

Christian Bisher  
Christian.bisher@CCEJN.org  
24-4-2

Good Morning, my name is Christian Bisher with the Central California Environmental Justice Network. I am here to ask for transparency and access to information.

The proposed Plan contains almost no citations and no reference material when making data-based statements or showing graphs or figures. This does not allow a member of the public to look into the sources of these claims. The Air District and CARB do not respond to information requests, and during a recent meeting with CARB, a staffer said they do not have the staff or the resources to look into these and other inquiries. The current process is not fair. We can see only what the District and CARB want us to see. We are not allowed to inform ourselves and intelligently participate.

I am asking that you direct CARB to require the Air District to make available, by default, all information used to create this and future attainment plans by either citing the source or including the information in a reference appendix. If CARB cannot verify the validity of their claims, plans should not be endorsed.

In my written comments, I shared that I previously worked at the San Joaquin Valley Air District as an Engineer in their Permits Department for four years, leaving earlier this year when I could morally no longer continue to participate in their permitting efforts that place business, industry, and their associated profits before public health. Given what I observed and heard first-hand, I would tell anyone not to trust anything from the Air District without verifying it first. The relatively recent ERC audit is but the tip of the San Joaquin Valley permitting iceberg.

Access to information should be the standard, by requiring citations or including references for ALL data-based claims, along with access to an exact duplicate copy of the emissions inventory used and up-to-date calculation methodologies. If there is nothing to hide, there is no reason not to share information.