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EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:

October 7, 2020

Richard Corey, Executive Officer
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

RE: 2020 (Year 3) Air District Community Recommendation for CARB's Community Air Protection Program

Dear Mr. Corey,

This letter serves as the Bay Area Air Quality Management District's (Air District) community nomination for Year 3 of the state's Community Air Protection Program. The Community Air Protection Program was established by the state to implement Assembly Bill 617 (C. Garcia, Chapter 136, Statues of 2017). AB 617 directs the state, in consultation with local air districts and others, to select communities that have a "high cumulative exposure burden" to air pollution. Once selected, these communities then become eligible to work with local air districts on community emission reduction programs and/or community monitoring campaigns.

State law also requires the California Air Resources Board to identify priority communities from the full list of candidate communities, as submitted by local air districts, or from those submitted directly by communities. Identification of priority communities is necessary due to resource limitations, which only allow for a small number of candidate communities to be selected each year to develop emission reduction programs or monitoring campaigns. Each year, the state selects communities that will go forward with either action plans or monitoring campaigns in the coming year. Local air districts are encouraged to submit Year 3 community recommendations to the Air Resources Board by October 16, 2020.

For Year 3 of the Community Air Protection Program, the Air District recommends that the Richmond-San Pablo area be nominated for a Community Emission Reduction Planning process. As described further below, this recommendation is based on Richmond-San Pablo's high cumulative exposure burden, and the desire of the Richmond-San Pablo community to move forward in evolving the AB 617 Richmond-San Pablo Community Air Monitoring Planning process into a Community Emission Reduction Planning process, starting in 2021.

Richmond-San Pablo Community

Approximately 150,000 people live in the Richmond-North Richmond-San Pablo area. A variety of communities and neighborhoods make up the Richmond-North Richmond-San Pablo area. Neighborhoods range from 16 to over 33 percent Black/African American; and from 40 to over 56 percent Latinx. Many of these areas experience economic, social or demographic disadvantages and have high health burden that increase vulnerability to environmental exposures. People living in the this area, especially North Richmond and the Iron Triangle neighborhood, experience more asthma emergency room visits, higher rates of cardiovascular disease, greater unemployment, lower educational attainment, higher housing cost burden, lower life expectancy and higher incidences of poverty than in other areas of Contra Costa County.

In addition, this area is already designated by the Air District as Community Air Risk Evaluation (CARE) Program area with a complex mix of emission sources: a large refinery and chemical plant, a petroleum coke terminal, organic liquid storage and distribution facilities, a seaport, organic waste and metal facilities, small to medium industrial and manufacturing sources, high volume freeways and roadways, a rail yard and rail lines.

AB 617 Richmond-San Pablo Community Air Monitoring Plan

In 2018, the Richmond-San Pablo area was recommended by the Air District, and selected by the California Air Resources Board, to participate in the development of an AB 617 Community Air Monitoring Plan. The recommendation was based on the community's high health burden, its designation as an Air District CARE community, and mix of complex sources in the area, as described above. The Air District also recommended Richmond-San Pablo to leverage ongoing monitoring and air quality research projects in the area which could also inform and improve further monitoring efforts. These projects included the expansion of monitoring efforts in Richmond due to the Air District's Regulation 12, Rule 15 (Petroleum Refining Emissions Tracking), a community monitoring project through an EPA STAR grant, in which the Air District was partnering with the South Coast Air Quality Management District to build a low-cost sensor guidance document, an air toxics data analysis effort with the City of Richmond through an EPA Community-Scale Air Toxics Monitoring Grant, and other studies by researchers or other government agencies.

Following its formation in April 2019, a 35-member Community Steering Committee met monthly to learn about regional air quality, the health effects of exposure to air pollution, and different air monitoring methods. Together, Steering Committee members defined the boundary of the area for air quality monitoring and spent significant time and effort discussing and identifying air quality concerns in the community and actions they wanted additional data to support. The concerns identified were wide-ranging across geographies and categories of pollution sources, highlighting the need for a comprehensive approach to air monitoring.

In June 2019, the Steering Committee selected three initial air monitoring projects to collect data, conducted by the following groups: Aclima, Groundwork Richmond, and Physicians, Scientists, and Engineers for Healthy Energy (PSE) in partnership with the Asian Pacific Environmental Network (APEN). Data from these exploratory air monitoring projects are expected to help identify areas with elevated levels of air pollution, evaluate differences among neighborhoods, provide real-time data to the public, and inform and refine additional monitoring projects in the Richmond-San Pablo area.

Building on this initial work, the Steering Committee then considered more specific air pollution concerns and additional monitoring projects to help inform those concerns. In February 2020, the Steering Committee voted to move forward with an air toxics monitoring project led by the Air District, focused on measurements of volatile organic compounds (VOCs). This project is expected to begin in coming months pending restrictions due to COVID-19. Updates on project status, data, and findings will be shared regularly with stakeholders and the public.

The AB 617 Richmond-San Pablo Community Air Monitoring Plan is currently being finalized, and several air quality monitoring projects are now ongoing across the area. Preliminary mobile monitoring data collected by Aclima in 2019 showed hyperlocal variability in air quality across the area. Data from ongoing air quality monitoring projects will be reviewed and analyzed to better understand variations in air quality and inform the development of emissions and exposure reductions efforts.

Community Support for a Community Emission Reduction Program

The Richmond-San Pablo Community Air Monitoring Plan Steering Committee is supportive of moving the Richmond-San Pablo area into a Community Emission Reduction Planning process beginning in 2021. This support was solidified at the Steering Committee meeting on September 11, 2019, when they voted to recommend that the California Air Resources Board formally select the Richmond-San Pablo area as a Community Emission Reduction Planning community in December 2020.

Thank you for the opportunity to participate in the state's Community Air Protection Program. The Air District's recommended community for Year 3 supports the Air District's and the Bay Area community's efforts to improve air pollution in a community that is significantly impacted by cumulative air pollution and/or experiences health vulnerabilities exacerbated by air pollution. We look forward to working with the State and the community in addressing these issues through the successful implementation of a Community Emission Reductions Plan.

Sincerely,

Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

cc: Vernon Hughes, Office of Community Air Protection Interim Director, California Air Resources Board