January 27, 2026

Steve Esselman
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Sent via email

Dear Steve Esselman:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Notice of Preparation (NOP) for the Ranch 12 Industrial Park Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2025121064. The Project proposes the development of a master-planned logistics center intended to support up to 11.7 million square feet of industrial uses, including distribution, fulfillment, cold storage warehouses, commercial retail, and manufacturing, on approximately 786.2 gross-acres. The Project requires General Plan Amendment no. 25-46 and Zone Change No. 25-81 to transition the site from its current Agricultural and Industrial designations to a Specific Plan designation. This action will allow for the implementation of the Ranch 12 Industrial Park's specialized land use and development standards. The Project site is located within the City of Shafter (City), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Industrial developments, particularly those including cold storage and fulfillment centers as proposed under the Project, would result in high daily volumes of heavy-duty diesel truck traffic and the operation of on-site equipment (e.g., forklifts and yard tractors) that emit diesel particulate matter (diesel PM) and contribute to regional air pollution. Diesel PM is a carcinogen and is linked to cancer and respiratory health effects such as asthma.[1] The community surrounding the Project site would be exposed to diesel PM during the construction and operation of the proposed industrial development.

The Project is directly north of Minter Airfield and Minter Village. There are residences located west of the Project site, with the closest residences located within 19,450 feet from the Project's western boundary. In addition to residences, Central Valley High School, Sequoia Elementary School and Richland Junior High School are located within five miles of the Project. These residences and schools are located within the Shafter community, which has been designated as a disadvantaged community under Assembly Bill (AB) 617 (Garcia, Chapter 136, Statues of 2017). To protect these receptors near the Project site from toxic

[1] CARB. Summary: Diesel Particulate Matter Health Impacts. Accessible at: *https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts*

diesel PM exposure, CARB staff urges the City to plan for the use of zero-emission technologies within the Project site as recommended in this letter.

The Project May Increase Exposure to Air Pollution for Residences Located Within the Shafter Environmental Justice Neighborhood Community

The Project is located within the boundaries of the Shafter community. The Shafter community was selected by CARB for the development of a community emissions reduction program (CERP) under AB 617 due to its high cumulative exposure burden from mobile and stationary sources of air pollution.[2] The census tracts within the area score as high as the 87th percentile in CalEnviroScreen 4.0. As previously discussed, there are numerous existing sensitive receptors located near the Project site, which includes residences and schools. The City must ensure the DEIR includes a robust analysis of all potential air quality and health risk impacts and implements the most stringent mitigation measures available to protect public health.

The following three pieces of legislation must be seriously considered when developing a Project like this near a disadvantaged community:

Senate Bill 535 (De León, 2012); Disadvantaged Communities

Senate Bill 535 (De León, Chapter 830, 2012)[3] recognizes the potential vulnerability of low-income and disadvantaged communities to poor air quality and requires funds to be spent to benefit disadvantaged communities. The California Environmental Protection Agency (CalEPA) must identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)).

CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen).[4] The Project is located with the boundary of the Shafter Community. Many residences within the Shafter Community are located in census tracts with a maximum CalEnviroScreen score in the top 5%, indicating that the area is home to some

[2] San Joaquin Valley Air Pollution Control District. Selected AB 617 Communities. Shafter. Accessible at: *https://community.valleyair.org/selected-communities/shafter*

[3] Senate Bill 535, De León, K., Chapter 800, Statutes of 2012, modified the California Health and Safety Code, adding § 39711, § 39713, § 39715, § 39721and § 39723.

[4] "CalEnviroScreen 4.0." Oehha.ca.gov, California Office of Environmental Health Hazard Assessment, June 2018, *https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40*

of the most vulnerable neighborhoods in the State. The air pollution levels in this community routinely exceed state and federal air quality standards.

The City must ensure the implementation of all feasible mitigations, including utilization of zero-emission technologies, to limit the Project's air quality and public health impact on neighboring disadvantaged communities.

Senate Bill 1000 (Leyva, 2016); Environmental Justice Element for Land Use Planning

Senate Bill (SB) 1000 (Leyva, Chapter 587, Statutes of 2016).[5] amended California's Planning and Zoning Law. SB 1000 requires local governments that have identified disadvantaged communities to incorporate the addition of an environmental justice element into their general plans upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities, like the Shafter Community.

Assembly Bill 617 (Garcia, 2017); Community Air Protection

The State of California has emphasized protecting local communities from the harmful effects of air pollution through the passage of AB 617.[6] AB 617 required CARB to develop the process that creates new community-focused and community-driven action to reduce air pollution and improve public health in communities that experience disproportionate burdens from exposure to air pollutants. In response to AB 617, CARB established the Community Air Protection Program with the goal of reducing exposure in communities heavily impacted by air pollution. As part of its role in implementing AB 617, CARB must annually consider the selection of communities for development and implementation of community air monitoring plans and/or community emission reduction programs for those communities affected by a high cumulative exposure burden.

