



336 Pacific Avenue, Shafter, California 93263

August 23, 2019

Ms. Jaime Holt
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93726

Subject: Comments on the Draft Community Emissions Reduction Plan for Shafter

Dear Ms. Holt

City of Shafter staff members have reviewed the draft Community Emissions Reduction Plan (CERP) for Shafter and offer the following comments for consideration.

1. It would be helpful for the CERP to include a discussion of the regional nature of air quality issues facing the community. As you related at the August 12 Steering Committee meeting when asked how Shafter's air quality compares to air quality in similar small communities, air quality within the San Joaquin Valley generally worsens moving from west to east and from north to south. This response implies there are important geographic components that contribute to Shafter's local air quality and that as a result, local air quality control measures may not result in substantial improvements in local air quality within Shafter. The CERP should acknowledge that a substantial portion of the local air pollutant emissions impacting Shafter come from agricultural and oil production sources, which are largely located outside of the Shafter CERP planning area.
2. It would also be helpful for the CERP to set forth some overarching strategies that provide overall guidance and context for specific CERP strategies. Such overarching strategies would address some of Shafter concerns regarding the CERP. Suggested overarching strategies include:
 - Emphasize the use of financial incentives to reduce pollutant emissions and exposure of vulnerable populations to pollution. Where regulatory strategies are needed, emphasize strategies that would not place Shafter's local economy and employment base at a competitive disadvantage compared with adjacent communities that are not addressed and are not subject to compliance with the Shafter CERP.
 - Because emissions from agricultural and dairy activities, as well as from oil production affecting the Shafter community are a regional (or valley-wide) issue that requires action on a regional (or valley-wide) basis, recognize that pollution reduction programs

applied only to the Shafter community can reduce pollutant emissions and exposure to pollutants, but will not necessarily result in measurable improvements to ambient air quality. Programs addressing emissions from agricultural and dairy activities, as well as from oil production should therefore emphasize:

- Programs that can be applied on a regional (or valley-wide) basis once their effectiveness has been demonstrated within the Shafter community.
 - Measures of success such as reducing total air pollutant emissions within the community, increased utilization of existing incentive programs, and improved separation between sources of pollution and, rather than on achieving substantial improvements in local air quality.
 - Emphasize emissions reduction strategies that have a high degree of cost effectiveness, are readily implementable, and are appropriate to the size and demographics of the Shafter community.
3. CERP Figure 3-1 is unclear. Figures 3-1 and 3-2 should be revised to include a legend to indicate:
- The 7-mile radius surrounding Shafter
 - City of Shafter city limits
 - Shafter community boundary approved by CARB
4. The discussion of CalEnviroScreen should be expanded to make clear that it is based on a ranking of Census tracts statewide. While the text of the CERP attempts to explain that the “Shafter community is impacted across a number of health indicators,” Table 3-1 does not necessarily support that assertion.

CalEnviroScreen ranks four of the five Census Tracts within the Shafter area as falling within the 80th to 90th percentile for overall pollution burden, meaning that Shafter area residents face a greater burden of exposure to various environmental pollution hazards than residents within 80 percent of the Census Tracts throughout the State. The fifth Census Tract in the Shafter area (#39), encompassing the eastern portion of Shafter’s planning area, is identified by CalEnviroScreen as “High Pollution, Low Population.”

A suggested revision to Table 3-1 is provided below. Of note is that some of the Shafter area’s highest pollution burden (e.g., PM_{2.5}, pesticides) is related to the Central Valley’s agricultural economy, rather than to local sources in Shafter. The data shows that the Shafter area’s pollution burden in relation to traffic and diesel particulate emissions from the area’s growing industrial and warehouse employment base is low compared to Census Tracts throughout the state. While population, poverty, unemployment, and population characteristics are indicative of a disadvantage community, they are not health indicators, which is what Table 3-1 purports to show. Attached to the City’s comments on the CERP is a more detailed table indicating CalEnviroScreen rankings for the Shafter area.

CalEnviroScreen Ranking of Pollution Burdens for Shafter Area Census Tracts

<u>High Pollution Burdens</u> (greater than 80 th Percentile)	<u>Moderate Pollution Burdens</u> (between 40 th and 80 th Percentile)	<u>Low Pollution Burdens</u> (less than 40 th Percentile)
Ozone	Toxics Release	Diesel Particulate Emissions
PM _{2.5}	Cleanup Sites	Traffic
Drinking Water	Groundwater Threats	
Pesticides	Hazardous Wastes	
Solid Waste (Census Tract 42)		
Overall Pollution Burden		

Source: CalEnviroScreen 3.0, 2018.

5. The description of air quality in Shafter provided on page 19 should provide a comparison to other communities in the San Joaquin Valley. This information has been requested by several members of the Steering Committee at various different Committee meetings; however, a clear answer to that question is still needed. In reviewing proposed emissions reduction strategies and taking action on the CERP it is important that Steering Committee members and the District Board have a clear understanding not only of the local air pollutant emissions inventory (CERP Section 3.2.4) but also have an understanding of:
 - The extent to which these local sources affect local air quality in Shafter; and
 - The extent to which regional air pollutant emissions (e.g., agriculture, oil production, mobile source emissions) that occur outside of Shafter and are not addressed by the CERP affect local air quality in Shafter.
6. On page 21, the CERP identifies the BNSF mainline rail running adjacent to State Route 43. The CERP should also identify the UP mainline rail running adjacent to the State Route 99 freeway.
7. Figures 3-5 and 3-6 identify off-road and on-road emissions sources within the Shafter area. Discussion is needed in the CERP as to the effects of these local emissions sources on local air quality. While the CERP does a good job identifying local sources of air pollution, the document remains unclear as to the extent to which these local emissions sources are problematic and contribute to local air quality issues.
8. On page 38, the CERP lists the “Top 10 Community Sources of Concern,” implying the order of these sources of concern reflect the Steering Committee’s priorities. This listing is not indicative of the questions, issues, and suggestions raised during Steering Committee meetings to date. Such questions, issues, and suggestions have focused on pesticides, pollution from older vehicles, and oil production. If the listing on page 38 reflects sources of pollution emissions, the CERP should so explicitly state.
9. Strategy A.10 states that development of strategies related to pesticide use will be completed by the end of August. As such, City staff may have additional comments on the strategies once they are available for review.

10. Page 87 of the CERP states that community members “suggested that the land use planning of the City of Shafter be improved.” City staff does not recall such a statement being made at a Steering Committee meeting. The CERP does not, however, provide any specific discussion or suggestions to clarify this statement. City staff would be glad to meet with District staff to identify and resolve any specific land use planning factors that might be improved, rather than leave such a blanket statement in the CERP.
11. Page 88 of the CERP notes that the City of Shafter had a “representative member” on the Steering Committee. The CERPS should note that the City and County each had two representatives on the Steering Committee (see Table 2-1).
12. Strategies RD.1 and RD.2 should be cross-referenced with Strategy LU.1, which addresses street sweeping and road paving in relation to increasing use of bicycles and reducing vehicle miles travelled.
13. Strategies VB.1 and UG.1, which address vegetative barriers and urban greening, should include specific funding for such programs. Studying potential locations will not, by itself have an effect on local air quality.
14. Please clarify whether the CARB programs described starting on page 138 are statewide programs that are relevant to local air quality in Shafter, or if these are programs to be carried out by CARB specifically in the Shafter area and not statewide.

Thank you for the opportunity to comment on the Draft Shafter Community Emissions Program. Please call me at (661) 746-5002 if you have any questions or would like to discuss any of these comments in greater detail.

Sincerely,



Wayne Clausen
Planning Director