REVISED VERSION 7-31-2026

AUGUST BOARD MEETING

DATE: August 4 and 5, 2026

TIME: 9:00AM – Noon Both Days

CAPCOA Office and
Zoom - Login Information Attached

AGENDA Day 1 – August 4, 2026 @ 9:00AM

CALL TO ORDER

CALL FOR ADDITIONS TO AGENDA

CONSENT ITEMS

1.	Approval of Agenda	**1-3**
2.	Receipt of Correspondence	**4-5**
3.	Approval of June 2026 meeting minutes	**6-10**

BOARD ACTION ITEMS

4.	Review and Approve Monthly Financials	**11-21**

DISCUSSION ITEMS

5.	Rx Fire Update	**22-29**
5.5	Air Curtain Incinerator White Paper Update	**30-53**
6.	Federal Legislation: Wildfire Emissions Prevention Act (WEPA)	**54-65**
7.	Secretary/Executive Director Report Out: Investment Account Update	**66-84**
8.	Bay Area Air District/CAPCOA Federal 105 Grant Passthrough Update	**83-84**
9.	FY 2026 – 2027 Budget Discussion a. Subcommittee Updates b. Draft Budget Discussion	**85-94**

CLOSED SESSION

10. Executive Director Performance Evaluation

NOTICE: Some supporting documentation for sections 7 and 9 contain confidential information and have been intentionally omitted from this packet.

Agenda Day 2 – August 5, 2026 @9:00AM

DISCUSSION ITEMS

11. Prep for CARB Discussion

CARB AND OEHHA DISCUSSION ITEMS (TIME CERTAIN AT 10:00AM)

12. Burnbot Technology – Opportunities
13. Update on CalEnviroScreen 5.0 (**Time-Certain at 11:00AM**)
14. Latest Updates on Congressional Review Act of California Waivers
15. Community Air Grant Updates
16. SB 1137 – Updates on Oil and Gas Leak Detection Regulation
17. SB 352 – Updates on 5-year Cycle Community Air Monitoring Plan Refresh
18. SB 905 – Carbon Capture, Removal, Utilization and Storage Program – Updates on Public Engagement Efforts
19. Statewide Mobile Monitoring Initiative Story Maps
20. Methane Satellite Program Updates **95-98**
21. Cumulative Risk Research RFP
22. Air Toxics Updates
    a) Roadmap
    b) PCBTF
    c) Acrolein/EtO
23. Climate Disclosure Updates
24. Three-party Climate Agreement and Emissions Budget Updates

OTHER COMMITTEES

25. Section Reports
    - Rural
    - Medium
    - Large
26. AAPCA (Poiriez, Sheikh)
27. NACAA (Ayala, Fine, Nastri, Stedman, White)
28. Western Regional Air Partnership (Stedman)
29. Community and Workplace Engagement Committee (Arlin Genet)

DISTRICT-SPECIFIC ISSUES, OTHER BUSINESS

30. Appearances by or Issues from any District
31. Next Meeting – Legislative Retreat, September 29-30 in San Diego and Virtual

Brad Poiriez
President

To Join the Video Conference, you will need a Webcam and Computer Audio (speakers and microphone). If you do not have either, you may dial in using the number listed below to join by audio only.

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1000 G Street, Ste 360
Sacramento, CA 95814
(916) 441-5700 (916) 441-5708 FAX
www.capcoa.org

June 12, 2026

The Honorable Isaac G. Bryan
Chair, Assembly Committee on Natural Resources
1020 N Street, Room 164
Sacramento, CA 95814

The Honorable Juan Carrillo
Chair, Assembly Committee on Local Government
1020 N Street, Room 157
Sacramento, CA 95814

RE: SB 1075 (Reyes) – Air resources: toxic air contaminants: criteria air pollutants: community emissions reduction programs: local community emissions reduction plans – Oppose

Dear Chairs Bryan and Carrillo:

On behalf of the California Air Pollution Control Officers Association (CAPCOA), I write to express our opposition to SB 1075 (Reyes) as amended May 22, 2026, which would make significant changes to the Community Air Protection Program (CAP program) established by AB 617 (C. Garcia; Chapter 136, Statutes of 2017). CAPCOA is the non-profit association of air pollution control officers from the 35 local air quality districts throughout California, dedicated to improving public health and providing clean air for all our residents.

The CAP program is an essential tool utilized by air districts, local communities, and the California Air Resources Board (CARB) to reduce health risk from exposure to air toxic and criteria pollutants in neighborhoods most impacted by air pollution. The CAP program brings together local air districts, community members, community-based organizations, environmental justice organizations, state and local governments, regulated industries, CARB, and other key stakeholders to develop and implement Community Emission Reduction Programs (CERPs) for each CAP community. The CAP program has cultivated new partnerships and deepened existing ones with overburdened communities and air districts through its community-focused and equity-centered approach. Through the collaborative efforts of air districts and community partners, the program is achieving substantial reductions in air pollution emissions and delivering measurable air quality and public health improvements in communities throughout the state.

The May 22, 2026 version of SB 1075 is highly concerning, as it would undermine years of progress and fundamentally alter the collaborative partnerships that have been established through considerable time, effort, and commitment from stakeholders. We have significant concerns with the bill, including that it:

- Imposes various requirements on air districts to implement and enforce Local Community Emission Reduction Plans (LCERPs), treating them the same as Community Emission Reduction Plans (CERPs). LCERP communities are created through a grant process between CARB and the grantee in the community. This grant process is significantly different than the CERP community process that includes a robust selection process, community steering committee input, and air district involvement. As LCERPs are not developed to the same level of stringency and comprehensiveness as CERPs, treating them as equivalent strategies shortcuts the development process which in turn can create significant challenges for both communities and the responsible air district in their implementation and enforcement.

- Would require CERPs to continue until attainment with federal Clean Air Act (FCAA) requirements are achieved. CERPs are designed to address air pollution, most notably toxic air contaminants, at the local community level. Tying these plans to achievement of FCAA requirements, which generally address criteria pollutants at the regional, multi-jurisdictional, and state-wide level, does not accurately reflect community-level air quality needs nor does it inform the efficacy of efforts to reduce emissions at the local level.

- Would require a 2/3 vote of the community steering committee members before disbanding the committee. CSCs are staffed by air districts, so in effect, this provision may force an air district to expend already limited resources, to the detriment of other communities, long after it is appropriate. While input from the community and all entities involved is appropriate and welcome, measuring CERP success, deciding when a CSC should be disbanded, and how air district resources are expended, is appropriately within the purview of the air district.

The changes to the CAP program contemplated by SB 1075 would be counterproductive, as they would divert resources and focus away from community-level efforts, especially on air toxics, which yield the greatest health benefits in communities overburdened by air pollution. Finally, as you may be aware, changes to the Cap and Invest Program adopted by CARB on May 29, 2026, will significantly reduce funding available statewide to the AB 617 Community Air Protection Program, even as SB 1075 establishes new requirements to extend support to existing CERP and LCERP communities. These changes to the Cap and Invest Program coupled with the proposed program changes in SB 1075 will have a significant negative impact on the CAP program and community health. We therefore urge you to oppose SB 1075 when it comes before you for consideration. Should you have any questions, please do not hesitate to contact me at (760) 245-1661 or our Legislative Advocate, Brendan Twohig, at (916) 426-2526.

Sincerely,

Brad Poiriez
President

CC: The Honorable Eloise Gómez Reyes, California State Senator, 29th District

JUNE BOARD MEETING MINUTES

DATE: June 9th and 10th, 2026

TIME: June 9th 9:02 AM – 12:07 PM
June 10th 9:01 AM – 11:33 AM

CAPCOA Office and
Zoom - Login Information Attached

In Person
Aeron Arlin Genet, *Santa Barbara APCD*
Brad Poiriez, *Mojave Desert AQMD*
Carlos Gonzalez, *South Coast AQMD*
Gretchen Bennitt, *Yolo-Solano AQMD*
Kellie Keitt, *CAPCOA*
Lisa Tanaka O'Malley, *South Coast AQMD*
Mark Montelongo, *San Joaquin Valley APCD*
Paula Forbis, *San Diego County APCD*
Richard Stedman, *Monterey Bay ARD*
Samir Sheikh, *San Joaquin Valley APCD*
Susan Nakamura, *South Coast AQMD*
Tung Le, *CAPCOA*
Viet Tran, *Bay Area Air District*
Wayne Nastri, *South Coast AQMD*

Virtual
Alberto Ayala, *Sacramento Metro AQMD*
Ali Ghasemi, *Venture County APCD*
Amy Roberts, *Sacramento Metro AQMD*
Anissa Heard-Johnson, *South Coast AQMD*
Barbara Lods, *Antelope Valley AQMD*
Erik White, *Placer County APCD*
Gary Ray Jr., *Eastern Kern APCD*
Herminia Perry, *Amador County APCD*
Janice Lam, *Sacramento Metro AQMD*
Joe Tona, *Tehama County APCD*
Julie Hunter, *Northern Sierra County AQMD*
Kevin Scheive, *CAPCOA*
Marcie Skelton, *Glenn County APCD*
Morgan Lambert, *San Joaquin APCD*
Nicole Dolney, *CARB*
Philip Crabbe, *South Coast AQMD*
Radhika Majhal, *CARB*
Rich Boyd, *CARB*
Rob Bamford, *Northern Sonoma County APCD*
Ryan Hayashi, *San Joaquin Valley APCD*
Sadie Gibbs, *CAPCOA*
Sheraz Gill, *San Joaquin Valley APCD*

AGENDA Day 1 – June 9, 2026 @ 9:00AM

***CALL TO ORDER** 9:02 AM*

CALL FOR ADDITIONS TO AGENDA

Request from Brad Poiriez to add Budget Subcommittee Debrief and Discussion to agenda Item #4

CONSENT ITEMS

1. Approval of Agenda

Wayne Nastri motion to approve additions to the agenda, Aeron Arlin Genet 2nd. All in favor, none opposed.

2. No Correspondence Since May 29th
3. Approval of May 2026 meeting minutes
   Paula Forbis motion to approve correspondence and May 2026 meeting minutes, Gretchen Bennitt 2nd. All in favor, none opposed.

BOARD ACTION ITEMS

4. Review and Approve Monthly Financials
   Jessica Swingle and Tung Le provided the monthly financials to the Board. CAPCOA is anticipating ~$120,000 in federal 105 funding from CARB, compared to estimated and budgeted amount of $107K. Additionally, CAPCOA has received slightly more in district 105 contributions than expected from the 2024-2025 budget. The budget subcommittee will decide how to credit the overage to those contributing districts. CAPCOA has completed its audit, and no issues have been identified. Because CAPCOA/MDAQMD counsel seemed surprised by the amount, Brad Poiriez inquired about the unexpected $30,000 legal fees for the amicus filing in December that the CAPCOA Board approved and would like to verify that the fees CAPCOA were charged were accurate. The Board has asked Tung to check in with BBK to verify legal fees and if CAPCOA was charged correctly. Spring Membership expenses will be included in the next financials presentation in August.

   Budget Subcommittee Debrief: Gretchen Bennitt updated the Board on the first CAPCOA Budget Subcommittee meeting. Tung provided an agenda for the meeting, and Jessica provided some materials for the subcommittee to review. The Board would like to schedule the next Budget Subcommittee meeting for July. The Board requested this meeting be attended by only subcommittee members as well as Tung and Jessica.

   Samir Sheikh motioned to approve monthly Financials, Wayne Nastri 2nd. All in favor, none opposed.

5. Approve Data Center White Paper
   Kevin Scheive presented the draft white paper to the Board, which has undergone three rounds of edits. The Board discussed the different areas of interest that districts are involved in regarding data centers, and difficulties with deciding which topics would be best to highlight to represent CAPCOA. The Board decided to use the white paper as a guiding document for the creation of brochures/pagers that would be drafted for specific audiences. Tung Le and Kevin will work to develop these documents.
   No action taken.

DISCUSSION ITEMS

6. Spring Membership Review
   Kellie Keitt provided a presentation to the Board covering the CAPCOA Spring Membership and key takeaways. As event costs continue to rise, Tung Le, the budget subcommittee and the EC will continue to work to reduce event costs for future CAPCOA meetings.

7. Fall Membership Planning Updates (no memo)

Tung Le relayed to the Board that Fall Membership will not be able to be located at CARB's Riverside office due to complicated logistics and a lack of nearby hotels. CAPCOA is currently exploring venues that are located near the Sacramento International Airport and will keep the Board apprised as more information becomes available throughout the planning process.

8. APCO Debrief C&I Meeting
   Several APCOs including CAPCOA board members were in attendance and provided comments at CARB's Board Meeting to consider adopting amendments to the Cap and Invest Regulation on May 28th. APCOs comments were generally well received and helped to set a calmer tone for the meeting. The Board discussed the lack of engagement that CAPCOA has seen from CARB on major issues and would like to continue trying to engage with CARB Executive Staff to resolve communication issues.

9. Strategizing Communication Efforts with CARB
   Tung Le and Brad Poiriez shared our efforts thus far to engage with CARB's EO to discuss the breakdown in communication between them and the air districts/CAPCOA. The Board discussed several different approaches including engaging with CARB board members, CARB chair, and CalEPA Secretary to ensure our concerns are being heard. Brad to attempt to contact Steve Cliff once more before CAPCOA explores other approaches.

CLOSED SESSION

10. Executive Director Performance Review

Agenda Day 2 – June 10, 2026 @9:00AM

DISCUSSION ITEMS

11. Prep for CARB Discussion

CARB DISCUSSION ITEMS (TIME CERTAIN AT 10:00AM)

No executive office staff were in attendance to participate in this discussion.

12. C&I Regulation Follow-up Discussion
    - Efforts to revisit SB 840 funding tiers
    - District/CARB Staffing Decisions

    Tung relayed to the APCOs that Steve indicated the C&I amendments would take effect in September.

13. Updates on acrolein/EtO workshops in Sacramento and LA
    CARB staff joined remotely and provided the board an overview of the first two workshops on acrolein and EtO. Several APCOs in attendance noted the workshops were highly technical and it was uncertain how much of the information was useful to those in attendance. CARB has received requests from EJ groups to put in place a process for them to help guide future research work related to these air toxics. Industry representatives requested similar.

14. Air Toxics Roadmap Updates

CARB staff provided an overview of their activities thus far on developing the road map. Air districts suggested that CARB review the planning document that was developed for acrolein/EtO as a template for the roadmap. CARB staff will consider doing so.

OTHER COMMITTEES

15. Section Reports
    - Rural
      Julie Hunter presented an update that the Rural Section is working to schedule their fall Rural Section meeting. Kellie Keitt is working with Helmsbriscoe to identify potential locations and dates to host this meeting.

    - Medium
      Erik White presented, the next scheduled Medium Section meeting is currently scheduled for the first week of August in Placer. Due to another planned event in the first week of August at the Capitol, this meeting may be rescheduled.

    - Large
      Nothing to report, the large districts may hold a meeting on the first week of August while attending an event being hosted at the Capitol.

16. AAPCA (Poiriez, Sheikh)
    Brad Poiriez presented an update on behalf of AAPCA. Spring Membership in Atlanta went well and had a lot of staff-level attendees. The next meeting in the fall will be in Raleigh, North Carolina to accommodate EPA attendance.

17. NACAA (Ayala, Fine, Nastri, Stedman, White)
    Richard Stedman presented an update on behalf of NACAA. The last meeting was held in St. Louis, Missouri. NACAA is in the process of planning leadership training, and NACAA members will keep the Board apprised as they learn more.

18. Western Regional Air Partnership (Stedman)
    WRAP's Board meeting was on 6/10, at the same time as the CAPCOA Board Meeting. Richard Stedman and Julie Hunter were unable to attend. The WRAP Fire and Smoke group is currently being reinvigorated, and a meeting is scheduled for June 30th.

19. CWEC (Arlin Genet)
    CWEC met on 6/4, with much of the discussion covering the CWEC panel that took place during the CAPCOA Spring Membership. Aeron Arlin Genet committed to sharing notes from that session with the CAPCOA Board and CWEC once the notes are collected. Janice Lam Snyder flagged that there is currently some concerning language in the Community Air Grants that suggest a potential EPA/CARB audit.

DISTRICT-SPECIFIC ISSUES, OTHER BUSINESS

20. Appearances by or Issues from any District
    Joe Tona mentioned that the Sacramento Valley Basin Control Counsel (BCC) sent a letter to CARB requesting permitting guidance for ACI's, BurnBot, and other similar burning equipment. This letter asks for guidance on how CARB sees the permitting requirements for

these burn techniques within the current regulatory framework. The BCC will be meeting with CARB on 6/11, and Joe plans to share what comes out from the meeting.

21. Next Meeting – August 11-12 in Sacramento and Virtual
    There is an event called "Clean Air, Clean Solutions" scheduled for August 3rd, which will be located at the Capitol on the west lawn. This event will have executives and staff from air districts throughout California to help educate the Legislature and the public on the role districts play on air quality in California. The Board requested for the August Board Meeting to be rescheduled to allow APCO's to attend this event. Tung Le also shared that CAPCOA's Legislative Advocate Brendan Twohig will be retiring in September, and the Board requested Tung to prepare a resolution and plaque to be presented to Brendan at the September Legislative Retreat.

Adjourned 11:33 AM

Brad Poiriez
President

Board

Financial Statements

May 2026

California Air Pollution Control Officers Association

California Air Pollution Control Officers Association
Statement of Activities by Class
8 Months Ended May 31, 2026

	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26		Total
	103 Grant PM2.5	**AB 836**	**CalEEMod**	**EPA 105 Pilot**	**MOYER/ RAP**	**Conferences**	**AB 617**	**Woodsmoke**	**Rx Fire**	**Unrestricted Support***	
	Apr25-Mar26	Sep21-Jul26		Oct25-Sep26	Feb25-Mar27		May26-Jun30	Jun23-Jun26	Jun21-Jun26		-2,526
Income	4,836	-	102,219	6,082	129,672	121,707	47,460	7,081	220,127	382,268	1,021,452
Expense											
Events Expenses	-	6	33	25	94,796	118,579	294	607	74,169	2,129	290,637
G&A Expense	-	329	1,332	1,469	7,650	1,102	12,287	2,247	37,503	82,972	146,892
Human Resource Expense	4,836	884	3,580	4,588	27,226	-	34,879	7,899	107,915	231,681	423,489
Program Expenses	-	-	97,275	-	-	2,500	-	-	540	143,758	244,073
Total Expense	**4,836**	**1,219**	**102,219**	**6,082**	**129,672**	**122,182**	**47,460**	**10,753**	**220,127**	**460,540**	**1,105,090**
Net Operating Income	-	(1,219)	-	-	-	(475)	-	(3,672)	-	(78,271)	(83,638)
Other Expense	441,128	-	-	-	-	-	-	-	76,683	-	517,811
Net Profit	-	(1,219)	-	-	-	(475)	-	(3,672)	-	(47,163)	(52,529)
Remaining Funding	10,639	411,822	48,669	605,854	108,119	-	41,530	-	1,969,017	-	

CAPCOA
Open Grants Dashboard
As of May 31, 2026

CAPCOA AWARDS

Grant	Total Award	Spent to Date	Remaining Award	Grant Start	Grant End	% time elapsed	% Spent
105 Pilot FY26 Estimated	25,614	6,082	19,532	10/1/2025	9/30/2026	58%	24%
EPA 103	15,000	15,000	-	4/1/2025	3/31/2026	108%	100%
Secretariat FY26 Estimated	123,711	203,446	(79,735)	10/1/2025	9/30/2026	58%	164%
Moyer/RAP Year 27	200,000	197,765	2,235	2/28/2025	3/31/2026	108%	99%
Moyer/RAP Year 28	200,000	94,116	105,884	1/14/2026	3/31/2027	24%	47%
AB 836	75,000	75,536	(536)	9/21/2021	7/31/2026	95%	101%
AB 617 FY24/25	55,000	55,000	-	7/1/2025	7/1/2026	83%	100%
AB 617 FY25/26	49,500	7,970	41,530	5/1/2026	6/30/2030	0%	16%
Woodsmoke	20,000	22,813	(2,813)	6/1/2023	6/30/2026	95%	114%
Prescribed Fire Admin	160,000	127,128	32,872	6/1/2021	6/30/2026	97%	79%
Prescribed Fire Coordination	900,000	373,295	526,705	6/1/2021	6/30/2026	97%	41%

DISTRICT PASSTHROUGH AWARDS

Grant	Total Award	Spent to Date	Remaining Award	Grant Start	Grant End	% time elapsed	% Spent
105 Pilot FY26 Estimated	586,322	-	586,322	10/1/2025	9/30/2026	58%	N/A
EPA 103	455,558	444,919	10,639	4/1/2025	3/31/2026	108%	98%
AB 836	925,000	512,641	412,359	9/21/2021	7/31/2026	95%	55%
Prescribed Fire Monitoring	170,000	48,243	121,757	6/1/2021	6/30/2026	97%	28%
Prescribed Fire Training	871,600	634,260	237,340	6/1/2021	6/30/2026	97%	73%
Prescribed Fire Large Districts	1,658,600	608,257	1,050,343	6/1/2021	6/30/2026	97%	37%

California Air Pollution Control Officers Association

Statement of Activities Budget Performance

8 Months Ended May 31, 2026

67% of Budget Year

	Oct 25 - May 26 Actuals	FY2026 Budget Budget	Variance	% of Budget	
Income					
Contributions Income					
District Assessments (CalEEMod)	4,945	20,000	(15,055)	25%	
District Contributions	91,908	-	91,908		A
Total Contributions Income	**96,853**	**20,000**	**76,853**	**484%**	
Dues Income	290,000	435,000	(145,000)	67%	
Events Income	100,165	120,210	(20,045)	83%	
Grants & Programs Income					
Federal Grants	10,918	141,950	(131,032)	8%	B
State Grants	523,156	680,000	(156,844)	77%	E
Total Grants & Programs Income	**534,074**	**821,950**	**(287,876)**	**65%**	
Other Income	360	50	310	721%	
Total Income	**1,021,452**	**1,397,210**	**(375,758)**	**73%**	
Expense					
Events Expenses	290,637	270,210	20,427	108%	E
General & Administrative Exp.					
Auditing & Financial	72,681	95,754	(23,073)	76%	
Bank and Merchant Fees	22	100	(78)	22%	
Board Development & Support	2,253	5,000	(2,747)	45%	
Dues & Subscriptions	12,482	12,000	482	104%	
Insurance	941	2,200	(1,259)	43%	
Interest Expense	0	-	0		
Internet & Technology	8,498	15,000	(6,502)	57%	
Minor Equipment	1,112	5,000	(3,888)	22%	
Miscellaneous	205	-	205		
Office Rent	35,194	52,752	(17,558)	67%	
Office Supplies	1,531	7,500	(5,969)	20%	
Postage & Delivery	1,081	1,500	(419)	72%	
Taxes & Licenses	195	300	(105)	65%	
Telephone & Communications	4,063	6,084	(2,021)	67%	
Travel	6,632	6,000	632	111%	
Utilities	-	8,160	(8,160)	-	
Total General & Administrative Exp.	**146,892**	**217,349**	**(70,458)**	**68%**	
Human Resource Expense					
Employee Benefits	37,042	62,031	(24,989)	60%	
Gross Wages	355,230	558,238	(203,007)	64%	
Payroll Processing Fees	5,815	11,165	(5,350)	52%	

