

Stockton Environmental Justice Education and Advocacy

California Air Resources Board Members
1001 I Street, Sacramento, CA 95814
P.O. Box 2815, Sacramento, CA 95812
via; Docket and/or cotb@arb.ca.gov

7.23.2026

Re: Public Comments for CARB Board Meeting 7.23.2026

26-5-3: Public Meeting to Hear Community Air Protection Program Annual Progress Update

The Community Air Protection Program has improved air quality for residents in Stockton, and we look forward to further emission reductions that decrease respiratory harms. We are particularly looking forward to cleaner switcher train at the Port and hope that Central California Traction will see the benefits and make further improvements. When I bring up the railroad, a community advocate says “now don’t get me started on the railroad”. The locomotives that go through parts of Stockton are very polluting.

The Community Air Protection Program is in the maturation process and now at an evaluative stage to plan improvements. I am proud to have been selected as a Stockton Community Steering Community representative serving on the AB617 Consultation Committee. There are several compliance evaluation efforts underway that will be useful when updating program documents that provide guidance to partner with communities to reduce emissions and improve air quality. Like I frequently remind the City of Stockton relating to alcohol and tobacco overconcentration: Not every zip code is created equal. We can and will need to do better so that progress can be maintained and expanded because we have many communities suffering from poor air quality in California.

Open Session to Provide an Opportunity for Members of the Public to Address the Board on Subject Matters within the Jurisdiction of the Board

I appreciate the effort in the Community Air Protection group in CARB to provide data and support of community emission reduction efforts but there is a whole level of CARB that seems to not understand that policies are encouraging a market for waste products from dairy operations. Waste products are being used as a money stream allowed by the Low Carbon Fuel Standard (LCFS) rules and creating pollutant burdens. These impacts involve air pollution other than methane (greenhouse gas) and water.

I recently submitted comments on the Bar 20 dairy project dated 6.2.2026 for consideration when making a LCFS decision. In those comments I reported the last time that the Regional Water Quality Control Board inspected the facility was in 2022. The Public Record Act request included an appendix of water well completion details which have not been located. The SJVAPCD inspection records were not available at the time I prepared and submitted comments, but subsequently, a Public Record Act request was made and information released 6.11.2025. The last time the SJVAPCD inspected the dairy was 1.12.2022 when violations were noted including:

Inspection Date: 1-12-22 **Inspector(s):** GLENN RAMMING
Accompanied By: Mark Jen, Justin Downs
Healthy Air Living Contact: _____ **Title:** _____ **Phone:** _____
Permit #: C-5203-CMPP-1 **Total Farmable Acres:** 0

Supplement Type	Quantity	Description	Compliant		Notes
			Yes	No	
DAIRY	1 Count	Maximum Number of Cows	☐	☐	
UNPAVED AREAS(AFO) 10	3.125 Miles	Unpaved Road Mileage	☐	☒	

A recent Stocktonia reprint of Inside Climate News¹ describes air pollution from dairies forcing people to close their windows which in the heat prevents natural cooling increasing air conditioning needs.

AGRICULTURE

Dairy Farms' Expansion Plan Worries California Families Who Once Had a 'Little Piece of Heaven'



by Steven Rodas • Inside Climate News July 19, 2026, 12:00 p.m.



Periodic inspection checks of proper spraying of unpaved roads on this operation of over 2,000 acres are needed instead of relying on neighboring residents to create and communicate an air pollution complaint. I do know if there have been any public air quality complaints submitted to the SJVAPCD in the area of Bar 20 operations. Without regulatory inspections violations increase and with inspections and enforcement better compliance is achieved, generally. Going more than 4 years since the last inspection has likely contributed to air quality issues found in many dairy communities. Not even considering odor issues, small particles that get picked up and worn down with traffic, PM2.5, are very hazardous contributing even to cardiovascular disease because the small particles can get into the bloodstream.

The extent of dairies with manure digesters has increased in California and the digest products have become a valuable commodity for energy sales with extra credits as the methane is deemed a low carbon fuel and renewable though there are prohibitions against receiving credits for both programs. A map of dairy facilities in California is included below and the Central Valley is predominantly represented with dairies within 1 mile of nitrate pollution high risk areas.²

¹ [Dairy Farms' Expansion Plan Worries California Families Who Once Had a 'Little Piece of Heaven' - Stocktonia News](#)

² https://www.waterboards.ca.gov/public_notices/petitions/water_quality/r5-2013-0122.html

Dairy waste containing nitrate pollution have contaminated groundwater wells over much of the areas where dairies are found in California as shown on the map posted with the Dairy Order under review now for adoption by the State Water Resources Control Board.

Environmental attorneys have been working tirelessly for many years on behalf of residents to get the State Board to regulate dairies that have created basin wide areas of harmful nitrate pollution. The State Water Resources Control Board released a statement dated 2.27.2025 announcing that the “State expands program that has provided free replacement water for over 1,800 nitrate-impacted wells.”³

