

**February 13th, 2023**

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

*Submitted electronically*

**Re: Assembly Bill 617 Community Air Protection Program – Fifth Annual Selection of Communities**

Dear Chair Randolph and members of the California Air Resources Board,

On behalf of the undersigned, please accept these comments for the Fifth Annual Selection of Communities of the Community Air Protection Program.

San Joaquin Valley communities are breathing some of the most polluted air in the United States. The Community Air Protection Program is a long overdue investment in addressing localized air pollution in some of our most impacted neighborhoods: South Kern, Stockton, Shafter, and South Central Fresno. For the fifth annual selection, the undersigned express strong support for south Madera, south Modesto, and Lost Hills, communities that have been building capacity for several years and have expressed that they are ready, willing, and welcome the investment to build on their momentum. We urge the San Joaquin Valley Air Pollution Control District to recommend them as part of the ongoing expansion of the program and to scale up immediate protections and long term investments for clean air and health equity across the region and state.

The undersigned support the south Madera communities of La Vina, Parkwood, Parksdale, Borden, Italian Swiss Colony, Irrigosa and Ripperdan for selection. These unincorporated

communities in South Madera are all severely disadvantaged as defined by SB 535 and AB 1550, and as an example, the community of La Viña has nominated itself three years in a row, and in 2020 had been nominated by the SJV Air District for community air monitoring and an emission reduction plan. La Vina is a prime example of the burden these communities are faced with, the need for resources, and community willingness to implement solutions. La Vina is in the top 14% most overburdened communities on CalEnviroScreen, and ranks in the top 2% most pollution burdened. The community ranks in the top 5% for PM 2.5 pollution, top 8% for pesticides, and top 15% for ozone.

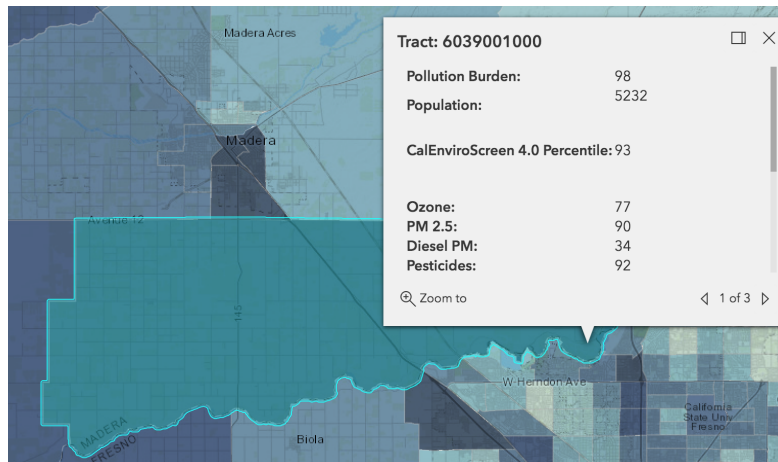


Figure 1.1: South Madera Census Tract<sup>1</sup>

Residents of South Madera are concerned with a variety of pollution sources. Because of the lack of transit and transportation options, as well as lack of job opportunities in the community itself, residents must drive long distances for work and other services. Pollution from passenger vehicles as well as diesel emissions from tractors and freight are large contributors to the area's poor air quality. Truck traffic is particularly increased during the harvesting seasons. There are 6 schools within a mile of these communities including a K-8 one mile from La Vina and High School the same distance from Iragosa and Ripperdan. Due to the lack of infrastructure and the danger of speeding diesel trucks and tractors, children are forbidden from walking to school and face suspension if caught by the school staff. There are virtually public parks, no community centers, a significant lack of basic infrastructure, and severe road issues due poor maintenance and heavy use by agriculture. Additionally, residents are concerned with pesticides and dust from agricultural operations as these communities are completely surrounded by various crops. A nearby winery, Mission Bell, on the northern end of the community as well as the Ardagh Glass manufacturing facility also create negative localized impacts. According to CARB's Pollution Mapping Tool, Ardagh Glass is a significant emitter of not only carbon dioxide, but also nitrous and sulfur oxides.

<sup>1</sup> Figure 1.1: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

The undersigned organizations also nominate south Modesto for monitoring and an emission reduction plan. To date, the community has been a part of establishing a network of monitors throughout the county and South Modesto, including black carbon monitors.

