

September 19, 2018

Richard Corey, Executive Officer
California Air Resources Board
1001 "I" Street Sacramento, CA 95814
Electronic submittal of six (6) pages to:
<https://www.arb.ca.gov/lispub/comm/bclist.php>.



Subject: Comments by the Association of Rural Town Councils on the 2018 Community Recommendations Staff Report.

Reference: The 2018 Community Recommendations Staff Report issued August, 2018.
Solicitation for Public Comment Issued by the California Air Resources Board.

Dear Mr. Corey;

The Association of Rural Town Councils ("ARTC") partnered with the Antelope Valley Air Quality Management District ("AVAQMD") as well as county and local agencies to submit a proposal to the California Air Resources Board ("CARB") on behalf of the Antelope Valley Community for consideration as a "first year" community under the Community Air Protection Program ("CAPP"). The ARTC seeks to participate in the CAPP Grant Program because of the abysmal health statistics observed for Antelope Valley neighborhoods.

Specifically, the ARTC seeks to assess the extent to which high ambient particulate levels occur in the Antelope Valley Community because rural neighborhoods frequently experience extended periods of high ambient particulate levels which are so severe that they obscure viewsheds less than 5 miles away *and* because no state or federal agency has ever established whether the Antelope Valley even complies with adopted PM2.5 air quality standards. The Antelope Valley is home to extensive farming operations and it has more than 45,000 acres of solar farms, both of which generate significant ambient particulate levels. The Antelope Valley is also home to large industrial and rock/sand/gravel operations, and it is bisected by both a major freight train corridor and large trucking/commuter corridors which accommodate more than 110,000 vehicles per day. The single BAMS that is located within the Antelope Valley Community does not assess air quality in rural neighborhoods and therefore provides no indication of the particulate-based respiratory insults that rural residents must endure. It was with the intent of addressing these very serious concerns that the ARTC seeks "first year" status for the Antelope Valley Community under the CAPP. The ARTC has reviewed the "2018 Community Recommendations Staff Report" ("Staff Report") and respectfully submits the following comments pursuant thereto.

**Association of Rural Town Councils
C/O Three Points Town Council
P.O. Box 76
Lake Hughes, CA 93532**

The ARTC understands that the "first year" community recommendations were developed based on the table of metrics provided in Appendix B of the Staff Report and were prepared in response to public comment and Air District input. The ARTC notes that the Staff Report does not recommend the Antelope Valley Community for "first year" status even though the metrics presented in Appendix B demonstrate that the Antelope Valley Community ranks higher than several recommended "first year" communities. For example, please consider the metrics data presented in Tables 1 and 2 for the communities of Antelope Valley, Shafter, West Oakland, Richmond, Calexico/El Centro/Heber, South Sacramento/Florin, and Richmond. For each parameter that is reported, the metrics are ranked lowest to highest. Table 1 provides the metrics and rankings for all the parameters considered in Appendix B and Table 2 provides the metrics and rankings for only those parameters that are "color coded" in Appendix B (thus omitting population, density, sensitive receptors, etc.). As these tables indicate, the Antelope Valley Community ranks considerably higher than several of the communities that the Staff Report recommends for "first year" status. Thus, it is not clear why the Antelope Valley Community is not recommended as a "first year" community.

Close examination of Tables 1 and 2 reveals that the only exposure factors for which the Antelope Valley Community metrics were comparatively low pertain to particulate-based pollutants (specifically, PM2.5 and Diesel PM). However, the PM2.5 and Diesel PM metrics data for the Antelope Valley Community are themselves highly suspect because (to the ARTC's knowledge) no legitimate or valid PM2.5 or Diesel PM sampling effort has ever been conducted within the Antelope Valley Community. In fact (and as stated above), there isn't even sufficient particulate data available to determine whether the Antelope Valley Community actually complies with adopted particulate air quality standards. For these reasons, the ARTC questions the reliability of the PM2.5 and Diesel PM metrics data reported for the Antelope Valley Community. And, when the PM2.5 and Diesel PM parameters are not factored in, the Antelope Valley Community ranks higher than at least 5 of the "first year" communities recommended by the Staff Report as shown in Table 3.