California Air Pollution Control Officers Association

Statement of Activities Budget Performance

8 Months Ended May 31, 2026

67% of Budget Year

	Oct 25 - May 26	FY2026 Budget			
	Actuals	Budget	Variance	% of Budget	
Payroll Taxes	27,617	42,984	(15,367)	64%	
Vacation Expense	(3,390)	-	(3,390)		
Worker's Compensation	1,174	1,987	(813)	59%	
Total Human Resource Expense	**423,489**	**676,405**	**(252,916)**	**63%**	
Program Expenses					
CalEEMod Expenses	-	20,000	(20,000)	-	
CalEEMod Handbook	97,275	-	97,275		C
Total CalEEMod Expenses	**97,275**	**20,000**	**77,275**	**486%**	
Legal Fees	35,022	12,100	22,922	289%	D
Legislative Contractor	108,736	163,104	(54,368)	67%	
Legislative Materials & Expense	-	2,000	(2,000)	-	
Other Program Expenses	40	8,000	(7,960)	1%	
Training	3,000	-	3,000		
Total Program Expenses	**244,073**	**205,204**	**38,869**	**119%**	
Total Expense	**1,105,090**	**1,369,168**	**(264,079)**	**81%**	
Net Operating Income	(83,638)	28,042	(111,679)	(298%)	
Other Income					
Dividends and Interest	15,910	-	15,910		
Investment Fees	(3,670)	-	(3,670)		
Pass-Through Funds Received (Federal)	441,128	877,549	(436,420)	50%	
Pass-Through Funds Received (State)	76,683	500,800	(424,117)	15%	
Unrealized Gain/Loss	18,869	-	18,869		
Total Other Income	**548,920**	**1,378,349**	**(829,429)**	**40%**	
Other Expense					
Pass-Through Funds Expended	517,811	1,378,349	(860,537)	38%	
Reserve Funding	-	28,000	(28,000)	-	
Total Other Expense	**517,811**	**1,406,349**	**(888,537)**	**37%**	
Net Profit	(52,529)	42	(52,571)	(126516%)	

BUDGET VS ACTUAL FOOTNOTES

A - District contributions represent the voluntary contributions to address the 105 FY 25 funding deficit

B - Federal revenue is under budget because we are not recording any of the budgeted Secretariat (CARB) until official award received; email notification indicates to expect $123,711

C- Cal EE Mod Handbook expenses are funded by a Cal Fire grant - unbudgeted revenue and expense

D- Unanticipated legal fees of $30k as approved to be funded from reserves

E - Moyer conference in March cost $94k - funded by grant

California Air Pollution Control Officers Association

Statement of Financial Position

As of May 31st, 2026

	May 26 Actuals	May 25 Prior Year	% Change
Assets			
Current Assets			
Bank Accounts			
Bill.com Money Out Clearing	500	-	
Project US Bank Checking 5321	0	0	30%
Secretariat US Bank Chkng 9829	2,484,950	1,728,887	44%
US Bank Investment Funds 4258 (deleted)	-	0	(100%)
Wells Fargo Investment Funds 8361	201,537	199,178	1%
Wells Fargo Investment Funds 8582	157,613	132,978	19%
Total Bank Accounts	**2,844,599**	**2,061,043**	**38%**
Accounts Receivable			
Accounts Receivable	340,883	337,400	1%
Total Accounts Receivable	**340,883**	**337,400**	**1%**
Other Current Assets			
Accrued Revenue			
AB 617 Grant Accrued Revenue	62,970	55,000	14%
EPA 105 Pilot Grant	6,082	-	
Moyer/ Rap Accrued Revenue	94,116	-	
Total Accrued Revenue	**163,168**	**55,000**	**197%**
Prepaid Expenses	20,855	26,099	(20%)
Total Other Current Assets	**184,023**	**81,099**	**127%**
Total Current Assets	**3,369,505**	**2,479,542**	**36%**
Other Assets			
ROU Asset	190,824	235,116	(19%)
Security Deposits Asset	4,970	4,970	-
Total Other Assets	**195,794**	**240,086**	**(18%)**
Total Assets	**3,565,299**	**2,719,628**	**31%**
Liabilities and Equity			
Liabilities			
Current Liabilities			
Accounts Payable	41,899	51,990	(19%)
Credit Card	8,799	22,861	(62%)
Other Current Liabilities			
Accrued Expense	-	433	(100%)
Accrued Vacation Payable	23,432	22,370	5%
Deferred Grant Revenue	-	-	(79%)
AB 836	411,822	411,822	(100%)
CalEEMod	48,669	26,431	(98%)
EETG Grant	858	-	100%
EPA 103 Grant	10,639	51,317	
EPA 105 Pilot Grant	-	11,056	(100%)
Moyer/ Rap	2,235	95,180	61%
Prescribed Fire	1,969,017	984,839	72%
Secretariat Invoices	123,711	-	
Woodsmoke	-	10,001	

California Air Pollution Control Officers Association
Statement of Financial Position
As of May 31st, 2026

	May 26 Actuals	May 25 Prior Year	% Change
Total Deferred Grant Revenue	**2,566,952**	**1,590,646**	
Deferred Membership Dues	145,000	84,415	
Employee Payable	-	-	84%
Total Other Current Liabilities	**2,735,384**	**1,697,865**	**61%**
Total Current Liabilities	**2,786,082**	**1,772,715**	**57%**
Long-Term Liabilities			
Lease Payable	208,015	252,680	
Total Long-Term Liabilities	**208,015**	**252,680**	
Total Liabilities	**2,994,096**	**2,025,395**	**48%**
Equity	571,203	694,233	(18%)
Total Liabilities and Equity	**3,565,299**	**2,719,628**	**31%**

California Air Pollution Control Officers Association
Statement of Activities Vs. Prior Year
8 Months Ended May 31, 2026

	Oct 25 - May 26	Oct 24 - May 25	Change	% Change
Income				
Contributions Income	96,853	21,249	75,604	356%
Dues Income	290,000	168,824	121,176	72%
Events Income	100,165	124,365	(24,200)	(19%)
Grants & Programs Income	534,074	617,667	(83,593)	(14%)
Other Income	360	8,157	(7,796)	(96%)
Total Income	**1,021,452**	**940,262**	**81,190**	**9%**
Gross Profit	1,021,452	940,262	81,190	9%
Expense				
Events Expenses	290,637	273,349	17,288	6%
General & Administrative Exp.	146,892	149,207	(2,315)	(2%)
Human Resource Expense	423,489	451,396	(27,907)	(6%)
Program Expenses	244,073	144,439	99,633	69%
Total Expense	**1,105,090**	**1,018,392**	**86,698**	**9%**
Net Operating Income	(83,638)	(78,130)	(5,508)	7%
Other Income				
Dividends and Interest	15,910	2,226	13,684	615%
Investment Fees	(3,670)	(1,763)	(1,907)	108%
Pass-Through Funds Received (Federal)	441,128	4,444,951	(4,003,823)	(90%)
Pass-Through Funds Received (State)	76,683	729,127	(652,444)	(89%)
Unrealized Gain/Loss	18,869	(3,153)	22,022	(698%)
Total Other Income	**548,920**	**5,171,388**	**(4,622,468)**	**(89%)**
Other Expense				
Pass-Through Funds Expended	517,811	5,174,078	(4,656,267)	(90%)
Total Other Expense	**517,811**	**5,174,078**	**(4,656,267)**	**(90%)**
Net Profit	(52,529)	(80,820)	28,290	(35%)

ACTIVITIES BY CLASS FOOTNOTES

* Unrestricted support includes general activities funded by membership fees and the Secretariat (Base) grant - EPA 105. CAPCOA budgeted revenue of $**107,100** for the base grant for FY26 and has been notified to expect **$123,711**. No revenue has been recorded to date pending confirmation of invoices.

*Unrestricted support also includes member contributions of $91,908, which are intended to help rebuild reserves after the FY25 deficit resulting from the Base grant variance.

Total net loss May 31: ($-52,529) ; normalized without one-time district contributions ($-144,437) before base grant.

California Air Pollution Control Officers Association
Conference Summary
8 Months Ended May 31, 2026

	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Oct 25 - May 26	Total
	50th Anniversary	**E&T Symposium**	**Fall Membership**	**Leg Retreat**	**Board Retreat**	**Spring Membership**	**Conferences**
Income							
Events Income	31,210		29,535		9,450	29,970	100,165
Grants & Programs Income		21,542					21,542
Total Income	**31,210**	**21,542**	**29,535**		**9,450**	**29,970**	**121,707**
Gross Profit	31,210	21,542	29,535		9,450	29,970	121,707
Expense							
Events Expenses	31,400	19,042	25,408	675	11,715	30,340	118,579
General & Administrative Exp.	44		60		481	517	1,102
Program Expenses		2,500					2,500
Total Expense	**31,444**	**21,542**	**25,468**	**675**	**12,196**	**30,857**	**122,182**
Net Profit	(234)		4,067	(675)	(2,746)	(887)	(475)

CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: August 4, 2026

From: Sadie Gibbs, Air Quality Specialist

To: CAPCOA Board Members

Subject: Prescribed Fire Update

Background

1) Wildfire Forest Resilience Task Force - Action Plan update.
2) Beneficial Fire Working Group Strategic Plan.
3) Air District Permitting for Prescribed Fire Activities, Draft Survey.
4) Allocation for grant year 8 update.

1. *Wildfire Forest Resilience Task Force update*

   The Wildfire Forest Resilience Task Force draft Action Plan is currently in the public comment period which closes August 7th. The final Action Plan is expected to be released during the regional meeting October 1st – 2nd.

   During a recent small group meeting, Patrick Wright, *Director at Governor's Wildfire and Forest Resilience Task Force,* mentioned plans to include an Air Quality presentation/panel as part of the October regional meeting. Additional details have not yet been provided. CAPCOA staff will continue to monitor developments to ensure CAPCOA and air districts are included in the panel and will provide updates to the Board as more information becomes available.

   CAPCOA staff continue to attend the quarterly Task Force meetings in person:
   - October 1–2 – River Lodge Conference Center, Fortuna, CA
   - December 11 – California Natural Resources Agency (CNRA) Building, Sacramento, CA

2. *Beneficial Fire Strategic Plan.*

   A small subset of the Beneficial Fire Working Group has been meeting to review the 2023 Strategic Plan, identify accomplishments, and highlight remaining challenges. The group is developing two documents:

- A two-page summary for the Task Force that will be released following the Action Plan and will highlight accomplishments, future goals, and current challenges.
- A more detailed 10-page document for the incoming administration.

Current participants include Patrick Wright, Lenya Quinn-Davidson, Nick Goulette, Don L. Hankins, Sara A. Clark, Ron Gray, Len Nielson (CAL FIRE), Paul Mason, and CAPCOA staff. The group is also planning to invite Faith Raider from the California Department of Public Health (CDPH) to participate beginning with the August 8 meeting.

Prior to the start of these discussions, Sadie Gibbs recommended that air quality be represented in the small group meetings and was invited to participate. The group's focus remains on refining and highlighting the information already included in the 2023 Strategic Plan rather than introducing new content. Throughout the discussions, we have been working to ensure the plan accurately reflects the important role Air Districts already play in supporting beneficial fire.

3. <u>Air District Permitting for Prescribed Fire Activities, Draft Survey.</u>
The Air District Permitting for Prescribed Fire Activities – Draft Survey was originally presented during the Stanford Convening held on May 28 in Sacramento. While CAPCOA staff were unable to attend the convening due to conflicting Spring Membership timing, Air District staff were able to attend and participated in the discussion. A copy of the current survey draft is attached for reference.

A meeting has been scheduled with Sara Clark, with Shute, Mihaly & Weinberger, representing the Resource Legacy Fund who are behind the survey and her team on August 11 at 2:00 p.m. to review the draft survey, which is intended for land managers and practitioners. The goal is to provide Air Districts with an opportunity to review the survey and provide feedback before it is finalized and released in late August.

Placer County APCD is collecting and compiling comments from Air Districts in advance of the meeting. The compiled feedback will be shared with Sara prior to the August 11 meeting to help facilitate the discussion. During the meeting, District representatives will have the opportunity to discuss potential revisions, ask questions, and provide additional input before the survey is finalized.

Following the August 11 meeting, the revised survey draft will be shared electronically with the Beneficial Fire Working Group for additional review before the survey is released.
21 Air District will have a representative participating in the meeting with Sara on Tuesday, August 11, at 2:00 p.m. Placer APCD has been collecting comments from

Districts in advance of the meeting and plans to compile and submit them to Sara beforehand to help facilitate the discussion.

4. Grant Year 8 Allocation update.

   CAPCOA staff continue to refine the Grant Year 8 allocation matrix while meeting individually with Air Districts and collecting information to inform the funding matrix. Staff anticipate completing the funding matrix in time for Board consideration and approval by the September Board meeting.

Recommended Action

This item is informational; no action is requested or recommended.

Written by: Sadie Gibbs

Reviewed by: Tung Le

Air District Permitting for Prescribed Fire Activities – Draft Survey

General Information
Name:
Organization Conducting Burn (if any):
Email:
Check here if:

- ☐ All information can be shared
- ☐ The surveyors can access your name/contact information, but any publicly shared information should be made anonymous
- ☐ You would prefer to remain completely anonymous (if so, leave name and contact information blank)

General Project Information
Please complete the following section only if you have applied for a permit or other permission from a local air district in California for a prescribed fire in the last three years. If not, please proceed to Question X.

We have a series of questions about individual air quality permits for prescribed fire activities. You will have the opportunity to provide information for up to three permits. If you have attempted to obtain more than three permits in the last three years, please provide information on the permit experiences you believe to be most informative for folks thinking about prescribed fire policy and permitting. If you would like to provide information about more than three permits (thank you!), please complete a second survey response.

Project lead (name of individual or organization):

- [Fill in]

Project size (acres): (check one)

- ☐ 0-5 acres
- ☐ 6-10 acres
- ☐ 11-20 acres
- ☐ 21-50 acres
- ☐ 51-100 acres
- ☐ 101-200 acres
- ☐ 201-500 acres
- ☐ >500 acres

Project vegetation type: (check all that apply)

- ☐ grassland
- ☐ woody shrubs / coastal scrub
- ☐ hardwood understory
- ☐ conifer understory
- ☐ pile
- ☐ broadcast
- ☐ jackpot
- ☐ Other (please specify): ____________________

Land ownership: (check one)

- ☐ state
- ☐ federal
- ☐ other public agency
- ☐ tribal trust
- ☐ tribal fee
- ☐ private

Air District: (check one)

- ☐ Amador County APCD
- ☐ Antelope Valley AQMD
- ☐ Bay Area AQMD
- ☐ Butte County AQMD
- ☐ Calaveras County APCD
- ☐ Colusa County APCD
- ☐ Eastern Kern APCD
- ☐ El Dorado County AQMD
- ☐ Feather River AQMD
- ☐ Glenn County APCD
- ☐ Great Basin Unified APCD
- ☐ Imperial County APCD
- ☐ Lake County AQMD
- ☐ Lassen County APCD
- ☐ Mariposa County APCD
- ☐ Mendocino County AQMD
- ☐ Modoc County APCD
- ☐ Mojave Desert AQMD
- ☐ Monterey Bay Air Resources District
- ☐ North Coast Unified AQMD
- ☐ Northern Sierra AQMD
- ☐ Northern Sonoma County APCD
- ☐ Placer County APCD
- ☐ Sacramento Metro AQMD
- ☐ San Diego County APCD
- ☐ San Joaquin Valley APCD
- ☐ San Luis Obispo County APCD
- ☐ Santa Barbara County APCD
- ☐ Shasta County AQMD
- ☐ Siskiyou County APCD
- ☐ South Coast AQMD
- ☐ Tehama County APCD
- ☐ Tuolumne County APCD
- ☐ Ventura County APCD
- ☐ Yolo-Solano AQMD

Permit cost: (please only write a number)

- $______

Burn type: (check one)

- ☐ Prescribed fire

☐ Cultural burn

Project Design

We understand that beneficial fire practitioners design their project with many factors in mind. We're trying to understand how air quality requirements might impact burn design. If seeking an air quality permit resulted in any of the following design impacts, please select the impact below:

- ☐ Limits on overall project footprint or boundary
- ☐ Limits on individual unit footprint or boundary
- ☐ Timing of burn (day v. night, number of hours per day, etc.)
- ☐ Vegetation type
- ☐ Desired fire intensity
- ☐ Other (please specify): ___________________

Did you collect any air quality data in implementation of the project? If no, select "none." If yes, what types of data did you collect? (check all that apply)

- ☐ None
- ☐ Screenshots of Purple Air
- ☐ Readings on your own portable air monitor
- ☐ Satellite imagery of smoke plumes
- ☐ Photographs/video of smoke behavior
- ☐ Handwritten notes based on observations
- ☐ Other (please specify): ____________________

Smoke Management Plan

Did the project require a smoke management plan? Note that some air districts may refer to this as a "burn plan"; for purposes of this survey, we use the term smoke management plan to refer to any plan required as part of air quality permitting.

- ☐ Yes
- ☐ No

How many hours were spent preparing the smoke management plan? (please only write a number)

- _______ hours

Smoke management plan cost paid to air district: (please only write a number)

- $_____

How many days did it take the district to review the smoke management plan? (please only write a number)

- _______ days

Did the district require or request changes to the smoke management plan?

- ☐ Yes
- ☐ No

If so, what were the changes?

- [Narrative]

If so, did air district staff provide a justification for the requested changes? (please describe, especially if any evidence for the justification was provided)

- [Narrative]

In your professional judgement, were the requested/required changes reasonable or necessary for protecting public health? (please explain why or why not)

- [Narrative]

Did changes to your smoke management plan compromise operational efficiencies or otherwise constrain feasibility of project implementation?

- ☐ Yes
- ☐ Partially
- ☐ No

If so, in what ways?

- [Narrative]

Was your smoke management plan approved?

- ☐ Yes
- ☐ Yes, after significant changes
- ☐ No

Burn Implementation

Did you receive burn authorization from your air district on the first day you were ready to burn?

- ☐ Yes
- ☐ No

If not, how many days did you have to wait until you received burn authorization? (please only write a number)

- _______ days

Did you complete your burn?

- ☐ Yes
- ☐ No
- ☐ Partially (please specify percent completed) ________

If not, did air quality requirements play a role in the failure to complete your burn?

- ☐ Yes, air quality requirements are the only reason I did not complete the burn
- ☐ Yes, air quality requirements were one of multiple reasons I did not complete the burn
- ☐ No

General Questions

Have air quality requirements had any effect on your implementation of beneficial fire projects?

- ☐ Yes
- ☐ No

If so, please describe. Effects could include costs, delays, changes to project design, changes in community outreach and communication, etc.

- [Narrative]

What percentage of your burns (based on your best estimate) have been effected by air quality requirements? (please only write a number)

- _____%

How would you rate your understanding of the criteria by which the air district is evaluating whether to approve a particular beneficial fire project? (check one)

- ☐ 0 – I have no idea what criteria the air district considers.
- ☐ 1 – I have a **minimal** understanding of the air district's evaluation criteria.

☐ 2 – I have a **moderate** understanding of the air district's evaluation criteria.
☐ 3 – I have a **strong** understanding of the air district's evaluation criteria.

Are criteria being applied consistently (either for you, on a burn-by-burn basis, or compared to other burners in your district or across the state)?

- [Narrative]

If you could change the air quality permitting process to make it easier to implement beneficial fire projects, what would you change?

- [Narrative]

Does the air district provide additional support or leadership with devising and collaboratively implementing "smoke ready community" strategies [e.g. air filter loan programs, clean air refuges, public notifications, collaborative engagement with institutions that serve sensitive populations (e.g. school districts, health care and elder care providers, etc.), beneficial fire messaging campaigns or talking points for district staff, etc.] within your project's air basin?

☐ Yes, **strong** support
☐ Yes, **moderate** support
☐ Yes, **minimal** support
☐ No
☐ Unknown / I don't know

If so, please describe.

- [Narrative]

What do you believe are the most important mechanisms for protecting public health from wildland fire smoke (including both wildfire and prescribed fire smoke)?

- [Narrative]

Are there other beneficial fire policy changes you'd like to see implemented in your district or other districts around the state?

- [Narrative]

How would you generally describe your experience working with your air district?

- [Narrative]

Thank you for your time!

CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: August 4, 2026

From: Tung Le, Executive Director

To: CAPCOA Board Members

Subject: Addenda Item 5.5: Air Curtain Incinerator White Paper Update

Background

During its March meeting, the Board asked the Engineering Managers to make one of its priorities for the year the development of a white paper that provides guidance on permitting of air curtain incinerators (ACIs). This was due to questions around how these devices are regulated – depending on jurisdiction, they may be regulated as stationary sources, portable equipment, or as open burn/ag burn.

ACIs and similar equipment used to treat forest waste and/or to implement beneficial fire activities are increasingly being relied on. This has brought additional scrutiny from burn practitioners and state-level decision makers regarding how these devices are regulated at the local level. Some approaches that have been brought forward in discussions with these entities include having them regulated by CARB or CalFire or imposing on air districts a streamlined permitting approach to ensure consistency across the state.

It was hoped that the white paper would address these concerns to head off action that would decrease or eliminate air districts' ability to regulate ACIs. However, the draft white paper which is attached to this memo, does not address those concerns, nor does it explain why air districts regulate them differently.

Recommended Action

This item is for discussion, therefore no action is recommended at this time. However, the ED suggests the Board consider asking the Engineering Managers to revise the white paper to address burn practitioner's concerns, or work to develop a more consistent permitting strategy that could be implemented across districts regionally, if not state-wide.

California Air Pollution Control Officers Association

Air Permitting Guidance for Air Curtain Incinerators

DRAFT

May 2026

Table of Contents

1. Purpose

This document is intended to serve as a resource to California air districts looking to evaluate the proposed use of an air curtain incinerator (ACI). In addition, this document may also serve as a reference for owners and operators of ACIs who are interested in using this equipment in a California air district and are interested in understanding the different regulatory programs under which an ACI may be permitted. The focus of this document is to provide guidance on regulatory requirements and emissions data from the combustion of clean vegetation in an ACI. Local, state, or federal requirements and combustion emissions associated with ancillary equipment, such as a diesel internal combustion engine, are not included.

While the information contained in this document may be used as a resource for the permitting of ACIs, the final permitting pathways selected for proposed projects are at the discretion of the overseeing air district(s) and those determination may be subject to change. It is recommended that an owner or operator of an ACI always contact the air district(s) in which they are interested in operating prior to mobilizing the equipment and commencing operation.

2. Background

As California continues to experience negative air pollution impacts, increased financial burdens, and direct human health and safety threats from more frequent and damaging wildfire events, state and federal land management agencies have recognized the need to increase the levels of wildland mitigation efforts through the selective thinning of dense and overly burdened forests and the removal of dead and dying trees and undergrowth throughout forested public lands. Historically, this has been accomplished by controlled open-burning techniques, such as prescribed broadcast burning or open-pile burning; however, these methods come with their own costs and impacts that are difficult to avoid. Even the most well-planned and thought-out controlled burn carries with it the potential for smoke impacts to the surrounding communities, as well as the possibility of a runaway fire which can in-turn become an uncontrolled wildfire.

