

From: noreply@sdcounty.ca.gov
To: [LUEG, APCD Public Comment; Reider, Robert; Garza, Israel; Vigil, Domingo; Luther, Mahian](#)
Subject: APCDGB Public Comment Submission
Date: Tuesday, July 13, 2021 10:55:42 AM

You've received a new form based mail from <https://www.sandiegocounty.gov/content/sdc/apcd/en/apcd-cob-agendas-and-meeting-materials-.html>.

Values:

first_name :
Elizabeth Havey

agenda_item :
4. OVERVIEW OF THE PORT'S DRAFT MARITIME CLEAN AIR STRATEGY

eComment :
Hi my name is Elizabeth Havey, resident of the City of San Diego, and I want to comment about the Agenda Item #4 regarding the OVERVIEW OF THE PORT'S DRAFT MARITIME CLEAN AIR STRATEGY. The MCAS as it currently stands has yet to set strong goals and strategies to help reduce the Port's carbon footprint and improve air quality for Portside communities. Every day heavy-duty trucks charge through these neighborhoods driving to and from the Port polluting the air with diesel particulate matter. It is not just the trucks. Ships, forklifts, welding, painting, and more spew diesel pollution and other toxins into our air. MCAS must right their wrongs and protect the portside communities. We understand that the CERP in fact sets even stronger and more robust strategies to reduce carbon emissions in these portside communities. I would like to see the MCAS embed similar goals and metrics to assure there is a plan to transition to 100% ZEV by 2030.

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DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
750 PACIFIC HIGHWAY
SAN DIEGO CA 92132-0058

5090
Ser N00/119
July 15, 2021

Mr. Robert Reider
Air Pollution Control Officer
10124 Old Grove Road
San Diego, CA 92131

SUBJECT: NAVY CONCERNS ON THE AB617 COMMUNITY EMISSIONS
REDUCTION PLAN (CERP)

Dear Mr. Reider:

The Navy has participated as an active member of the AB617 Portside Environmental Justice Neighborhoods Community (Portside Community) Steering Committee from its inception. As part of our collaboration with the AB617 Steering Committee, we provided significant input to the Community Emissions Reduction Plan (CERP), and are currently working with your agency to install an ambient monitoring station at Naval Base San Diego to gather data for the Portside Community. The Navy's goal is to support a CERP that is founded on sound science and data, and results in meaningful emission reductions for the Portside Community.

However, the Navy has two major concerns about the Final (June 2021) CERP that was approved on 15 June 2021. First, the Navy is concerned that at the last minute, a series of significant revisions were made to the CERP before its adoption without adequate time for stakeholders to review and provide comments. Second, the Navy is concerned with the significant changes to the data, in particular hexavalent chromium (Cr6) emissions attributed to stationary sources, without highlighting these changes or providing any explanation. Most notably, a significant change was made to the percent contribution of stationary sources to Cr6 emissions between the April and June versions of the CERP, 7% in April to 74% in June, without discussion or explanation, concluding that stationary sources are the major contributor of Cr6 emissions - an inconsistency with CERPs from other similar AB617 Communities, such as Southeast Los Angeles and San Bernardino/Muscoy, where contribution of mobile and area sources to emissions, including Cr6 emissions, are well documented. The California Air Resources Board and the APCD have both agreed that Cr6 emissions from these sources could be underestimated and that the data would need to be refined. Yet, the CERP provides percent source contribution for Cr6, knowing that the dataset is incomplete and potentially missing major sources of emissions.

The Navy fully supports and recognizes the importance of implementing the CERP to reduce emissions and potential health impacts to the community. However, if the CERP is incomplete and if major contributors to emissions are omitted or not noted appropriately, it is

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unlikely that the implementation of the CERP will achieve the goal of preventing potential health impacts to the community. It is therefore essential to address inaccuracies and inconsistencies in the CERP. The enclosure summarizes the Navy's concerns along with proposed revisions to the CERP for sections where the data is incomplete at this time.