[5] Senate Bill 1000, Leyva, S., Chapter 587, Statutes of 2016, amended the California Health and Safety Code, § 65302.

[6] Assembly Bill 617, Garcia, C., Chapter 136, Statutes of 2017, modified the California Health and Safety Code, amending § 40920.6, § 42400, and § 42402, and adding § 39607.1, § 40920.8, § 42411, § 42705.5, and § 44391.2.

The San Joaquin Valley Air Pollution Control District adopted the Shafter Community Emissions Reductions Program (CERP)[7] in September 2019; the CERP describes strategies to achieve emission and exposure reductions throughout Shafter, including significantly reducing emissions from toxic pesticides and heavy-duty mobile sources, with strategies aimed at reducing dust from harvesting, open burning, and freight activities associated with agriculture. The CERP focuses on concentrated efforts by the Air District, CARB, the Department of Pesticide Regulation, and the community to reduce these threats, including goals to implement pesticide notification systems, pave unpaved roads, and replace aging agricultural equipment and school buses throughout the community.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Operation

According to the Project Description Section of the NOP, the Project would allow for cold storage uses.[8] The operation of the proposed cold storage uses will result in trucks and trailers with transportation refrigeration units (TRUs) visiting the Project area.[9] TRUs can emit large quantities of diesel PM, a toxic air contaminant, while operating. Residences and other sensitive reports located near where these TRUs could be idling and operating would be exposed to diesel PM emissions, potentially resulting in a significant health risk to the nearby community. Since the Project would generate diesel powered heavy-duty truck traffic along roadways adjacent to residential communities, CARB urges the City to prepare a health risk assessment (HRA) for the Project. The HRA should account for all potential operational health risks from Project-related diesel PM emission sources, including, but not limited to, back-up generators, on-site diesel-powered equipment, and heavy-duty trucks. The HRA must also account for cancer risk impacts from the operation of trucks and trailers with TRUs operating within and outside of the Project area. Although the NOP states that the proposed cold storage facilities will include "electric plug-ins for refrigerated truck units," providing hookups alone does not prevent TRUs that are not plug-in capable from accessing and operating at the site. To fully disclose the Project's potential air quality impacts, the City must thoroughly evaluate the Project's potential health risks from the operation of TRUs in the HRA.

The HRA prepared in support of the Project should be based on the latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots

[7] Community Emissions Reduction Program (CERP) Shafter. Accessible at: *https://community.valleyair.org/media/msga0jpv/01-finalshaftercerp-9-19-19.pdf*

[8] City of Shafer. Notice of Preparation for the Ranch 12 Industrial Park. Page 2. December 2025. Accessible at: *https://ceqanet.lci.ca.gov/2025121064/Attachment/QWCnEO*

[9] TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

Program Guidance Manual for Preparation of Health Risk Assessments).[10] The Project's mobile diesel PM emissions used to estimate the Project's cancer risk impacts should be based on CARB's latest 2025 Emission Factors model (EMFAC2025. Mobile emission factors can be easily obtained by running the EMFAC2025 Web Database: *https://arb.ca.gov/emfac/*

To reduce diesel PM exposure and associated cancer risks during the operation of the Project, CARB urges the City to include all the air pollution reduction measures listed below.

- Include contractual language in tenant lease agreements requiring tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support zero-emission vehicles and equipment that will be operating on site.
- Include contractual language in tenant lease agreements requiring all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with TRUs or auxiliary power units. This requirement will substantially decrease the amount of time that a TRU powered by a fossil-fueled internal combustion engine can operate at the project site.
- Use of zero-emission all-electric plug-in TRUs, hydrogen fuel cell transport refrigeration, and cryogenic transport refrigeration are encouraged and can also be included in lease agreements.[11]
- The 2022 Amendments to the TRU Regulation require the transition of diesel truck TRUs to zero-emission technology.[12] Facilities should monitor compliance with the zero-emission transition schedules.
- Include contractual language in tenant lease agreements requiring all TRUs entering the project-site be plug-in capable.
- Include contractual language in tenant lease agreements requiring future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

[10] Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*.

