



Wednesday, July 28, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically

Re: Stockton Community Emissions Reduction Plan (CERP)

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

On behalf of the undersigned, please accept these comments on the Community Emissions Reduction Plan (CERP) for Stockton. Given the serious procedural issues in Stockton, we urge you to conditionally approve Stockton's CERP, contingent upon:

1. The Valley Air District finalizing charter updates to rectify procedural issues (examples provided below),
2. The creation of a community designed Technical Advisory Group,
3. Reallocation of the \$5 million originally earmarked for port related incentive measures to other community priorities in Stockton at the discretion of Community Steering Committee members.
 - a. Examples of CSC priorities where funding could potentially be increased include vegetative barriers, air filtration in schools and homes, incentives for electric vehicles, home weatherization and electrification, and an EV mechanics training program.
 - b. Although 25.4% of PM 2.5 emissions are attributable to "Cooking Including Charbroiling,"¹ no incentive measures were identified to address this source and CSC members were not provided timely technical advice on potential measures. Measures to address this source present another option to which the CSC could redirect that funding to achieve substantial exposure and emissions reductions.

¹ <http://community.valleyair.org/media/2487/final-stockton-cerp-no-appendix-with-cover.pdf> SJVAPCD Community Emissions Reduction Plan for Stockton, pp 36. Dated March 18, 2021.

The Stockton Community Steering Committee experienced significant process problems that ultimately impacted outcomes, including but not limited to:

- a. Untimely provision of materials necessary for informed voting to the CSC
 - i. One excerpt of language was provided 10 minutes before the vote
 - ii. Final language of the CERP wasn't available until after it was voted on
- b. Repeated votes and break down in negotiations, particularly around port-related measures
- c. Voting processes have been inconsistent, including votes being taken after official end of CSC meetings
- d. Despite multiple requests, other AB 617 CSC members were never brought in to share their experiences.

As community co-hosts have shared at several Community Steering Committee (CSC) meetings, south Stockton has historically been redlined and marginalized, with some of the highest asthma rates in the state², so the improvements outlined in the Stockton CERP are essential and long overdue. The Stockton CERP has potential to deliver immediate relief to community members who are experiencing severe air pollution impacts now, and make long term investments in transformative changes that could improve the health and lifespan of people living in the community. There are many measures in the proposed plan that will generate immediate exposure reductions along with substantial efforts to reduce emissions, including multiple measures to address heavy duty diesel pollution such as assessment of truck routes, funding for zero emissions trucks, construction of vegetative barriers along heavily trafficked corridors near sensitive sites like homes and schools, in-home and school air filters, electric school buses, and ambitious commitments such as working toward zero emissions zones through integrated land use and transportation planning. For successful implementation, CSC members need to be engaged as authentic partners, technical analysis must inform the refinement and prioritization of measures, and the problematic process and budgeting issues encountered in Stockton must be rectified.

For current and future AB 617 planning processes, we urge CARB staff to:

1. Actively engage in discussions and decision making on community engagement and CSC structures such as the charter, voting, strategic decision-making, and participatory budgeting processes. Though we appreciate forthcoming revisions to

²<https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-40>: An estimated 238 people per 10,000 people in this census tract visited the emergency department for asthma. **The asthma percentile for this census tract is 100, meaning the asthma rate is higher than 100%** of census tracts in California.

the Blueprint, a document will not resolve these issues in real time. Staff must step into the role of ensuring that the framework provided by the Blueprint is followed so that communities aren't forced to re-teach regulatory agencies how to respectfully engage in participatory decision making with disproportionately impacted communities.

2. Provide more proactive, tailored technical analysis, and invite existing AB 617 communities' leaders to share their expertise and experiences with CSCs at the beginning of their planning processes.

Overall, successful implementation of the Community Air Protection Program requires a paradigm shift in how the San Joaquin Valley Air Pollution Control District (Valley Air District) engages with the public, particularly people living and working in environmental justice communities. As the oversight authority, the California Air Resources Board (CARB) should do more to ensure that both the process and outcomes are transparent, robust technical analysis is provided, and ultimately that the Community Steering Committee member's questions and priorities are not just heard but substantively integrated into the plan within the adopted measures and metrics. We urge you to conditionally approve the Stockton CERP so that critical implementation work can continue while ensuring that procedural issues are rectified and the \$5 million is reallocated.

Sincerely,

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Climate Policy Coordinator, Leadership Council for Justice and Accountability

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Kern Community Organizer, Clean Water Action