The Navy values its long-standing and mutually beneficial relationship with the District, and we look forward to continuing to work with you in support of the AB617 Portside Community CERP and our shared goal of clean air for all of San Diego County and protection of human health and the environment. My point of contact is Mr. Brian Gordon, the Navy Region Southwest Shore Installation Environmental Program Manager. He can be reached at (619) 705-6700 or e-mail: brian.gordon@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Keck', with a long horizontal line extending to the right.

D. KECK
Executive Director

Enclosure: Navy Concerns with the CERP

Copy to:
Supervisor Nathan Fletcher
California Air Resources Board Executive Office

9 July 2021

Navy Concerns with June 2021 Community Emissions Reduction Plan (CERP) Community of Portside Environmental Justice Neighborhoods

Navy has participated as a member of the Portside Environmental Justice Neighborhoods Community (Portside Community) Steering Committee from its inception. We are collaborating with the APCD to install an ambient monitoring station within the fence line of one of our installations, Naval Base San Diego, in support of data gathering for the Portside Community. We have supported and provided significant contribution to the Community Emissions Reduction Plan (CERP) and CERP subcommittees. Navy's goal is to support a CERP that is accurate, defensible and results in meaningful emission reductions for the Portside Community.

Navy has concerns about the Final (June 2021) CERP that was approved on 15 June 2021, and the process that led to the adoption of the document. Our main concerns are summarized below:

1. Last minute changes were made to the CERP prior to its adoption. APCD has informed the Navy, changes were made to the CERP when CARB identified an error in their calculations. None of these issues were communicated to the stakeholders in advance of the meeting and significant changes were made to the document without corresponding explanations. Adoption of such an important document should have been paused to ensure the changes were incorporated and referenced correctly and any additional errors and inconsistencies identified and corrected.
2. Significant changes were made to the hexavalent chromium (Cr6) data without providing an explanation. As shown below, in the April 2021 draft CERP, area sources and on-road mobile sources contributed 90.9% of Cr6. In the June 2021 revision, the contributions have mostly been removed from the analysis, leaving stationary sources as the major contributor to Cr6 emissions. No explanation for this change was provided in the CERP. CARB only provided an explanation by email after concerns were raised by stakeholders and hours before the vote to approve the CERP. APCD appeared to be unable to explain the data and referred to CARB to lead the technical and risk discussions.

April 2021

Table 6 - Community Baseline Emission Summary for selected Toxic Air Contaminants²⁹

Source Category	Arsenic (lb./yr.)	Benzene (lb./yr.)	1,3-Butadiene (lb./yr.)	Hexavalent chromium (lb./yr.)	DPM (lb./yr.)
Off-road mobile	0.08 (0.2%)	17,196 (52.8%)	3,462 (63.3%)	0.56 (1.9%)	44,150 (78.0%)
On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	6.42 (21.2%)	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	83 (1.5%)	2.18 (7.2%)	1,504 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	21.09 (69.7%)	0 (0%)
Total (pounds/year)	39	32,578	5,466	30.2	56,558

June 2021

Table 6 - Community Baseline Emission Summary for selected Toxic Air Contaminants²⁹

Source Category	Arsenic (lb./yr.)	Benzene (lb./yr.)	1,3-Butadiene (lb./yr.)	Hexavalent chromium (lb./yr.)	DPM (lb./yr.)
Off-road mobile	0.08 (0.2%)	17,196 (52.8%)	3,462 (63.3%)	0.56 (19%)	44,150 (78.0%)
On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	0.2 (7.1%)	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	84 (1.5%)	2.18 (73.9%)	1,472 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	0 (0%)	0 (0%)
Total (pounds/year)	39	32,578	5,466	2.95	56,526

