October 16, 2020

Mr. Richard Corey, Executive Officer
3/0 Laura Zaremba-Schmidt, Air Resources Engineer
California Air Resources Board
9480 Telstar Avenue #4
El Monte, CA 91731

Subject: Request for State Resources for Inclusion of Additional Communities of the Sacramento Region in Year 3 of the AB 617 Community Air Protection Program

Dear Mr. Corey:

On July 31, 2018, the Sacramento Metropolitan Air Quality Management District (Air District) submitted its Assessment of Proposed Monitoring Locations for Assembly Bill (AB) 617 Community Air Protection Program (CAPP) to the California Air Resources Board (CARB). For Year 1 (2019), CARB selected the South Sacramento-Florin community for air monitoring. We have been working arduously with the residents and business representatives in our South Sacramento-Florin Community Steering Committee (CSC) to develop and implement a successful Community Air Monitoring Plan (CAMP). For Year 2 (2020), CARB did not select any additional communities of the Sacramento region.

On July 1, 2020, in consultation with and upon the recommendation of the CSC, the Air District forwarded the South Sacramento-Florin CAMP to CARB. We thank CARB for assistance in completing the CAMP. Implementation of the plan will continue through next year. On September 22, 2020, the CSC voted to remain an air monitoring-only community for Year 3 (2021) but committed to build the foundation for a Community Emission Reduction Plan (CERP). This groundwork will enable the community to successfully move forward to a CERP when state funding is made available. In the meantime, the Air District is committed to do all it can to continue to support the CSC through the CAMP and CERP processes.

For the new Year 3 community selections by CARB, the Air District joins several important community voices in the region including the elected officials who represent those communities and are also members of our Board of Directors to recommend the inclusion of additional Sacramento communities in the state’s CAPP. We are asking for the state to commit the
necessary funding and select three of our communities with the highest documented air pollution burdened in Year 3 of the program as air monitoring communities. These are North Sacramento, Oak Park/Fruitridge, and Meadowview as illustrated in Figure 1. Based on the Air District’s updated analysis for 2020 (Attachment 1), these communities continue to be identified as areas that desperately need the assistance and solutions promised by AB 617. The Air District joins the voices of many of our prominent community organizations (Attachment 2) and respectfully call to your attention the various communities that are often overlooked who need the pollution relief made possible by AB 617 actions and investments.

**Figure 1: Recommended General Community Areas for Year 3**
In addition, please note North Sacramento and Oak Park/Fruitridge were awarded a CARB Community Air Grant earlier this year. This work will establish a framework for community engagement and help build community capacity to actively participate in the discussion of local air quality issues and associated impacts. The grant recipients are working with the community to site and install a network of air monitoring sensors that can be complemented with more sophisticated monitoring of the type potentially enabled by the state AB 617 selection and resources.

All three proposed areas have received extensive community support to be included in this request for the next round CAPP selections. Thus, we are already working with community members and stakeholders on suggestions for initial potential boundaries for the three community areas. Based on this feedback, we anticipate providing CARB with additional information in next month on proposed community boundaries for these three general areas. As stated above, the Air District is benefitting from active community engagement and has received explicit support from residents, community organizations, and the respective local elected officials (Attachment 2) for this nomination. Furthermore, CARB can expect the communities to self-nominate. We thank CARB staff for the assistance they have provided to community representatives for navigating the AB 617 state process.

In closing, we believe in the promise of AB 617 and remain committed to implementing the program to improve the well-being of our residents by addressing long-standing air quality disparities. We appreciate the considerable community support to expand our AB 617 efforts. With your support and adequate state funding, we can all look forward to a growing community-state-local partnership and promptly deliver many AB 617 solutions to our marginalized and vulnerable residents in the Sacramento region. If you have any questions regarding our recommendations, please contact Mr. Mark Loutzenhiser, Division Manager, Program Coordination Division, at 916-874-4872, MLoutzenhiser@airquality.org.

