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ARB STUDY SESSION ON
RELATIONSHIP BETWEEN LOCATION OF SENSITIVE RECEPTORS AND AIR POLLUTION SOURCES

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Good morning and thank you.

WHAT I WILL COVER

I would like to cover 4 areas this morning.

1. What is CCEEB?

2. Some of the areas where members of ARB's EJ Stakeholders Group have found **common ground** in the area of air quality and land use planning.

3. Where the "rub" is – i.e., what is the key issue.

4. CCEEB's perspective on the key issue.

1. CCEEB

CCEEB is a private, non-profit coalition of business members, labor members and public leaders.

CCEEB works to develop and advance policies that protect public health and the environment and at the same time allow for a strong economy.

We work on environmental policies at the State Capitol, Cal/EPA, the Air Resources Board, the South Coast Air Quality Management District, and other environmental agencies.

So that is what CCEEB is.

2. COMMON GROUND

ARB's EJ Stakeholder Group has met several times regarding air quality and land use issues. These meetings have shown that there is consensus in some key areas.

For example, there is consensus that:

A. Land use planning decisions should protect public health.

B. Both community residents and businesses have an interest in local governments not creating incompatible land uses in the future.

C. It is appropriate for ARB to provide a handbook with air quality information to local governments to assist them in land use planning.

D. It is important for cities and counties and their respective air districts to work together to better understand potential air quality impacts from land use decisions and to avoid the creation of incompatible land uses.

3. WHERE IS THE RUB? (WHAT IS THE KEY ISSUE?)

The general question is what type of guidance should ARB provide to local governments as to the siting of sensitive receptors (such as neighborhoods) near sources of toxic air pollutants?

And the flip side – what guidance should ARB provide regarding the siting of sources of toxic air pollutants near sensitive receptors?

To be more specific, one option is for ARB to suggest generic buffer zones for source categories based on worst-case assumptions. The other option is for ARB to identify sources that emit toxic air pollutants and suggest that the local governments consult with the air districts as to the nature of the risk and whether a distance limitation is needed and, if so, what is an appropriate distance limitation in light of the site-specific factors for the project in question, such as local meteorology?

4. CCEEB'S PERSPECTIVE

This brings me to the fourth area – CCEEB's perspective. CCEEB believes that consideration of site-specific risk factors is critical – and I will explain why.

To start more generally, this issue is a very challenging air quality issue.

What makes it particularly challenging is that there is a tension between this issue other environmental and societal goals. In other words, having overly conservative buffer zones (i.e., buffer zones that are too long) can work against other environmental and societal goals such as:

i. minimizing urban sprawl

ii. smart growth

iii. affordable housing

iv. infill development (which the Administration supports)

v. economic development

That is what makes this challenging.

*The key is how do you protect public health **without** going beyond what is needed - because going beyond what is needed would **unnecessarily** work against other societal goals such as meeting affordable housing mandates.

It is important to resolve this complex issue with a sound approach.

The question again, is what type of guidance should ARB provide in this area?

A. Generic Buffer Zones

Again, one option is for ARB to suggest generic buffer zones for different types of source categories.

The problem with that approach is that if you suggest generic buffer zones based on worst-case assumptions, you end up with buffer zones that in many instances will be more stringent that what is needed to protect public health.

Overly conservative buffer zones would waste land and take needed land away for valuable purposes such as affordable housing.

For example, consider a situation where a local government is planning to site a residential area near a freeway. (High volume freeways are one of the highest health risk emission source types.) What an appropriate distance criterion would be would depend on many risk factors, including the number of lanes, the volume of traffic, the types of vehicular traffic, and the meteorology for the area. The appropriate distance criterion could vary by several times depending on just the factor of meteorology.

B. Consultation with Air District/Consideration of Project Specific-Factors

The other option, which avoids the problem of having overly conservative buffer zones is for the guidance to flag the relevant sources in question and recommend that the local government consult with the air district to determine the nature of the risk and what are appropriate distance considerations.

In the May draft of ARB's Land Use Handbook, staff is suggesting that when a local government is siting a sensitive site such as a housing development near sources of toxic air pollutants, the land use agencies should consult with the local air district on appropriate screening and risk assessment procedures.

To CCEEB, that ARB proposal makes sense. It makes sense for local governments to consider the actual health risk factors for the project and location in question – as opposed to relying on overly conservative (i.e., overly long) generic buffer zones.

ARB staff notes in the draft handbook that the actual risk from a source category will vary due to site specific parameters including equipment technologies, emission rates, fuel properties, meteorology, nature of the buildings and terrain and the location of sensitive individuals.

Since there are so many potential variables involved, the determination of whether a distance criterion is needed and, if so, what should it be, should be based on site-specific information.

So, CCEEB's perspective is that it makes sense for ARB to identify relevant source types (particularly ones that may not be on a local government's radar screen such as high volume freeways) and recommend that the local government consult with its air district as to appropriate screening and risk assessment procedures and whether a distance criterion is needed and, if so, what is an appropriate distance criterion.

To go with a more generic approach would unnecessarily work against other air quality programs and societal goals.

5. CLOSING

In closing, CCEEB appreciates the time that ARB staff has taken in putting this study session together. I look forward to the discussion this afternoon.