3. It is unclear why Cr6 from mobile sources was reduced more than a factor of 10 and how CARB and APCD justify zero contribution from Area Sources to Cr6. Area Sources constitute residential fuel combustion, consumer products use, construction and demolition, and commercial cooking. In the April 2021 CERP, they were the major contributor to Cr6; in the June version, the emissions were zeroed out. The source of these data is cited as Appendix A of the CERP. No explanation is provided.
4. The Navy has reviewed the CERPs for other AB617 communities that are similar to Portside communities in terms of traffic. Similar to the CERP for the Portside Community, those CERPs document Diesel Particulate Matter (DPM) as a major contributor to emissions. However, in those CERPs, Cr6 emissions from traffic range from 422 to 2700 pounds per year. While we recognize that the emission calculation methodologies differ among the various CERPs, even with the adjustment factors that CARB appears to have used, there is still a major discrepancy between 0.7 lbs. of Cr6 from mobile sources in the Portside Community CERP versus other CERPs, especially when the CERP shows two (2) pounds of emissions from stationary sources surrounding the Portside Community. In other words, the Portside Community CERP asserts that Cr6 emissions from stationary sources are almost 3 times those from mobile source; a conclusion that is inconsistent with all other CERPs, including those prepared by leading agencies such as South Coast Air Quality Management District (SCAQMD). This leads us to believe that significant contributors to Cr6 emissions are likely left out of the analysis.
5. Specifically, the CERP has omitted a potentially major contributor to Cr6 emissions and risk: Diesel Particulate Matter (DPM) and Cr6 emissions from brake and tire wear. SCAQMD has identified that Cr6, DPM and PM emissions are expected to increase with rising vehicle miles traveled. This is true for electric vehicles as well. The individual CERPs for various South Coast AB617 communities also identified brake wear as a source of Cr6. San Joaquin Valley Air Pollution Control District also recognizes trace metals emitted in connection with combustion from engine wear, brake wear as PM_{2.5} species.
6. CARB agrees that Cr6 emissions could be underestimated. They have stated that, at this time CARB does not have an approved speciation profile for Cr6 to use in their analysis and that CARB staff is working on developing these speciation profiles. CARB is also researching Cr6 emissions from brake wear. Even though other districts have used available methodologies to estimate these emissions, CARB and APCD have chosen not to include an estimate or a discussion of this potentially significant source of Cr6 emissions in the CERP and have not explained why existing methodology could not be used to preliminarily estimate these emissions. Given that CARB and APCD both agree that the Cr6 data are incomplete, it is scientifically indefensible to provide percent source contribution for Cr6 if knowing that the dataset is incomplete and potentially missing major sources of emissions. We disagree with the simple idea of coming back to modify the report when additional data becomes available without editing the current table and providing a footnote, because we feel that could erode the trust of the community to potentially see such a drastic change. Additionally, we feel that if there is no footnote and edits to Table 6, the large percentage from stationary sources will be the take home message that could raise larger concerns without other data in place to provide the fullest picture of air quality. At a

minimum, Table 6 of the CERP should be revised as shown below with proper footnote to accurately present the information.

Table 6 – Community Baseline Emission Summary for Selected Toxic Air Contaminants

Source Category	Arsenic (lbs/yr)	Benzene (lbs/yr)	1,3-Butadiene (lbs/yr)	Hexavalent ¹ Chromium (lbs/yr)	DPM (lbs/yr)
Off-road mobile	0.08 (0.2%)	17,196 (52.8%)	3,462 (63.3%)	TBD	44,150 (78%)
On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	TBD	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	84 (1.5%)	2.0	1,472 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	TBD	0 (0%)
Total (pounds/year)	39	32,578	5,466	TBD	56,526

¹ A verified and accurate determination of hexavalent chromium emissions from mobile sources and area sources has yet to be established.

