

May 26, 2016

Chairwomen Mary Nichols
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Re: Comments on proposed Short-Lived Climate Pollutant Reduction Strategy

On behalf of residents from disadvantaged communities in Fresno and Kern Counties, we thank you for the opportunity to provide comments on the proposed Short-Lived Climate Pollutant Reduction Strategy. We are especially grateful that an additional evening workshop was added and made accessible to residents in Fresno. Through this letter, we hope to guide the California Air Resource Board (“CARB”) and other administering agencies as they develop a strategy plan to reduce Short-Lived climate pollutants in disadvantaged communities throughout the San Joaquin Valley.

Short-Lived Climate Pollutants and Environmental Quality

We are concerned about the current methods being used by ranchers to dispose of old trees. The burning of trees deposits carbon dioxide back into the atmosphere resulting in a net gain of greenhouse gasses in the air that contaminates our communities. An alternative to this method is to grind old trees into wood chips to use as a substitute for grass in households. Additionally, we recommend that ranchers donate or sell this material to residents in nearby communities with discounted rates for low-income people. This method will help reduce pollution in disadvantaged communities and reduce water consumption.

Furthermore, we are concerned about the odor emitted from dairies and chicken coops in addition to climate impact of those facilities. Also, fecal matter from these facilities is contaminating the water, which not only affects our access to safe drinking water, but also contaminates the food growth nearby. Dairies should install filters in order to reduce air contaminants and foul odors emitted from these facilities.

Required Yearly Updates

The Air Resources Board aims to reduce short-lived climate pollutants by 40% by 2030. As of now there are no realistic dates or required yearly updates from the Air Resource Board that shows how targets are being achieved. In order to stay updated on the progress of the target goals, we believe the resource board should provide an updated report

annually. This report should also include an analysis of how the reduction levels will be implemented and enforced.

Long-Term Policies

Diesel engines from large trucks exacerbate conditions in our communities by emitting air pollutants, such as black carbon, that further degrade the air quality. Furthermore, the effects of diesel exhaust particulates have resulted in negative health impact for many residents. We recommend that as part of a strategy plan to reduce diesel particulate matter, the Air Resource Board implement more stringent regulations of diesel engines and further invest in policies and programs that will reduce the amount of diesel engines on the road, especially when these impact disadvantaged communities. These regulations would enable a long-term policy that would improve the quality of air in low-income communities located along truck routes.

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Questions or concerns regarding this comment letter may be addressed to Abigail Ramirez, Policy Advocate, Leadership Counsel for Justice and Accountability, at aramirez@leadershipcounsel.org or (415) 374-6020.

Sincerely,

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