Sincerely,

Alberto Ayala, Ph.D., M.S.E.
Executive Director/Air Pollution Control Officer

cc: Mr. Eric Guerra
Chair, Sacramento Metropolitan Air Quality Management District
Council Member, City of Sacramento
915 I Street, 5th Floor
Sacramento, CA 95814
cc: (continued)

Ms. Sue Frost  
Vice Chair, Sacramento Metropolitan Air Quality Management District  
Supervisor, Sacramento County  
700 H Street, Suite 2450  
Sacramento, CA 95814

Mr. Larry Carr  
Council Member, City of Sacramento  
Board Member, Sacramento Metropolitan Air Quality Management District  
915 I Street, 5th Floor  
Sacramento, CA 95814

Mr. Steve Hansen  
Council Member, City of Sacramento  
Board Member, Sacramento Metropolitan Air Quality Management District  
915 I Street, 5th Floor  
Sacramento, CA 95814

Mr. Jeff Harris  
Vice Mayor, City of Sacramento  
Board Member, Sacramento Metropolitan Air Quality Management District  
915 I Street, 5th Floor  
Sacramento, CA 95814

Mr. Patrick Kennedy  
Supervisor, Sacramento County  
Board Member, Sacramento Metropolitan Air Quality Management District  
700 H Street, Suite 2450  
Sacramento, CA 95814

Mr. Don Nottoli  
Supervisor, Sacramento County  
Board Member, Sacramento Metropolitan Air Quality Management District  
700 H Street, Suite 2450  
Sacramento, CA 95814

Mr. Phil Serna  
Chair, Sacramento County  
Board Member, Sacramento Metropolitan Air Quality Management District  
Board Member, California Air Resources Board  
700 H Street, Suite 2450  
Sacramento, CA 95814
cc: (continued)

The Honorable Jim Cooper
Assembly District 9, State Assembly
P.O. Box 942849
Sacramento, CA 94249-0009

The Honorable Christina Garcia
Assembly District 58, State Assembly
P.O. Box 942849
Sacramento, CA 94249-0058

The Honorable Kevin McCarty
Assembly District 7, State Assembly
P.O. Box 942849
Sacramento, CA 94249-0007

The Honorable Dr. Richard Pan
Senate District 6, State Senate
State Capitol, Room 5114
Sacramento, CA 95814-4900

Via Email:

Mr. Bill Knowlton, Chair of the South Sacramento-Florin Air Quality Steering Committee and Executive Director, Mack Road Partnership

Ms. Patricia Shelby, Vice-Chair of the South Sacramento-Florin Air Quality Steering Committee

Mr. Vernon Hughes, Interim Director, Office of Community Air Protection, California Air Resources Board

Ms. Karen Buckley, Branch Chief, Community Planning Branch, Office of Community Air Protection, California Air Resources Board

Mr. Mark Loutzenhiser, Division Manager, Program Coordination Division, Sacramento Metropolitan Air Quality Management District

Ms. Janice Lam Snyder, Program Manager, Program Coordination Division, Sacramento Metropolitan Air Quality Management District
Attachment 1:

2020 Suitability Analysis Update for Year 3

AB 617 Community Selection
2020 Suitability Analysis Update for Year 3
AB 617 Community Selection

Program Coordination Division, Sacramento Metropolitan Air Quality Management District

October 16, 2020

Introduction
On July 31, 2018, the Sacramento Metropolitan Air Quality Management District (Air District) submitted to the California Air Resources Board (CARB), a Technical Assessment identifying communities in Sacramento County to be a part of the State’s Community Air Protection Program (AB 617). The District has updated its 2020 (Year 3) analysis based on more recent air pollution information and community feedback. The new analysis puts a heavier focus on local concerns voiced by underserved communities and their elected representatives and is reflected on the factor that accounts the community population characteristics. The description offered below provides details of the updated analysis and a map of the census tracts that fall within the top 5 percent of the new ranking of pollution burden.

2018 Suitability Analysis Background
The 2018 Technical Assessment was based largely on three groups of data: (i) Emission Sources, (ii) Population Characteristics, and (iii) Sensitive Receptors. The analysis identified the census tracts within the top 5 percentile of the suitability score and combined them separately with the census tracts within the top 2 percentile of toxic emissions modeling by CARB to identify possible community areas. The Air District methodology is illustrated in Figure 1.