With these challenges in mind, land managers are constantly searching for new tools and methods to continue to achieve their respective forest biomass mitigation objectives in a safe and reliable manner. Included among these tools are portable air curtain incinerators or air curtain burners. ACIs are external combustion devices which are designed to dispose of various types of combustible materials quickly and with reduced impacts from visible emissions or smoke. ACIs can be used by both public agencies, such as CALFIRE, CA State

Parks, U.S. Forest Service, National Park Service, etc., as well as privately owned entities, to process unwanted vegetative materials from various sources, including excess forest fuels from densely forested areas, dead and dying trees in forested lands, and agricultural material such as orchard prunings.

Due to the various operating scenarios in which ACIs can be utilized, their ability to be transported and operated at multiple locations (versus more easily distinguishable stationary operations), and their complex history within the federal statutory and regulatory framework, the pathways in which ACIs can be authorized to operate in the air quality domain are not always well-defined. This document provides a technical description of ACIs, their principles of operation, and an overview of the criteria and toxic air pollutants which may result from their operation. Additionally, it identifies the more common regulatory programs that the thirty-five air pollution control and air quality management districts in California may consider as a permitting pathway for ACIs.

In the context of this document, the types of material combusted by an ACI shall consist only of wood waste, clean lumber, yard waste, or a mixture of these feedstocks. The use of an ACI to combust materials that are not consistent with the abovementioned feedstocks are generally subject to more restrictive regulatory requirements and will not be addressed in this document.

3. Air Curtain Incinerators

Air Curtain Incinerators are devices commonly used to combust wood waste from agricultural sources as well as forest fuel management and wildfire mitigation. They are designed to reduce visible smoke and particulate matter when burning clean wood waste material and can be a good alternative to traditional open burning techniques. The defining features of an ACI include:

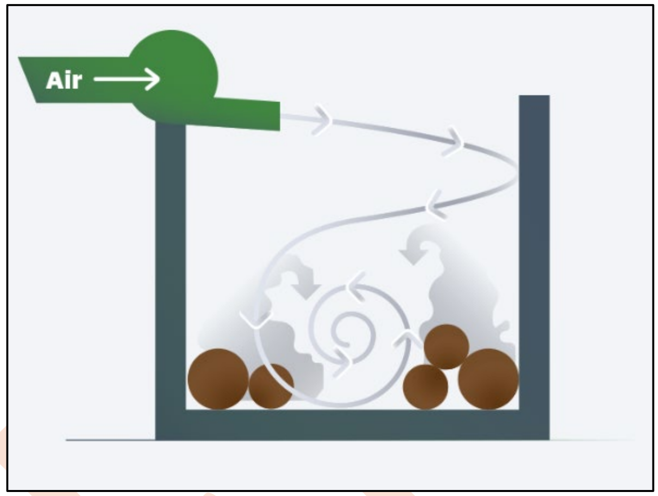
- A combustion chamber, commonly referred to as the firebox. The firebox is used to hold the material combusted/incinerated and is typically refractory lined to reflect heat.
- An air blower and manifold system, which blows air over the firebox to create an air "curtain" which flows over the top of the combustion chamber.
- A power source to run the air blower, often a diesel internal combustion engine.

Operating Principle and Stages of Operation

The main operating principle of an ACI is the blowing of high-velocity air across and into the upper portion of the combustion chamber. As the high-velocity air blows across the top, a rotational air current develops within the firebox. This "curtain" of air has two effects: First, the high volume of air increases oxygenation of the fire, which increases the combustion temperature, resulting in a more complete combustion process and reduced smoke.

Second, the high-velocity air over the combustion chamber and the rotational air current within the combustion chamber entraps particulates and smoke. The graphic from AirBurners, Inc.[1] presented in **Figure 3A** provides a visual representation of how the air curtain is formed over the top of the firebox while an ACI is in operation, preventing smoke and other pollutants from escaping the firebox prior to being fully combusted.

Figure 3A: Visual Representation of an Air Curtain Over the ACI Firebox



Source: AirBurners, Inc.

ACI operations occur in three stages: startup, operation, and burndown. During startup, operators partially load the firebox with clean wood waste, apply an accelerant (such as diesel) and ignite the pile (often with a torch or flare). Once the unit reaches its desired burning temperature and the heavier material starts to combust, the air blower fan is started, and the speed is gradually increased. Smoke is typically produced during startup, but the amount of smoke decreases as the fan speed increases and the air curtain approaches full operation. The startup process typically takes 15 - 60 minutes depending on vegetation type and moisture content. During full operation, wood waste is fed into the ACI at a steady rate. ACIs are generally designed to process between ½ ton – 15 tons per hour. Heavy-duty off-road equipment (most commonly an excavator) is used to feed the stockpiled wood waste into the firebox.

The last stage, known as burndown, typically takes 2 to 3 hours, depending on the type and size of the vegetation. The feed of wood waste into the ACI is halted, and the unit is allowed to burn without interruption to the air curtain. Once the materials inside burn down to under one half the height of the firebox, the operator slowly decreases the air flow. After burndown, hot coals may remain for several days under a layer of ash. ACIs are designed to run for about 24 hours before requiring ash removal, but actual running time depends on the wood waste type and size. Long burns are generally more efficient and produce lower emissions than shorter burns. Efficiency starts to drop once the ash pile reaches about one-quarter to one-third of the firebox depth.

Technologically speaking, feedstocks for ACIs can include nearly any type of combustible solid waste, but as discussed later in this document, for an ACI to be considered eligible for

[1] AirBurners, Inc. – Air Curtain Burner Technology – How It Works https://airburners.com/technology/principle/

an exemption from Federal Title V permitting requirements, only the following solid waste can be burned: 100% wood waste, clean lumber, yard waste, or a mixture of these feedstocks. This could include wood waste materials or woody crop materials, including wood collected from forest fire clearance activities, trees and clean wood found in disaster debris, clean biomass from land clearing operations, tree harvesting residuals from logging and sawmill materials, clean construction and demolition wood, or material from vines and orchard trees. Furthermore, it should not be assumed that the full list of feedstock materials listed here will, by default, be allowed to be combusted by an ACI. Individual air districts retain the right to place further limits on allowable feedstock materials, hours of operations, or any other parameter associated with use of a proposed ACI, based on project-specific considerations.

Criteria Pollutant and Toxic Air Emissions

Compared to traditional outdoor open burning techniques for wood waste, ACIs emit lower levels of certain air pollutants, including carbon monoxide, organic hydrocarbons, and visible particulate matter, which contributes to smoke and “opacity” emissions. Because of the open combustion chamber and the highly turbulent exhaust stream leaving the ACI, as well as the variability in biomass materials burned, it can be difficult to accurately quantify the mass emissions of pollutants produced during the incineration process. One of the goals of this document is to identify sources of emission factors for applicants and air districts to consider in the absence of data which better represents a specific project. However, certain air districts may require the use of district-approved, or rule-based, emission factors. In cases where multiple emission factor datasets exist, the overseeing air district retains discretion to select the most representative and health-conservative values based on local conditions, permitting practices, and regulatory requirements. Use of third-party emission factor datasets should be justified and documented on a case-by-case basis.

There are multiple documented source testing programs which have measured, or otherwise estimated, emissions from ACIs over the past 30 years. Some of the more recent and comprehensive test programs include the *Wood Waste Burn Box Emissions Testing* program (2024) prepared for Andy Gallo in the San Joaquin Valley Air Pollution Control District (SJVAPCD) and the *Air Curtain Incinerator Emission Factor Testing* program (2023) prepared for the Oregon Department of Environmental Quality (ODEQ). Extensive efforts were made during these two programs, in particular, to representatively sample the exhaust streams through the construction and utilization of engineered exhaust hoods and dimensioned exhaust stacks to capture and more-accurately measure the post-combustion pollutant concentrations and exhaust flows. The Gallo test program focused on measuring criteria pollutants from tree nut orchard wood local to the San Joaquin Valley, while the ODEQ test program measured criteria pollutants and various toxic organics, dioxins, and metals from ash wood sourced from Washington County, Oregon. It is noted that variations in the measured emissions of criteria pollutants from the two test programs may be attributable to the different feedstocks, feedstock processing rates, operating conditions, or any combination of the above.

In addition to using published results from individual test programs, extensive efforts have been made by air districts to analyze the results from multiple individual test programs and compile more prescriptive datasets which may be applied in a rule-based approach. An example of such work can be found in SJVAPCD's *Air Curtain Incinerator Emissions Factors Determination* memo (2017). The memo effectively examines various test data and recommends emission factors for ACIs burning woody biomass derived from agricultural sources and forest vegetation in the SJVAPCD. The memo also serves as a basis for the regulatory emission standards for ACIs subject to SJVAPCD's Rule 2280 Portable Equipment Registration.

In the absence of equipment-specific or site-specific emissions data, permit applicants and air districts may consider using the criteria and toxic air pollutant data derived from the test programs and compiled emission factor documentation described herein to estimate emissions from ACI's burning wood waste, clean lumber, or yard waste. Summary tables containing the criteria and toxic air pollutant emission factors published in the abovementioned documents are included in Appendix A, as are links and references to the original source test reports and emission factor compilation documents.

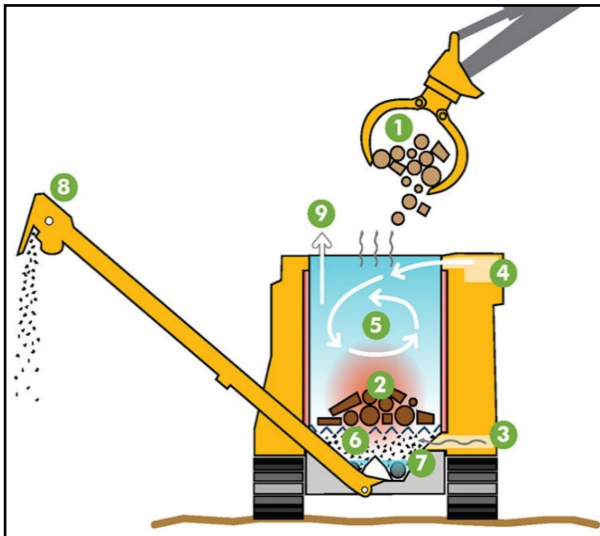
Biochar Producing Air Curtain Burners

Other types of partially enclosed incineration devices, such as the Tigercat Carbonizer[2] or the AirBurners CharBoss[3], share some design principles with conventional ACIs. Like an ACI, the Carbonizer and CharBoss utilize a refractory-lined firebox with high velocity air blown over the top to increase combustion temperature and reduce smoke. In the case of the Carbonizer, the unit also utilizes a secondary air supply, located at the base of the machine, to achieve more turbulent combustion and higher combustion temperature throughout the entire combustion chamber. The goal of these units is to achieve pyrolysis of the wood waste materials, and to form a biochar byproduct. As the biochar drops or detaches from the wood waste material, the char is both gravity-fed and mechanically deposited toward the base of the machine, into a chamber beneath the combustion grates. The biochar is immediately quenched with water, mechanically fed to the rear of the machine, and discharged onto a stacking conveyor or fed into a non-combustible storage bin. Because the Carbonizer and Char Boss effectively operate the same as an ACI, up until the extraction and quenching of the biochar, the combustion portion of these units is often considered by

[2] Tigercat | TCi, Inc. – Carbonizing Process - Process Overview
https://www.tigercat.com/feature/carbonizing-process/
[3] AirBurners, Inc. – Boss Series – CharBoss – CharBoss Air Curtain Burner for Biochar Production

California air districts and the United States Environmental Protection Agency (EPA) to be functionally equivalent to ACIs with regard to emission profiles, applicable air quality regulations, and potential permitting pathways. **Figure 3B** below provides a graphical representation of the stages of operation for the Tigercat Carbonizer unit.

Figure 3B: Visual Representation of Tigercat Carbonizer Operation



Process Overview

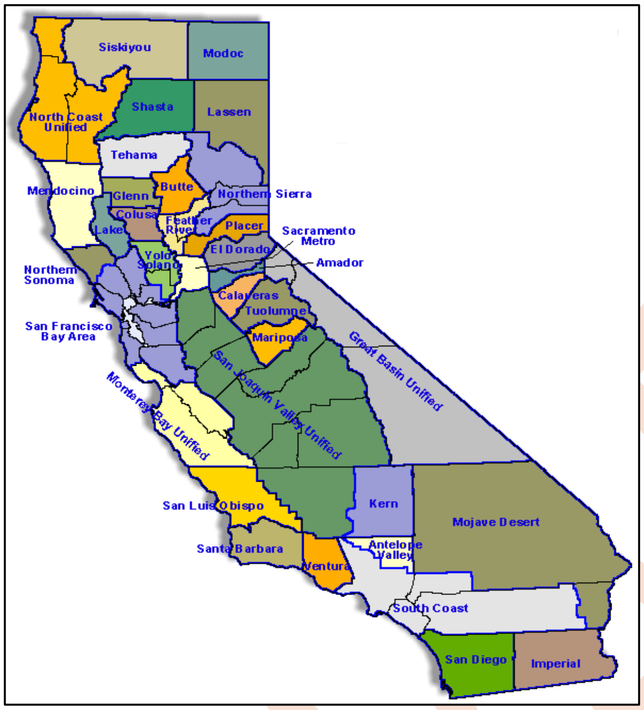
1. Load feedstock (no preprocessing required)
2. Primary combustion
3. Under-air supply provides upward pressure
4. Over-air supply creates vortex
5. Secondary Combustion (1095°C / 2000°F)
6. Organic carbon falls through grates
7. Organic carbon is quenched in water bath
8. Organic carbon is conveyed away
9. Fresh oxygen mixes to cool exhaust

Source: Tigercat – https://www.tigercat.com/feature/carbonizing-process

4. Air Districts Overview and Regulatory Programs

California law has established thirty-five local and regional air regulatory agencies (air districts) across the State. Air districts are responsible for regional air quality planning, monitoring, and have primary authority to regulate stationary sources of emissions. Air districts also implement and enforce federal Clean Air Act (CAA) requirements where delegated to do so by the EPA. The map below identifies the location of each air district in relation to the State of California.

Figure 4A: Map of California Air Districts



Source: CARB – https://ww2.arb.ca.gov/california-map-local-air-district-websites

Air districts typically regulate sources of air pollution through the issuance of a permit. Depending on the individual air district's rules, regulations and policies, an ACI may be subject to permitting in the Stationary Source Program, or an open burning/prescribed burning permit (burn permit) in the Smoke Management/Burn Program. Where stationary source permitting is required, air districts may require an Authority to Construct (ATC) or Permit to Operate (PTO) for the ACI unit, the internal combustion engine powering the air blower, or both.

Statutory Authority for Stationary Sources of Air Pollution

The California Health and Safety Code (H&SC) §39002 and H&SC §40000, et seq specifically identifies air districts as having the primary responsibility for control of air pollution from all sources other than emissions from motor vehicles. Air districts are required to adopt and enforce rules and regulations to achieve and maintain federal and state ambient air quality standards. Air districts that are not attaining air quality standards will generally have more stringent rules than those attaining the standards. Each air district adopts its own set of rules and regulations to control emissions and the issuance of air permits. Thus, permitting requirements vary depending on the air district. Sources which are regulated under the stationary source program are typically issued an ATC or PTO, conditionally authorizing the equipment to operate in the district.

Statutory Authority for Portable Sources of Air Pollution

H&SC §41750-§41755 identifies the regulatory structure for portable equipment which, by definition, includes portable internal combustion engines. These regulations give air districts regulatory authority over portable engines and portable equipment which produce air emissions. Under this statute, the California Air Resources Board (CARB) has adopted the Regulation to Establish a Statewide Portable Equipment Registration Program (PERP). The PERP regulation allows portable engines and equipment that meet certain qualifications to maintain a state-wide registration in lieu of an air district permit, but only if approved by the air district it is operating within.

Off-road mobile engines, while similar to portable engines, are subject to the CARB In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation) and must be registered in Diesel Off-Road Online Reporting System (DOORS). Engines regulated under the DOORS program are distinct from portable engines in that they must be designed and have the capability to propel the off-road equipment unit independently. The distinction between portable engines that require a stationary source ATC/PTO permit, and engines that may only require registration in PERP or DOORS can vary depending on air district rules and policies.

Interested parties should contact the specific air district prior to operating an ACI within the air district to confirm the requirements. Engines may be required to obtain an air district permit even if the engine is registered in the PERP or DOORS programs, depending on the use and intent of the operation and at the discretion of the local air district.

Statutory Authority for Agricultural and Prescribed Burning

Air district authority to regulate agricultural and prescribed burning comes from the California Health and Safety Code and Title 17 of the California Code of Regulations. H&SC §41850 established that agricultural burning be reasonably regulated, while H&SC §41852 requires a valid permit to perform agricultural burning. Air districts adopt local rules to establish permit systems and manage burning in their jurisdiction.

The Smoke Management Guidelines for Agricultural and Prescribed Burning of Title 17 of the California Code of Regulations (CCR) were issued by the California Air Resources Board under authority granted by H&SC sections 39600, 39601, 41856 and 41859. The Guidelines provide direction to air districts in the regulation and control of agricultural burning, including and prescribed burning, in California. The Guidelines are intended to provide for the continuation of agricultural burning, including prescribed burning, as a resource management tool, and provide increased opportunities for prescribed burning and agricultural burning, while minimizing smoke impacts on the public. Smoke management programs or SMPs are adopted by air districts individually or as part of a basin control council to manage agricultural and prescribed burning in accordance with the Guidelines. Projects which are regulated under a district's agricultural or prescribed burning program are typically issued a burn permit by the district, authorizing the agency or project manager(s) to complete the proposed burn.

5. Title V Permitting and Federal Regulatory Requirements

In addition to administering local and state regulatory requirements through various permitting and/or smoke management programs, California air districts have delegation over the issuance and enforcement of federal Title V operating permits. Title V permits, also commonly referred to as Part 70 permits, are operating permits required by Title V of the federal CAA. They are legally enforceable documents designed to improve compliance by clarifying what facilities must do to control air pollution. Title V permits are typically reserved for "major" stationary sources with substantial facility emission profiles, though they can also be required for smaller "area" sources when mandated by federal regulations. The application and permit review process for Title V permitting usually takes multiple months, if not years, and can be prohibitively expensive, and/or technically daunting from an air permitting perspective for small operators.

In recent years, the need to obtain a Title V operating permit for the installation and operation of air curtain incinerators has been one of the more significant regulatory hurdles which has discouraged the use of ACIs in California. Because ACIs have historically been named as equipment units which may be subject to Title V permitting in various federal New Source Performance Standards (NSPS) regulations, namely 40 CFR Part 60 Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units (CISWI)[4] and 40 CFR Part 60 Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units (OSWI)[5], successfully permitting a project which utilizes an ACI, even for a limited period of time, has been difficult, or in many cases, impossible.

However, recent changes to the OSWI NSPS regulation allow for Title V permit exemptions for ACIs in specifically defined operating scenarios. The April 17, 2024, amendments to the OSWI regulation provide an exemption from Title V permit requirements for ACIs which exclusively combust wood waste, clean lumber, yard waste, or a mixture of these feedstocks, provided that the subject ACI is not otherwise required to obtain a Title V

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[4] Code of Federal Regulations – 40 CFR 60 Subpart CCCC – Standards of Performance for Commercial and Industrial Solid Waste Incineration Units
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-CCCC

[5] Code of Federal Regulations – 40 CFR 60 Subpart EEEE – Standards of Performance for Other Solid Waste Incineration Units
https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-60/subpart-EEEE

operating permit. It is important to note that simply combusting wood waste, clean lumber, yard waste, or a mixture of these feedstocks does not automatically qualify an ACI for a Title V permit exemption.

To qualify for an exemption for Title V permitting under OSWI, the ACI must clearly satisfy one of the following operating criteria:

1.a) The unit must burn less than 35 tons per day of wood waste, clean lumber, yard waste, or a combination of these feedstocks collected from the general public and originating from residential, commercial, institutional or industrial facilities; or,

1.b) The unit must be located at an institutional facility and burn wood waste, clean lumber, yard waste, or a combination of these feedstocks generated at the facility. As applied to this requirement, an institutional facility means "a land-based facility owned and/or operated by an organization having a governmental, educational, civic, or religious purpose such as a school, hospital, prison, military installation, church, or other similar establishment or facility."

In addition to being subject to the OSWI regulation, the ACI unit must also:

2) Not operate at an existing Title V source, such as a landfill or other facility which is already operates under a Title V permit; and,

3) Not operate at a facility which has a potential to emit (PTE) that is greater than any locally applicable Title V thresholds for federally regulated pollutants. For air permitting purposes, PTE refers to the maximum capacity of a stationary source to release air pollutants under its physical and operational design while also considering limitations on operating hours or feedstock consumption.

If the abovementioned criteria cannot be achieved, and/or cannot be federally enforced through an air district's regulatory program, the ACI cannot qualify for the Title V permitting exemption in the OSWI regulation and, therefore, must obtain a Title V operating permit to remain in compliance with the applicable federal NSPS regulation.

Regardless of whether an ACI is required to obtain a Title V permit, all new ACIs which burn only wood waste, clean lumber, yard waste, or any combination of those feedstocks are still required to comply with the emission (opacity) limitations, opacity monitoring requirements, and recordkeeping and reporting requirements contained within the applicable federal NSPS. In general, both the CISWI and OSWI regulations contain the following opacity requirements:

1) 10 percent opacity limitation (6-minute average) during normal operation.

2) 35 percent opacity limitation (6-minute average) during the startup period that is within the first 30 minutes of operation.

Similarly, the opacity monitoring conditions in both the CISWI and OSWI regulations consist of the same requirements:

1) Use EPA Method 9 to determine compliance with the opacity limitations.
2) Conduct an initial test for opacity within 60 days after the ACI reaches the charge rate at which it will operation, but no later than 180 days after its initial startup.
3) Conduct annual tests no more than 12 months following the date of the previous test.
4) For ACIs which are not in operation when the 12-month testing is required, an initial opacity test must be completed upon startup of the unit.

The noticing, recordkeeping, and reporting requirements in the CISWI and OSWI regulations can be summarized as follows:

1) Initial notification of your intent to operate the ACI, along with the planned initial startup date and the types of material you plan to burn in the ACI.
2) Records be maintained for all initial and annual opacity tests for 5 years, with a minimum of 2 years of records on-site.
3) Records of all opacity testing results must be submitted to administrating air district within the timelines specified and must also be made available for review upon request.

For the specific language regarding emission limitations, opacity monitoring requirements, and noticing, recordkeeping, and reporting requirements for ACIs which are subject to the CISWI regulation, please reference §60.2245 through §60.2260 of 40 CFR Part 60 Subpart CCCC. For the specific language regarding emission limitations, opacity monitoring requirements, and noticing, recordkeeping, and reporting requirements for ACIs which are subject to the OSWI regulation, please reference §60.2970 through §60.2973 of 40 CFR Part 60 Subpart EEEE.