The 50,000+ residents of rural neighborhoods in the Antelope Valley Community are surprised and disappointed that they may be passed over as a "first year" community, particularly given the devastating health conditions and the extant environmental justice and disadvantaged neighborhood concerns that exist within the Community and which are clearly revealed by CARB's own metrics. Perhaps factors other than those reported in Appendix B were relied upon to conclude that the Antelope Valley Community does not merit designation as a "first year" community; if this is the case, the Staff Report does not reveal what these factors are. It cannot be budgetary concerns which are driving the rejection of Antelope Valley as a "first year" Community because the AVAQMD's proposed monitoring program would cost less than \$200,000 and is negligible compared to the many millions of dollars sought by the monitoring programs proposed by the recommended

"first year" communities. What is certain is that, if CARB adopts the Staff Report recommendations, then the rural residents of the Antelope Valley Community will once again be relegated to the margins when it comes to the serious health, environmental justice, and air quality concerns within our neighborhoods

For all the reasons stated above, the ARTC respectfully requests that CARB reconsider the Staff Report recommendation and select the Antelope Valley as a "first year" community. Short of this, the ARTC asks that CARB please provide a comprehensive explanation regarding why the Antelope Valley Community does not warrant "first year" status in light of the CARBs own metrics which clearly prove that "first year" status is justified.

Sincerely,

A handwritten signature in black ink that reads "Susan Zahuta". The signature is written in a cursive, flowing style.

Director,
The Association of Rural Town Councils

Table 1. The Metrics Reported in Appendix B and the Corresponding Rankings of the Antelope Valley Community and Five of the "First Year" Communities Recommended by the Staff Report.

RANKING IF ALL PARAMETERS ARE CONSIDERED												
LOW TO HIGH												
	Antelope Valley		Shafter		Calexico/El Centro/Heber		West Oakland		Florin		Richmond	
	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking
CES 3.0 Score	78	1	90	3	95	5	88	2	91	4	95	5
California Healthy Places Index	99	6	97	4	98	5	94	3	93	2	84	1
Environmental Justice Score	90	4	90	4	84	3	90	4	77	2	70	1
Total Population	375,119	6	18,072	1	97,710	4	25,019	2	26,649	3	138,983	5
Density	293	1	1216	3	617	2	3504	4	6350	6	4926	5
PM2.5 Percentile	18	1	100	5	95	4	31	2	41	3	31	2
Diesel Percentile	30	1	31	2	78	4	99	6	59	3	95	5
Ozone Percentile	98	6	91	5	78	4	8	1	61	3	11	2
Toxic Release Percentile	46	3	55	5	49	4	45	2	20	1	72	6
Traffic Percentile	77	2	10	1	93	5	92	4	87	3	92	4
Mobile Percentile	76	3	48	1	51	2	90	6	79	4	82	5
Stationary Percentile	86	2	87	3	0	1	95	4	99	5	100	6
# Large stationary sources	2	3	0	1	2	3	1	2	0	1	4	4
Areawide Percentile	94	4	27	1	100	6	97	5	66	2	88	3
# of Sensitive Receptors	336	6	15	1	96	4	32	3	22	2	121	5
Asthma Percentile	99	4	52	1	95	2	99	4	98	3	100	5
Low Birthweight Percentile	99	5	86	2	96	4	36	1	99	5	92	3
Cardiovascular	100	5	64	1	86	2	100	5	89	3	96	4
Poverty	100	6	98	4	99	5	97	3	88	2	85	1
Unemployment	99	4	98	3	100	5	99	4	95	2	92	1
TOTAL:		73		51		74		67		59		73

METRICS INDICATE THAT THE ANTELOPE VALLEY WARRANTS SELECTION OVER 3 OF THE RECOMMENDED "FIRST-YEAR" COMMUNITIES

Table 2. The "Color Coded" Metrics Reported in Appendix B and the Corresponding Rankings of the Antelope Valley Community and Five of the "First Year" Communities Recommended by the Staff Report.

