



**Ventura County
Air Pollution
Control District**

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July 31, 2018

Laura Zaremba-Schmidt
California Air Resources Board
9480 Telstar Avenue #4
El Monte, California 91731

SUBJECT: PRIORITIZED AB 617 COMMUNITY RECOMENDATIONS FOR VENTURA COUNTY

Ms. Zaremba-Schmidt:

This letter transmits the Ventura County Air Pollution Control District's (VCAPCD) recommendation to the California Air Resources Board (CARB) on communities to be included in the first year of the AB 617 Community Air Protection Program. During this first year of AB 617 implementation, VCAPCD does not yet possess adequate community level air monitoring data to make empirical assessments on burdened communities. Therefore, in making this recommendation VCAPCD staff utilized:

- CalEnviroScreen 3.0
- U.S. EPA's EJSCREEN mapping tool
- VCAPCD information on permitted facilities in and nearby disadvantaged/burdened communities identified via CalEnviroScreen 3.0 or EJSCREEN
- Community/public input

VCAPCD staff's areas of focus in using CalEnviroScreen 3.0 were air emission related information (ozone, PM 2.5, diesel particulate), traffic information, pesticide application information, and health factors (asthma, low birth weight and cardiovascular disease). The scores for pesticide application rates, asthma, cardiovascular disease, and diesel particulate are elevated in some of these census tracts. With regard to the elevated asthma scores, staff contacted both the local Medi-Cal provider for Ventura County, Gold Coast Health Plan, and Ventura County Public Health. We requested information on the utilization of medical services related to asthma by Oxnard area residents as compared to residents in other areas of Ventura County. Ventura County Public Health responded with information showing elevated asthma rates in the 93030 zip code in Oxnard. The 93030 zip code matches reasonably well with the census tracts identified with elevated asthma rates in CalEnviroScreen 3.0.

VCAPCD staff's review of the U.S. Environmental Protection Agency's (EPA) EJSCREEN mapping tool has determined that this tool does not provide much information beyond that provided by CalEnviroScreen 3.0. VCAPCD staff noted the EJSCREEN Environmental Justice

(EJ) index data is concerning as Oxnard has an ozone EJ index of 94th percentile (state) and Simi Valley has an ozone EJ index of 21st percentile (state). Currently, Oxnard has an ozone design value of 61 ppb (eight-hour average) and Simi Valley has a design value of 77 ppb (eight-hour average). This seems to indicate that the EJSREEN model is weighed heavily on demographic indicators. However, staff's initial review shows that the EJSCREEN environmental and demographic indicators seem reasonable.

VCAPCD staff has also reviewed our air toxics information from our AB 2588 "Hot Spots" program. Staff focused on core (non-industrywide) sources in the initial list of recommended communities included in our submittal of April 27, 2018. The current AB 2588 information does not identify any core sources with a cancer risk of over 10 in a million, or an acute or chronic hazard indices of greater than 1.0. Staff is currently in the process of hiring a replacement for our toxics engineer. As soon as this new hire is on-board we will begin the AB 2588 work of prioritizing facilities using our updated prioritization procedures and focusing on core facilities in the initial list of recommended communities. On November 8, 2016, VCAPCD adopted updated prioritization guidelines to implement the Cal-EPA Office of Environmental Health Hazard Assessment's updated Health Risk Assessment Guidelines for use by California air districts.

In addition, VCAPCD staff reviewed the results of the University of Southern California's Environmental Justice Screening Method (EJSM); however, the results were not as relevant to Ventura County as to other Southern California counties. Staff noted that EJSM displayed similarity to CalEnviroScreen 3.0 results.

On June 20, 2018, VCAPCD staff hosted our second AB 617 public workshop at the Oxnard Performing Arts Center in the City of Oxnard. The main comments received from the public were related to concerns with emissions from heavy-duty trucks in an area identified by CalEnviroScreen 3.0 as a disadvantaged/burdened area. This area does have food distribution facilities for onions, squid, and other commodities, which would utilize heavy-duty trucks.

Based on VCAPCD staff's review of the available data, we are recommending that the greater Oxnard/Port Hueneme area be the highest priority region in Ventura County for inclusion in CARB's Community Air Protection Program. Staff's recommendation is based on our assessment that we have not identified a single or multiple sources of significant air emissions that would lead us to identify a smaller region adjacent to these source(s). This is in part based on our review of our permitted sources in the area. The greater Oxnard/Port Hueneme area is also home to several agricultural operations, and these operations generally utilize pesticides and diesel equipment. In addition, the small Port of Hueneme and several warehouse type distribution centers are located in the area. Heavy-duty trucks associated with these goods movement facilities move throughout the area. In summary, we are looking at a diffuse inventory of air pollution sources in this area. This will likely require additional research including community level air monitoring in several locations to identify any sources of concern.