Lastly, on March 20, 2026, EPA announced proposed rulemaking under CAA section 129 which would consolidate the existing provisions governing ACIs that only burn wood waste, yard waste, and clean lumber into one new rule subpart. This rulemaking would specifically consolidate the opacity limitations and associated monitoring, recordkeeping, and reporting requirements which currently exist across various subparts (CISWI, OSWI, etc.) and bring them together under a single rule. The consolidated rule will also remove the Title V permitting requirement for these ACIs which are not located at Title V major sources or otherwise subject to Title V permitting requirements. While the proposed rulemaking is intended to consolidate and clarify the applicable requirements for these ACIs, it is not expected to impact ACIs which are currently subject to the existing rules which have been recently amended to remove Title V permitting requirements, as described earlier in this section. As of early May 2026, the proposed rulemaking was still in the public comment period and no final action has been taken by EPA.

6. Conclusion

In summary, air curtain incinerators offer an alternative approach for effectively managing excess wood waste and vegetative material, particularly in the context of increased wildfire mitigation efforts in California. However, navigating the regulatory requirements associated with ACIs can be challenging given their ability to operate under various portable and stationary scenarios and the evolving treatment under federal, state, and local air quality programs. Ultimately, successful implementation of ACI projects will depend on early coordination with the administering air district, clearly defined scopes of work and proposed timelines associated with the projects, and adherence to the applicable requirements for the regulatory pathways which are presented.

Appendix A
ACI Emission Factor Resources

Table A1: Criteria Pollutant Emission Factors for ACIs

Data Source	Material	Year	NOx (lb/ton)	SOx (lb/ton)	PM10 (lb/ton)	CO (lb/ton)	VOC (lb/ton)	Notes
Source Test Gallo – Modesto, CA (P&F Metals Model PTO-ACI-AA)	Tree nut orchard wood	2024	0.52	< 0.03	0.56	1.86	< 0.02	Best Environmental (EPA Methods; sampling by fume hood)
Source Test Oregon DEQ – Hillsboro, OR (Air Burners BurnBoss T24)	Forest wood (ash)	2023	1.98	0.24	4.25	14.2	1.17	Montrose (EPA Methods and others; sampling by fume hood)
Compilation Study Air Curtain Incinerator Emission Factor Determination – SJVAPCD	Various	2017	1.0	0.1	1.3	2.6	0.9	Evaluation of various test programs for best representation of agricultural and forest biomass
Source Test † Victoria, Australia (Air Burners Model S-119)	Wood	2016	0.27	0.23	0.006	4.2	0.096	EPA Methods
Source Test † US EPA "Katrina" Study (Air Burners Model S-327)	Vegetative material	2016	1.6	0.49	7.7	6.9	0.41	Flow rate based on carbon mass balance rather than actual measurements; (sampling by scoop)
Source Test † USDA – San Bernardino, CA (McPherson M30)	Forest vegetation	2003	Not measured	Not measured	1.4 ($PM_{2.5}$)	30	0.6	Missoula Fire Science Lab
Source Test † BC Hydro – Jordan River, British Columbia (Air Burners Model S-116)	Wood	2003	0.04	0.003	0.13	0.61	0.11	Modified EPA Methods and Canadian Methods
Source Test † USDA – Baker, OR (Air Burners Model S-217)	Forest vegetation	2002	Not measured	Not measured	1.1 ($PM_{2.5}$)	2.6	1.1	Missoula Fire Science Lab
Source Test † Fountainhead Engineering – Clarkston, MI (Whitton Model S-127)	Wood	2000	Not reported	Not reported	0.12	1.1	Not reported	Modified EPA Methods
AP-42, 2.1-12, J.O. Burckle † (Pilot Scale Trench Incinerator)	Wood and cord wood	1968	4	-	13	-	-	Pilot Scale Box Trench Burner, Max temp 1,300 F.

† - Denotes this was one of the seven studies used by SJVAPCD as the basis for the 2017 Air Curtain Incinerator Emission Factor Determination memo.

Table A2: Polycyclic Aromatic Hydrocarbon (PAH) Emission Factors for ACIs

Pollutant	Emission Factor (lb/ton wood fuel)
Naphthalene	> 3.70×10^{-3}
2-Methylnaphthalene	9.25×10^{-4}
Acenaphthylene	4.20×10^{-4}
Acenaphthene	6.15×10^{-5}
Fluorene	4.42×10^{-4}
Phenanthrene	1.36×10^{-3}
Anthracene	1.52×10^{-4}
Fluoranthene	1.00×10^{-3}
Pyrene	3.04×10^{-4}
Benzo(a)anthracene	8.08×10^{-5}
Chrysene	1.33×10^{-4}
Benzo(b)fluoranthene	1.46×10^{-4}
Benzo(k)fluoranthene	4.97×10^{-5}
Benzo(e)pyrene	6.60×10^{-5}
Benzo(a)pyrene (CCC)	6.77×10^{-5}
Perylene	5.80×10^{-6}
Indeno(1,2,3-cd) pyrene	5.78×10^{-5}
Dibenz(a,h)anthracene	6.02×10^{-6}
Benzo(g,h,i)perylene	7.48×10^{-5}

Table A3: Organic Hazardous Air Pollutant Emission Factors for ACIs

Pollutant	Emission Factor (lb/ton wood fuel)
Acrolein	1.25×10^{-2}
Formaldehyde	7.61×10^{-2}
Benzene	2.31×10^{-2}
Trichloroethane	< 1.41×10^{-4}
Vinyl Acetate	< 4.82×10^{-3}

Table A4: Multiple Metals Emission Factors for ACIs

Pollutant	Emission Factor (lb/ton wood fuel)
Antimony (Sb)	< 8.23×10^{-6}
Arsenic (As)	< 5.03×10^{-5}
Barium (Ba)	1.32×10^{-3}
Beryllium (Be)	2.76×10^{-6}
Cadmium (Cd)	1.41×10^{-5}
Chromium (Cr)	6.02×10^{-5}
Cobalt (Cb)	2.64×10^{-5}
Copper (Cu)	1.97×10^{-3}
Lead (Pb)	1.30×10^{-4}
Manganese (Mn)	1.77×10^{-3}
Mercury (Hg)	5.90×10^{-6}
Nickel (Ni)	1.73×10^{-5}
Phosphorus (P)	3.65×10^{-2}
Selenium (Se)	< 2.47×10^{-5}
Silver (Ag)	1.30×10^{-5}
Thallium (Tl)	7.89×10^{-6}
Zinc (Zn)	9.51×10^{-3}

Table A5: Dioxins/Furans Emission Factors for ACIs

Pollutant	Emission Factor (lb/ton wood fuel)
Total Dioxin/Furans	2.88×10^{-9}

Note: The emission factors presented in Tables A2 through A5 are direct results from the 2023 Oregon DEQ Air Curtain Incinerator Emission Factor Testing study

Additional Emission Factor Resources

1) *Source Test Report for Wood Waste Burn Box Emissions Testing (July 2024)* – Andy Gallo – Modesto, California

Gallo Source Test 2024.pdf

2) *Source Test Report for 2023 Emission Factor Testing – Mobile Air Curtain Incinerator (September 2023)* – Oregon Department of Environmental Quality – Hillsboro, Oregon oregon.gov/deq/aq/cao/Documents/montroseFSTestReport.pdf

3) *Air Curtain Incinerator Emission Factor Determination (April 2017)* – San Joaquin Valley Air Pollution Control District https://ww2.valleyair.org/media/dpipwseq/criteria-air-incinerator-ef-determination-analysis.pdf

4) *ACT Waste Feasibility Study (October 2016)* – ACT Recycling Pty Ltd – Hampton, Victoria (Australia)

Victoria Australia Air Burners Test (201

5) *"Katrina" Managing Debris after a Natural Disaster: Evaluation of the Combustion of Storm-Generated Vegetative and C&D Debris in an Air Curtain Burner: Source Emissions Results (November 2016)* – United States Environmental Protection Agency

Managing Debris after a Natural Disas

6) *The Use of Air Curtain Destructors for Fuel Reduction and Disposal (November 2005)* – United States Department of Agriculture – San Bernardino, CA

San Bernardino USDA (2005).pdf

7) *Emissions Testing Report (March 2003)* – BC Hydro – Jordan River, British Columbia (Canada)

Jordan River Air Burners Emissions T

8) *Reducing PM2.5 Emissions Through Technology (October 2002)* – United States Department of Agriculture – Missoula, MT

Baker Missoula Fire Lab (USDA) (2002).pc

9) *Final Report Describing Particulate and Carbon Monoxide Emissions from the Whitton S-127 Air Curtain Destructor (December 2000)* – Fountainhead Engineering – Clarkston, Michigan
https://airburners.com/files/technical-reports/final-report-describing-particulate-and-carbon-monoxide-emissions-from-the-whitton-s127-air-curtain-destructor.pdf

10) AP42 Table 2.1-12 – Uncontrolled Emission Factors for Refuse Combustors Other Than Municipal Waste – United States Environmental Protection Agency
https://www.epa.gov/sites/default/files/2020-10/documents/c02s01.pdf

11) *The Effects Of Operating Variables And Refuse Types On Emissions From A Pilot-Scale Trench Incinerator (May 1968)* – J.O. Burkle, *et al.*
https://www.epa.gov/sites/default/files/2020-10/documents/c02s05.pdf

Appendix B
Air District Contact Information

Air District Name and Counties Covered	Website	Phone
Amador County APCD Includes all of Amador County	https://www.amadorcounty.gov/services/amador-air-district	(209) 257-0112
Antelope Valley AQMD Includes northeast portion of Los Angeles County	https://www.avaqmd.ca.gov/	(661) 723-8070
Bay Area Air District Includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara counties, and the western portion of Solano and southern portion of Sonoma counties	https://www.baaqmd.gov/	(415) 749-5000
Butte County AQMD Includes all of Butte County	https://www.bcaqmd.org/	(530) 332-9400
Calaveras County APCD Includes all of Calaveras County	https://ema.calaverasgov.us/Air-Pollution-Control	(209) 754-6601
Colusa County APCD Includes all of Colusa County	https://www.countyofcolusaca.gov/461/Air-Pollution-Control-District	(530) 458-0590
Eastern Kern APCD Includes eastern portion of Kern County	http://www.kernair.org/	(661) 862-5250
El Dorado County AQMD Includes all of El Dorado County	https://www.eldoradocounty.ca.gov/Land-Use/Air-Quality-Management-District	(530) 621-7501
Feather River AQMD Includes all of Sutter and Yuba counties	https://www.fraqmd.org/	(530) 634-7659
Glenn County APCD Includes all of Glenn County	https://www.countyofglenn.net/government/departments/agriculture-weights-measures/air-pollution-control-district	(530) 934-6500
Great Basin Unified APCD Includes all of Alpine, Inyo, and Mono counties	https://www.gbuapcd.org/	(760) 872-8211
Imperial County APCD Includes all of Imperial County	https://apcd.imperialcounty.org/	(442) 265-1800
Lake County AQMD Includes all of Lake County	https://lcaqmd.net/	(707) 263-7000
Lassen County APCD Includes all of Lassen County	https://www.lassenair.org/	(530) 252-4247
Mariposa County APCD Includes all of Mariposa County	https://www.mariposacounty.gov/433/Air-Pollution	(209) 966-2220

Air District Name and Counties Covered	Website	Phone
Mendocino County AQMD Includes all of Mendocino County	https://www.co.mendocino.ca.us/aqmd/	(707) 463-4354
Modoc County APCD Includes all of Modoc County	https://www.co.modoc.ca.us/departments/agricultural/air_pollution_control_2.php	(530) 233-6401
Mojave Desert AQMD Includes the northern portion of San Bernardino County, and the eastern portion of Riverside County	https://www.mdaqmd.ca.gov/	(760) 245-1661
Monterey Bay Air Resources District Includes all of Monterey, San Benito, and Santa Cruz counties	https://www.mbard.org/air-curtain-burners	(831) 647-9411
North Coast Unified AQMD Includes all of Del Norte, Humboldt, and Trinity counties	https://www.ncuaqmd.org/	(707) 443-3093
Northern Sierra AQMD Includes all of Nevada, Plumas, and Sierra counties	https://www.myairdistrict.com/	(530) 274-9360
Northern Sonoma County APCD Includes the northern portion of Sonoma County	https://www.nosocoair.ca.gov/	(707) 433-5911
Placer County APCD Includes all of Placer County	https://www.placerair.org/	(530) 745-2330
Sacramento Metro AQMD Includes all of Sacramento County	https://www.airquality.org/	(279) 207-1122
San Diego County APCD Includes all of San Diego County	https://www.sdapcd.org/	(858) 586-2600
San Joaquin Valley APCD Northern Region: Merced, San Joaquin, Stanislaus Central Region: Fresno, Kings, Madera Southern Region: Tulare and portions of Kern County	https://valleyair.org/ https://valleyair.org/permitting/portable-equipment-registration/applications/	Northern Region: (209) 557-6400 Central Region: (559) 230-6000 Southern Region: (661) 392-5500

Air District Name and Counties Covered	Website	Phone
San Luis Obispo County APCD Includes all of San Luis Obispo County	https://www.slocleanair.org/	(805) 781-5912
Santa Barbara County APCD Includes all of Santa Barbara County	https://www.ourair.org/	(805) 979-8050
Shasta County AQMD Includes all of Shasta County	https://www.shastacounty.gov/air-quality	(530) 225-5674 Within Shasta County: (800) 528-2850
Siskiyou County APCD Includes all of Siskiyou County	https://www.siskiyoucounty.gov/airpollution	(530) 841-4025
South Coast AQMD Includes Los Angeles County (except for areas covered by the Antelope Valley AQMD), Orange County, and the western portion of San Bernardino and Riverside counties	https://www.aqmd.gov/	(909) 396-2000
Tehama County APCD Includes all of Tehama County	https://www.tehcoapcd.net/	(530) 527-3717
Tuolumne County APCD Includes all of Tuolumne County	https://www.tuolumnecounty.ca.gov/364/Air-Pollution-Control-District	(209) 533-5693
Ventura County APCD Includes all of Ventura County	https://www.vcapcd.org/	(805) 303-4005
Yolo-Solano AQMD Includes all of Yolo County and the eastern portion of Solano County	https://www.ysaqmd.org/	(530) 757-3650

CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: **August 4, 2026**

From: **Tung Le, Executive Director**

To: **CAPCOA Board Members**

Subject: **Federal Legislation: Wildfire Emissions Prevention Act (WEPA)**

Background

US Senator Curtis (R-UT), including Senators Capito (R-WV), Merkley (D-OR), Boozman (R-AR), Padilla (D-CA) and Kelly (D-AZ) recently introduced a bipartisan bill named the *Wildfire Emissions Prevention Act (WEPA)* that would modify the Federal Clean Air Act to streamline and facilitate identifying emissions from the implementation of prescribed fire as exceptional events.

Due to the devastating impact of recent wildfires in the state, California has been at the forefront of accelerating the development of strategies to treat forest waste, including the increased use of prescribed fire. This includes many of the activities CAPCOA and air districts are engaged in, including participating in strategic discussions with the Governor's Wildfire Task Force, UC Extension, CalEPA, CA Natural Resources Agency, and coordinating closely with CalFire and US Forest Service to implement prescribed burns. As the pace and scale of prescribed burns has increased, emissions from their use have increasingly become a concern due to the potential for these emissions to exacerbate Federal Clean Air Act attainment challenges.

This item is for the Board to consider taking a support position on this important federal legislation. Please see attached:

Attachment 6a: one-pager with a brief summary of WEPA

Attachment 6b: current bill text

Recommended Action

No action is recommended at this time, though after discussion of potential concerns and feedback we may wish to share with the bill's authors, the Board may wish to direct the ED to craft a support letter with the Association's recommendations.

THE WILDFIRE EMISSIONS PREVENTION ACT OF 2026

UNITED STATES SENATE
COMMITTEE
on
ENVIRONMENT
& PUBLIC WORKS

What the Wildfire Emissions Prevention Act Accomplishes

- Makes it easier for states and communities to use prescribed fire to prevent wildfire emissions
- Protects ecosystems and wildlife habitat
- Provides certainty that States won't be penalized for taking action to prevent wildfires
- Promotes the efficient use of State air quality resources
- Makes our forests and communities safer, healthier, and cleaner

The Wildfire Emissions Prevention Act Has Bipartisan Support

- Sen. John Curtis (R-Utah)
- Sen. Shelley Moore Capito (R-W.Va.)
- Sen. John Boozman (R-Ark.)
- Sen. Jeff Merkley (D-Ore.)
- Sen. Alex Padilla (D-Calif.)
- Sen. Mark Kelly (D-Ariz.)

The Wildfire Emissions Prevention Act Has Broad Stakeholder Support

- National Association of State Foresters
- Association of Fish and Wildlife Agencies
- Property and Environment Research Center
- American Conservation Coalition Action
- National Wild Turkey Federation
- Pheasants Forever
- ConservAmerica
- Congressional Sportsmen's Foundation
- Forest Landowners Association
- Alliance for Wildfire Resilience
- Southeastern Lumber Manufacturers Association
- National Wooden Pallet & Container Association
- Intrinsic Exchange Group
- Society of American Foresters
- National Wildlife Federation
- Bipartisan Policy Center Action
- Breakthrough Institute
- National Rural Electric Cooperative Association
- Association of Air Pollution Control Agencies
- Southeastern Air Pollution Control Agencies
- Tall Timbers
- Rural Voices for Conservation Coalition
- ClearPath Action
- Quail Forever
- Ducks Unlimited
- National Alliance of Forest Owners
- Hardwood Federation
- C3 Solutions
- American Wood Council
- American Forests
- Citizens for Responsible Energy Solutions
- Federation of American Scientists
- Megafire Action
- American Forest and Paper Association
- National Deer Association
- The Stewardship Project

119TH CONGRESS
2D SESSION

S. ______

To amend the Clean Air Act to modify the handling of air quality monitoring with respect to prescribed fires, and for other purposes.

IN THE SENATE OF THE UNITED STATES

Mr. CURTIS (for himself, Mr. MERKLEY, Mrs. CAPITO, Mr. PADILLA, Mr. BOOZMAN, and Mr. KELLY) introduced the following bill; which was read twice and referred to the Committee on ____________________

A BILL

To amend the Clean Air Act to modify the handling of air quality monitoring with respect to prescribed fires, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the ''Wildfire Emissions Prevention Act of 2026''.

SEC. 2. AIR QUALITY MONITORING DATA INFLUENCED BY EXCEPTIONAL EVENTS.

(a) IN GENERAL.—Section 319(b) of the Clean Air Act (42 U.S.C. 7619(b)) is amended—

(1) in paragraph (1)—

(A) in subparagraph (B)—

(i) in the matter preceding clause (i), by striking "In this subsection, the" and inserting "The"; and

(ii) by redesignating clauses (i) through (iii) as subclauses (I) through (III), respectively, and indenting appropriately;

(B) by redesignating subparagraph (B) as clause (ii) and indenting appropriately;

(C) by striking the paragraph designation and heading and all that follows through "exceptional event." at the end of subparagraph (A)(iv) and inserting the following:

"(1) DEFINITIONS.—In this subsection:

"(A) EXCEPTIONAL EVENT.—

"(i) IN GENERAL.—The term 'exceptional event' means an event—

"(I)(aa) that—

"(AA) affects air quality;

"(BB) is not reasonably controllable or preventable; and

"(CC) is an event caused by human activity that is unlikely to recur at a particular location or a natural event; or

"(bb) that is a prescribed fire; and

"(II) that is—

"(aa) determined by the Administrator, through the process established in the regulations revised under paragraph (2)(B), to be an exceptional event; or

"(bb) deemed to be an exceptional event pursuant to a State petition deemed to be approved pursuant to paragraph (3)(B)(v)."; and

(D) by adding at the end the following:

"(B) PRESCRIBED FIRE.—

"(i) IN GENERAL.—The term 'prescribed fire' means a fire deliberately ignited in accordance with applicable law (including regulations) to burn wildland fuels in a natural or modified state under specified environmental conditions that are intended to allow the fire to be confined to a predetermined area and produce the fireline intensity and rate of spread required to attain planned resource management objectives.

"(ii) INCLUSION.—The term 'prescribed fire' includes cultural burning activities, as determined by an Indian tribe.";

(2) in paragraph (2), by striking subparagraph (B) and inserting the following:

"(B) REVISION OF REGULATIONS.—

"(i) PROPOSED REVISIONS.—Not later than 270 days after the date of enactment of the Wildfire Emissions Prevention Act of 2026, the Administrator, after consultation with Federal land managers, State air pollution control agencies, State foresters, State fish and wildlife agencies, and Indian tribes, shall publish in the Federal Register any necessary revisions to existing regulations promulgated under this section—

"(I) to reduce the burden and cost for States to demonstrate an exceptional event;

"(II) to clarify the eligibility of prescribed fires as exceptional events pursuant to the definition in paragraph (1)(A); and

"(III) to establish the procedure for the review of State petitions described in paragraph (3)(B)(iv).

"(ii) FINAL REVISIONS.—Not later than 180 days after the date on which the Administrator publishes proposed revisions to regulations promulgated under this section under clause (i), and after providing an opportunity for interested persons to make oral presentations of views, data, and arguments regarding the proposed revisions, the Administrator shall finalize those revisions to govern air quality monitoring data influenced by exceptional events that are consistent with paragraph (3).";

(3) in paragraph (3)—

(A) in subparagraph (A)—

(i) by redesignating clauses (ii) through (v) as clauses (iii) through (vi), respectively;

(ii) by inserting after clause (i) the following:

"(ii) the principle that prescribed fire can play an important role in reducing the magnitude and frequency of wildfires;"; and

(iii) in clause (iv) (as so redesignated), by striking "manner, an appropriate" and inserting "manner in an appropriate";

(B) in subparagraph (B)—

(i) in clause (ii), by inserting "or, for prescribed fire, be reasonably expected to exist," after "must exist";

(ii) in clause (iii), by striking "and" at the end;

(iii) in clause (iv)—

(I) by striking "with respect to exceedances" and inserting the following: "with respect to—

"(I) exceedances";

(II) in subclause (I) (as so designated), by striking the period at the end and inserting "; and"; and

(III) by adding at the end the following:

"(II) the designation, redesignation, classification, or reclassification of an area, the determination of attainment of a national ambient air quality standard, or other determinations by the Administrator for determining compliance with this Act; and"; and

(iv) by adding at the end the following:

"(v)(I) a State petition described in clause (iv) be approved, disapproved, or approved-in-part and disapproved-in-part by the Administrator by the date that is 1 year after the date on which the petition is submitted; and

"(II) if the Administrator does not act on a State petition described in clause (iv) by that date, the State petition be deemed approved unless the Administrator, through the process established in the regulations revised under paragraph (2)(B), subsequently determines that the event is not an exceptional event."; and

(4) by striking paragraph (4) and inserting the following:

"(4) REGIONAL, NATIONAL, OR INTERNATIONAL EXCEPTIONAL EVENTS.—At the request of multiple State or local government agencies or Tribal authorities, the Administrator shall conduct analyses or otherwise collaborate with such agencies or authorities to lead the development of regional, national, or international exceptional event demonstrations when exceptional events impact multijurisdictional areas.".

