



September 24, 2018

Karen Magliano  
Division Chief Office of Community Air Protection  
California Air Resources Board  
1001 I Street Sacramento, CA 95814

Sent Via Email

Re: AB 617 Community Air Protection Program, 2018 Community Recommendations – Shafter Boundaries

Dear Ms. Magliano:

We write this letter in response to the geographical boundaries identified for Shafter community proposed for selection in the initial implementation of AB 617 Community Air Protection Program. We strongly support the recommendation of California Air Resources Board and the San Joaquin Valley Air Pollution Control District to include Shafter in ARB's selection. However, to ensure that AB 617 achieves its purpose of reducing air emissions in the state's most burdened communities, it is critical that the boundary lines chosen by CARB for the selected communities encompass the sensitive receptors in those communities.

The San Joaquin Valley AB617 Environmental Justice Steering Committee ranked Shafter number one in the Rural and Oil & Gas categories in the nomination document we submitted in June 6, 2018. Later that month, the San Joaquin Valley Air District's board recommended that the Air District's staff add Shafter to the two communities they were nominating for year one (Northern Bakersfield and South/Central Fresno). And in the Spirit of AB617, residents from communities just South of Shafter, The Mexican Colony and Smith Corner, are calling to be included within the Shafter Boundary. These communities are just miles South of the City of Shafter and have been forgotten communities for decades; now is the time to act and amend the Shafter boundaries to includes these communities.

While we are on board with the inclusion of Shafter, we strongly recommend expanding the boundaries to include the Mexican Colony and Smith Corner. The Mexican Colony is a census-designated place located 2 miles south of Shafter (see Appendix 1, Map 1). According to the 2010 census, this small community had a population of 281 residents; more than 80 percent of them are Latinos. This community includes 78 households, out of which 63.4% had children under the age of 18 living in them. Smith Corner is a census-designated place in Kern County, California. It is located 1.5 miles (2.4 km) south of Shafter; the population was of 524 according to the 2010 census.

Both the Mexican Colony and Smith Corner are rural, agriculture communities that have historically been overlooked while still being affected by the vast majority of the regional pollution sources in the area, both stationary and mobile. Both communities sit just south of the city limits of Shafter and are affected by the heavy use of pesticides in the region. According to CalEnviroScreen 3.0, this area is ranked in the 97<sup>th</sup> percentile for pesticide use. Both communities are located near large oil & gas operations that range from exploration, to storage, and transformation. These communities are also located just northwest of some of the largest distribution centers around the Shafter region with operators like Fed-Ex, ATD Distribution Center, and a Target Distribution Center. Not surprisingly, this area ranks in the 100<sup>th</sup> percentile for PM2.5 and 91<sup>th</sup> percentile for Ozone according to CalEnviroScreen 3.0. Given all these various sources of pollution, we urge CARB to amend the boundaries to include both the Mexican Colony and Smith Corner to the proposed community of Shafter.

Thank you for your consideration of our comments. We appreciate CARB's commitment to ongoing dialogue with community stakeholders to ensure the effective implementation of AB 617 for the state's most impacted communities. Please feel free to call Nayamin Martinez with Central California Environmental Justice Network at (559) 907-2047 if you need additional information or have any questions.

Sincerely,

Nayamin Martinez  
Director  
Central California Environmental Justice Network

Phoebe Seaton  
Co-Director  
Leadership Counsel for Justice  
and Accountability

Paulina  
Staff Attorney  
Center for Race Poverty and the Environment

Sarah Aird  
Co-Director  
Californians for Pesticide  
Reform

Kevin Hamilton  
Director  
Central Asthma California Asthma Collaborative

cc. CARB Board Members  
Kurt Karperos, Deputy Executive Officer, CARB  
Richard Corey, Executive Officer, CARB  
Veronica Eady, Assistant Executive Officer, CARB  
Samir Sheikh, Executive Air Pollution Control Officer, SJVAPCD  
Sheraz Gill, Deputy Air Pollution Control Officer, SJVAPCD