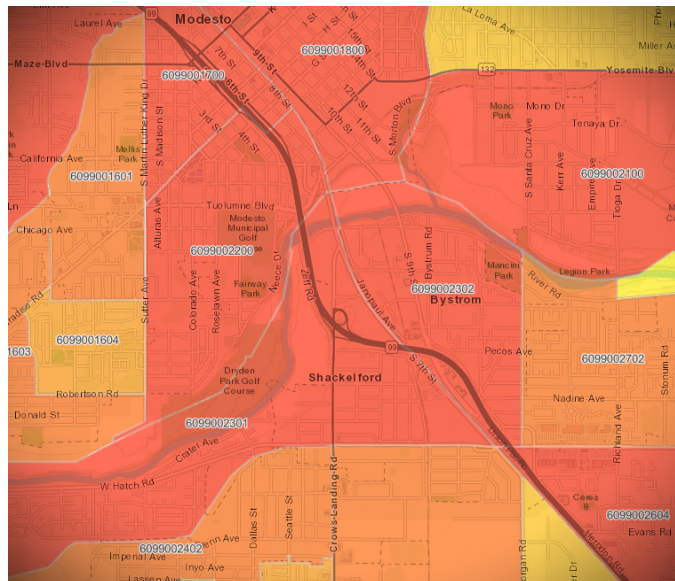


Figure 1.2: South Modesto Census Tracts<sup>2</sup>

This community encompasses the urban areas of Southwest Modesto and the bordering unincorporated county pockets. Its boundaries are, roughly, Hwy 132 (Maze Blvd/Yosemite Blvd) to the North, MLK Dr./Sutter Ave. to the West, the Modesto Airport and Richland Ave. to the East, and Hatch Rd. to the South. It includes the South Modesto neighborhoods of Bystrom, Shackelford, Bret Harte, and Parklawn, the Airport Neighborhood, as well as parts of Downtown and West Modesto and North Ceres. This community has a population of approximately 30,000 people throughout its urban neighborhoods. Virtually all of the census tracts that compose this community are ranked in the 90-99th percentile in CalEnviroScreen. Their “Pollution Burden” scores range from the 82nd to 94th percentile and their “Population Characteristics Burden” scores range from the 82nd to 99th percentile. They rank especially high in Diesel PM (averages in the 90th percentile), Asthma (92nd), Education (90th), and Poverty (95th). This community has a lot of diesel truck traffic and particulate matter emissions from industrial facilities, a railroad, Hwys 99 and 132, the downtown transportation hub, and traffic from the major thoroughfares. The Airport Neighborhood has the nearby airport, a glass manufacturing plant, and a major diesel truck route for Gallo wine/glass and various canneries along Yosemite Boulevard/Hwy 132 to Hwy 99.

<sup>2</sup> Figure 1.2: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

Last year, the Air Districts demanded more resources for implementing this program, though current spending lacks transparency and accountability. Community engaged work is a durable, decades old model introduced to air agencies by AB 617 that must be integrated into existing programs and staffing to truly achieve environmental justice. Community groups receive a tiny fraction of program resources yet provide critical inputs and support to planning and implementation. Air Districts should increase efficiencies with available resources by scaling up and cross pollinating lessons learned from the program’s first 3 years and by training all staff in community engagement, racial justice, and cultural humility.

The undersigned organizations also support the nomination of Lost Hills, an unincorporated community approximately 40 miles Northwest of Bakersfield, for both community air monitors and an emissions reduction plan. The community is located west of I-5, east of Blackwells Corner on HWY 46, south of Lost Hills Rd., and north of the California Aqueduct & the Lost Hills Airport. The Lost Hills community is heavily industrialized and surrounded by Kern County oil fields and almond farming. It is directly north of California's largest active oil & gas production field, Belridge North-Belridge South, & Midway Sunset oil fields. Lost Hills is surrounded by two very large corporations, the Wonderful Company and Area Energy. According to the Kern County Agricultural Commissioner, Lost Hills is the number one location in Kern for pesticides use.

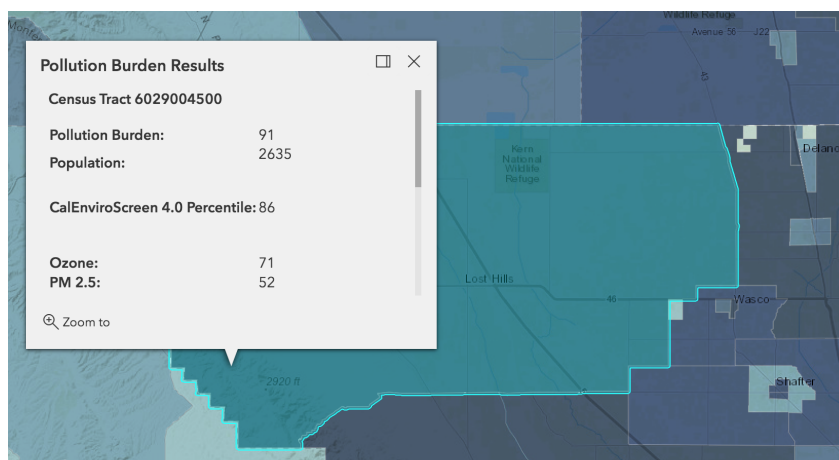


Figure 1.3: Lost Hills Census Tract<sup>3</sup>

According to census data, Lost Hills has a population of 2,400 people and a median household income of just \$36,000. The community is 98% Latino/Hispanic, 1% White, and the other 1% split across African American, Asian, and other backgrounds. Over the past couple of years Lost Hills residents have been committed to environmental justice through mobilizing locally and working with our organizations. They have been engaging in community science events in which

<sup>3</sup> Figure 1.3: <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>

they capture and track pollution over time. For years, Lost Hills residents have organized tours for regulators, participated in public comment at key hearings, and have been active in voicing their concerns with air pollution from oil and gas operations, diesel pollution from the I-5 and HWY 46, and the overwhelming practice of pesticide application.

Please support these communities for the 5th annual selection process and continue to work collaboratively with community groups on process improvements and program expansion.

Sincerely,

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Central Valley Air Quality Coalition

Jesus Alonso, Community Organizer  
Clean Water Action

Thomas Helme, Co-Founder/Project Director  
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Kevin D Hamilton, RRT, Co-Executive Director  
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Nayamin Martinez, Executive Director  
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Mariela Loera, Climate Policy Coordinator  
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