(b) SAVINGS PROVISION.—Nothing in this section or an amendment made by this section makes stationary source (as defined in section 51.491 of title 40, Code of Federal Regulations (as in effect on the date of enactment of this Act)) emissions that did not qualify as an exceptional event (as defined in section 319(b)(1) of the Clean Air Act (42 U.S.C. 7619(b)(1))) on the day before the date of enactment of this Act an exceptional event under that section after that date of enactment.

SEC. 3. SMOKE READY COMMUNITIES PROGRAM.

(a) ESTABLISHMENT.—Subject to the availability of appropriations, the Administrator of the Environmental Protection Agency (referred to in this section as the "Administrator") may make competitive grants under section

103(b)(3) of the Clean Air Act (42 U.S.C. 7403(b)(3)) to eligible entities for the assessment, prevention, control, or abatement of wildfire smoke hazards in community buildings, including school buildings (as defined in section 11 of the Asbestos School Hazard Detection and Control Act of 1980 (20 U.S.C. 3610)), and related activities.

(b) ELIGIBLE ENTITIES.—The entities eligible for a grant under subsection (a) are—

(1) States;

(2) federally recognized Indian Tribes; and

(3) any entities eligible for grants under section 103(b)(3) of the Clean Air Act (42 U.S.C. 7403(b)(3)).

(c) COST SHARE.—

(1) IN GENERAL.—Subject to paragraph (2), the Federal share of the cost of an activity carried out using a grant under subsection (a) shall be not more than 90 percent.

(2) WAIVER.—The Administrator may waive the cost-share requirement under paragraph (1) if the facility that is the subject of the activity for which the grant is provided is in an economically distressed community.

(d) LIMITATION.—Of the amounts made available each fiscal year for grants under this section, not more than 25 percent may be awarded to recipients in any 1 State.

CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: **August 4, 2026**

From: **Tung Le, Executive Director**

To: **CAPCOA Board Members**

Subject: **Secretary/Executive Director Report Out: Investment Account Update**

Background

On June 23, 2026, CAPCOA's ED met with the Association's investment advisor to discuss moving a portion of its funds (approximately $145K) to a different investment vehicle. These funds were invested in an equity portfolio (see attachment 7a, Federated Hermes) that is made up of primarily holdings in the energy, consumer staples, and banking sectors. While these investments have partially accounted for the Association's ~16% or $53K overall gains since account opening in February 2025 (see attachment 7b, June 2026 Overview), ongoing uncertainty in the Middle East is creating volatility in the energy sector, which may also have impact on other sectors in the portfolio.

In following with CAPCOA's investment policy X7 which directs the investment advisor to minimize fund risk, they recommended moving funds from Federated Hermes to Capital Group US Core (see attachment 7c, CapGroup). CapGroup is primarily made up of holdings in information technology, healthcare, and communication services. These holdings are expected to realize moderate growth in the future while being more stable than those under Federated Hermes.

After discussion with the Association's Secretary-Internal CFO, CAPCOA's ED authorized proceeding with the above recommendation, which was carried out June 30, 2026.

Recommended Action

No Board action is necessary. This item is an informational update to keep the Board apprised of changes to the investment account, per Policy X7.

Federated Hermes, Inc.-Strategic Value Dividend SMA (Equity Income)

Rating	Availability	Program
Recommended	Open	Personalized Unified Managed Accounts

Trading Authority provided by Wells Fargo Advisors All data shown, as of 03-31-2026 unless otherwise stated.

Firm Information

Location	Pittsburgh, PA
Year Founded	1955
Total Employees	2,059
Firm Assets ($mil)	903,685.07
Strategy Assets ($mil)	1,734.13
Vehicle Inception Date	10-01-2001

Fees %

Manager Fee	0.28%
Maximum Advisory Fee	2.05%
Total Fee	2.33%

Key Investment Personnel

Daniel Peris, CFA. Since 10-01.
Deborah Bickerstaff. Since 10-01.
Jared Hoff. Since 03-17.

Top 10 Securities

	% Assets
TotalEnergies SE	5.35
Chevron Corp	4.64
Enbridge Inc	4.07
Sanofi SA ADR	3.89
British American Tobacco PLC	3.70
FirstEnergy Corp	3.67
Verizon Communications Inc	3.59
Pfizer Inc	3.54
U.S. Bancorp	3.54
PNC Financial Services Group	3.50

Estimated Number of Equity Positions	40
Estimated Number of Fixed Inc Positions	0
Annual Turnover Ratio %	48

Firm Overview

John Donahue founded Federated in 1955 as an investment firm specializing in daily sweep liquidity products for bank trust departments. Federated has evolved over the years to provide investment management services for both retail and institutional clients across equity, fixed income, and money market strategies. In 2018, Federated acquired a majority interest in Hermes Investment Management, a European asset management firm with a variety of strategies and an ESG focus. In 2020, Federated was renamed Federated Hermes Inc. Federated Hermes Inc. has been registered with the SEC since June 12, 1989 as an issuer. Federated Hermes, Inc. is publicly traded, but privately controlled. Federated Hermes, Inc. is headquartered in Pittsburgh, Pennsylvania and maintains offices across the United States and globally.

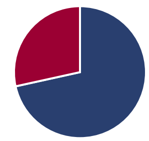
Investment Process

The Federated Hermes Strategic Value Dividend strategy's (the Strategy) philosophy is that a portfolio of high dividend paying stocks can produce attractive total returns and offer lower levels of long-term volatility than stocks with low or no dividends. The Strategy's universe comprises all common stocks in developed equity markets with yields greater than 3% and market capitalizations greater than $3 billion. The universe is screened for stocks that appear attractive based on attributes such as dividend yield, dividend growth, strong financial condition, and performance during periods of market weakness. Next, the team's dedicated analysts perform in-depth fundamental analysis, ultimately producing a forecast of the company's future dividends. The Strategy typically holds 35-50 names, averages roughly 20-25% in annual portfolio turnover, and targets less than 30% exposure to non-U.S. developed markets equities. Given its investment approach, the Strategy has a tendency to have significant deviations in sector weights when compared to the benchmark.

Summary

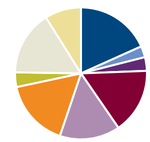
The Strategy's objective is to provide investors with an equity portfolio that produces a high level of dividend yield, sometimes at the expense of near-term performance. Investors should be aware of this focus on high yielding equity securities and the impact that can have on total return. There are no assurances that these goals and objectives will be met.

Composition % Assets



U.S. Stocks	71.6
Non-U.S. Stocks	28.5

Equity Sector Weightings %



Energy	18.29
Materials	2.74
Industrials	3.35
Consumer Staples	16.03
Healthcare	14.78
Financials	16.49
Communication Svcs	3.59
Utilities	15.82
Real Estate	8.91

Sector weightings and allocations may vary and are subject to change.

Portfolio Characteristics

	Port Avg	Rel Cat
P/E Ratio	20.20	1.02
P/B Ratio	2.21	0.81
GeoAvgCap $mil	100,374.96	0.81
Dividend Yield %	4.00	—

Category: Large Value

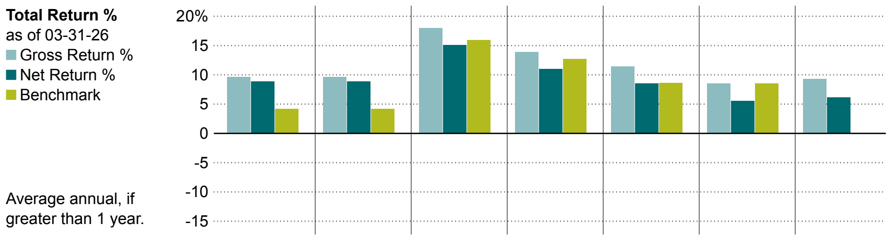
Please see important disclosures and definitions beginning on page 6 of this report.

In dual contract accounts, Federated Hermes, Inc. intends to execute trades away from Wells Fargo Advisors as they seek best execution for your trades. You will incur additional trading costs not included in your Program Fee when this occurs. See the SMA Trade Away Disclosure on the legal disclosures section of WFA.com for more details. (https://www.wellsfargoadvisors.com/pdf/disclosures/trade-away-disclosure-for-public-solicitable-nonsolicitable.pdf.)

Federated Hermes, Inc.-Strategic Value Dividend SMA (Equity Income)

Trading Authority provided by Wells Fargo Advisors All data shown, as of 03-31-2026 unless otherwise stated.

Index Relative Performance



	QTD	YTD	1 Year	3 Year	5 Year	10 Year	Since Incep
Gross Return %	9.61	9.61	18.04	13.91	11.39	8.57	9.31
Net Return %	8.92	8.92	15.07	11.04	8.51	5.56	6.16
Benchmark Ret %	4.15	4.15	15.92	12.71	8.64	8.56	—
Mgr Rank %	—	—	38	63	32	99	—
Out of # of Mgrs	—	—	550	530	500	424	—

Performance Disclosure: The performance data quoted represents past performance and does not guarantee future results. The investment return and principal value of an investment will fluctuate; thus an investor's shares, when redeemed, may be worth more or less than their original cost. Performance figures include the reinvestment of dividends and other earnings. Please refer to the performance section of the disclosure page for more information. All investing involves risk, including the possible loss of principal.

Risk Metrics*

	Return	Standard Deviation	Sharpe Ratio	Beta	Alpha	Tracking Error	Info Ratio (geo)	R2
3 Year Risk Metrics								
Strategic Value Dividend SMA	13.91	12.85	0.71	1.05	0.87	5.07	0.21	84.64
Benchmark 1	12.71	11.29	0.70	1.00	0.00	0.00	N/A	N/A
Category Average	14.96	11.64	0.83	0.93	2.40	5.09	0.35	81.34
5 Year Risk Metrics								
Strategic Value Dividend SMA	11.39	13.86	0.59	1.02	2.60	5.63	0.45	83.60
Benchmark 1	8.64	12.54	0.44	1.00	0.00	0.00	N/A	N/A
Category Average	10.53	13.76	0.53	1.01	1.73	5.36	0.30	84.77
10 Year Risk Metrics								
Strategic Value Dividend SMA	8.57	13.63	0.50	0.99	0.24	5.51	0.00	83.70
Benchmark 1	8.56	12.67	0.53	1.00	0.00	0.00	N/A	N/A
Category Average	11.63	14.59	0.66	1.08	2.47	5.30	0.52	87.26

*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

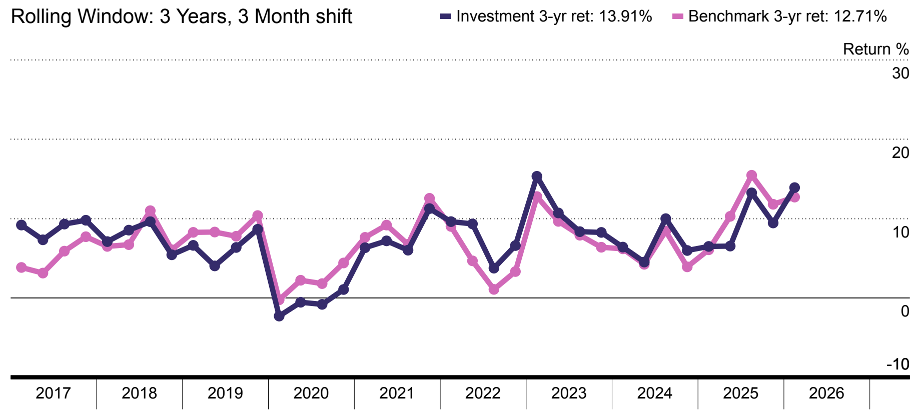
Benchmark 1: MSCI World High Dividend Yield NR USD - The index measures the performance of large and mid cap segments of 23 developed markets countries equity securities, excluding REITs, with higher dividend income and quality characteristics than average dividend yields that are both sustainable and persistent. The index applies quality screens and reviews 12-month past performance to omit stocks with potentially deteriorating fundamentals that could force them to cut or reduce dividends.

Annual Returns

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	03-26
Gross Return %	10.05	15.63	-7.89	20.43	-6.95	22.90	5.93	-2.54	15.30	16.68	9.61
Net Return %	6.81	12.22	-10.61	16.88	-9.73	19.20	3.26	-4.99	12.40	13.74	8.92
+/- Benchmark	0.77	-2.51	-0.33	-2.72	-6.92	7.07	10.67	-11.66	7.35	-1.96	5.46
Morningstar Category Large Value											
Mgr Rank %	91	67	55	93	98	84	2	100	49	44	2
Out of # of Mgrs	456	434	449	489	457	493	493	513	516	535	558
Performance Quartile (within category)											

Rolling Return*

Rolling Window: 3 Years, 3 Month shift



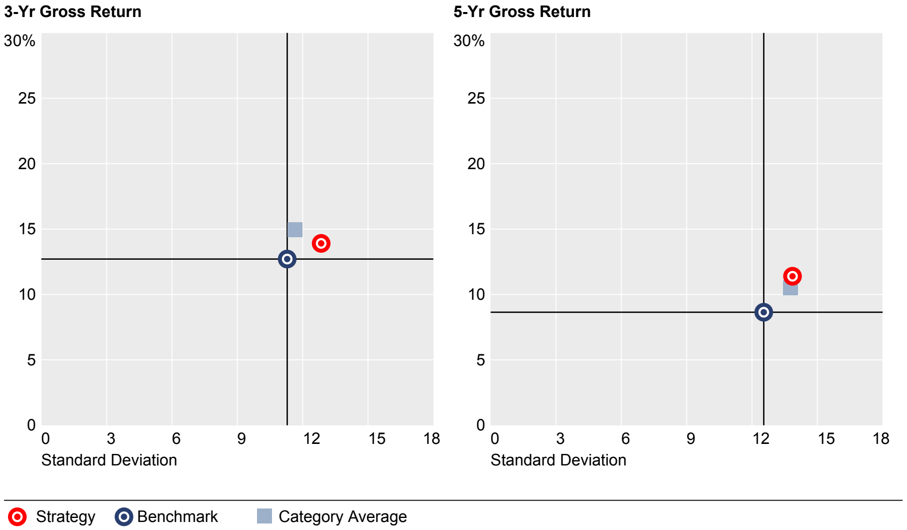
*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

Rolling periods analysis: A method of analysis where a quarterly return stream is grouped into rolling periods of a given length (three years, for example). Performance and/or risk statistics are calculated for the three-year period ending with a given quarter, then for the three-year period ending with the next quarter, and so on. This type of analysis helps minimize the arbitrary nature of focusing primarily on calendar years or trailing returns.

Federated Hermes, Inc.-Strategic Value Dividend SMA (Equity Income)

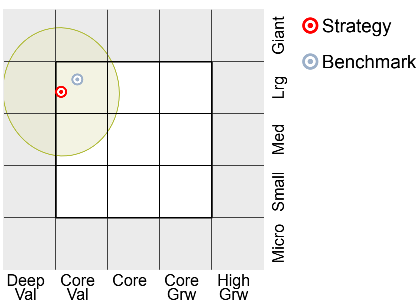
Trading Authority provided by Wells Fargo Advisors — All data shown, as of 03-31-2026 unless otherwise stated.

Trailing Risk/Return



Trailing Risk/Return Charts: A graphical representation of the amount of return the manager and index achieved relative to the amount of risk (standard deviation) they took on. Manager returns/ statistics are presented gross of fees. Please refer to the performance section of the disclosure page for more information. The index is unmanaged.

Morningstar Ownership Zone™ Equity



The Morningstar Ownership ZoneSM provides a graphic and intuitive representation of the size and investment style of stocks in an equity portfolio. The Ownership Zone is derived by plotting each stock in the portfolio within the Morningstar Style Box. The Ownership Zone is the shaded area that represents 75% of the assets in the portfolio and indicates the level of concentration in the holdings. The “centroid” in the middle of the Ownership Zone represents the weighted average of all the holdings. The Ownership Zone helps investors differentiate between portfolios that may otherwise look similar. Investors can also use the Ownership Zone to construct diversified portfolios and model how multiple funds complement one other in a portfolio.

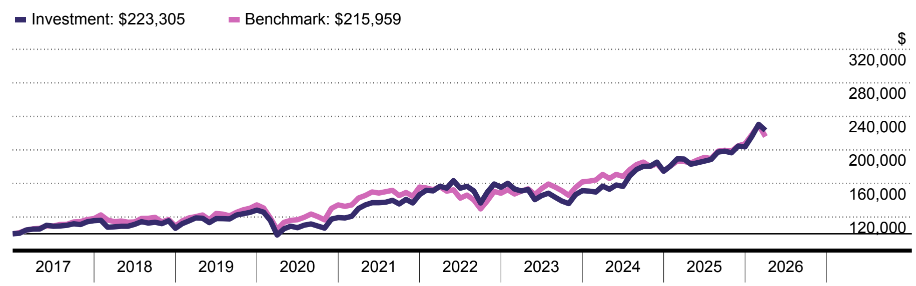
Up/Down Market Analysis*

	Up Period %	Down Period %	Best Quarter	Worst Quarter	Up Capture Ratio	Down Capture Ratio	Batting Average
3 Year Analysis							
Strategic Value Dividend SMA	61.11	38.89	15.27	-4.52	102.74	96.32	58.33
Benchmark 1	63.89	36.11	10.23	-5.79	100.00	100.00	N/A
Category Average	66.67	33.33	9.87	-2.53	106.24	97.02	55.56
5 Year Analysis							
Strategic Value Dividend SMA	60.00	40.00	15.27	-11.45	104.37	89.46	60.00
Benchmark 1	60.00	40.00	14.41	-8.99	100.00	100.00	N/A
Category Average	60.00	40.00	12.78	-11.01	110.95	105.59	56.67
10 Year Analysis							
Strategic Value Dividend SMA	61.67	38.33	15.27	-23.21	96.21	93.99	52.50
Benchmark 1	65.00	35.00	14.41	-21.82	100.00	100.00	N/A
Category Average	66.67	33.33	15.99	-25.15	112.17	99.19	55.83

*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

Caution: The up/down capture ratios can be deceiving if the nominal numbers involved are small. For example, if a manager's return during down-market periods was -3%, while the index's return during those same periods was -1%, the manager's down market capture ratio would be 300.

Growth of $100,000*



*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information. Growth of $100,000 Chart: A graphical representation of the performance of a $100,000 investment in the manager's composite, beginning ten years ago or at the inception of the product. The above graph is for illustrative purposes only. **Past performance is not indicative of future results.**

Federated Hermes, Inc.-Strategic Value Dividend SMA (Equity Income)

Appendix

Rolling Return Data Table

	03-31-17	06-30-17	09-30-17	12-31-17	03-31-18	06-30-18	09-30-18	12-31-18	03-31-19	06-30-19	09-30-19	12-31-19	03-31-20	06-30-20	09-30-20	12-31-20	03-31-21	06-30-21	09-30-21	12-31-21
Investment	9.19	7.33	9.31	9.79	7.10	8.54	9.61	5.44	6.63	4.04	6.36	8.65	-2.29	-0.54	-0.81	1.06	6.33	7.19	6.02	11.26
Benchmark	3.84	3.13	5.90	7.72	6.49	6.72	11.00	6.07	8.27	8.31	7.77	10.38	-0.24	2.23	1.80	4.41	7.63	9.18	6.76	12.56

	03-31-22	06-30-22	09-30-22	12-31-22	03-31-23	06-30-23	09-30-23	12-31-23	03-31-24	06-30-24	09-30-24	12-31-24	03-31-25	06-30-25	09-30-25	12-31-25	03-31-26
Investment	9.62	9.33	3.76	6.60	15.33	10.71	8.35	8.26	6.41	4.52	9.99	5.98	6.49	6.54	13.25	9.45	13.91
Benchmark	9.01	4.68	1.08	3.33	12.78	9.65	7.91	6.39	6.19	4.24	8.43	3.92	6.07	10.28	15.46	11.80	12.71

Growth 100k Data Table

	12-31-16	01-31-17	02-28-17	03-31-17	04-30-17	05-31-17	06-30-17	07-31-17	08-31-17	09-30-17	10-31-17	11-30-17	12-31-17	01-31-18	02-28-18
Investment	$100,000	$100,600	$104,483	$105,580	$105,717	$110,200	$109,010	$109,293	$110,124	$111,930	$111,012	$114,365	$115,634	$116,154	$107,803
Benchmark	$100,000	$101,339	$104,424	$105,910	$106,594	$109,522	$109,303	$111,107	$111,300	$114,148	$114,542	$117,106	$118,140	$122,532	$116,448

	03-31-18	04-30-18	05-31-18	06-30-18	07-31-18	08-31-18	09-30-18	10-31-18	11-30-18	12-31-18	01-31-19	02-28-19	03-31-19	04-30-19	05-31-19
Investment	$108,299	$108,992	$108,992	$111,281	$114,463	$112,781	$113,773	$112,067	$115,541	$106,505	$112,054	$115,394	$118,925	$118,556	$113,292
Benchmark	$114,424	$115,269	$113,852	$114,159	$118,377	$118,460	$119,622	$114,143	$117,027	$109,209	$115,397	$118,966	$120,496	$122,441	$116,751

	06-30-19	07-31-19	08-31-19	09-30-19	10-31-19	11-30-19	12-31-19	01-31-20	02-29-20	03-31-20	04-30-20	05-31-20	06-30-20	07-31-20	08-31-20
Investment	$118,118	$118,024	$117,705	$122,378	$123,920	$125,543	$128,268	$125,818	$115,853	$98,498	$105,905	$109,061	$107,240	$110,307	$111,741
Benchmark	$124,228	$123,440	$121,444	$125,581	$128,612	$130,515	$134,494	$130,781	$118,846	$105,154	$113,648	$116,024	$116,773	$119,674	$123,591

	09-30-20	10-31-20	11-30-20	12-31-20	01-31-21	02-28-21	03-31-21	04-30-21	05-31-21	06-30-21	07-31-21	08-31-21	09-30-21	10-31-21	11-30-21
Investment	$109,227	$106,736	$117,474	$119,354	$118,864	$120,849	$130,203	$134,422	$137,056	$137,070	$137,632	$139,917	$135,579	$141,002	$136,730
Benchmark	$120,442	$116,585	$130,264	$134,455	$132,698	$134,401	$142,682	$145,711	$149,883	$148,584	$150,201	$151,829	$145,546	$149,269	$144,711

	12-31-21	01-31-22	02-28-22	03-31-22	04-30-22	05-31-22	06-30-22	07-31-22	08-31-22	09-30-22	10-31-22	11-30-22	12-31-22	01-31-23	02-28-23
Investment	$146,684	$151,891	$151,162	$156,649	$154,441	$163,352	$154,368	$156,637	$151,170	$136,688	$149,728	$159,430	$155,381	$160,260	$153,417
Benchmark	$155,744	$154,648	$152,608	$156,105	$150,830	$152,448	$142,487	$146,184	$140,309	$129,684	$139,388	$150,521	$148,367	$152,480	$147,443

	03-31-23	04-30-23	05-31-23	06-30-23	07-31-23	08-31-23	09-30-23	10-31-23	11-30-23	12-31-23	01-31-24	02-29-24	03-31-24	04-30-24	05-31-24
Investment	$151,100	$152,747	$140,680	$145,522	$148,433	$143,553	$138,951	$136,010	$146,712	$151,437	$150,894	$149,791	$156,868	$153,094	$158,192
Benchmark	$150,834	$153,609	$146,751	$153,945	$159,359	$155,670	$151,322	$145,794	$155,264	$161,905	$162,779	$164,132	$170,851	$165,979	$170,886

	06-30-24	07-31-24	08-31-24	09-30-24	10-31-24	11-30-24	12-31-24	01-31-25	02-28-25	03-31-25	04-30-25	05-31-25	06-30-25	07-31-25	08-31-25
Investment	$156,524	$169,096	$176,753	$180,423	$180,597	$185,474	$174,605	$180,983	$189,424	$189,183	$182,947	$184,754	$186,652	$188,647	$197,454
Benchmark	$168,300	$176,538	$182,574	$185,525	$180,245	$183,546	$174,778	$180,853	$186,722	$186,296	$184,481	$188,088	$191,113	$189,743	$198,558

	09-30-25	10-31-25	11-30-25	12-31-25	01-31-26	02-28-26	03-31-26
Investment	$198,521	$196,572	$204,600	$203,721	$216,113	$230,549	$223,305
Benchmark	$199,629	$198,587	$205,010	$207,348	$218,247	$229,698	$215,959

Appendix

Ownership Zone Data Table

The fund's centroid is in the Large Core Value box and the benchmark's centroid is in the Large Core Value box. The Fund's Ownership Zone encompasses the Giant Deep Value box, Giant Core Value box, Giant Core box, Large Deep Value box, Large Core Value box, Large Core box, Medium Deep Value box, Medium Core Value box, and Medium Core box.

