



September 17, 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 – South Central Fresno Boundaries

Dear Ms. Magliano:

We write this letter in response to the geographical boundaries identified for the “South Central Fresno” community proposed for selection for 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 South Fresno neighborhoods 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.¹

In the case of the South Central Fresno, the boundaries proposed in Figure 15 in the “2018 Community Recommendations Staff Report” omits key sensitive receptors, including the Orange Center Elementary School and residences, in one of the state’s most pollution burdened communities while including areas with significantly lower pollution burdens and vulnerability. Specifically, the map identifies the BNSF railroad tracks as the Southwestern diagonal boundary of the South Central community from California to East Central Avenue, excluding the area to the West to Highway 41 which includes the state’s most pollution burdened communities under CalEnviroScreen, 3.0.

We urge the ARB to adopt a revised version Figure 15, with revised Western and Southern boundaries that run South along Highway 41 from Golden State Boulevard to East Central Avenue and runs East from East Central Avenue to Malaga. The revised boundary lines should

¹ Appendix B of the Final Draft Community Air Protection Blueprint recognizes that, “[i]n selecting communities, AB 617 specifies that the underlying assessment shall...[p]rioritize disadvantaged communities and sensitive receptor locations.” Health and Safety Code Section 42705.5(a)(5) establishes that “‘Sensitive receptors’ includes hospitals, schools and day care centers, and such other locations as the district or state board may determine.”

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include the communities and neighborhoods on the South side of East Central Avenue. For your convenience, Attachment A to this letter depicts our proposed revised Figure 15 Southwestern boundaries for the South Central community. These lines reflect requests by residents from these neighborhoods to be included within communities selected pursuant to AB 617 and who participated in the San Joaquin Valley Air Pollution Control District's public process on this matter.

This area, known colloquially by the City of Fresno as the "Reverse Triangle," includes census tracts 6019001500 and 6019001800, which respectively rank 100th and 98th percentile for pollution burden under CalEnviroScreen. Both of these census tracts rank 98th percentile for ozone exposures and 97th percentile for PM 2.5 exposure. Census Tract 6019001500 ranks 98th percentile for toxic releases from facilities. The Reverse Triangle is also home to extremely vulnerable populations and sensitive receptors, including the Orange Center Elementary School, the disadvantaged unincorporated community of Daleville, unincorporated communities and neighborhoods on the Southern side of East Central Avenue, and the Flamingo Mobile Home Park, in unincorporated Fresno County at the juncture of East Central Avenue and Highway 99. Among students at Orange Center Elementary School, 290 of 300 students qualified for free or reduced priced lunch, were English Language Learners, or foster youth in the 2016-2017 school year and 96% of students were students of color.

Hazardous waste, recycling centers, a landfill, an asphalt mixing plant, warehouses drawing constant truck and car traffic, agricultural fields where toxic pesticides are sprayed, and other polluting land uses abut residences and Orange Center Elementary School in the Reverse Triangle and Highways 99 and 41 border the area immediately next to homes. The City of Fresno also has designated this area as a hub for further logistics center development, having invested millions of dollars into infrastructure and roadway expansions and adopted tax abatement programs for this purpose. The City anticipates that one pending distribution center alone would result in at least 6,200 additional car and truck trips per day in the area, including on roads adjacent to homes. Existing pollution in the Reverse Triangle has undermined residents' health, resulting in elevated asthma, allergy, and cancer rates according to information provided to us by numerous households. Anticipated new pollution sources threaten to further degrade public health in the area absent measures to reduce exposure among vulnerable populations.

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 Ashley Werner with Leadership Counsel for Justice and Accountability at (559) 369-2790 if you need additional information or have any questions.

Sincerely,

Ashley Werner
Leadership Counsel for Justice and Accountability

Genevieve Gale
Central Valley Air Quality Coalition

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Central California Asthma Collaborative

Nayamin Martinez
Central California Environmental Justice Alliance

Thomas Weiler
Faith in Fresno

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cc: Kurt Karperos, Deputy Executive Officer, CARB
Richard Corey, Executive Officer, CARB
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Samir Sheikh, Executive Air Pollution Control Officer, SJVAPCD
Sheraz Gill, Deputy Air Pollution Control Officer, SJVAPCD

Attachment A

Revised South Central Community South/West Boundaries