Figure 1: 2018 analysis flowchart

2020 Suitability Analysis Update
The Air District has updated its 2020 analysis with three significant changes. These changes and rationale are discussed in detail below and are as follows. The new analytical methodology is shown in Figure 2.

- Updated CARB Toxic Emissions Modeling

1 http://www.airquality.org/ProgramCoordination/Documents/SMAQMD%20Final%20Recommendations-Report.pdf
Emissions Sources are now represented by the updated CARB Toxic Emissions Modeling
• Increased emphasis on the Population Characteristics consistent with strong community feedback

Figure 2: 2020 analysis flowchart

Updated Toxic Emissions Modeling

The CARB Toxic Emissions Modeling was updated to include the most up-to-date information on emission sources. Previous modeling used 2012 toxic emissions inventory data, which was updated to 2016 data. The 2016 data included updates to on-road sources, such as impacts of newer and retrofitted trucks and compliance with truck regulations, as well as updates to stationary and area-wide sources. The updated Sacramento Valley modeling showed a reduction of diesel particulate matter emissions, a slight increase in particulate matter emissions from area-wide sources, and an overall reduction in total cancer risk posed by these updated sources of 40% from 2012 to 2016.

Emission Sources Replaced by Toxic Emissions Modeling

As shown in Figure 1, the previous methodology included both the Emission Sources category and CARB's Toxic Emissions Modeling. In the 2018 analysis, we gave more weight to total emissions from a source, which reduced the weighting of the other two factors. The 2020 analysis is updated to increase the weighting of the population characteristics (low income communities, non-English speaking households, asthma rates, hospitalizations, etc.) to help put a stronger emphasis on the concerns voiced by the various community organizations that are speaking up in the AB 617 process on behalf of underserved communities most burdened by air pollution and other challenges.

The emission sources included in the 2018 Emission Sources category are more accurately represented in the updated CARB Toxic Emissions Modeling. Table 1 describes each layer included in the 2018 Emissions Sources category and whether that information is included in the updated toxic emissions modeling.

Increased Overall Weighting of Population Characteristics Factor Consistent with Community Feedback

AB 617 looks to improve the conditions of communities most burdened by air pollution. Population characteristics are a major factor identifying uniquely in these communities and, for this update, the Air District increased the weighting of this factor. This approach is consistent with on-going community feedback the Air District has received where communities and their elected representatives continue to speak up on the importance of the local realities that AB 617 must recognize. As a result of this community-led dialogue, the Air District updated the weighting to 40% to Population Characteristics, 40% to the CARB Toxic Emissions Modeling, and 20% to Sensitive Receptors.
Table 1 – Description of emission source indicators from the previous suitability analysis and whether they are included in the update CARB toxic emissions modeling.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Traffic Density</td>
<td>CES3(^b)</td>
<td>Sum of traffic volumes adjusted by road segment length (vehicle-kilometers per hour) divided by total road length (kilometers) within 150 meters of the census tract boundary</td>
<td>Yes</td>
</tr>
<tr>
<td>Diesel Emissions</td>
<td>CES3(^b)</td>
<td>Spatial distribution of gridded diesel particulate matter emissions from on-road and non-road sources for a 2012 summer day in July (kg/day)</td>
<td>Yes</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>CES3(^b)</td>
<td>Annual mean concentration of PM(_{2.5}) (average of quarterly means, μg/m(^3)), over three years (2012 to 2014)</td>
<td>Yes(^c)</td>
</tr>
<tr>
<td>Toxics Releases from facilities</td>
<td>CES3(^b)</td>
<td>Toxicity weighted concentrations of modeled chemical releases to the ambient air from facility emissions and off-site incineration.</td>
<td>Yes</td>
</tr>
<tr>
<td>Retail Gasoline Dispensing Facilities</td>
<td>District</td>
<td>Total throughput is used as a surrogate for the emissions from gas stations because gasoline volume can be used to calculate the different pollutants from gasoline dispensing facilities. Emissions of particulate matter (lbs/day) released from permitted emergency diesel engines in the county.</td>
<td>Yes</td>
</tr>
<tr>
<td>Emergency Engines</td>
<td>District</td>
<td>This indicator reports the types and quantities of certain substances routinely released into the air by certain stationary sources.</td>
<td>Yes</td>
</tr>
<tr>
<td>AB 2588 Air Toxics &quot;Hot Spots&quot; Program Core Facilities(^d)</td>
<td>District</td>
<td>Most of these facilities are those that have GHG emissions greater than 10,000 metric tons per year, which is the reporting threshold for most GHG stationary sources. These facilities are included in this analysis based on annual GHG emissions in units of metric tons of carbon dioxide equivalent (CO(_{2e})).</td>
<td>Some(^e)</td>
</tr>
<tr>
<td>GHG Emissions from Large Stationary Sources</td>
<td>District</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