Important Information

Ratings:

Recommended: Product is in good standing with Global Manager Research and the coverage analyst has high conviction in it.

Watch: In cases where ongoing assessments indicate areas of uncertainty or potential for growing concerns, a fund can be placed on "Watch". A Watch rating has three levels:

- Recommended: Watch - Level I: An event has occurred and is being evaluated. Pending the outcome of the evaluation, GMR maintains its recommendation for new purchases.
- Recommended: Watch - Level II: An event has occurred that may have the potential to impact longer term investment prospects and is being evaluated. Pending the outcome of the evaluation, GMR maintains its recommendation for new purchases.
- Watch Level - III: An event has occurred that has elevated concern regarding this product's longer term investment prospects. GMR recommends restricting new flows into the product until our evaluation is complete.

Sell - Assigned when GMR believes the time for Clients to exit a strategy should be relatively short.

Sunset: Assigned when GMR believes a relatively longer time period for Clients to exit a strategy is acceptable.

Top Ten Securities
Top Ten Securities list represents the largest percentage of holdings in a representative account of the style as of the date shown above and is subject to change without notice. Mention of specific securities is not a recommendation or a solicitation for any person to buy, sell or hold a particular security. Portfolio shown subject to change. As Portfolios are separately managed, and due to factors such as client restrictions, tax considerations and cash flows, individual client account holdings will vary, perhaps significantly, from those listed on this factsheet. A client opening an account today may, or may not, be invested in securities or sectors based upon the percentages shown on this factsheet. For most recent portfolio composition contact your Financial Advisor. This list does not include any cash or cash alternative positions.

Portfolio characteristics: Characteristics that help identify the types of stocks or bonds a manager buys.

P/E (Price-to-earnings) ratio: A measure of stock valuation, calculated by dividing the market price of a stock by its earnings per share. For example, a stock selling for $20 per share that earned $2 per share in the last 12 months has a P/E ratio of 10.

P/B (Price-to-book) ratio: A measure of stock valuation, calculated by dividing the market price of a stock by its book value per share. For example, a stock selling for $20 per share whose book value is $5 per share has a P/B ratio of 4.

Geometric Average Capitalization: measures the average size of a fund's U.S. and non-U.S. stock holdings. It provides an estimate of the fund's average size using a different method than median market capitalization. Investors can use this value to position the fund in relation to its category peers. Geometric average capitalization can also help an investor select an appropriate fund for their investing needs or monitor their fund for size drift.

Dividend Yield: represents the amount an equity security pays out as a dividend over the prior 12 months divided by its share price. For a portfolio as represented by this profile the dividend yield is the weighted average of dividend yields for the eligible stocks the portfolio or strategy invests in. Hence if a portfolio consisted of just 2 equities, 30% XYZ with a dividend yield of 10% and 70% ABC with a dividend yield of 5%, it would have a portfolio dividend yield of; 30% x 10% + 70% x 5% = 6.5%

Alpha: A statistic that seeks to measure that portion of a stock, mutual fund, or composite's annualized return attributable to specific or nonmarket risk. Because Alpha seeks to measure non-market return, it is often used as an indication of how much value has been added or lost by a manager, based on that manager's investment decisions.

Beta: Beta is a quantitative measure of the volatility of a given stock, mutual fund, or composite, relative to its assigned benchmark. It measures the systematic risk associated with a composite. For example, a composite with a beta of 1.10 is expected (based on previous performance) to perform 10% better than its benchmark index in up markets and 10% worse in down markets. As with any statistic based on past performance, there is no guarantee of future performance.

Information Ratio: Measures the consistency with which a fund beats a benchmark. Calculated as annualized excess return divided by standard deviation of excess return.

R-Squared (R2): A measure of correlation, r-squared ranges from 0 to 1 (or 0 to 100%) and reflects the percentage of a composite's variability that is explained by the variability of the benchmark. An r-squared measure of 0.25 (or 25%) means that the regression model only explains 25% of the variability. The higher the r-squared, the more useful the beta and annualized alpha statistics.

Sharpe Ratio: The Sharpe ratio seeks to adjust the return of a composite or fund based on the amount of risk taken to achieve it. It is calculated by dividing a composite's total risk premium by the standard deviation of its risk premium. The risk premium is defined as the return above the risk-free rate (usually T-bill rate).

Standard Deviation: Measures the total volatility or range of a fund or composite's return. It is often used to measure how much a composite's actual return deviates from its expected return for the measured period. Standard deviation measures total risk, which can be broken down into market risk and specific risk. The 3-Year standard deviation measures this total risk over a rolling period of 3 years, while the 5-Year standard deviation measures the total risk over a rolling period of 5 years.

Tracking Error: Measures how closely a fund's returns track those of a benchmark. Represents the standard deviation, or variability, of a fund's returns relative to the benchmark.

The illustration of the historical Morningstar Style Boxes is dependent on whether the strategy's manager provided Morningstar Inc. with the required data in a timely manner. A dash indicates the manager did not meet this requirement.

Up/Down Market Capture Ratios: A measure of managers' before-fee performance in up and down markets relative to the market itself. A down market is one in which the index's quarterly return is less than zero. To calculate down-market capture ratio, we link returns for the manager and the market for all down-market quarters over the selected time frame, then divide the manager's return during down-market quarters by the index's return during the same quarters. To calculate up-market capture ratio, this same process is carried out using returns from periods when the index's return was greater than zero. The lower the manager's down-market capture ratio, the better the manager protected capital during a market decline. A value of 90 suggests that a manager's losses were only 90% of the market loss when the market was down.

Batting Average: a measure of a manager's ability to consistently beat the market. It is calculated by dividing the number of months in which the manager beat or matched an index by the total number of months in the period. For example, a manager who meets or outperforms the market every month in a given period would have a batting average of 100. A manager who beats the market half of the time would have a batting average of 50.

Morningstar Manager Rank: This is the portfolio's total-return percentile rank relative to all portfolios that have the same Morningstar Category. The highest (or most favorable) percentile rank is 1 and the lowest (or least favorable) percentile rank is 100. The top-performing portfolio in a category will always receive a rank of 1.

Trading Authority for Personalized UMA Programs: Investment managers available through this program are defined as either Discretionary Managers or Model Managers. The manager for this strategy is a Model Manager. Model Managers provide their investment strategy to Wells Fargo Advisors, who will implement the strategy and handle the day-to-day investment management of client assets. Other managers are Discretionary Managers and are responsible for the day-to-day investment management of client assets.

Risk Considerations
Advisory programs are not designed for excessively traded or inactive accounts and are not appropriate for all investors. Please carefully review the Wells Fargo Advisors advisory disclosure document for a full description of our services, including fees and expenses. There are minimum account balances associated with these programs.

Asset allocation and diversification cannot eliminate the risk of fluctuating prices and uncertain returns nor can they guarantee profit or protect against loss in declining markets.

There are no guarantees objectives will be met.

Dividends are not guaranteed and are subject to change or elimination.

Investing in foreign securities presents certain risks not associated with domestic investments, such as currency fluctuation, political and economic instability, and different accounting standards. This may result in greater share price volatility. These risks are heightened in emerging markets.

The value style of investing cannot guarantee appreciation in the market value of the fund's holdings. The return and principal value of stocks fluctuate with changes in market conditions. The value type of investing tends to shift in and out of favor.

Strategies that are concentrated in a limited number of securities or sectors may be subject to a higher degree of market risk than investments that are more diversified.

The Energy sector may be adversely affected by changes in worldwide energy prices, exploration, production spending, government regulation, and changes in exchange rates, depletion of natural resources, and risks that arise from extreme weather conditions.

Consumer Staples industries can be significantly affected by competitive pricing particularly with respect to the growth of low-cost emerging market production, government regulation, the performance of the overall economy, interest rates, and consumer confidence. Risks associated with the Technology sector include increased competition from domestic and international companies, unexpected changes in demand, regulatory actions, technical problems with key products, and the departure of key members of management. Technology and Internet-related stocks smaller, less-seasoned companies, tend to be more volatile than the overall market.

Some of the risks associated with investment in the Health Care sector include competition on branded products, sales erosion due to cheaper alternatives, research and development risk, government regulations and government approval of products anticipated to enter the market.

Morningstar Category: Morningstar assigns categories to separate accounts portfolios. Portfolios are placed in a given category based on their average holdings statistics over the past three years. Morningstar's editorial team also reviews and approves all category assignments. If the portfolio is new and has no history, Morningstar estimates where it will fall before giving it a more permanent category assignment. When necessary, Morningstar may change a category assignment based on recent changes to the portfolio. In the United States, Morningstar supports 110 categories.

Large-value portfolios invest primarily in big U.S. companies that are less expensive or growing more slowly than other large-cap stocks. Stocks in the top 70% of the capitalization of the U.S. equity market are defined as large cap. Value is defined based on low valuations (low price ratios and high dividend yields) and slow growth (low growth rates for earnings, sales, book value, and cash flow).

Composite performance is presented for third-party separately managed account (SMA). manager strategies. Performance information shown is based on performance data provided by the manager to Morningstar. The performance data provided by the manager is taken from its composite of similarly managed accounts in the strategy. Accounts are included in the composite in the first full calendar month under management and remain in the historical composite record through the last full calendar month under management. All returns are asset and time-weighted and reflect reinvestment of interest, income and/or realized capital gains. Returns for periods longer than one year are annualized. Because these accounts are individually managed, and clients have the ability to impose restrictions on management, individual account performance will vary.
Gross performance returns presented represent performance returns before the deduction of any program, management or platform fees.

Net performance returns presented after deducting the maximum fee a client could have paid during the reported period, including: program, management and platform fees and internal fund expenses. For periods prior to 12/31/21 the maximum fee used in the net return is higher than current maximum fee schedule for new accounts.
Maximum Fee
Inception to 4Q21- 3.0%
1Q22 to 2Q23 -2.559%
3Q23 to 1Q24 -2.55%
2Q24 to Current: 2.05% plus the management fee found on page 1 of this Profile

Past performance is not indicative of future results. The strategy is subject to investment risk and there is no assurance that this strategy's objectives will be attained. Fees for this program cover advisory services, transaction costs and relevant expenses. Fees are based on the assets in the account and are assessed quarterly. During periods of lower trading activity, your costs might be lower if our compensation were based on commissions.

Benchmarks: Benchmarks are provided for illustrative purposes only. Comparisons to benchmarks have limitations because benchmarks have volatility and other material characteristics that may differ from those of the Manager. Because of these differences, benchmarks should not be relied upon as an accurate measure of comparison. There is no guarantee that any of the securities invested in by any Manager are included in these benchmarks. The performance shown is compared to a broad-based securities market index. Broad-based securities indices are unmanaged and are not subject to fees and expenses typically associated with managed accounts. It is not possible to invest directly in an index.

Global Portfolio Management (GPM) and Global Manager Research (GMR) are divisions of Wells Fargo Investment Institute, Inc. (WFII). WFII is a registered investment adviser and wholly-owned subsidiary of Wells Fargo Bank, N.A., a bank affiliate of Wells Fargo & Company.

GPM provides model investment advice based upon the universe of products researched by GMR and asset allocation advice provided by Global Investment Strategy (GIS). GIS is an affiliated division of WFII. GMR may provide research analysis for Wells Fargo affiliated mutual funds, private funds and other products, which may also be advised by WFII or a Wells Fargo affiliate (Wells Fargo). The analysis utilizes the same processes and scrutiny as for non-affiliated products and WFII is committed to providing research that is fair and unbiased, but a conflict may arise as Wells Fargo may benefit from a favorable recommendation for an affiliated product. Information and opinions have been obtained or derived from sources we consider reliable, but we cannot guarantee their accuracy or completeness. Opinions and estimates are as of a certain date and subject to change without notice. The information contained herein constitutes general information and is not directed to, designed for, or individually tailored to, any particular investor or potential investor.

Wells Fargo & Company (“Wells Fargo”) holds a limited ownership interest in Allspring Global Investments (“Allspring”), a trade name used to describe the asset management businesses of Allspring Global Investments Holdings, LLC. Wells Fargo receives compensation from Allspring for the distribution, administrative, research, and operational services that they provide.

Allspring Global InvestmentsTM is the trade name for the asset management firms of Allspring Global Investments Holdings, LLC, a holding company indirectly owned by certain private funds of GTCR LLC and Reverence Capital Partners, L.P. These firms include but are not limited to Allspring Global Investments, LLC, and Allspring Funds Management, LLC. Certain products managed by Allspring entities are distributed by Allspring Funds Distributor, LLC (a broker-dealer and Member FINRA/SIPC).

Wells Fargo Advisors is a trade name used by Wells Fargo Clearing Services, LLC and Wells Fargo Advisors Financial Network, LLC, Members SIPC, separate registered broker-dealers and non-bank affiliates of Wells Fargo & Company.

Capital Group U.S. Core

Rating	Availability	Program
Recommended	Open	Personalized Unified Managed Accounts

Trading Authority provided by Wells Fargo Advisors All data shown, as of 03-31-2026 unless otherwise stated.

Firm Information

Location	Los Angeles, CA
Year Founded	1931
Total Employees	9,262
Firm Assets ($mil)	3,249,621.13
Strategy Assets ($mil)	126.29
Vehicle Inception Date	01-02-1934

Fees %

Manager Fee	0.28%
Maximum Advisory Fee	2.05%
Total Fee	2.33%

Key Investment Personnel

James Lovelace, CFA. Since 03-91.
Christopher Buchbinder. Since 03-07.
Grant Cambridge. Since 03-16.

Top 10 Securities

	% Assets
Broadcom Inc	6.58
NVIDIA Corp	6.29
Microsoft Corp	5.72
Amazon.com Inc	4.96
Alphabet Inc Class A	4.82
Eli Lilly and Co	3.56
British American Tobacco PLC	3.28
Apple Inc	2.62
Meta Platforms Inc Class A	2.58
GE Aerospace	2.19

Estimated Number of Equity Positions	79
Estimated Number of Fixed Inc Positions	0
Annual Turnover Ratio %	29

Firm Overview

Capital Research and Management Company (CRMC) is a wholly-owned subsidiary of The Capital Group Companies, Inc (collectively Capital Group or the Firm) and was founded in 1931. Capital Group offers exchange-traded funds as well as actively managed equity, fixed-income, and balanced investment portfolios through separate accounts, trusts and mutual funds globally. CRMC has been registered as an investment advisor with the U.S. Securities and Exchange Commission since 1971. Capital Group is privately held and 100% employee owned. The Firm is headquartered in Los Angeles, California but has offices located throughout the United States as well as internationally.

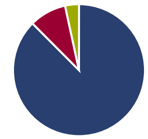
Investment Process

The Capital Group U.S. Core strategy (the Strategy) uses a multi-manager strategy with sleeves managed independently by individual portfolio managers. The portfolio managers are generalists who select from a wide range of investments that have undergone rigorous research by the analyst team. Analysts are sector specialists and will use a mixture of fundamental, quantitative, and macroeconomic research. While investment professionals share their perspective with others, each portfolio manager acts on personal conviction, not consensus. Underlying sleeve portfolio managers will be chosen for their complementary approaches and the analysts will manage a portion of the Strategy, known as the research portfolio. The Strategy seeks to invest in financially sound, large-cap, dividend-paying companies. The approach is generally value-oriented but the strategy has a penchant for investing in fallen growth stocks, if the opportunities arise. The Strategy has the flexibility to invest up to 15% in non-US names. The initial portfolio construction process typically leads to around 150-200 stocks selected by the portfolio managers. The vehicle portfolio managers then utilize a quantitative process to reduce the more diversified holdings list to typically 80 names they expect to offer similar characteristics as the initial list. There are no guarantees that these objectives will be met.

Summary

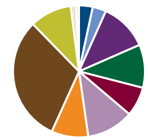
The Strategy seeks to provide long-term growth of capital and income, placing greater emphasis on the potential for dividend growth than on current income. The Strategy seeks to invest in financially sound, large-cap, dividend-paying companies. The approach is generally value-oriented but the Strategy has a penchant for investing in fallen growth stocks, if the opportunities arise. The Strategy may be an option for investors seeking a balanced portfolio of blue-chip companies.

Composition % Assets



U.S. Stocks	87.5
Non-U.S. Stocks	9.1
Cash/Cash Alt	3.4

Equity Sector Weightings %



Energy	3.36
Materials	3.31
Industrials	11.76
Con. Discretionary	10.57
Consumer Staples	7.20
Healthcare	11.53
Financials	9.04
Info. Technology	30.93
Communication Svcs	10.27
Utilities	1.36
Real Estate	0.66

Sector weightings and allocations may vary and are subject to change.

Portfolio Characteristics

	Port Avg	Rel Cat
P/E Ratio	24.33	0.96
P/B Ratio	5.01	1.15
GeoAvgCap $mil	434,031.38	1.43
Dividend Yield %	1.36	—

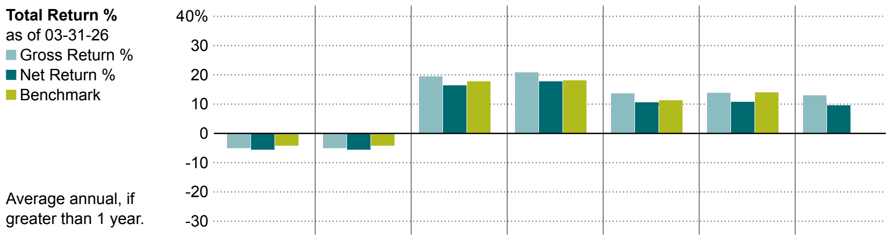
Category: Large Blend

Please see important disclosures and definitions beginning on page 6 of this report.

Capital Group U.S. Core

Trading Authority provided by Wells Fargo Advisors All data shown, as of 03-31-2026 unless otherwise stated.

Index Relative Performance



	QTD	YTD	1 Year	3 Year	5 Year	10 Year	Since Incep
Gross Return %	-4.97	-4.97	19.46	20.85	13.60	13.91	13.02
Net Return %	-5.57	-5.57	16.46	17.81	10.66	10.75	9.65
Benchmark Ret %	-4.18	-4.18	17.74	18.14	11.34	13.97	—
Mgr Rank %	—	—	28	10	9	31	—
Out of # of Mgrs	—	—	815	767	700	502	—

Performance Disclosure: The performance data quoted represents past performance and does not guarantee future results. The investment return and principal value of an investment will fluctuate; thus an investor's shares, when redeemed, may be worth more or less than their original cost. Performance figures include the reinvestment of dividends and other earnings. Please refer to the performance section of the disclosure page for more information. All investing involves risk, including the possible loss of principal.

Risk Metrics*

	Return	Standard Deviation	Sharpe Ratio	Beta	Alpha	Tracking Error	Info Ratio (geo)	R2
3 Year Risk Metrics								
Capital Group U.S. Core	20.85	12.05	1.25	0.95	2.96	2.95	0.78	94.27
Benchmark 1	18.14	12.37	1.03	1.00	0.00	0.00	N/A	N/A
Category Average	16.33	11.47	0.95	0.92	-0.84	1.80	-0.96	98.27
5 Year Risk Metrics								
Capital Group U.S. Core	13.60	14.63	0.71	0.92	2.58	3.45	0.59	95.04
Benchmark 1	11.34	15.45	0.55	1.00	0.00	0.00	N/A	N/A
Category Average	10.53	14.13	0.52	0.91	-0.34	2.19	-0.42	98.59
10 Year Risk Metrics								
Capital Group U.S. Core	13.91	14.28	0.83	0.91	0.90	3.40	-0.01	95.29
Benchmark 1	13.97	15.33	0.78	1.00	0.00	0.00	N/A	N/A
Category Average	12.84	14.18	0.73	0.92	-0.72	1.91	-0.78	98.94

*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

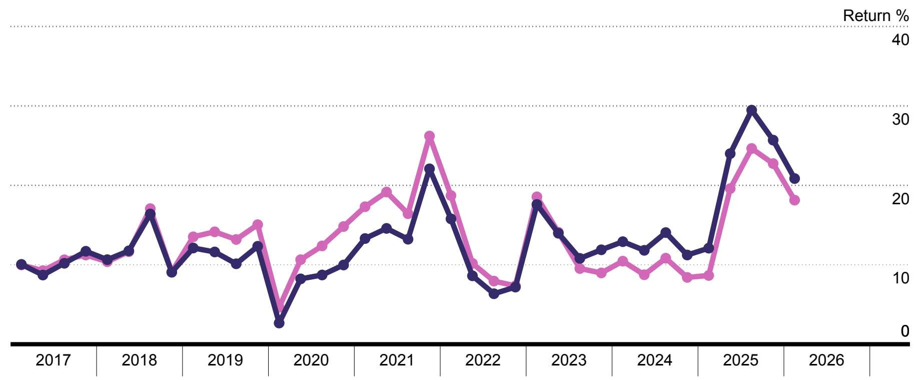
Benchmark 1: Russell 1000 TR USD - The index measures the performance of the large-cap segment of the US equity securities. It is a subset of the Russell 3000 index and includes approximately 1000 of the largest securities based on a combination of their market cap and current index membership.

