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Energy Equity In the San Joaquin Valley

Additional submitted attachment is included below.

SB-100 comments

November 18, 2019

Central California Asthma Collaborative is a 501c.3 Non-Profit working to reduce the burden of asthma and related conditions through education, intervention, policy analysis and advocacy in the San Joaquin Valley. CCAC sees a San Joaquin Valley with the health of every resident is our foremost concern.

Decision making for selection of SB-100 qualifying energy sources should be seen through the lens of equity in disadvantaged communities (DAC's) across California. Any resulting plan should be intentionally developed in partnership with Environmental Justice Advocates or a group such as California Air Resources Board's Environmental Justice Advisory Committee (EJAC) and at all times reflect Environmental Justice principles. California DAC's have a long history of so-called "clean" or "renewable" energy generation, storage and transportation being located in and moving through their neighborhoods with significant negative impacts.

Nowhere in California is this history better illustrated than California's San Joaquin Valley. Home to over 4.5 million people, almost 50% of whom live at or below 150% of the federal poverty line. The Valley's many landfills, water treatment plants, Large Confined Animal Feeding Operations (LCAFOs), and natural gas "peaker" plants, combine to emit thousands of pounds of air, toxic and climate emissions daily. Virtually all sited in or adjacent to disadvantaged communities. These siting decisions by local, regional, state and agency policy makers have resulted in years of disinvestment, environmental degradation, disproportionate health impacts including high rates of asthma, pre-term birth, and other chronic illnesses in these communities. Unsafe conditions resulting from insufficient or defective oversight of facilities construction, operation and maintenance is evidenced by the numerous "accidents" from wildfires, methane leaks, and worker safety records. Local neighborhoods bear the brunt of these many insults but have virtually no role in the decision making when it comes to how, where and when these facilities are selected, sited and operated, and very often do not see any benefits from these energy sources, which are often sending energy to much more affluent communities far away.

Also not discussed or described well by the existing SB-100 draft plan is the disposal of various waste products resulting from described renewable energy portfolio scenarios. Planned lithium ion storage batteries have a finite life span and are considered toxic waste when disposed at the end of their useful life. The environmental impacts of megawatt level solar arrays are poorly understood but the by-products of their manufacture are very well understood to be toxic, requiring long term storage at hazardous waste sites, a number of which are in the San Joaquin Valley and virtually all are located in or adjacent to DAC's, with local residents often have no idea of this potential threat. Renewable Natural Gas generated by landfills and water treatment plants also generates waste. Landfill energy is often either stored on site in tanks that leak and flare regularly, often within a few hundred feet of homes. Dairy produced RNG has a host of byproducts, some of which are useful and others that are not. Most of this waste is removed by diesel truck, and enters already oversubscribed landfills, increasing black carbon and NOx levels in already over-burdened communities.

CCAC supports SB-100 goals and believes strongly that decarbonizing our energy system is a laudable and critical goal to achieve. However, this must not increase the already heavy environmental and health burdens DAC's are already experiencing from this activity. CCAC recommends all new renewable energy generation, transmission and storage facilities be sited outside disadvantaged communities and existing older facilities be decommissioned and removed from them. We recommend a specific buffer

or set-back of at least one mile from any neighborhoods or other sensitive receptor locations should be included in the plan. Local residents must be actively engaged in any planning in a substantive way including the right to decline the placement or expansion of an energy producing facility in or adjacent to their community.

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