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Possible Framework for Considering Cumulative Impacts Policy based on NJ and CA Experience

Considerations

- ▶ Vulnerable Communities
- ▶ Requirements by Facility Type, Permit Type, Emissions Type, Emissions Volume
- ▶ Measures for Analysis
 - ▶ Checklists
- ▶ Elements of Comparative Analysis
- ▶ Public Input Process and Inclusion of Stakeholder Groups

How are Vulnerable Communities Defined?

- ▶ Race and Ethnicity
- ▶ Income Status
- ▶ Key Stressors
- ▶ Cumulative Impacts Index
- ▶ Level of Geography (census tract, zip code, neighborhood association boundaries, etc.)

What are the Requirements by Facility Type, Permit Type, Emissions Type, Emissions Volume?

- ▶ Commercial Facility
- ▶ Industrial Facility
- ▶ Volume of permitted emissions
- ▶ Type of permitted emissions (HAPS, PM, VOCs)
- ▶ New Permit
- ▶ Renewal Permit
- ▶ Major Source Permit
- ▶ Minor Source Permit
- ▶ Registration

What are the Measures for Analysis and What Should be Required as part of the Permit Application (i.e., checklist elements)?

- ▶ Net increase in pollution, by type of emission
- ▶ Number of stressors (Used in NJ analysis)
- ▶ Cumulative Impacts Score (used in CA analysis)
- ▶ Other

What are the Elements of Comparative Analysis?

- ▶ Comparison of measure (i.e., CI score) at subject community with state
- ▶ Comparison of measures at subject community with immediately adjacent communities
- ▶ Comparison of measures at subject community with vulnerable communities

What is the Public Input Process and how do we Include Stakeholders?

- ▶ Does the policy mirror public input process used for Environmental Impact Statements, Environmental Assessments, or other types of permits?
- ▶ Do impacted Stakeholders have greater levels in decision making?