Annual Returns

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	03-26
Gross Return %	14.48	21.94	-7.08	25.08	14.43	27.11	-15.33	30.14	24.88	22.19	-4.97
Net Return %	11.10	18.34	-9.82	21.39	11.02	23.29	-17.46	26.86	21.74	19.11	-5.57
+/- Benchmark	2.43	0.25	-2.29	-6.34	-6.53	0.66	3.80	3.61	0.37	4.82	-0.79
Morningstar Category Large Blend	—										
Mgr Rank %	16	39	63	79	56	46	42	10	25	10	76
Out of # of Mgrs	575	532	570	614	627	676	668	755	785	796	825
Performance Quartile (within category)											

Rolling Return*

Rolling Window: 3 Years, 3 Month shift



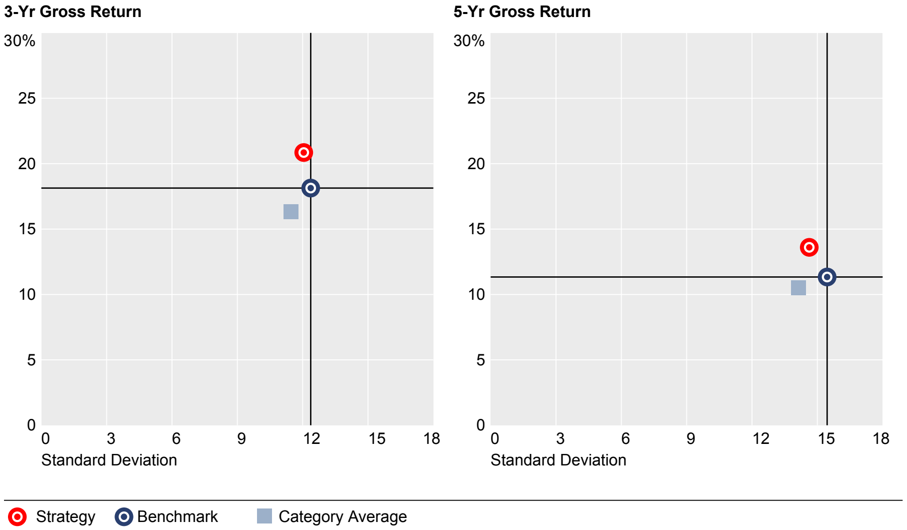
*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

Rolling periods analysis: A method of analysis where a quarterly return stream is grouped into rolling periods of a given length (three years, for example). Performance and/or risk statistics are calculated for the three-year period ending with a given quarter, then for the three-year period ending with the next quarter, and so on. This type of analysis helps minimize the arbitrary nature of focusing primarily on calendar years or trailing returns.

Capital Group U.S. Core

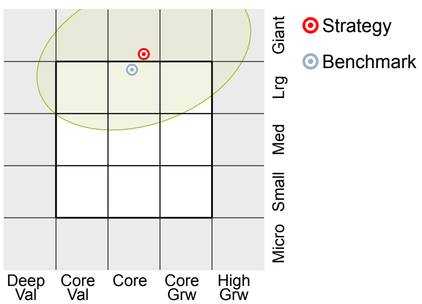
Trading Authority provided by Wells Fargo Advisors All data shown, as of 03-31-2026 unless otherwise stated.

Trailing Risk/Return



Trailing Risk/Return Charts: A graphical representation of the amount of return the manager and index achieved relative to the amount of risk (standard deviation) they took on. Manager returns/ statistics are presented gross of fees. Please refer to the performance section of the disclosure page for more information. The index is unmanaged.

Morningstar Ownership Zone™ Equity



The Morningstar Ownership ZoneSM provides a graphic and intuitive representation of the size and investment style of stocks in an equity portfolio. The Ownership Zone is derived by plotting each stock in the portfolio within the Morningstar Style Box. The Ownership Zone is the shaded area that represents 75% of the assets in the portfolio and indicates the level of concentration in the holdings. The “centroid” in the middle of the Ownership Zone represents the weighted average of all the holdings. The Ownership Zone helps investors differentiate between portfolios that may otherwise look similar. Investors can also use the Ownership Zone to construct diversified portfolios and model how multiple funds complement one other in a portfolio.

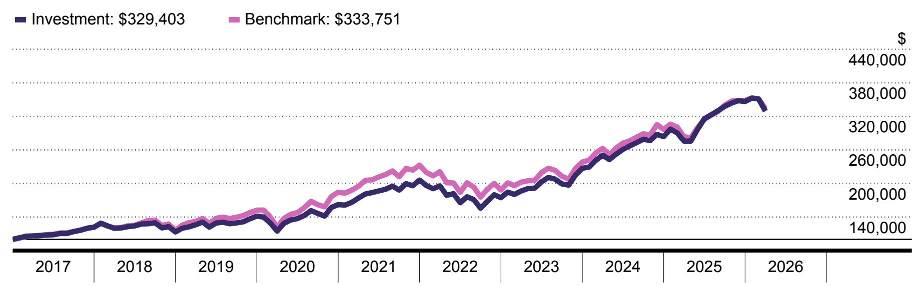
Up/Down Market Analysis*

	Up Period %	Down Period %	Best Quarter	Worst Quarter	Up Capture Ratio	Down Capture Ratio	Batting Average
3 Year Analysis							
Capital Group U.S. Core	69.44	30.56	14.49	-4.97	103.18	86.26	61.11
Benchmark 1	69.44	30.56	11.96	-4.49	100.00	100.00	N/A
Category Average	69.44	30.56	11.27	-3.09	91.68	95.44	44.44
5 Year Analysis							
Capital Group U.S. Core	65.00	35.00	14.49	-15.41	99.03	86.92	58.33
Benchmark 1	63.33	36.67	11.96	-16.67	100.00	100.00	N/A
Category Average	65.00	35.00	11.27	-14.35	91.52	91.95	48.33
10 Year Analysis							
Capital Group U.S. Core	70.83	29.17	19.59	-19.03	95.02	91.26	49.17
Benchmark 1	71.67	28.33	21.82	-20.22	100.00	100.00	N/A
Category Average	70.83	29.17	18.47	-20.56	91.06	93.63	40.83

*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information.

Caution: The up/down capture ratios can be deceiving if the nominal numbers involved are small. For example, if a manager's return during down-market periods was -3%, while the index's return during those same periods was -1%, the manager's down market capture ratio would be 300.

Growth of $100,000*



*The above performance calculations and/or statistics for the strategy are presented gross of fees. Please refer to the performance section of the disclosure page for more information. Growth of $100,000 Chart: A graphical representation of the performance of a $100,000 investment in the manager's composite, beginning ten years ago or at the inception of the product. The above graph is for illustrative purposes only. **Past performance is not indicative of future results.**

Appendix

Rolling Return Data Table

	03-31-17	06-30-17	09-30-17	12-31-17	03-31-18	06-30-18	09-30-18	12-31-18	03-31-19	06-30-19	09-30-19	12-31-19	03-31-20	06-30-20	09-30-20	12-31-20	03-31-21	06-30-21	09-30-21	12-31-21
Investment	10.05	8.71	10.19	11.70	10.64	11.75	16.40	9.06	12.11	11.61	10.13	12.33	2.67	8.23	8.71	9.97	13.30	14.58	13.22	22.08
Benchmark	9.99	9.26	10.63	11.23	10.39	11.64	17.07	9.09	13.52	14.15	13.19	15.05	4.64	10.64	12.38	14.82	17.31	19.16	16.43	26.21

	03-31-22	06-30-22	09-30-22	12-31-22	03-31-23	06-30-23	09-30-23	12-31-23	03-31-24	06-30-24	09-30-24	12-31-24	03-31-25	06-30-25	09-30-25	12-31-25	03-31-26
Investment	15.78	8.61	6.35	7.19	17.60	13.97	10.80	11.89	12.91	11.82	14.05	11.23	12.09	23.99	29.47	25.69	20.85
Benchmark	18.71	10.17	7.95	7.35	18.55	14.09	9.53	8.97	10.45	8.74	10.83	8.41	8.65	19.59	24.64	22.74	18.14

Growth 100k Data Table

	12-31-16	01-31-17	02-28-17	03-31-17	04-30-17	05-31-17	06-30-17	07-31-17	08-31-17	09-30-17	10-31-17	11-30-17	12-31-17	01-31-18	02-28-18
Investment	$100,000	$102,928	$105,471	$106,045	$106,651	$107,777	$108,261	$110,518	$110,499	$113,924	$116,260	$119,720	$121,939	$129,068	$124,194
Benchmark	$100,000	$102,011	$105,959	$106,026	$107,147	$108,515	$109,273	$111,436	$111,785	$114,166	$116,784	$120,346	$121,687	$128,367	$123,654

	03-31-18	04-30-18	05-31-18	06-30-18	07-31-18	08-31-18	09-30-18	10-31-18	11-30-18	12-31-18	01-31-19	02-28-19	03-31-19	04-30-19	05-31-19
Investment	$119,685	$120,525	$122,713	$124,112	$127,562	$127,996	$129,650	$120,554	$122,827	$113,309	$119,919	$122,449	$126,146	$130,959	$121,832
Benchmark	$120,847	$121,258	$124,353	$125,158	$129,477	$133,938	$134,447	$124,933	$127,476	$115,865	$125,575	$129,827	$132,087	$137,422	$128,665

	06-30-19	07-31-19	08-31-19	09-30-19	10-31-19	11-30-19	12-31-19	01-31-20	02-29-20	03-31-20	04-30-20	05-31-20	06-30-20	07-31-20	08-31-20
Investment	$129,260	$130,744	$128,000	$129,440	$131,423	$136,878	$141,728	$139,861	$129,165	$114,754	$128,667	$134,617	$137,232	$142,654	$151,455
Benchmark	$137,697	$139,836	$137,275	$139,654	$142,614	$148,003	$152,278	$152,442	$139,985	$121,486	$137,539	$144,796	$147,998	$156,664	$168,163

	09-30-20	10-31-20	11-30-20	12-31-20	01-31-21	02-28-21	03-31-21	04-30-21	05-31-21	06-30-21	07-31-21	08-31-21	09-30-21	10-31-21	11-30-21
Investment	$146,375	$141,700	$157,211	$162,184	$161,303	$166,206	$174,086	$181,107	$183,713	$186,697	$189,656	$195,287	$188,166	$199,722	$195,971
Benchmark	$162,017	$158,110	$176,729	$184,200	$182,683	$187,977	$195,091	$205,593	$206,568	$211,745	$216,143	$222,399	$212,183	$226,906	$223,862

	12-31-21	01-31-22	02-28-22	03-31-22	04-30-22	05-31-22	06-30-22	07-31-22	08-31-22	09-30-22	10-31-22	11-30-22	12-31-22	01-31-23	02-28-23
Investment	$206,154	$196,302	$190,623	$195,785	$178,753	$181,822	$165,609	$176,174	$171,160	$155,714	$168,065	$179,871	$174,556	$184,518	$180,402
Benchmark	$232,930	$219,797	$213,766	$220,979	$201,281	$200,975	$184,143	$201,294	$193,566	$175,655	$189,743	$200,008	$188,378	$201,007	$196,224

	03-31-23	04-30-23	05-31-23	06-30-23	07-31-23	08-31-23	09-30-23	10-31-23	11-30-23	12-31-23	01-31-24	02-29-24	03-31-24	04-30-24	05-31-24
Investment	$186,619	$190,986	$191,601	$203,152	$210,820	$207,745	$199,117	$197,083	$215,257	$227,165	$229,361	$241,424	$250,575	$242,708	$252,565
Benchmark	$202,431	$204,940	$205,894	$219,800	$227,358	$223,381	$212,883	$207,738	$227,140	$238,353	$241,677	$254,728	$262,894	$251,707	$263,560

	06-30-24	07-31-24	08-31-24	09-30-24	10-31-24	11-30-24	12-31-24	01-31-25	02-28-25	03-31-25	04-30-25	05-31-25	06-30-25	07-31-25	08-31-25
Investment	$261,031	$267,129	$272,948	$279,171	$276,740	$287,820	$283,688	$297,258	$290,310	$275,741	$275,780	$296,963	$315,683	$322,996	$330,024
Benchmark	$272,283	$276,245	$282,793	$288,840	$286,821	$305,287	$296,775	$306,222	$300,866	$283,454	$281,767	$299,754	$314,934	$321,932	$328,708

	09-30-25	10-31-25	11-30-25	12-31-25	01-31-26	02-28-26	03-31-26
Investment	$337,912	$343,776	$348,124	$346,627	$352,659	$351,129	$329,403
Benchmark	$340,104	$347,444	$348,291	$348,313	$353,110	$351,216	$333,751

Appendix

Ownership Zone Data Table

The fund's centroid is in the Giant Core box and the benchmark's centroid is in the Large Core box. The Fund's Ownership Zone encompasses the Giant Deep Value box, Giant Core Value box, Giant Core box, Giant Core Growth box, Giant High Growth box, Large Deep Value box, Large Core Value box, Large Core box, Large Core Growth box, Large High Growth box, Medium Core Value box, Medium Core box, Medium Core Growth box, and Medium High Growth box.

Important Information

Ratings:

Recommended: Product is in good standing with Global Manager Research and the coverage analyst has high conviction in it.

Watch: In cases where ongoing assessments indicate areas of uncertainty or potential for growing concerns, a fund can be placed on "Watch". A Watch rating has three levels:

- Recommended: Watch - Level I: An event has occurred and is being evaluated. Pending the outcome of the evaluation, GMR maintains its recommendation for new purchases.
- Recommended: Watch - Level II: An event has occurred that may have the potential to impact longer term investment prospects and is being evaluated. Pending the outcome of the evaluation, GMR maintains its recommendation for new purchases.
- Watch Level - III: An event has occurred that has elevated concern regarding this product's longer term investment prospects. GMR recommends restricting new flows into the product until our evaluation is complete.

Sell - Assigned when GMR believes the time for Clients to exit a strategy should be relatively short.

Sunset: Assigned when GMR believes a relatively longer time period for Clients to exit a strategy is acceptable.

Top Ten Securities

Top Ten Securities list represents the largest percentage of holdings in a representative account of the style as of the date shown above and is subject to change without notice. Mention of specific securities is not a recommendation or a solicitation for any person to buy, sell or hold a particular security. Portfolio shown subject to change. As Portfolios are separately managed, and due to factors such as client restrictions, tax considerations and cash flows, individual client account holdings will vary, perhaps significantly, from those listed on this factsheet. A client opening an account today may, or may not, be invested in securities or sectors based upon the percentages shown on this factsheet. For most recent portfolio composition contact your Financial Advisor. This list does not include any cash or cash alternative positions.

Portfolio characteristics: Characteristics that help identify the types of stocks or bonds a manager buys.

P/E (Price-to-earnings) ratio: A measure of stock valuation, calculated by dividing the market price of a stock by its earnings per share. For example, a stock selling for $20 per share that earned $2 per share in the last 12 months has a P/E ratio of 10.

P/B (Price-to-book) ratio: A measure of stock valuation, calculated by dividing the market price of a stock by its book value per share. For example, a stock selling for $20 per share whose book value is $5 per share has a P/B ratio of 4.

Geometric Average Capitalization: measures the average size of a fund's U.S. and non-U.S. stock holdings. It provides an estimate of the fund's average size using a different method than median market capitalization. Investors can use this value to position the fund in relation to its category peers. Geometric average capitalization can also help an investor select an appropriate fund for their investing needs or monitor their fund for size drift.

Dividend Yield: represents the amount an equity security pays out as a dividend over the prior 12 months divided by its share price. For a portfolio as represented by this profile the dividend yield is the weighted average of dividend yields for the eligible stocks the portfolio or strategy invests in. Hence if a portfolio consisted of just 2 equities, 30% XYZ with a dividend yield of 10% and 70% ABC with a dividend yield of 5%, it would have a portfolio dividend yield of; 30% x 10% + 70% x 5% = 6.5%

Alpha: A statistic that seeks to measure that portion of a stock, mutual fund, or composite's annualized return attributable to specific or nonmarket risk. Because Alpha seeks to measure non-market return, it is often used as an indication of how much value has been added or lost by a manager, based on that manager's investment decisions.

Beta: Beta is a quantitative measure of the volatility of a given stock, mutual fund, or composite, relative to its assigned benchmark. It measures the systematic risk associated with a composite. For example, a composite with a beta of 1.10 is expected (based on previous performance) to perform 10% better than its benchmark index in up markets and 10% worse in down markets. As with any statistic based on past performance, there is no guarantee of future performance.

Information Ratio: Measures the consistency with which a fund beats a benchmark. Calculated as annualized excess return divided by standard deviation of excess return.

R-Squared (R2): A measure of correlation, r-squared ranges from 0 to 1 (or 0 to 100%) and reflects the percentage of a composite's variability that is explained by the variability of the benchmark. An r-squared measure of 0.25 (or 25%) means that the regression model only explains 25% of the variability. The higher the r-squared, the more useful the beta and annualized alpha statistics.

Sharpe Ratio: The Sharpe ratio seeks to adjust the return of a composite or fund based on the amount of risk taken to achieve it. It is calculated by dividing a composite's total risk premium by the standard deviation of its risk premium. The risk premium is defined as the return above the risk-free rate (usually T-bill rate).

Standard Deviation: Measures the total volatility or range of a fund or composite's return. It is often used to measure how much a composite's actual return deviates from its expected return for the measured period. Standard deviation measures total risk, which can be broken down into market risk and specific risk. The 3-Year standard deviation measures this total risk over a rolling period of 3 years, while the 5-Year standard deviation measures the total risk over a rolling period of 5 years.

Tracking Error: Measures how closely a fund's returns track those of a benchmark. Represents the standard deviation, or variability, of a fund's returns relative to the benchmark.

The illustration of the historical Morningstar Style Boxes is dependent on whether the strategy's manager provided Morningstar Inc. with the required data in a timely manner. A dash indicates the manager did not meet this requirement.

Up/Down Market Capture Ratios: A measure of managers' before-fee performance in up and down markets relative to the market itself. A down market is one in which the index's quarterly return is less than zero. To calculate down-market capture ratio, we link returns for the manager and the market for all down-market quarters over the selected time frame, then divide the manager's return during down-market quarters by the index's return during the same quarters. To calculate up-market capture ratio, this same process is carried out using returns from periods when the index's return was greater than zero. The lower the manager's down-market capture ratio, the better the manager protected capital during a market decline. A value of 90 suggests that a manager's losses were only 90% of the market loss when the market was down.

Batting Average: a measure of a manager's ability to consistently beat the market. It is calculated by dividing the number of months in which the manager beat or matched an index by the total number of months in the period. For example, a manager who meets or outperforms the market every month in a given period would have a batting average of 100. A manager who beats the market half of the time would have a batting average of 50.

Morningstar Manager Rank: This is the portfolio's total-return percentile rank relative to all portfolios that have the same Morningstar Category. The highest (or most favorable) percentile rank is 1 and the lowest (or least favorable) percentile rank is 100. The top-performing portfolio in a category will always receive a rank of 1.

Trading Authority for Personalized UMA Programs: Investment managers available through this program are defined as either Discretionary Managers or Model Managers. The manager for this strategy is a Discretionary Manager. Discretionary Managers will implement the strategy and handle the day-to-day investment management of client assets. Other managers are Model Managers and provide their investment strategy to Wells Fargo Advisors, who will implement the strategy and handle the day-to-day investment management of client assets.

Risk Considerations

Advisory programs are not designed for excessively traded or inactive accounts and are not appropriate for all investors. Please carefully review the Wells Fargo Advisors advisory disclosure document for a full description of our services, including fees and expenses. There are minimum account balances associated with these programs.

Asset allocation and diversification cannot eliminate the risk of fluctuating prices and uncertain returns nor can they guarantee profit or protect against loss in declining markets.

There are no guarantees objectives will be met.

Dividends are not guaranteed and are subject to change or elimination.

Strategies that are concentrated in a limited number of securities or sectors may be subject to a higher degree of market risk than investments that are more diversified. Technology and internet-related stocks, especially of smaller, less-seasoned companies, tend to be more volatile than the overall market.

Some of the risks associated with investment in the Health Care sector include competition on branded products, sales erosion due to cheaper alternatives, research and development risk, government regulations and government approval of products anticipated to enter the market.

Risks associated with the Technology sector include increased competition from domestic and international companies, unexpected changes in demand, regulatory actions, technical problems with key products, and the departure of key members of management. Technology and Internet-related stocks, especially those of smaller, less-seasoned companies, tend to be more volatile than the overall market.

This strategy uses a multi-manager approach. While the investment strategies employed by the money managers are intended to be complementary, they may not in fact be complementary. A multi-manager approach could result in more exposure to certain types of securities and higher portfolio turnover rates, which may result in higher levels of realized capital gains or losses with respect to a strategy's portfolio securities, higher brokerage commissions and other transaction costs.

Morningstar Category: Morningstar assigns categories to separate accounts portfolios. Portfolios are placed in a given category based on their average holdings statistics over the past three years. Morningstar's editorial team also reviews and approves all category assignments. If the portfolio is new and has no history, Morningstar estimates where it will fall before giving it a more permanent category assignment. When necessary, Morningstar may change a category assignment based on recent changes to the portfolio. In the United States, Morningstar supports 110 categories.

Large-blend portfolios are fairly representative of the overall US stock market in size, growth rates and price. Stocks in the top 70% of the capitalization of the US equity market are defined as large cap. The blend style is assigned to portfolios where neither growth nor value characteristics predominate. These portfolios tend to invest across the spectrum of US industries, and owing to their broad exposure, the portfolios' returns are often similar to those of the S&P 500 Index.

Composite performance is presented for third-party separately managed account (SMA). manager strategies. Performance information shown is based on performance data provided by the manager to Morningstar. The performance data provided by the manager is taken from its composite of similarly managed accounts in the strategy. Accounts are included in the composite in the first full calendar month under management and remain in the historical composite record through the last full calendar month under management. All returns are asset and time-weighted and reflect reinvestment of interest, income and/or realized capital gains. Returns for periods longer than one year are annualized. Because these accounts are individually managed, and clients have the ability to impose restrictions on management, individual account performance will vary.

Gross performance returns presented represent performance returns before the deduction of any program, management or platform fees.

Net performance returns presented after deducting the maximum fee a client could have paid during the reported period, including: program, management and platform fees and internal fund expenses. For periods prior to 12/31/21 the maximum fee used in the net return is higher than current maximum fee schedule for new accounts.

Maximum Fee

Inception to 4Q21- 3.0%

1Q22 to 2Q23 -2.559%

3Q23 to 1Q24 -2.55%

2Q24 to Current: 2.05% plus the management fee found on page 1 of this Profile

Past performance is not indicative of future results. The strategy is subject to investment risk and there is no assurance that this strategy's objectives will be attained. Fees for this program cover advisory services, transaction costs and relevant expenses. Fees are based on the assets in the account and are assessed quarterly. During periods of lower trading activity, your costs might be lower if our compensation were based on commissions.

Benchmarks: Benchmarks are provided for illustrative purposes only. Comparisons to benchmarks have limitations because benchmarks have volatility and other material characteristics that may differ from those of the Manager. Because of these differences, benchmarks should not be relied upon as an accurate measure of comparison. There is no guarantee that any of the securities invested in by any Manager are included in these benchmarks. The performance shown is compared to a broad-based securities market index. Broad-based securities indices are unmanaged and are not subject to fees and expenses typically associated with managed accounts. It is not possible to invest directly in an index.

