be set as 4.5 until the next calibration event.	
Appendix E: Hyperlocal Enhancement-Based Data Products Quality Assurance System (v2.2)6	CAMP Supplemental Material	SMMI/CAMP General	3.0 Impact of Sensor Uncertainty Interfering Species - Potentially High (Enhancement Data Product Sensitivity) TVOC 32% (Typical Gain Uncertainty)	Same comment as above		The appendix documents are considered part of the CAMPs and are the most appropriate place for describing sensor limitations (alongside detailed descriptions of the enhancement-based data products) to ensure readability of the CAMPs. These limitations are taken into account at the stage of producing appropriate visualizations. Limitations will be included in documentation that accompanies the visualizations.	

SMMI Document	Document Type	Comment - SMMI/CAMP General or Specific CNC CAMP	Section	Section-Specific Comment	Section-Specific Recommendation	Formal Response	Proposed Edits
North Bakersfield CAMP2	CAMP	Specific CNC CAMP	General updates throughout for the 7-1-2025 revisions	The additions to the 7-1-2025 CAMP document appear to include minor editorial issues which could be resolved for finalization. This includes redefinition of acronyms (e.g., NOx is defined as an acronym on p. 14, 18, and 31), use of a term before definition (e.g., PM2.5 on p. 13 before definition on p. 18), and typos (e.g., "20204" on p. 18 in text).	Editorial revisions should be made to the CAMPs to resolve typos, new text integration errors, and other editorial issues to finalize the documents.	Thank you for catching these.	Edits incorporated
Paramount and North Long Beach CAMP3	CAMP	Specific CNC CAMP	General updates throughout for the 7-1-2025 revisions	The additions to the 7-1-2025 CAMP document appear to include minor editorial issues which could be resolved for finalization. This includes redefinition of acronyms (e.g., NOx is defined as an acronym on p. 14, 18, and 31), use of a term before definition (e.g., PM2.5 on p. 13 before definition on p. 18), and typos (e.g., "Ethylene Oxide" in Fig. 9).	Editorial revisions should be made to the CAMPs to resolve typos, new text integration errors, and other editorial issues to finalize the documents.	Thank you for catching these.	Edits incorporated

Overarching Responses to CMTA Comments

Theme 1: Targeted Area Representativeness and Selection Process

Response:

The selection of targeted area sites and the planning of monitoring around these sites within the logistical constraints of our mobile lab partners and their unique capabilities in a way that is responsive to community needs was one of the most challenging parts of developing CAMPs for SMMI. The process was approached from a desire to empower the communities in the planning of monitoring areas (as called out in CARB's Blueprint 2.0 and built into the SMMI Community Engagement Plan co-developed with the Project Expert Group). The list of sources and general areas of concern produced through the community engagement process was the starting point for allocating mobile lab resources for targeted area studies. The goal was to align PML resources and their distinct capabilities with common chemical signatures associated with sources of interest that were identified through the engagement process. This process and the results are outlined in detail in Appendix H.

In response to comments received on the first CAMP drafts, we included an overview of known sources in each community based on emissions inventories compiled and maintained by CARB (AB2588 hot spots and Major Facilities database from CARB's pollution mapping tool) in the Community Profile section of each CAMP (Section 2). In some cases, targeted area monitoring plans have been updated to include sources from these inventories, particularly in CAMPs where the targeted area monitoring is focused in specific impacted areas, rather than specific facilities (e.g. San Jose). In these cases, the monitoring area is generally the same, but specific facilities of potential concern in these areas are identified. In other cases, the monitoring plans have been slightly modified by providing flexibility for monitoring to be conducted around the inventory-based facilities if time and logistics allow. In these cases, the primary targets for this monitoring remain the community-identified facilities, but where opportunity arises, the objective will be to collect data around as many potential sources of pollution as possible. It should also be noted that the identification of facilities and community concerns in Section 2 of the CAMPs do not automatically mean that data will be collected around these sites. The aim of Section 2 (in part) is to provide an overview of air quality issues and monitoring projects in the community. The monitoring objectives and locations are described in Sections 4 and 8.

While we received comments that an approach based solely on the emissions inventories would be more scientifically rigorous, our methodology is intentionally grounded in multiple complementary data sources, including emissions inventories, community surveys, and prior mobile monitoring. This integrated approach provides a more comprehensive and contextually relevant understanding of community air quality. Importantly, community-sourced information, which has historically been underutilized, has been incorporated alongside traditional emissions inventory data to ensure that SMMI monitoring efforts are both scientifically robust and responsive to community-identified concerns.

