



January 31st, 2022

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

Submitted electronically

Re: Public Meeting to Consider Assembly Bill 617 Community Air Protection Program – Fourth Annual Selection of Communities

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

On behalf of the undersigned, please accept these comments on the Fourth Annual Selection of Communities for the Community Air Protection Program. We express strong support for south Madera and south Modesto, 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.

The undersigned support the south Madera communities of La Vina, Parkwood, Parksdale, Borden, Italian Swiss Colony, Iragosa and Ripperday 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 Vina has nominated itself three years in a row, and in the past year 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.

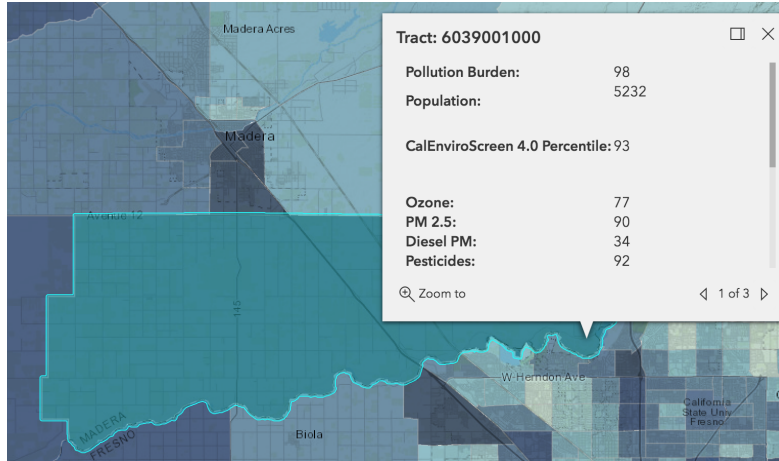


Figure 1.1: South Madera Census Tract¹

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.

The undersigned organizations also nominate south Modesto for an emission reduction plan, the rural west side of Stanislaus County for an emission reduction plan, and both the urban and rural areas for the development of a county-wide air monitoring campaign. To date, the community has been a part of establishing a network of monitors throughout the county and South Modesto, including black carbon monitors.

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

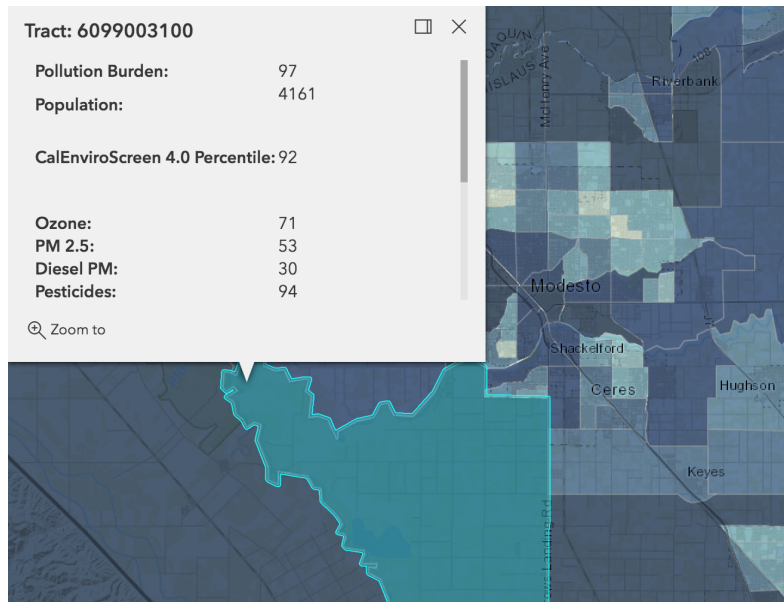


Figure 1.2: South Modesto Census Tract²

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, Carpenter Road to the West, Mitchell Road to the East, and Hatch Road to the South. It includes the neighborhoods of Downtown Modesto, West Modesto, South Modesto (Bystrom/Shackelford/Bret Harte), and the Airport Neighborhood. This community has a population of approximately 40,000 people throughout its urban neighborhoods. Virtually all of the census tracts that compose this community are ranked in the 96-100th percentile in CalEnviroScreen. Their “Pollution Burden” scores range from the 77th to 99th percentile and their “Population Characteristics Burden” scores range from the 82nd to 100th percentile. They rank especially high, mostly in the 90th percentile range, in Education, Linguistic Isolation, Poverty, and Unemployment. This community has a lot of diesel truck traffic and particulate matter emissions from industrial facilities, a railroad, Hwy 99, 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 to Hwy 99.

We have heard representatives of Air Districts demand 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

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

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.

Sincerely,

Catherine Garoupa White
Executive Director
Central Valley Air Quality Coalition

Nayamin Martinez
Executive Director
Central California Environmental Justice Network

Thomas Helme
Co-Founder
Valley Improvement Projects

Dillon Delvo
Executive Director
Little Manila Rising

Kevin Hamilton
Executive Director
Central California Asthma Collaborative

Jesus Alonso
Community Organizer
Clean Water Action

Lourdes Herrera
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Leticia Casillas Luquin
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