TBD – To be Determined

- Appendix A is listed as the source for the data presented in Tables 9 and 10, but there are no corresponding data in this appendix for some of the TACs, including acrolein, ammonia, manganese, and naphthalene, that can be harmful to community residents. Similarly, vinyl chloride is shown in Appendix A but is not discussed in the CERP.
- As shown below, there seems to be some disconnect between the cancer risk data listed in the CERP and CARB's estimated risk which was a part of CARB's presentation, titled *Regional Air Toxics Risk Modeling from a Community Perspective: Support for Draft Portside CERP Strategy Action A3*, and was presented to the Portside Steering Committee on 16 March 2021. DPM risk aligns with the risk estimated by CARB but the risks from other chemicals (Cr6, Cd, VOCs) do not. No explanation was provided for this inconsistency. Could CARB/APCD provide a source document for the Estimate of Cancer Risk to help provide the basis for the numbers provided?

TAC	CERP Estimate of Cancer Risk	CARB Estimate of Cancer Risk
Diesel PM	84%	84%
Benzene	4%	4.95%
1,3 Butadiene	4%	5.72%

TAC	CERP Estimate of Cancer Risk	CARB Estimate of Cancer Risk
Chrome 6	2%	0.23%
Formaldehyde	0%	2.66%
Cadmium	1%	0.22%

9. The Steering Committee was presented with a motion, which would have approved the CERP while annotating those tables where the data were in question. Instead, the Steering Committee chose expediency over science and rejected the motion, with the approved CERP including incomplete, inaccurate, and potentially misleading information with the promise of updating the data at a later date. Again, we request a strategic pause to update with the added information to the tables to clarify the information and reduce confusion and increase the community's trust when the data will ultimately be updated.

In summary, the Navy fully supports and recognizes the importance of implementing the CERP to reduce emissions and potential health impacts to the community. This is why it is essential that the document be accurate, science-based, and defensible, so that it results in meaningful reduction in emissions in the Portside Community. The Navy believes that the revisions identified above are necessary to address serious inaccuracies and inconsistencies in the CERP that could result in confusion or mistrust. Ultimately, if the CERP is incomplete and if major contributors to emissions are omitted or not noted appropriately, it is unlikely that the implementation of the CERP will achieve the goal of preventing potential health impacts to the community. We respectfully ask for the time for these administrative changes to be made to provide clarity in the process and more completeness to the report to identify areas where we do not know the full data at this time.

From: [Diane Takvorian](#)
To: [Vargas, Nora](#); [Flores, David](#)
Cc: [Joy Williams](#); [Danny Serrano](#)
Subject: EHC Comments on APCD Items #3 & 4 - July 16, 2021
Attachments: [EHC CommentLetter_CERP_May7_2021.pdf](#)

Dear Chair Vargas,

I am writing to you in regards to two items on the July 16, 2021 Governing Board meeting. EHC staff and community leaders will be testifying at the meeting, however I wanted to provide you with a brief summary of EHC's position on two important items in advance of the meeting.

Item # 3 Portside Community Emission Reduction Plan – SUPPORT

EHC has participated in the Portside Communities AB 617 process since its inception as we nominated the communities and have served on the Community Steering Committee since its inception in 2018. We participated as well in all of the subcommittees that met to develop the actions and strategies in the draft CERP. The Community Emission Reduction Plan CERP was developed through an almost 3-year community participatory process and we thank the community members who have given so many hours of their time to engage in this process. We also thank APCD staff who worked so hard to develop the CERP and those engaged in air monitoring, enforcement, and incentives programs. Attached please find our most recent letter of support. **EHC encourages the APCD board to approve the DRAFT CERP.**

Item #4 Port of San Diego Maritime Clean Air Strategy – SUPPORT Port MCAS Aligned with CERP goals

The Maritime Clean Air Strategy (MCAS) is focused on reducing air pollution from Port of San Diego operations on the Tenth Avenue and National City terminals as well from port tenants. The MCAS is a critically important element to achieve the goals of the CERP so the two plans must be aligned. The Board of Port Commissioners has determined that the MCAS should be ambitious and aspirational as it strives to significantly reduce air pollution, especially from heavy duty trucks, ships and cargo handling equipment as it elevates health equity and racial justice and accelerates the timeline for installing heavy duty truck charging stations at TAMT and NCMT as well as throughout the region.