The comments received touch on some very important implications of this approach that we have provided additional language on in the CAMPs to highlight (in Section 4.3). The primary implication is that the data that is collected from the targeted area studies may be biased towards a priori assumptions or perceptions by community members participating in SMMI. Data will be collected and highlighted in SMMI visualizations around sites identified by community members; however, we acknowledge that this will not capture all sources of pollution in the data set or the visualizations. It should also be acknowledged that an approach driven by emissions inventories alone would also be subject to similar, although likely orthogonal biases. Ultimately, intensive targeted area monitoring around all of the important sources across all communities in a way that would result in a comprehensive survey of all sources is not the goal of SMMI. The goal was to provide monitoring resources and screening to a large number of communities effectively. We do not suggest in the CAMPs that an outcome of targeted area monitoring will be to provide a comprehensive analysis that confidently identifies the most impactful sources in each community; however, we acknowledge that it is important to specifically say this, both in the CAMPs as well as in the presentation of results for communities. In the presentation of results, we will communicate that the inclusion of data near specific facilities is not meant to indicate that those facilities are the sole source of the measured concentrations, nor does it rule out the presence of other potentially more impactful pollution sources in the community. It should also be noted that broad area monitoring, due to its more systematic approach, will be better at capturing more comprehensive data across the community, independent of community concerns or emissions inventories, albeit with less chemical specificity.

On the representativeness of targeted area studies, we acknowledge the limited amount of time dedicated to targeted area monitoring in each community. We also acknowledge the inherent limitations that will result in the collected data not being fully representative of operations and meteorological conditions over the long term. We have designed a plan to capture data from the PMLs around as many sources as possible and across as many communities as possible. The primary objective of these studies is to provide a chemically detailed snapshot of pollutant concentrations near potential sources. We hope that relationships may be drawn

between these detailed chemical snapshots over the short term and the more general pollutant data (but more temporally representative) that is collected via broad area monitoring in the same locations. For example, persistently elevated TVOC detected around a facility over 9 months of monitoring can be coupled with detailed PML chemical characterization around that same facility over a 5 day window to provide complementary information about the representativeness of that short term monitoring result. We also acknowledge that care must be taken in making such extrapolations and will do so carefully.

Finally, we acknowledge the critical importance of evaluating the extent of these important sources of bias that may be present in the final collected data set through an analysis of all the factors raised by the comments here. Aclima and its partners have extensive experience working with and communicating mobile monitoring data (to provide a few examples: air.health, aq.aclima.io, NYS DEC Mobile Monitoring Initiative produced in partnership with NYS DEC, scientific publications such as Apte et al., 2017, and this report produced by Aerodyne for SCAQMD). The SMMI team will take these factors into account in the data analysis stage and in the presentation of results.

Edits:

Section 4.2

Targeted area monitoring: a subset of monitoring vehicles focuses on specific air pollution concerns (sources or impacted areas) at smaller spatial scales and shorter time periods. This measurement strategy involves monitoring over a relatively small area over a shorter time period with more intensive driving (i.e. more samples in a specific area on any single day). There is an inherent limitation in the targeted area studies in that they will typically occur over a short time period and the results are likely to not be representative over longer time periods (different facility operating patterns and/or meteorological conditions). While broad area monitoring may provide more temporally representative results, t~~T~~argeted area monitoring is a complimentary approach that can tell~~s~~ us more detail about a specific concern, such as the exact makeup of chemicals downwind of a particular facility, what areas of a community are most impacted in the immediate vicinity of pollution sources, or what times of day these areas are most impacted. Targeted area monitoring vehicles will either be drawn from the broad area monitoring fleet (Aclima Mobile Platforms) or from a special mobile laboratory fleet (a small number of vehicles with higher accuracy/precision sensors detecting a wider range of pollutants including toxic air contaminants), depending on the specific source of concern. In contrast to the broad area monitoring approach, the number of concerns that can be addressed is much more limited, but the depth at which the data about the concerns can be collected and analyzed is potentially greater.

Section 4.3

The community engagement process has defined a range of air pollution concerns. These concerns were translated into specific high-level monitoring objectives and sub-objectives, which in turn allowed the selection of appropriate mobile monitoring methods and data analysis plans to collect the type of data needed to address gaps in prior monitoring efforts and to address specific community concerns. Not all concerns and identified pollution sources are assigned specific monitoring objectives. In some cases it is because the measurement methods for monitoring the sources are not available to address the specific pollution sources. *[CUSTOM CNC-SPECIFIC TEXT]* More generally, however, it is because resources for targeted area monitoring are limited across the entire SMMI project (62 different communities) and not all concerns can be directly addressed through the targeted area monitoring approach. While the concerns listed below will be the primary focus of the monitoring in *[CNC]*, the final collected data set can be further analyzed beyond the scope of SMMI to address a much wider set of concerns and sources.

Note that the selection of specific concerns to be included as monitoring objectives for targeted area studies does not imply that these are the most impactful sources or the most impacted areas in the community. The results of these studies will not be able to provide a comprehensive view into all possible sources in the community and the monitoring objectives listed here should not be interpreted that way.

Table 3 below provides an outline of the community specific concerns, objectives/sub-objectives, mobile monitoring methods, and data analysis approaches that may support actions to reduce emissions or exposure in a community. More details on the monitoring methods and presentation approaches can be found in Section 8 and Section 13, respectively. *[CUSTOM CNC-SPECIFIC TEXT]*

Theme 2: Broad Area Monitoring Sampling Bias and Dynamic Sampling Approach

Response:

In response to comments about temporal sampling bias and the dynamic sampling approach, we have added additional detail on the dynamic sampling algorithm to the CAMPs in section 7.2 (see below). Importantly, it should be noted that lower mileage communities are not treated differently from higher mileage communities. The mileage here does not refer to “odometer” mileage, or the total distance driven by vehicles over the duration of the monitoring period. It refers to the mileage of roads existing in the communities for which Aclima will include in the monitoring area. Thus, even though the communities vary in terms of total miles contained (and allocated), each individual census block group across each community will be treated similarly from a drive planning perspective.