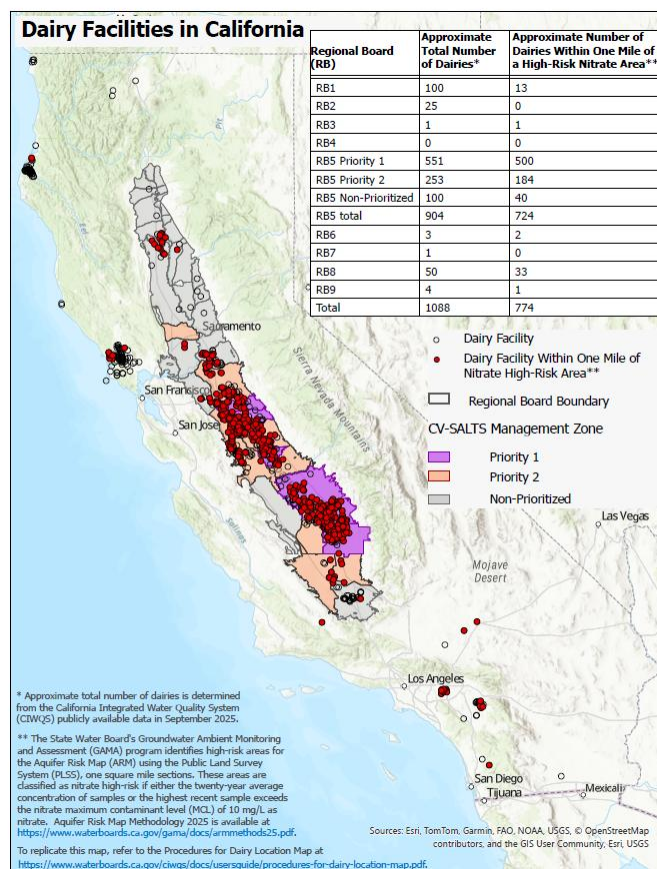
The Draft Order under consideration with comments due 7.30.2026 states:

“We are establishing the new regulatory framework for nitrogen discharges primarily because of our evolving understanding of the outsized contribution of dairies to groundwater nitrate pollution in the Central Valley compared to other sources of nitrogen loading, as well as the relative amount of nitrogen loading to groundwater from the different sources of dairy manure discharged from dairies.”

The California Air Resources Board has contributed to these problems for residents in California related to the LCFS credit evaluation of the value of dairy biogas produced by confined dairy herds without fully considering the environmental costs.

Please consider forming a task force to characterize how these Low Carbon Fuel Standard program economic benefits have resulted in unintended consequences with dairy expansions such as Bar 20 and others throughout the United States. Producing milk seems to be a valuable byproduct. A recent example is the Merced dairy expansion whose CEQA analysis documents have more significant and unavoidable impacts.⁴ I wonder how many residents knew about the project? Communities continue to be harmed when Lead CEQA agencies make Findings of Overriding Significance. These communities that are harmed by these decisions and declarations are generally not those with higher incomes.

Also, please consider having some more explanation about posting written comments on the docket and include the combination to search for the docket in the agenda for board meetings.



³ https://www.waterboards.ca.gov/press_room/press_releases/2025/pr20250227-cv-salts-expansion.html

⁴ <https://ceqanet.lci.ca.gov/2024010339/3>

I wanted to submit comments yesterday, but was unable and received the following message from the Clerk of the Air Board:

From: ARB Clerk of the Board <carb@arb.ca.gov>
Sent: Wednesday, July 22, 2026 9:47 AM
To: Mary Elizabeth <mebeth@outlook.com>
Subject: Re: Public comments written for 7.23.2026

Good morning,

The electronic dockets for all July Agenda Items, including Open Comment, will open at the start of the July Board Meeting tomorrow, 7/23, at 1:00 p.m.

Members of the public can submit their written comments to the dockets during that time.

Thank you.



Clerk of the Board
Executive Office - BARCU
Email: carb@arb.ca.gov
VoIP: +1 916-322-5594

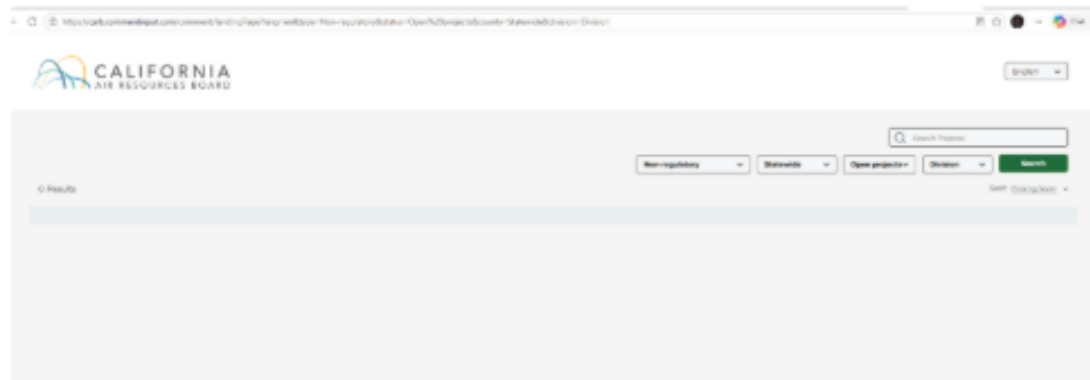
From: Mary Elizabeth <mebeth@outlook.com>
Sent: Wednesday, July 22, 2026 9:41 AM
To: ARB Clerk of the Board <carb@arb.ca.gov>
Subject: Public comments written for 7.23.2026

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

When I click the link to comment on non-agenda open session I get a topic that is not open session. Also, I wanted to put in a comment on the item 26-5-3 Community Air Protection program.

I tried searching but am not finding the right combination



Thank you.

Mary Elizabeth, M.S., R.E.H.S.

Please contact me at mebeth@outlook.com if you would like to discuss these comments.

Peace and thanksgiving for your efforts to improve air quality in California.

Clean Air For ALL!

Mary Elizabeth, M.S., R.E.H.S.