EHC requests that the APCD Governing Board express your support for a Port MCAS that aligns with the CERP goals in all regards but specifically related to heavy duty truck transition to ZEV, installation of charging stations and improving health in Portside communities.

Thank you for your consideration of our requests. Please contact myself, Joy Williams for the CERP and Danny Serrano for the MCAS if you have any questions or would like to discuss our recommendations further.

All the best,

Diane

DIANE TAKVORIAN • EXECUTIVE DIRECTOR
(SHE/HER/HERS)

[Environmental Health Coalition](#) | *Environmental Health & Justice Campaign*

2727 Hoover Avenue, Suite 202, National City, CA 91950

Office (619) 474 0220 x 112 | Cell (619) 992-0805

[EHC WEB](#) | [EHC TWITTER](#) | [EHC FACEBOOK](#)

May 7, 2021

Domingo Vigil, Deputy Director
San Diego County Air Pollution Control District
10124 Old Grove Road | San Diego, California 92131

Via email to: apcdoutreach@sdcounty.ca.gov

Re: EHC Comments on Final Portside CERP

Dear Mr. Vigil:

Environmental Health Coalition (EHC) thanks San Diego Air Pollution Control District staff for the opportunity to comment on the draft Final Portside Community Emission Reduction Plan (CERP).

Introduction

Environmental Health Coalition (EHC) is a 41-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and air pollution. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region. EHC has participated in the AB 617 Steering Committee from its inception onward. We participated as well in all of the subcommittees that met to develop the actions and strategies in the draft CERP.

This Community Emission Reduction Plan was developed through an almost 3-year community participatory process that began with Steering Committee meetings in October of 2018, and continued with active subcommittee meetings from June 2020 through the present. We thank the community members who have given so many hours of their time to engage in this process.

We also thank APCD staff, including those leading the meetings and developing the CERP, as well as staff engaged in air monitoring, enforcement, and incentives programs. Our comments on the draft CERP follow.

Comments on Final CERP with Phase II Strategies and Actions

Support for Overall Goals

EHC supports the inclusion in Chapter 7, the Actions and Strategies chapter, of a set of Overall Goals for the CERP. These aspirational goals set forth quantified measures and timelines that address the community's highest priorities for the CERP: reduction of diesel and other toxic air

contaminants; reduction of health risk due to air pollution; increasing trees and green spaces in the communities; and addressing issues with heavy duty trucks – a long time source of air pollution and safety concerns in residential areas of Portside. We thank staff for their willingness to include these aspirational metrics to express the community’s vision for clean air and to provide a yardstick to measure progress, even if it is not completely clear yet how to reach the goals. We thank staff also for their extensive engagement with affected stakeholders to refine the goals and achieve a degree of consensus on including them.

Support for Land Use Actions and Strategies

EHC supports all land use strategies. The Land Use Committee included most of the community resident members of the Steering Committee, along with SANDAG representatives, and met over 12 times. This committee reflected deeply on the links between air quality and the land uses in Portside, and developed recommendations that link the CERP to other plans being done in our region, including community land use plans, regional transportation plans, San Diego’s Climate Action Plan (tree canopy), and the Port’s Harbor Drive Multiuse Corridor Study projects. The community identified high priority projects for limiting truck traffic on surface streets, grade separations to improve pedestrian safety and reduce traffic bottlenecks, and increase green spaces near homes. Additional strategies promote improvements in air quality at schools, and a health equity study of the community. APCD staff met with all the agencies whose collaboration is needed on these actions, to make sure they are feasible. This extensive set of land use strategies is unique among the CERPs done to date, and distinguishes the Portside CERP.

