



336 Pacific Avenue, Shafter, California 93263

September 24, 2018

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: City of Shafter comments for CARB's Draft Staff Report and Proposal to Designate Shafter as one of the Ten Initial Communities for Community-Based Air Quality Planning Pursuant to AB 617 (CARB Agenda Item No. 18-7-3).

Dear Sir or Madame:

The City of Shafter has reviewed the Community Air Protection Program 2018 Community Recommendations Staff Report and is providing the following comments.

As noted in the staff report, Shafter is a small rural community with 18,000 residents. The entirety of the existing community is identified as a disadvantaged community. Key pollution source types are described in the report as "Rural / Oil and Gas."

The Shafter community is located along the northern edge of Kern County's oil producing region. The primary producing oil fields in the county are located to the south and southwest of Shafter. The community is surrounded by farmlands; however, Shafter is not a major dairy production area. While there are some dairies to the west of Shafter, the majority of existing dairies in the County are located south of Bakersfield, and well to the north of Shafter.

Because Shafter is a small rural community, and the key pollution source types affecting the community -- agriculture and oil -- are dispersed over a very large geographic area, Shafter's disadvantaged community is being impacted by two large regional pollutant sources. Realistically, focusing on agricultural and oil pollutant sources within and immediately adjacent to Shafter is not likely to yield a substantial improvement in local air quality and improve the health of Shafter's disadvantaged residents. To achieve substantive improvements in Shafter's air quality, the Community Air Protection Program undertaken in the Shafter area needs to focus on a program to address agricultural and oil pollutant sources on a regional scale much larger than Shafter and its immediate surroundings. Such a large-scale regional program coupled with the community-based air quality monitoring recommended by your staff has the best chance of addressing the large-scale regional air quality and health effects of agriculture and oil on Shafter's small rural disadvantaged community.

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Concurrent with SJVAPCD's AB 617 efforts, the City of Shafter as the local land use authority will be undertaking preparation of Environmental Justice provisions to be incorporated into the City's General Plan pursuant to SB 1000. These provisions include identification of goals and policies to "reduce the unique or compounded health risks in disadvantaged communities by means that include but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity¹."

The City of Shafter has proactively expanded services to the community. For example, in 2010, the City of Shafter, the Richland School District, and Shafter High School formed the Shafter Education Partnership to support educational excellence in Shafter. Since that time, the partnership has focused on challenging advanced students, forming a strong foundation in reading, and building community for learning. In addition to hosting school year and summer classes, the Shafter Learning Center provides English classes to help parents engage in their children's school work, tutoring centers to help students with homework, and reading programs to connect community members with students.

The City has also emphasized economic development as a means of creating employment opportunities for disadvantaged residents, supporting programs such as the Shafter Education Partnership, maintaining a safe community (appropriate staffing levels, improved equipment, etc.), and providing essential water and wastewater infrastructure to disadvantaged unincorporated community, all of which improve the quality of life for our community.

Thus, SJVAPCD's AB 617 planning efforts focusing on agriculture and oil-related pollution sources and the City's SB 1000 environmental justice planning efforts focusing on land use and other healthy community policies share a common goal set forth by the legislature: to identify and reduce the unique or compounded health risks on disadvantaged communities in California.

Recognizing that high unemployment is a key characteristic of a disadvantaged community, we can each develop policies, programs, and actions that can both reduce the unique or compounded health risks of the community's disadvantaged residents, while at the same time increasing their access to employment opportunities.

The City of Shafter looks forward to meeting with CARB and SJVAPCD staff in the near future to discuss our respective planning programs and explore how we they can best be coordinated.

Sincerely,



Scott Hurlbert
City Manager

¹ California Government Code Section 65302(h)(1)(A), (B), (C)