An important feature of the dynamic sampling approach is that locations with higher pollutant concentrations (which are likely to also have more variable pollutant concentrations) are more likely to have more temporally and spatially dense sampling in the final collected data set. This monitoring approach is aligned well with the primary monitoring objectives of SMMI being the identification and characterization of air pollution near sources of concern as well as identification of areas of disproportionate impact. A trade-off of this approach is that while areas where pollution is high and variable will be relatively well characterized, highly localized and intermittent pollution sources in areas with otherwise clean air may go undetected. This limitation is discussed in Section 3.1 in Appendix D.

Temporal bias is unavoidable in mobile monitoring. The drive planning approach is an important aspect of minimizing temporal bias, and we accomplish this through the sampling algorithm (e.g. ensuring that the revisit rate is a key part of the prioritization function) and through the scheduling of driver shifts around the clock and over different days of the week. Accounting for temporal bias can also be handled in the data aggregation approach. Aclima uses different modeling approaches for estimating hyperlocal ambient concentrations. Hyperlocal concentrations are derived using a Background-Normalized Median with Bayesian-bootstrap precision and Statistical Measurement Reconstruction that fits regional space-time trends (GAM) and uses residuals with gap-filling. Estimates are validated near regulatory monitors with daily and campaign-integrated metrics (MAE, CRMSE, R^2), with pollutant-specific bias adjustments as needed (described in more detail in Appendix D). Evaluation of temporal bias, and uncertainty in general, is a key part of evaluating success of the monitoring (as described in Section 12 as well as in Appendix D). The results of these evaluations will be included in the final report as part of a QA results report. Additionally, with all 1 second data being released to the public, users of the data can perform their own evaluations that are relevant to their specific use cases to characterize temporal or other sources of bias.

Edits:

Section 7.2:

In broad area monitoring, Aclima's fleet of Mobile Platforms will collect data within the community defined monitoring area boundary. AMPs will measure on publicly accessible roads within this boundary, gathering repeat measurements at different times of day, days of the week, and seasons.

Aclima will conduct monitoring within the defined boundary such that the fleet will complete an average of 20 repeat measurements distributed across all residential and major roads in all census block groups to provide adequate coverage throughout the monitoring area. However, rather than specify the number of samples on any specific length of road within each census block group, Aclima uses a dynamic mobile sampling algorithm that is updated daily with the specific goal of collecting data that will maximize improvement in the characterization of a location's air quality. This approach ensures that sufficient measurements are collected in areas where greater pollutant variability requires additional sampling to achieve representativeness, or measurements that are representative of the conditions across the specific monitoring period. The system uses observed data in combination with predictive models to prioritize data collection ~~where there is specific need based on observed characteristics like a large mis-match between the expected and observed air quality at a location, a relatively small amount of data collected to date, a need for a greater density of data collection at a specific location based on an identified community need, and other air quality considerations.~~ in locations based on these factors:

- Number of visits to-date relative to expected visits, given the time elapsed over the 9 month monitoring period
- Time elapsed since the last visit
- Variability in observed pollutant concentrations over repeat visits, i.e. a mismatch between observed concentration and the predicted concentration based on prior observations

At the beginning of the monitoring period, the number of visits is more heavily weighted than the other factors and once a suitable number of observations have been made to make reliable predictions, the variability of observed pollutant concentrations becomes more heavily weighted. In the end, locations where pollutant variability is higher, will be prioritized for more repeat visits in order to more adequately characterize the average pollutant concentrations in these locations.

Aclima ensures continuous mobile monitoring throughout the day by staffing driving shifts throughout the day and staggering start times to avoid operational gaps when drivers are ending and starting shifts. The drive planning algorithm operates across large areas, not individual communities of varying sizes, and aims for spatially diverse data collection daily across all CNCs, regardless of the amount of road miles contained in those communities. To mitigate time-of-day bias, specific road locations are randomly assigned to 6-hour windows on a daily basis to mitigate against overly biased collection in certain locations to certain times of day. The sampling algorithm also prioritizes maintaining an equal revisit rate across the monitoring area, aiming for the 20-visit average over a nine-month period rather than quickly completing specific locations. Locations that receive 20 visits early on in the nine-month period will continue to be visited over time.

The mobile sampling algorithm ensures sufficient data collection to support the calculation of spatially resolved ambient concentration estimates. In addition, the method supports source identification and assessment of disproportionate impacts by directing more sampling either in regions where there is larger variation in pollution concentrations ~~or around locations of interest for the community~~. For a detailed discussion of the broad area mobile monitoring and the dynamic mobile monitoring algorithm, see Aclima's QA documentation in the Appendices C, D, and E.