Support for Working Waterfront Strategies

EHC supports all Working Waterfront strategies, with the edits to Action E-1 noted below. Subcommittee meetings had broad representation from the Steering Committee and affected agencies and industries. It included representation from ILWU, for whom it is important to have the opportunity to try out new zero emission equipment before it is purchased. A Teamsters representative also participated throughout the process.

Support for Truck Strategies

EHC supports the Heavy Duty Truck Strategies. These strategies provide for near term and longer term measures to shift heavy duty and medium duty trucks to zero emission vehicles over time.

Support for Advocacy Measures

EHC supports the inclusion of Advocacy Measures. Advocacy Measures are included in recognition that it is important for the Steering Committee and APCD to advocate in support of strong air quality protections in planning and rule making processes that have not yet begun or that will require a public process. This set of actions can allow the CERP to address issues at regional and state levels where decisions will be made that will affect air quality in Portside. Regulatory measures such as the proposed Advanced Clean Fleets rule, to be heard by the California Air Resources Board later this year, are appropriate for advocacy action under this

provision of the CERP.

Recommended Additions

EHC recommends the following additions to the draft CERP.

Action E-1, Truck short-haul EV pilot program: language should match current MCAS wording for a truck shuttle program, as spelled out in the March 24, 2021 draft of the MCAS Truck Objective 1A:

TRK Objective 1A: Develop a short-haul on-road ZE Truck Shuttle Program comprised of a trucking company and/or independent drivers to displace approximately 20,000 diesel vehicle miles traveled (equal to about 12% of community miles) by 2024 and continuing through 2026.

Action E-1: Add EV charging goal detail, removed from Overall Goals section at the recommendation of the CERP Subcommittee:

- By July 2021, establish ZEV HD truck charging infrastructure plan and install 4 fast charge stations by January 2022.

Add Overall Goal 9 actions, removed from the Overall Goals at the recommendation of the CERP Subcommittee, to Working Waterfront Actions:

- Port of San Diego to support funding for tree canopy;
- Navy to increase tree canopy and barriers along Harbor Drive.

Add consideration of the following District actions to raise the visibility and priority of welding emissions:

- Adopt a welding rule modeled on South Coast AQMD Rule 1407.1 for chromium alloy metal melting, and incorporate Rule 1407 for non-chromium alloys to cover a broad range of welding operations.
- Capture welding emissions discreetly, rather than as area sources, for Emissions Inventory Program and Health Risk Assessments;
- Add emissions from welding to the Health Risk Assessment requirement for New Source Review for Toxic Air Contaminants.

Thank you for the opportunity to comment on this draft Portside CERP.

Sincerely,



Joy Williams
EHC Representative to AB 617 Steering Committee



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
750 PACIFIC HIGHWAY
SAN DIEGO CA 92132-0058

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July 15, 2021

Mr. Robert Reider
Air Pollution Control Officer
10124 Old Grove Road
San Diego, CA 92131

SUBJECT: NAVY CONCERNS ON THE AB617 COMMUNITY EMISSIONS
REDUCTION PLAN (CERP)

Dear Mr. Reider:

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However, the Navy has two major concerns about the Final (June 2021) CERP that was approved on 15 June 2021. First, the Navy is concerned that at the last minute, a series of significant revisions were made to the CERP before its adoption without adequate time for stakeholders to review and provide comments. Second, the Navy is concerned with the significant changes to the data, in particular hexavalent chromium (Cr6) emissions attributed to stationary sources, without highlighting these changes or providing any explanation. Most notably, a significant change was made to the percent contribution of stationary sources to Cr6 emissions between the April and June versions of the CERP, 7% in April to 74% in June, without discussion or explanation, concluding that stationary sources are the major contributor of Cr6 emissions - an inconsistency with CERPs from other similar AB617 Communities, such as Southeast Los Angeles and San Bernardino/Muscoy, where contribution of mobile and area sources to emissions, including Cr6 emissions, are well documented. The California Air Resources Board and the APCD have both agreed that Cr6 emissions from these sources could be underestimated and that the data would need to be refined. Yet, the CERP provides percent source contribution for Cr6, knowing that the dataset is incomplete and potentially missing major sources of emissions.