In addition, by having a larger area, the VCAPCD will have flexibility to target our incentive funds within the area as we learn more about potential issues with air pollutant sources in and adjacent to the area.

VCAPCD staff defines the greater Oxnard/Port Hueneme area as the following census tracts (map attached).

- 6111002905 Oxnard (North West area)
- 6111003201 Oxnard (North area)
- 6111009100 Oxnard (Colonia area)
- 6111004902 Oxnard (North East area)
- 6111005002 Oxnard (Auto Center)
- 6111004704 Oxnard (South East area)
- 6111004715 Oxnard (South area)
- 6111004400 Port Hueneme

Staff reviewed information on other communities in Ventura County identified as potentially disadvantaged/burdened in CalEviroscreen 3.0. While staff is not recommending these areas as “first priority” for inclusion in CARB’s program, we plan to work with these communities as we move forward implementing AB 617.

These other communities include the following census tracts:

- 6111002400 Ventura (Downtown area)
- 6111002300 Ventura (Avenue area near Hwy 33)
- 6111002200 Ventura (Avenue area East)
- 6111001302 Ventura (Saticoy)
- 6111006100 Newbury Park
- 6111000400 Santa Paula (North East area)*
- 6111000500 Santa Paula (South of Hwy 126)*
- 6111000302 Fillmore area*
- 6111000200 Piru area*
- 6111005002 El Rio area*

* Areas are included based on community/public input received at the April 9, 2018 local Community Environmental Justice workshop sponsored by the Central Coast Alliance United for a Sustainable Economy (CAUSE) and the California Environmental Justice Alliance. These areas were included in CalEnviroScreen 2.0 as potential disadvantaged/burdened communities.

VCAPCD staff is cognizant that other regions of the state have disadvantaged communities with higher pollution burdens than the greater Oxnard/Port Hueneme area. This may very well mean the Oxnard/Port Hueneme area is not included in CARB’s Community Air Protection Program

during this first year. As VCAPCD staff obtains additional information applicable to recommending communities for inclusion in CARB's Community Air Protection Program, we plan to submit this information to CARB in future years.

In the spirit of AB 617, VCAPCD will continue to work to ensure all Ventura County communities enjoy the benefits of healthful air. For example, staff will target incentive funds to reduce diesel particulate in the greater Oxnard/Port Hueneme area and other Ventura County communities also identified as potentially disadvantaged/burdened.

Staff will also be collaborating with the local environmental organization Citizens for Responsible Oil and Gas (CFROG) on the implementation of AB 617. CFROG has been awarded a Community Air Grant by CARB. CFROG is tentatively planning to conduct air monitoring in the south Oxnard area and the Ventura Avenue area. Both of these areas are identified as areas VCAPCD is planning to target in implementing AB 617. CFROG is also planning on utilizing low-cost PM_{2.5} sensors, which could help identify areas with particulate matter concerns (especially if related to diesel combustion). In addition, VCAPCD has contacted the Californians for Pesticide Reform organization as it was also awarded a Community Air Grant and has noted it is looking at additional air monitoring for pesticides in the central coast region. VCAPCD staff is planning to coordinate with both CFROG and Californians for Pesticide Reform to ensure monitoring data has been subject to quality assurance and is understandable to the community.

VCAPCD staff will also be working through the Air Toxics "Hot Spots" program using the updated procedures, which may identify sources where additional emission reduction measures should be implemented. In addition, staff will be reviewing data from the California Department of Pesticide Regulation/CARB air monitoring site at Rio Mesa High School in Ventura County (El Rio area, just north of Oxnard).

VCAPCD staff is planning to conduct additional outreach to the community on AB 617 and work with local social/environmental justice and environmental organizations such as CAUSE and the Los Padres Chapter of the Sierra Club.

In closing I would like to note even if a Ventura County community is not included in the first year of CARB's program, the VCAPCD will still incur significant costs in implementing AB 617 in this current fiscal year. I'm hopeful this will be considered when AB 617 implementation funds are allocated to air districts in this current fiscal year.

VCAPCD AB 617 Submittal

July 31, 2018

Page: 5

Please contact me at 805/645-1440 or mike@vcapcd.org, if you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike V", is written over the typed name.

Michael Villegas

Air Pollution Control Officer

Attachments:

CalEnviroScreen 3.0 map of Oxnard area

Oxnard/Port Hueneme Area