RANKING IF ONLY COLOR CODED PARAMETERS ARE CONSIDERED													
LOW TO HIGH													
	Antelope Valley		Shafter		Callexico/El Centro/Heber		West Oakland		Florin		Richmond		
	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking	
CES 3.0 Score	78	1	90	3	95	5	88	2	91	4	95	5	
California Healthy Places Index	99	6	97	4	98	5	94	3	93	2	84	1	
Environmental Justice Score	90	4	90	4	84	3	90	4	77	2	70	1	
PM2.5 Percentile	18	1	100	5	95	4	31	2	41	3	31	2	
Diesel Percentile	30	1	31	2	78	4	99	6	59	3	95	5	
Ozone Percentile	98	6	91	5	78	4	8	1	61	3	11	2	
Toxic Release Percentile	46	3	55	5	49	4	45	2	20	1	72	6	
Traffic Percentile	77	2	10	1	93	5	92	4	87	3	92	4	
Mobile Percentile	76	3	48	1	51	2	90	6	79	4	82	5	
Stationary Percentile	86	2	87	3	0	1	95	4	99	5	100	6	
Areawide Percentile	94	4	27	1	100	6	97	5	66	2	88	3	
Asthma Percentile	99	4	52	1	95	2	99	4	98	3	100	5	
Low Birthweight Percentile	99	5	86	2	96	4	36	1	99	5	92	3	
Cardiovascular	100	5	64	1	86	2	100	5	89	3	96	4	
Poverty	100	6	98	4	99	5	97	3	88	2	85	1	
Unemployment	99	4	98	3	100	5	99	4	95	2	92	1	
TOTAL:		57		45		61		56		47		54	

METRICS INDICATE THAT THE ANTELOPE VALLEY WARRANTS SELECTION OVER 4 OF THE RECOMMENDED "FIRST-YEAR" COMMUNITIES

Table 3. The "Color Coded" Metrics Other than PM2.5 and Diesel PM Reported in Appendix B and the Corresponding Rankings of the Antelope Valley Community and Five of the "First Year" Communities Recommended by the Staff Report.

RANKING IF ONLY COLOR CODED PARAMETERS ARE CONSIDERED AND PM & DIESEL PM ARE OMITTED													
LOW TO HIGH	Antelope Valley		Shafter		Calexico/El Centro/Heber		West Oakland		Florin		Richmond		
	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking	metric	ranking	
CES 3.0 Score	78	1	90	3	95	5	88	2	91	4	95	5	
California Healthy Places Index	99	6	97	4	98	5	94	3	93	2	84	1	
Environmental Justice Score	90	4	90	4	84	3	90	4	77	2	70	1	
Ozone Percentile	98	6	91	5	78	4	8	1	61	3	11	2	
Toxic Release Percentile	46	3	55	5	49	4	45	2	20	1	72	6	
Traffic Percentile	77	2	10	1	93	5	95	4	87	3	92	4	
Mobile Percentile	76	3	48	1	51	2	90	6	79	4	82	5	
Stationary Percentile	86	2	87	3	0	1	95	4	99	5	100	6	
Areawide Percentile	94	4	27	1	100	6	97	5	66	2	88	3	
Asthma Percentile	99	4	52	1	95	2	99	4	98	3	100	5	
Low Birthweight Percentile	99	5	86	2	96	4	36	1	99	5	92	3	
Cardiovascular	100	5	64	1	86	2	100	5	89	3	96	4	
Poverty	100	6	98	4	99	5	97	3	88	2	85	1	
Unemployment	99	4	98	3	100	5	99	4	95	2	92	1	
TOTAL:		55		38		53		48		41		47	

METRICS INDICATE THAT THE ANTELOPE VALLEY WARRANTS SELECTION OVER 5 OF THE RECOMMENDED "FIRST-YEAR" COMMUNITIES