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Sincerely,

A handwritten signature in black ink, appearing to be 'D. Keck', with a long horizontal line extending to the right.

D. KECK
Executive Director

Enclosure: Navy Concerns with the CERP

Copy to:
Supervisor Nathan Fletcher
California Air Resources Board Executive Office

9 July 2021

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April 2021

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On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	6.42 (21.2%)	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	83 (1.5%)	2.18 (7.2%)	1,504 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	21.09 (69.7%)	0 (0%)
Total (pounds/year)	39	32,578	5,466	30.2	56,558

June 2021

Table 6 - Community Baseline Emission Summary for selected Toxic Air Contaminants²⁹

Source Category	Arsenic (lb./yr.)	Benzene (lb./yr.)	1,3-Butadiene (lb./yr.)	Hexavalent chromium (lb./yr.)	DPM (lb./yr.)
Off-road mobile	0.08 (0.2%)	17,196 (52.8%)	3,462 (63.3%)	0.56 (19%)	44,150 (78.0%)
On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	0.2 (7.1%)	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	84 (1.5%)	2.18 (73.9%)	1,472 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	0 (0%)	0 (0%)
Total (pounds/year)	39	32,578	5,466	2.95	56,526

3. It is unclear why Cr6 from mobile sources was reduced more than a factor of 10 and how CARB and APCD justify zero contribution from Area Sources to Cr6. Area Sources constitute residential fuel combustion, consumer products use, construction and demolition, and commercial cooking. In the April 2021 CERP, they were the major contributor to Cr6; in the June version, the emissions were zeroed out. The source of these data is cited as Appendix A of the CERP. No explanation is provided.
4. The Navy has reviewed the CERPs for other AB617 communities that are similar to Portside communities in terms of traffic. Similar to the CERP for the Portside Community, those CERPs document Diesel Particulate Matter (DPM) as a major contributor to emissions. However, in those CERPs, Cr6 emissions from traffic range from 422 to 2700 pounds per year. While we recognize that the emission calculation methodologies differ among the various CERPs, even with the adjustment factors that CARB appears to have used, there is still a major discrepancy between 0.7 lbs. of Cr6 from mobile sources in the Portside Community CERP versus other CERPs, especially when the CERP shows two (2) pounds of emissions from stationary sources surrounding the Portside Community. In other words, the Portside Community CERP asserts that Cr6 emissions from stationary sources are almost 3 times those from mobile source; a conclusion that is inconsistent with all other CERPs, including those prepared by leading agencies such as South Coast Air Quality Management District (SCAQMD). This leads us to believe that significant contributors to Cr6 emissions are likely left out of the analysis.
5. Specifically, the CERP has omitted a potentially major contributor to Cr6 emissions and risk: Diesel Particulate Matter (DPM) and Cr6 emissions from brake and tire wear. SCAQMD has identified that Cr6, DPM and PM emissions are expected to increase with rising vehicle miles traveled. This is true for electric vehicles as well. The individual CERPs for various South Coast AB617 communities also identified brake wear as a source of Cr6. San Joaquin Valley Air Pollution Control District also recognizes trace metals emitted in connection with combustion from engine wear, brake wear as PM_{2.5} species.
6. CARB agrees that Cr6 emissions could be underestimated. They have stated that, at this time CARB does not have an approved speciation profile for Cr6 to use in their analysis and that CARB staff is working on developing these speciation profiles. CARB is also researching Cr6 emissions from brake wear. Even though other districts have used available methodologies to estimate these emissions, CARB and APCD have chosen not to include an estimate or a discussion of this potentially significant source of Cr6 emissions in the CERP and have not explained why existing methodology could not be used to preliminarily estimate these emissions. Given that CARB and APCD both agree that the Cr6 data are incomplete, it is scientifically indefensible to provide percent source contribution for Cr6 if knowing that the dataset is incomplete and potentially missing major sources of emissions. We disagree with the simple idea of coming back to modify the report when additional data becomes available without editing the current table and providing a footnote, because we feel that could erode the trust of the community to potentially see such a drastic change. Additionally, we feel that if there is no footnote and edits to Table 6, the large percentage from stationary sources will be the take home message that could raise larger concerns without other data in place to provide the fullest picture of air quality. At a

minimum, Table 6 of the CERP should be revised as shown below with proper footnote to accurately present the information.