\(^a\) CARB’s toxic emissions modeling calculated the cancer risks from multiple air pollution sources, such as on-road mobile sources (i.e. cars and trucks), area-wide sources (i.e. residential wood burning devices and gas dispensing facilities), and stationary sources (i.e. Title V facilities and AB 2588 facilities) and summed the total cancer risks and burdens from all sources (Final AB617 Assessment, page 21)

\(^b\) CalEnviroScreen Version 3.0, more information can be found at [https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30](https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30).

\(^c\) The modeling includes only toxic PM\(_{2.5}\) emissions.

\(^d\) More information can be found at [https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/about](https://ww2.arb.ca.gov/our-work/programs/ab-2588-air-toxics-hot-spots/about).

\(^e\) Only sources that emit toxic emissions are reflected in CARB Toxic Emissions Modeling.
2020 Map with Top 5 Percent Communities

A map of the census tracts within the top 5 percent of the suitability score for the 2020 analysis is shown in Figure 3. Based on these updates, the Air District is recommending three general community areas for Year 3 of the State’s Community Air Protection Program: North Sacramento, Oak Park/Fruitridge, and Meadowview.

Figure 1 – Census tracts within the top 5 percent of the updated suitability analysis, the updated suitability score for those census tracts, and the existing community boundary. Census tracts within the boundary of the existing community were removed.
Attachment 2:

Community Support
Email Correspondence to Dr. Alberto Ayala, Executive Director, Sac Metro Air District

Thu 10/15/2020 1:31 PM

GNNA <gnnaboard@gmail.com>
Re: AB 617

To: Alberto Ayala
Cc: Flavio Huizar; Liz Johnson; jsharris@cityofsacramento.org; Julie Rhoten; Sharon Jennings; David Guerrero; Ronald Jimenez; Janice Lam Snyder; Ashley Reynolds

*** THIS EMAIL ORIGINATED OUTSIDE AIRQUALITY.ORG ***

On Thu, Oct 15, 2020 at 1:28 PM GNNA <gnnaboard@gmail.com> wrote:

October 15 2020

Dear Dr. Alberto Ayala,

We are writing in support of designating Northern Sacramento as an AB617 air pollution reduction site. Our partners are very interested that the designation includes the communities represented by the groups listed below. This would require including the Northgate corridor in the North Sacramento boundaries in your recommendation to CARB.

Secondly, and more importantly, if our area is designated as an AB617 project, can you please include us in any communications regarding the selection of the steering committee?

Let us know what we can do to assist you in this effort.

We greatly appreciate your consideration.

Sincerely,

Gardenland Northgate Neighborhood Association, Flavio Huizar, President

Liz Johnson, GNNA AB617 contact

Jeff Harris, Vice Mayor of Sacramento, District 3 council member

Stanford Settlement Neighborhood Center, Julie Rhoten, Executive Director

South Natomas Improvement Association, Sharon Jennings, President

David Guerrero, Parks Commissioner, District 3

United Latinos, Ronald Jimenez, Board President

Latino Leadership Council, Herman Barahona, Board President

St. Joseph Catholic Church, Fr. Rodolfo Llamas, Pastor

St. Philomene Catholic Church, Fr. Frank Velazquez, Pastor