

April 27, 2018

Laura Zaremba-Schmidt  
Office of Community Air Protection  
California Air Resources Board  
9480 Telstar Avenue, #4  
El Monte, CA 91731

RE: Community Recommendation – Community Air Protection Program

Dear Ms. Zaremba-Schmidt:

Assembly Bill (AB) 617 created the Community Air Protection Program (CAPP), which among its several elements requires new community air monitoring programs and community emission reduction plans. AB 617 represents the most sweeping change in air pollution regulation over the last decade, and the Placer County Air Pollution Control District (District) appreciates the leadership and cooperative working relationship the California Air Resources Board (CARB) has taken with local air districts on their implementation of AB 617. The District has thoroughly evaluated the communities in Placer County for potential inclusion in CAPP, and does not believe there are any communities that should be identified at this time. However, the District recognizes that certain neighborhoods within the City of Roseville (Roseville) may warrant inclusion in a future year; but, as discussed below, additional information is needed to better determine the appropriateness of their identification in CAPP.

In its implementation of AB 617, CARB has developed the “Draft Process and Criteria for 2018 Community Selections” (Criteria), which provides a process for identifying and recommending communities for inclusion in CAPP. Under the Criteria, local air districts are to submit community recommendations to CARB by April 30, 2018. In considering potential communities for recommendation, CARB has identified six criteria air districts must consider. These are:

- Information about concentrations of criteria air pollutants and toxic air contaminants from measurements, air quality modeling or other information quantifying exposure burden.
- Sensitive receptors (e.g., schools, day care centers, hospitals), exposed population, and proximity to mobile and stationary emissions sources of concern, including freeways.
- Density of contributing emissions sources and magnitude of emissions within the community including mobile, area-wide, and stationary sources.
- Public health indicators that are representative of incidence or exacerbation of disease related to air quality.

- Cancer risk estimates based on air quality modeling.
- Socio-economic factors such as poverty levels, unemployment rates, and linguistic isolation.

Considering these Criteria, the District recognizes that certain neighborhoods within Roseville may be appropriately identified in the future under CAPP, due to their close proximity to both the J.R. Davis Union Pacific (UP) Railyard (Railyard) and Interstate 80 (I-80). The District is examining these neighborhoods (located directly north and south of the Railyard) because of the expected potential cumulative health impacts associated from diesel particulate matter (PM) emissions that originate from I-80 and the Railyard and their proximity to sensitive receptors (such as schools), as well as due to the social demographics of these neighborhoods.

In recognition of this, on April 25, 2018, the District held an evening public meeting at Roseville City Hall to explain the CAPP, solicit ideas on potential emission reduction projects, and to hear community concerns. The District posted to its website information on the meeting, as well as coordinated with the City of Roseville to also share the meeting information with neighborhood residents via their community outreach tools. As part of this effort, the District greatly appreciates the participation by CARB staff at the meeting.

However, the District does not believe that the data and information currently available are sufficient to warrant the identification of these neighborhoods in CAPP at this time. For example, while a health risk assessment (HRA) was prepared by CARB in 2004 on the Railyard, the District believes that the results from that study are informative but no longer accurate. This is based on HRA modeling changes approved by the Office of Environmental Health Hazard Assessment since 2004, as well as changes to the type and tier of equipment in use at the Railyard, and changes in the activity of this equipment. The District is working with UP and CARB to update the equipment inventory, activity and emission data so that an updated HRA may be developed and used to provide a contemporary evaluation of risk around the Railyard. Additionally, while there are no census tracts in the top 25<sup>th</sup> percentile of impacted tracts in the state, the District recognizes that one Roseville census tract is in the top 61<sup>st</sup>-65<sup>th</sup> percentile. Based on this, the District intends to work to evaluate other health indicators in this census tract to better understand the total health burden affecting these residents.

While the District is not identifying any of the neighborhoods in Roseville under CAPP at this time, it remains nonetheless committed to proactively addressing community impacts while additional analytical work on the actual health impacts is being performed. District actions include:

- Working cooperatively with CARB staff to install high-efficiency particulate air filters at three Roseville City School District elementary schools in close proximity to the Railyard utilizing CARB supplemental environmental program funding. District staff is in discussions with CARB staff regarding securing additional funding to conduct additional installations at impacted elementary schools within the Roseville City School District, as well as at Roseville High School.

- Securing AB 134 funding for the replacement of an older diesel school bus in the Roseville City School District.
- Requesting 12 personal PM monitors from CARB for deployment around the Railyard in order to create a low-cost community monitoring network. Planned deployments include Roseville civic buildings, public schools, and private residences. This will provide important information on the localized PM health exposures, and supplement data currently collected at ARB's fixed air quality monitor located in Roseville.
- Prioritizing upcoming local air quality incentive funding (such as Carl Moyer funding) towards projects in and around the Railyard, including projects targeting diesel off-road equipment, school buses, transit buses and refuse trucks. District staff is also actively encouraging CARB to allow the "stacking" of Volkswagen Mitigation funding with local AB 923 funds so that the District may more effectively direct funding towards the replacement of switcher locomotives at the Railyard (which would otherwise be cost prohibitive).
- In cooperation with CARB, utilizing around the clock video surveillance of the Railyard repair and maintenance shop to better confirm citizen complaints of excessive locomotive emissions. The District also maintains after hours and weekend complaint response for incidents reported at the Railyard.
- Supporting CARB's development of a comprehensive Statewide Freight Strategy that is expected to provide substantial benefits in these neighborhoods.

In considering these actions, the District reminds CARB that because the expected health impacts are almost exclusively mobile source related, the District is dependent upon the assistance and leadership of CARB to achieve significant meaningful reductions in these neighborhoods. The District looks forward to working cooperatively with CARB to take actions to reduce the health impacts in Roseville and throughout Placer County.

If you have any questions or concerns, please feel free to contact me via email at [ecwhite@placer.ca.gov](mailto:ecwhite@placer.ca.gov), or via phone at (530) 745-2330.

Sincerely,



Erik C. White  
Air Pollution Control Officer  
Placer County Air Pollution Control District