Table 6 – Community Baseline Emission Summary for Selected Toxic Air Contaminants

Source Category	Arsenic (lbs/yr)	Benzene (lbs/yr)	1,3-Butadiene (lbs/yr)	Hexavalent ¹ Chromium (lbs/yr)	DPM (lbs/yr)
Off-road mobile	0.08 (0.2%)	17,196 (52.8%)	3,462 (63.3%)	TBD	44,150 (78%)
On-road mobile	1.1 (2.9%)	14,601 (44.8%)	1,756 (32.2%)	TBD	10,904 (19.3%)
Stationary Sources	0.9 (2.4%)	409 (1.3%)	84 (1.5%)	2.0	1,472 (2.7%)
Area Sources	37 (94.4%)	372 (1.1%)	164 (3.0%)	TBD	0 (0%)
Total (pounds/year)	39	32,578	5,466	TBD	56,526

¹ A verified and accurate determination of hexavalent chromium emissions from mobile sources and area sources has yet to be established.

TBD – To be Determined

- Appendix A is listed as the source for the data presented in Tables 9 and 10, but there are no corresponding data in this appendix for some of the TACs, including acrolein, ammonia, manganese, and naphthalene, that can be harmful to community residents. Similarly, vinyl chloride is shown in Appendix A but is not discussed in the CERP.
- As shown below, there seems to be some disconnect between the cancer risk data listed in the CERP and CARB's estimated risk which was a part of CARB's presentation, titled *Regional Air Toxics Risk Modeling from a Community Perspective: Support for Draft Portside CERP Strategy Action A3*, and was presented to the Portside Steering Committee on 16 March 2021. DPM risk aligns with the risk estimated by CARB but the risks from other chemicals (Cr6, Cd, VOCs) do not. No explanation was provided for this inconsistency. Could CARB/APCD provide a source document for the Estimate of Cancer Risk to help provide the basis for the numbers provided?

TAC	CERP Estimate of Cancer Risk	CARB Estimate of Cancer Risk
Diesel PM	84%	84%
Benzene	4%	4.95%
1,3 Butadiene	4%	5.72%

TAC	CERP Estimate of Cancer Risk	CARB Estimate of Cancer Risk
Chrome 6	2%	0.23%
Formaldehyde	0%	2.66%
Cadmium	1%	0.22%

9. The Steering Committee was presented with a motion, which would have approved the CERP while annotating those tables where the data were in question. Instead, the Steering Committee chose expediency over science and rejected the motion, with the approved CERP including incomplete, inaccurate, and potentially misleading information with the promise of updating the data at a later date. Again, we request a strategic pause to update with the added information to the tables to clarify the information and reduce confusion and increase the community's trust when the data will ultimately be updated.

In summary, the Navy fully supports and recognizes the importance of implementing the CERP to reduce emissions and potential health impacts to the community. This is why it is essential that the document be accurate, science-based, and defensible, so that it results in meaningful reduction in emissions in the Portside Community. The Navy believes that the revisions identified above are necessary to address serious inaccuracies and inconsistencies in the CERP that could result in confusion or mistrust. Ultimately, if the CERP is incomplete and if major contributors to emissions are omitted or not noted appropriately, it is unlikely that the implementation of the CERP will achieve the goal of preventing potential health impacts to the community. We respectfully ask for the time for these administrative changes to be made to provide clarity in the process and more completeness to the report to identify areas where we do not know the full data at this time.