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Bay Area Air District:



July 15, 2019

Ms. Lina Velasco
Director of Planning and Building Services
City of Richmond, Planning and Building Services Department
450 Civic Center Plaza
Richmond, CA 94804

RE: Proposed Ordinance Prohibiting Storage and Handling of Coal and Petroleum Coke in the City of Richmond

Dear Ms. Velasco:

This is regarding the proposed ordinance prohibiting the storage and handling of coal and petroleum coke in the City of Richmond, to be considered by the Planning Commission at the July 18, 2019 meeting. We applaud the City's efforts to improve air quality and health in Richmond. We also want to clarify the intent of our July 5, 2018 letter to Mayor Butt regarding a proposed local air quality study around the Levin Terminal.

We share the City's concerns about air pollution and community health, and specifically about potential impacts from coal dust emissions associated with the Levin Terminal. Richmond residents are impacted by multiple pollution sources, including a refinery and other industrial facilities, freeways, rail yards and rail lines, a seaport, waste facilities, materials handling facilities, and more. While many factors affect community health, local air pollution exposure is a contributing factor, so it is critical that we continue to reduce air pollution throughout the City to help make progress in improving community health.

Pursuant to Assembly Bill (AB) 617, the Air District identified Richmond as a community with high cumulative pollution exposure burden, and the California Air Resources Board concurred. Specifically, we, in partnership with the community, are developing and implementing a community air monitoring program to better understand the relative impacts from the complex mix of sources present in and around the City of Richmond. The AB 617 Richmond-San Pablo Area Community Air Monitoring Plan Steering Committee (Steering Committee) is overseeing this process and will ensure that community priorities are addressed. This is a long-term effort, and we are committed to continue working with the City and with the Steering Committee.

In a July 5, 2018 letter to Mayor Butt, we shared what factors would be important to consider in the design of a monitoring study to determine the impact of coal dust emissions in a community. We did not have enough technical information about the proposal to work with Ramboll to determine whether it would likely be successful.

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In that letter we expressed our view that the extensive community monitoring program noted above would provide more robust data on local pollution sources, emissions rates, and local concentrations.

However, we need not delay efforts to reduce emissions, even as these monitoring studies are underway. The AB 617 community monitoring program will provide extremely useful information to target and prioritize strategies, but efforts to reduce emissions will continue as this research and analysis continues; we know we need to reduce air emissions in Richmond wherever feasible. As such, we applaud the City for exploring any and all opportunities to reduce local emissions and community exposure.

We look forward to continuing to work with City officials, the Steering Committee, and residents at large in improving air quality in the Richmond area. If you have any questions about this issue, please contact me at gnudd@baaqmd.gov or (415) 749-4786.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: Supervisor John Gioia
Mayor Tom Butt