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GPM provides model investment advice based upon the universe of products researched by GMR and asset allocation advice provided by Global Investment Strategy (GIS). GIS is an affiliated division of WFII. GMR may provide research analysis for Wells Fargo affiliated mutual funds, private funds and other products, which may also be advised by WFII or a Wells Fargo affiliate (Wells Fargo). The analysis utilizes the same processes and scrutiny as for non-affiliated products and WFII is committed to providing research that is fair and unbiased, but a conflict may arise as Wells Fargo may benefit from a favorable recommendation for an affiliated product. Information and opinions have been obtained or derived from sources we consider reliable, but we cannot guarantee their accuracy or completeness. Opinions and estimates are as of a certain date and subject to change without notice. The information contained herein constitutes general information and is not directed to, designed for, or individually tailored to, any particular investor or potential investor.

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Allspring Global InvestmentsTM is the trade name for the asset management firms of Allspring Global Investments Holdings, LLC, a holding company indirectly owned by certain private funds of GTCR LLC and Reverence Capital Partners, L.P. These firms include but are not limited to Allspring Global Investments, LLC, and Allspring Funds Management, LLC. Certain products managed by Allspring entities are distributed by Allspring Funds Distributor, LLC (a broker-dealer and Member FINRA/SIPC).

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CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: August 4, 2026

From: Tung Le, Executive Director

To: CAPCOA Board Members

Subject: Bay Area Air District/CAPCOA Federal 105 Grant Passthrough Update

Background

As a federal 105 grantee, the Bay Area Air District currently provides passthrough support to the Association for two types of funding: 1) 105 Pilot grants, and 2) CARB's contribution to the Secretariat.

105 Pilot Grants

In FY 2025-2026, US EPA awarded 105 Pilot Grants totaling $611,936 (out of which $25K is to cover CAPCOA's admin) to the Bay Area Air District to be passed through to CAPCOA, which in turn passes through funds to the following Pilot Grant air districts:

- Butte County APCD
- E. Kern County APCD
- Great Basin APCD
- Mojave Desert AQMD
- Placer County APCD
- San Luis Obispo County APCD
- Yolo Solano AQMD

CAPCOA staff is responsible for coordinating with the above districts and Bay Area Air District to ensure work plans are developed, twice-annual progress reports are filed, and coordinating closely with Region 9 project officers to ensure compliance with grant requirements.

Secretariat

Under the dues structure implemented beginning FY 2025-2026, direct 105 grantee air districts no longer authorize US EPA to withhold a portion of their 105 funds to support the Association. Instead, all air districts support CAPCOA through dues payments, lessening the Association's reliance on federal funds. However, as CARB is not a member of the Association, in FY 2025-2026, approximately $107K of CARB's share of 105 funding was expected to be passed through to

CAPCOA to support its Secretariat. CAPCOA and Bay Area Air District staff work closely to ensure monthly expenses are accounted for accurately and reported to US EPA.

In carrying out both passthrough responsibilities described above, the Bay Area Air District and CAPCOA incurs not insignificant staffing and related costs. Logically, CAPCOA may wish to become a direct 105 grantee; doing so would streamline the granting process, which could reduce both the Bay Area Air District and CAPCOA's administrative burdens in implementing these grants. CAPCOA's ED has discussed this approach with Region 9 grants staff, which has identified a potential funding mechanism that applies to non-profits like ours. However, due to higher priority responsibilities, Region 9 grants staff will not be able to explore this mechanism until September or October 2026 at earliest. Additionally, the Association pursuing direct grantee status comes with risk, which comes from the fact that California already receives more than its fair share of national 105 funding, as well as risk from increased scrutiny from US EPA HQ, which may not be desired under the current federal administration.

Planned next steps are for the ED to continue exploring and better understanding the direct grantee application process with Region 9 grant staff, but to hold short of actually applying. The ED will keep the Board apprised of his findings and may make recommendations in a future meeting.

Recommended Action

No action is requested at this time. This item is to share update with the Board and invite the Board's feedback on planned next steps considering the background information outlined above.

CAPCOA
California Air Pollution Control Officers Association

Memorandum

Date: **August 4, 2026**

From: **Tung Le, Executive Director**

To: **CAPCOA Board Members**

Subject: **FY 2026 – 2027 Budget Discussion**

Background

A budget subcommittee made up of CAPCOA Board member volunteers has met twice to better understand and to develop recommendations for addressing the anticipated budget deficit for the current FY 2025-2026 budget, as well as to inform FY 2026-2027 budget design. The deficit is primarily driven by unanticipated increased work from conference planning and execution, increased legislative support, and increased coordination with CARB on issues such as revisions to the Landfill Methane Regulation, revisions to the Cap and Invest Regulation, Air Toxics work, increased grant language coordination, and other items (see attached CARB tracking list for some examples). This work cannot be fully covered by restricted grant funding, increasing reliance on unrestricted funding. Unrestricted funding is primarily from Membership dues and CARB's 105 contribution that is passed through to the Association from Bay Area Air District.

The ED has adjusted staff's work activities to focus as much as possible on restricted sources of funding to minimize the anticipate deficit for the current FY 2025-2026. We anticipate restricted funding sources will be spent by year-end, save for prescribed fire grant funds. This is because the 2025-2026 budget was based on 2025 activities with CalEPA, CNRA, the Wildfire Task Force and the fact Governor Newsom's executive order directing state agencies to increase the pace and scale of prescribed fire implementation. The Association had anticipated that the state would significantly increase its activities in the beneficial fire space, therefore an increase in staff time was budgeted towards the Rx Fire grant. Unfortunately, this anticipated level of increased activity did not occur to the extent expected, while at the same time work related to CARB actions increased. Though its impacts were felt to a lesser extent, a busier than usual legislative year exacerbated this misalignment in budget assumptions.

Looking ahead to FY 2026-2027, we anticipate continued federal action that will complicate air quality regulation, which will have downwind impact on state and local agencies. Additionally, a new Governor will be selected, which will require the Association to focus its attention on ensuring air district missions are prioritized with the incoming administration and its staff.

With the above in mind, the budget subcommittee has directed the ED and CFOs to focus on likely increased work at the Legislature, therefore increased reliance on the services of CAPCOA's Legislative Advocate. Complicating this issue is Twohig Consulting's ending of its service contract at the end of the fiscal year, September 30, 2026. Additionally, key air district legislative staff are retiring, potentially reducing the assistance they may lend to the organization. Finally, subcommittee members believe that air district access to representation at the legislature is a key benefit of membership, therefore it must be prioritized. Since lobbying retainers cannot be paid for with restricted funds, this increases pressure on unrestricted funding.

The ED will present multiple budget scenarios, focusing on unrestricted funding, that address the subcommittee's recommendations as outlined above. These scenarios include actions that can be taken with shifts in staff workload and efficiencies that can be gained with new tools such as using HelmsBriscoe for conference planning and 5 Star Bank's administrative support tools. However, these steps alone cannot address anticipated unrestricted budget needs, therefore other strategies for the Board to consider include:

- Staff furloughs
- Limited ED furlough
- Permanent staffing reduction
- Adjustment to conferences
- Reducing or eliminating sponsorships that the Association provides

Recommended Action

No action is recommended at this time. This discussion is meant to help inform design of the FY 2026-2027 budget, which will be presented to the Board for consideration in September 2026.

2025 - 2026 CARB Tracking Items			
Item Number	**Board Meeting Month/Year Item was Requested or Identified and Item Details**	**Status**	**Complete**
1	October 2025 - Request for emissions reduction needs in districts due to waiver turnover	CARB staff are developing data. Available by end of January -CARB transmitted to CAPCOA/Districts on 1/23	**Yes**
2	January 2026 - Air toxics roadmap outline to be shared with CAPCOA	- CARB staff to brief EO and then send to CAPCOA for distribution to Board members - done - Solicit volunteer APCOs and district staff (TARMAC) to assist in refining outline and identifying deliverables - agreed to on 2/11	**Yes**
3	January 2026 - LMR 15-day change language to be shared with CAPCOA for 7-10 day review	CARB to send draft language to MOU air districts end Feb - early March for 1 week review	**Yes**
4	January 2026 – CARB to share their 2026 priorities memo with CAPCOA	- CARB to send when the memo is ready. CAPCOA provided feedback to CARB on the air toxics paragraph on 1/13/2026 -memo was sent on 1/28	**Yes**
5	January 2026 – Air district review of communications from 3PA/subgrantees from methane plumes identified by satellites (Methane RFP)	- CARB agreed to this. More to come.	**No**
6	January 2026 – CARB requesting CAPCOA/air district co-leading carbon capture regulatory approach development in response to SB 905	- First workshop planned for February 2026 - Item to CARB board in October 2026 - SJV offered to host a workshop in Kern County	**No**
7	January 2026 – CARB to provide a presentation to MS&G Committee on their Drive Forward efforts	- Chris Grundler to present to committee on February 18, 2026 Misscommunication on Chris Grundler's presentation. He will not be presenting to MS&G after all.	**N/A**
8	January 2026 – Affected air district CHIRP applications due January 16	- CARB staff tracking this item. - Board resolution or minute order is required to accept funds, but not to apply (can get resolution/minute order later)	**No**
9	January 2026 – CARB no longer supporting monitoring calibration as it transitions to the new ozone TAD	- This item is being tracked through the Monitoring Committee. CARB staff have responded to air district needs. CAPCOA staff is coordinating committee needs with CARB as they are identified.	**No**
10	February 2026 - Volunteers solicited for air toxics work group and shared with CARB	- Co-Chairs Tung Le and Charanya Varadarajan met with district staff (pre-meet) -kickoff meeting scheduled for middle of April -WG pivoted to acrolein/EtO rollout -WG re-pivot back to roadmap. Restart meeting on 6/23	**No**
11	March 2026 - Requested CARB staff to re-visit how CAG grants are awarded and implemented	- discussion is ocurring in bi-weekly Thursday calls CARB staff suggesting two review processes: red flag review or full detail review. Discussions continue.	**No**

12	March 2026 - Status of CTR Reporting Guidance for EGU and Landfills that were sent to CARB for public process	CARB no longer wedded to idea of a public process. David Quiros is exploring other options with staff	**No**
13	March 2026 - Methane Satellite RFP (See Item 5)	1 organization has been selected (Central Valley Asthma Collaborative) Elizabeth Scheele reviewing staff's proposal for initial kickoff with 3PA CAPCOA and SJV to be invited to initial kickoff meeting	**No**
14	March 2026 - Acrolein and EtO roll out	Roadmap efforts pivoted to developing short-term strategy instead CARB/air districts to collaborate on roll out approach	**Yes**
15	April 2026 - Mobile Monitoring Story Maps Available May 8. CARB Requesting Air District Review	Story maps have not been shared yet Tung asked for update on 5/21 and 6/22 6/24 update - CARB is still working through data from Aclima. Update on progress to CAPCOA Board possibly in August	**No**
16	June 2026 - Repivoting CARB and air district work group back to longer-term air toxics roadmap development	- Restart meeting held 6/23. CARB to share writeup on 6/30, with workshops planned in mid August. Still intend to take to CARB board in November	**No**

CAPCOA BUDGET DISCUSSION

Aug. 4, 2026

DUES STRUCTURE COMPARISON

Total dues received was similar between FY 24-25 to FY 25-26

	FY 24/25 (Old Dues Structure)			FY 25/26 (New Dues Structure)			
District Annual Dues	**Pass-Through**	**Annual Dues**	**Total**	**No Pass-Through**	**Annual Dues**	**Total**	**Change from Old to New Dues Structure**
Bay Area Air District	25,770	31,300	57,070		65,000	65,000	7,930
Monterey Bay ARD	5,783	10,430	16,213		15,000	15,000	(1,213)
Sacramento Metro AQMD	12,047	17,390	29,437		30,000	30,000	563
San Diego County APCD	13,933	17,390	31,323		30,000	30,000	(1,323)
San Joaquin Valley APCD	25,000	20,870	45,870		45,000	45,000	(870)
Santa Barbara County APCD	10,120	10,430	20,550		15,000	15,000	(5,550)
South Coast AQMD	63,761	43,470	107,231		85,000	85,000	(22,231)
Ventura County APCD	12,888	10,430	23,318		15,000	15,000	(8,318)
Total of "105" Districts	**169,302**	**161,710**	**331,012**		**300,000**	**300,000**	**(31,012)**
Non "105" Districts	**No Pass-Through**	**Annual Dues**	**Total**	**No Pass-Through**	**Annual Dues**	**Total**	**Change from Old to New Dues Structure**
Amador County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Antelope Valley AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Butte County AQMD		2,960.00	2,960.00		6,500.00	6,500.00	3,540.00
Calaveras County AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Colusa County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
E. Kern APCD		2,960.00	2,960.00		6,500.00	6,500.00	3,540.00
El Dorado County AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Feather River AQMD		2,960.00	2,960.00		6,500.00	6,500.00	3,540.00
Glenn County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Great Basin Unified APCD		5,560.00	5,560.00		10,000.00	10,000.00	4,440.00
Imperial County APCD		5,560.00	5,560.00		10,000.00	10,000.00	4,440.00
Lake County AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Lassen County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Mariposa County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Mendocino County AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Modoc County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Mojave Desert AQMD		10,430.00	10,430.00		15,000.00	15,000.00	4,570.00
North Coast Unified APCD		2,960.00	2,960.00		6,500.00	6,500.00	3,540.00
Northern Sierra AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
N. Sonoma County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Placer County APCD		5,560.00	5,560.00		6,500.00	6,500.00	940.00
San Luis Obispo County APCD		5,560.00	5,560.00		6,500.00	6,500.00	940.00
Shasta County AQMD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Siskiyou County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Tehama County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Tuolumne County APCD		1,480.00	1,480.00		3,000.00	3,000.00	1,520.00
Yolo-Solano AQMD		5,560.00	5,560.00		10,000.00	10,000.00	4,440.00
Total of Non "105" Districts		**75,230.00**	**75,230.00**		**135,000.00**	**135,000.00**	**59,770.00**
Total Contrib. from All Districts			**406,242**	**0**	**435,000**	**435,000**	**28,758**
CARB 105 Passthrough	124,317	-	124,317	107,100	-	107,100	(17,217)
Total Unrestricted Revenue			**530,559**			**542,100**	**11,541**

UNRESTRICTED REVENUE VS. EXPENSES

	FY 25 - 26 Total UNRESTRICTED			
Revenue				
CARB 105 Passthrough		107,100		
Membership Dues		435,000		
Total Revenue		**542,100**		**-**
				-
	Actual thru April (58% of FY)	**Projected to Year End (If no change)**	**Budgeted**	**Projected Variance**
Expenses				
G&A Expenses[1]	60,072	114,037	115,015	978
Conferences	16,874	16,874	-	(16,874)
Staffing (Fully Burdened Rates)[2]	204,223	350,096	213,889	(136,207)
Legal (Program Expense)	35,022	45,022	12,100	(32,922)
Lobbyist (Fixed Program Expense)	95,144	163,104	163,104	-
Other Program Expense	-	10,000	10,000	-
Reserves[3]	-	28,000	28,000	-
Total Expenses	**411,335**	**727,133**	**542,108**	**(185,025)**

[1] Includes categories such as office rent, auditing fees, telecom/internet costs, and office supplies

[2] Unrestricted portion of budget

[3] Includes $28,000 contribution to Reserves

STAFF TIME COVERED BY UNRESTRICTED

UNEXPECTED RELIANCE ON UNRESTRICTED FUNDING DUE TO INCREASED:

- Conference Planning/Execution
- Legislative Support
- CARB Coordination

	Unrestricted Time	
Staff	**Actual**	**Budget**
Gibbs, Sadie	17,624	18,067
Gutierrez, Laura	27,630	34,439
Keitt, Kellie	36,988	20,260
Le, Tung	92,609	121,173
Scheive, Kevin	29,255	15,791
	204,106	209,730
Actual: Oct 2025-Apr 2026 (*58% of fiscal year*)		
Budget: Oct 2025-Sep 2026		

	Unrestricted Time	
Staff	**Projected (Full FY)**	**Budget**
Gibbs, Sadie	30,213	18,067
Gutierrez, Laura	47,365	34,439
Keitt, Kellie	63,408	20,260
Le, Tung	158,758	121,173
Scheive, Kevin	50,152	15,791
	349,897	209,730
Projected Oct 2025-Sep 2026 (Full FY)		
Budget: Oct 2025-Sep 2026		

Figures are fully burdened rates

CAPCOA
Open Grants Dashboard
As of May 31, 2026

CAPCOA AWARDS

Grant	Total Award	Spent to Date	Remaining Award	Grant Start	Grant End	% time elapsed	% Spent
105 Pilot FY26 Estimated	25,614	6,082	19,532	10/1/2025	9/30/2026	58%	24%
EPA 103	15,000	15,000	-	4/1/2025	3/31/2026	108%	100%
Secretariat FY26 Estimated	123,711	203,446	(79,735)	10/1/2025	9/30/2026	58%	164%
Moyer/RAP Year 27	200,000	197,765	2,235	2/28/2025	3/31/2026	108%	99%
Moyer/RAP Year 28	200,000	94,116	105,884	1/14/2026	3/31/2027	24%	47%
AB 836	75,000	75,536	(536)	9/21/2021	7/31/2026	95%	101%
AB 617 FY24/25	55,000	55,000	-	7/1/2025	7/1/2026	83%	100%
AB 617 FY25/26	49,500	7,970	41,530	5/1/2026	6/30/2030	0%	16%
Woodsmoke	20,000	22,813	(2,813)	6/1/2023	6/30/2026	95%	114%
Prescribed Fire Admin	160,000	127,128	32,872	6/1/2021	6/30/2026	97%	79%
Prescribed Fire Coordination	900,000	373,295	526,705	6/1/2021	6/30/2026	97%	41%

Association is on track to spend out restricted funding (exc. Rx Fire), therefore discussion is driven by unrestricted activities

	FY 24/25 (Old Dues Structure)			FY 25/26 (New Dues Structure)			
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Total Unrestricted Revenue			**530,559**			**542,100**	**11,541**

California Satellite Methane Project Community Engagement Grant

Background

CARB is contracting with the Central California Asthma Collaborative (CCAC), a third-party administrator, to administer grants to community-based organizations (CBOs). CCAC will collaborate with these CBOs to develop and carry out statewide community engagement activities related to CARB's California Satellite Methane Project (CalSMP).

Purpose

The grant aims to provide assistance to communities to support their understanding of methane science and how CalSMP works to reduce methane emissions, how communities can access and interpret the project data, and to collect community feedback on information needs. Information will be shared on how CARB and the Districts have responded appropriately to methane plume detections and that we are open to feedback to improve the usefulness and transparency of the data. One objective is to develop materials that can proactively address community concerns and thus lessen requests to the Districts and/or CARB. CBOs can and have distributed material outside this grant on methane plumes. This grant will provide educational input and expert review to enable more informed community level engagement and materials. ***This grant does not support the purchase or use of any methane-detection equipment.***

Third-party Administrator

- The contract with CCAC was signed on 6/18, with work to begin in August. Their duties will include:
    - Managing a solicitation for CBO sub-awardees
    - CBO selection, coordination and support
        - 6 CBOs in the SJV, 3 for Norcal region, and 3 for Socal region (see map of regions on *page 8*)
    - Collation and synthesis of data across communities
    - Development and coordination of educational materials across communities

The contract has multiple points where CARB serves as a reviewer/approver or in a consultation role.. Below we go through CARB recommended coordination points with CAPCOA/districts for the bullets above. We welcome discussion with CAPCOA on these coordination points.

Note: Any indicated dates/timeframes are estimates that could shift as the contract with CCAC is finalized.

CBO Solicitation

CCAC is responsible for developing a solicitation package that meets the requirements of the contract, as laid out in the grant solicitation.

CARB Role: CARB will review and provide input on the solicitation package and will advertise it widely

District Coordination Process: CARB will consult with interested districts on the solicitation package and Districts and CAPCOA could help advertise the solicitation to their networks of CBOs.

Timing: Estimated in July/August after the solicitation is finalized by CCAC

CBO Selection and Projects

CCAC will partner with CBOs to develop and implement community engagement projects. These projects will be proposed by CBOs in their sub-grant applications. CCAC and CARB will review proposals and CCAC will propose sub-grant awardees.

CARB Role: CARB has ultimate approval of the sub-grantee applications. CARB will work with proposed sub-grantees to amend projects, if necessary, before sub-grantee approval.

District Coordination Process: CARB will consult with interested districts on the final selection of sub-grantees.

Timing: Anticipated in late Fall (Sept/Oct)

The projects will vary somewhat by region and may include:

- Gathering community feedback on CARB resources, such as data dashboards
- Developing recommendations for informing communities when a methane plume is detected in or near their community
- Convening community methane workgroups to support coordination among CBOs and local stakeholders
- Creating educational materials about methane and its impacts (e.g., written content, videos, short-form media)
- Building websites to host public education resources
- Organizing speaker series or local events open to CBOs, local stakeholders, and the public that focus on methane sources, emissions, and health or climate impacts of potential co-pollutants
- Developing a pathway for community members to suggest new areas for program evolution

Kick-Off Meeting and Regular Quarterly Updates

The kick-off meeting is mainly procedural and goes over the administrative rules and requirements and task deliverables.

District Coordination Process: CARB suggests meeting with CAPCOA in August on the project overview and follow up with information from the kick-off meeting scheduled for mid-August. CARB suggests regular quarterly CARB/CAPCOA updates. Options for discussion: Monthly APCO updates, staff level workgroup, other suggestions?

Timing: Anticipated August for first meeting

Potential Public Workshop on the Solicitation

While CCAC is not required to hold a workshop on the CBO solicitation, CARB sees value in this approach. The purpose of the workshop would be to provide an overview of the project and answer questions CBOs might have on the content and process. Again, this would be at the discretion of the administrator.

CARB Role: CARB would play a facilitation role and provide clarification and scientific assistance.

District Coordination Process: Given the nature of the workshop and desire to gather unfettered feedback from CBOs and the public, CARB requests discussion/feedback at our regular district check-in meetings where the districts would share their input directly with CARB.

Timing: Anticipated in August/September

Ongoing Material Review

CCAC will coordinate the development of educational materials across communities. CARB does not have explicit ability granted by the contract to accept or reject materials – only to consult and provide input on their creation. This grant process will provide an avenue for scientific input and direction on CBO materials.

CARB Role: CARB will work closely with Grantees and Sub-Grantees to provide scientific expertise in the development of materials.

District Coordination Process: CARB will seek district review of materials and provide comments back to CCAC that reflect combined CARB/CAPCOA review. Materials to be reviewed include:

- Recommendations on plume detection notification
- Educational materials on methane and related impacts including co-pollutants

- Speaker series content

Timing: This will be on an ongoing, as-needed basis beginning in October/November.

Ongoing Meetings with CBOs

CCAC will meet with communities and their CBO sub-awardees frequently.

CARB Role: To ensure that the meetings are primarily between CBOs and CCAC, CARB will limit their own attendance of meetings.

District Coordination Process: CARB will report out during quarterly meetings between CARB and Districts. If questions arise that are better suited for Districts to answer, they may be asked to attend subsequent meetings, as needed.

Timing: This will be on an ongoing, as-needed basis beginning in October/November