



February 20, 2023

Liane M. Randolph, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted via CARB's online Comment Submittal Form

Re: San Joaquin Valley Community Resident Opposition to the Proposed LCFS Amendments

Dear Chair Randolph and members of the CARB board,

We are Defensores del Valle Central para el Agua y el Aire Limpio (Central Valley Defenders for Clean Air and Water) a group of residents from the San Joaquin Valley who have come together out of the need to defend our right to healthy neighborhoods. Our mission is simple, to promote and enforce policies and practices that decrease pollution, degradation of the environment, and other negative impacts from dairies on vulnerable communities and the region.

For almost two years, our group has played an active role in ensuring the concerns of our communities, regarding the proliferation of factory farm gas and its harmful effects on our health, are addressed by CARB in the LCFS rulemaking update. Unfortunately at every turn, CARB staff ignores our concerns and blatantly tries to erase our lived experiences and the impacts we live with every day, from the expansion of factory farm gas infrastructure, like digesters and pipelines near our communities.

As Environmental Justice communities in a region with poor air quality, high levels of asthma and other respiratory illnesses, a lack of public health infrastructure, and many of us without clean and affordable drinking water, we demand that CARB eliminate avoided methane crediting and use the power the legislature gave them to initiate a rulemaking to directly regulate emissions from manure.

Below you will find a collection of comments from a few members of Defensores urging you to think about how staff proposals, that did not mention any community concerns, must and should take those concerns into account in this rulemaking.

"I have lived in Pixley, CA for over 47 years. I have come to this body in Sacramento, over Zoom, the phone, and some of you have even visited Pixley to hear our stories. Unfortunately, it seems like you have not heard or listened to the yells from our community. One mile north of Pixley is a dairy digesters cluster where factory farm gas is being produced. The smell of ammonia and concentrated cow manure has only gotten worse in Pixley. We are surrounded by dairies and their digesters, the truck traffic in our community keeps getting worse, and people in our community are suffering from the air quality impacts. There are three generations of people in my family that use a CPAP machine, my 36-year-old son, my 11-year-old grandson, and myself, Sadly, this is not a unique story in my community, in fact respiratory illnesses have become a "normal" thing for us. This is why we need your leadership more than ever because our communities can not wait."

Maria Arevalo, Pixley

"I live in Santa Nella and was raised in the Central Valley. Since the inception of digesters, there has never been any intention of actually engaging communities in this process. In the past, meetings did not provide translation, outreach was not conducted, and materials were not accessible to non-English speakers. Now, you ask us to attend workshops and you meet with us, only to not mention our concerns in your documents at all. In addition to ignoring what the community has to say and trying to erase us from your record, there was not one mention of public health in your document and the already existing problems many SJV communities face. You are contaminating our air, water, and all for companies that are not even in our communities. We have needs in our communities to improve our local air quality and not line the pockets of investors who have never had to live with the smell day in and out. We ask the board to consider public health for all over profit for some."

Patricia Ramos-Anderson, Santa Nella

"CARB must regulate the dairy industry. We have to endure the flies, the odors, and the air quality impacts. Many people in my community live with Asthma. The dairy industry impacts our air and water quality. I worry about our safety and our health. CARB must have regulations on the dairies manure."

Josefa Gonzalez, Pixley

"I stand with my partners in community demanding justice for our communities that are already overburdened with pollution. We do not need more mechanisms in our communities to make us sick, you should be investing in community-identified measures to improve the health of our air."

Tere Ochoa, Los Banos

"I've been living here since 1960. Hillcrest arrived in 2002 with over 3,000 cows. In 2012 they

were out of compliance with Merced County with over 8,000 cows. Our Town population is only a little bit over 4,000. I've gone to the Board of Supervisors in Merced County to complain with a group of citizens as well but it goes and it falls on deaf ears. In January 2024, CARB could start a rulemaking for the regulation of methane, but to this day we have not heard any desire from staff of the board to begin this process. California Regulators have not adequately evaluated this program as to local air and small communities so we implore your help communities, just like Pixley and Planda and any other small town that just want to breathe.”

David Rodriguez, Planada

We thank you for your time and consideration and look forward to a better program that does not disproportionately impact our communities.

Sincerely,

Defensores del Valle Central Para el Aire y el Agua Limpio
Central Valley Defenders for Clean Air and Water