

June 18, 2021

Nora Vargas, Chair
San Diego Air Pollution Control District Governing Board
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RE: Item #2 -- Air Toxics Hot Spots Report - REVISED; EHC Recommends Approval

Dear Chair Vargas:

Thank you for the opportunity to comment on the San Diego Air Pollution Control District (SDAPCD) 2019/2020 Air Toxics Hot Spots (ATHS) Annual Report. **Environmental Health Coalition (EHC) has reviewed the revised report and recommends that the SDAPCD Governing Board approve the report.**

EHC would like to first commend the APCD staff on the enormous amount of work they have put into the original and revised report and into the ATHS program over the past year. As stated in EHC's May 7, 2021 letter and testimony, the version presented to the board was significantly better than the reports for the preceding decade or more. While improved, EHC noted that there were several important areas that were in need of revision prior to board approval. We very much appreciate the APCD staff's work to make these changes.

The revised report takes a significant step towards providing a clear description of the purpose and importance of the Air Toxics Hot Spots Program; useful information for community residents regarding their potential health risks from facilities emitting air toxics and a detailed explanation and timeline for the flow of the program. The APCD staff took an important step towards visualization with the publication of an interactive map of air toxics facilities on the website. The following section recalls EHC's previous comments with *observations about the revised report in italics*.

- California Health & Safety Code [Section 44363\(a\)](#) requires an **ANNUAL report**
 - *The revised report provides clarification that the state requirement is for an annual report. It also demonstrates that a significant amount of work was done in 2019 and 2020 to compensate for a lack of attention to the program in previous years. Over 2650 facilities have had emission inventories approved; 52 had HRA requests and 9 HRAs were approved. This level of detailed data was not provided in the 2018 ATHS report, however HRAs were 5-15 years old.*
- **Facility Status and Timeline to District Compliance is lacking.**
 - *The revised report in Appendix 3 provides clarity regarding status of all affected facilities and district actions (NOVs) for that are out of compliance. It is clear that the district was not prioritizing this program in previous years. The report now contains an overall timeline which provides complete information about the entire process.*

- **Risk Reduction Strategies must be included in the report**, per the requirements in the California Health & Safety Code.
 - *While some new information is provided, EHC would like to see additional improvements to this section in next year's report. Specifically, AB617 program and CERP goals that aim for emission reductions for the portside communities can serve as a model for regional emission reductions going forward.*
 - *EHC also recommends the addition of specific strategies for risk reduction for each facility or type of facility that is required to reduce.*
- **The data and health risk information is not provided in a publicly accessible and understandable manner**
 - *There is much improved clarity on the SDAPCD policy that establishes cancer risk levels and the anticipated review and updating of the risk levels in Rule 1210 to be in alignment with other California air districts.*
 - *The maps are a very big step in the right direction. The static regional maps are very helpful and indicate a stronger understanding of the need to provide information geographically. The inclusion of the interactive map on the website sets the expectation for more interactive maps that allow residents to be able to focus in on their neighborhoods and have more information about the impacts. We appreciate the relatively fast addition of this map as it really demonstrates APCD staff's commitment to providing clear and understandable public information.*
 - *EHC's recommendation and as required in AB423, all of the APCD permit and emissions information should be mapped and searchable.*

Again, EHC appreciates the Governing Board's attention to the importance of the Air Toxics Hot Spots Program and the staff's responsiveness to the Board's direction to make improvements that increase the transparency and public information provided. The final report is a substantial improvement and EHC recommends approval. We also recommend that the 2021 report include additional improvements that continue to increase public accessibility including:

- More visualization in the on-line version to include mapping of all facilities and associated health risks
- A discussion of cumulative health risks from multiple facilities, especially in highly impacted areas
- Information should be searchable. Residents should be able to readily identify facilities near their home or work; latitude/longitude coordinates should be provided
- Facilities should be provided on maps with map layers as part of the publicly downloadable information ([CalEnviroScreen](#) is a good model of this)
- Facility historical data should be provided back to the initial ATHS disclosures to provide complete public health information and potential exposure as well as documented risk reduction
- Community information workshops should be held in each neighborhood with facilities required to disclose and reduce.
- SDAPCD should issue the disclosure statements to the public, rather than or in addition to the facility notice in order to increase public accessibility.

Thank you again for your attention to improving this program that will improve public health and advance environmental justice.

Sincerely,



Diane Takvorian
Executive Director