[11] CARB's technology assessment for transport refrigerators provides information on the current and projected development of TRUs, including current and anticipated costs. The assessment is available at: *https://www.arb.ca.gov/msprog/tech/techreport/tru_07292015.pdf*

[12] CARB. Zero-Emission Transport Refrigeration Unit (TRU) Regulation Summary. Accessible at: *https://ww2.arb.ca.gov/zero-emission-transport-refrigeration-unit-tru-regulation-summary - :~:text=operate in California.-,As of October 1, 2022, the effective date of the,if they operate in California.*

- Include contractual language in tenant lease agreements requiring all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available and can be purchased using incentive funding from CARB's Clean Off-Road Equipment Voucher Incentive Project (CORE).[13]
- Include contractual language in tenant lease agreements requiring all heavy-duty trucks, entering or on the project site, to be zero-emission vehicles to the maximum extent feasible. A list of commercially available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP).[14] Additional incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.[15]
- Include contractual language in tenant lease agreements requiring the tenant to be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[16] Advanced Clean Trucks Regulation,[17] Clean Truck Check (Heavy-Duty Inspection and Maintenance Program)[18], and the Statewide Truck and Bus Regulation.[19]
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

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[13] Clean Off-Road Equipment Voucher Incentive Project. Accessible at: *https://californiacore.org/how-to-participate/*

[14] Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: *https://californiahvip.org/*

[15] Carl Moyer Program and Voucher Incentive Program. *https://ww2.arb.ca.gov/carl-moyer-program-apply*

[16] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: *https://ww2.arb.ca.gov/our-work/programs/ttghg*

[17] On June 25, 2020, CARB approved the Advanced Clean Trucks Regulation. The regulation requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 electric trucks in California by the end of 2030 and about 300,000 by 2035. CARB is expected to consider a fleet regulation in 2021 that would be compatible with the Advanced Clean Trucks regulation, requiring fleets to purchase a certain percentage of zero-emission trucks and vans for their fleet operations. *https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks*

[18] CARB. Enforcement of Clean Truck Check HD I/M Regulation. Accessible at: *https://ww2.arb.ca.gov/es/our-work/programs/heavy-duty-diesel-inspection-periodic-smoke-inspection-program/about*

[19] The regulation requires that newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model-year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: *https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm*

- Include contractual language in tenant lease agreements, requiring the installing of vegetative walls[20] or other effective barriers that separate loading docks and people living or working nearby.

The DEIR Should Quantify and Discuss the Potential Cancer Risks from Project Construction

In addition to the health risks associated with operational diesel PM emissions, health risks associated with construction diesel PM emissions should be included in the air quality section of the DEIR and the Project's HRA. Construction of the uses proposed under the Project would result in short-term diesel PM emissions from the use of both on-road and off-road diesel equipment. The OEHHA guidance recommends assessing cancer risks for construction Projects lasting longer than two months. Since construction would very likely occur over a period lasting longer than two months, the HRA prepared for the Project should include health risks for existing residences near the Project site during construction. The HRA should account for all diesel PM emission sources related to Project construction, including, but not limited to, off-road mobile equipment, diesel generators, and on-road heavy-duty trucks. To reduce diesel PM exposure and associated cancer risks during the construction of the Project, CARB urges the City to include all the air pollution reduction measures listed below:

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and nearzero equipment and tools.
- Implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology vehicles and equipment that will be operating on site. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, on-site vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
- In construction contracts, include language that requires all off-road diesel-powered equipment used during construction to be equipped with Tier 4 Final or cleaner engines, except for specialized construction equipment in which Tier 4 engines are not available.
- Consistent with the 2022 Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation (Adopted January 01, 2024), construction contracts must prohibit the

[20] Effectiveness of Sound Wall-Vegetation Combination Barriers as Near-Roadway Pollutant Mitigation Strategies (2017) is available at: *https://ww2.arb.ca.gov/sites/default/files/classic//research/apr/past/13-306.pdf*

addition of Tier 3 and older vehicles to fleets and mandates the phase-out of the oldest engines [Tiers 0, 1, and 2).[21]

    - In place of Tier 4 engines, off-road equipment can incorporate retrofits, such that emission reductions achieved are equal to or exceed that of a Tier 4 Final engine.

- In construction contracts, include language requiring the use of renewable diesel (R99 or R100) in all off-road diesel-powered equipment, consistent with the 2022 amendments to the Off-Road Regulation.[22]
- In construction contracts, include language that requires all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during project construction be battery powered.
- In construction contracts, include language that requires all heavy-duty trucks entering the construction site during the grading and building construction phases be zero-emission vehicles (ZEV) where feasible. If ZEVs are not feasible, trucks must be model year 2017 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-oxides of nitrogen (NOx) standard.[23]
- In construction contracts, include language that requires all construction equipment and fleets to be in compliance with all current air quality regulations. CARB is available to assist in implementing this recommendation.

Conclusion

Given the Project's location within the AB 617-designated Shafter community, the City has a critical responsibility to ensure its development does not further burden residents with toxic air pollution. To this end, the Project should serve as a model for modern, zero-emission logistics and commercial development. CARB strongly urges the City and the applicant to incorporate the emission reduction measures provided in this letter.

Given the breadth and scope of Projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to respond to all issues associated with a Project, CARB must prioritize its substantive

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[21] CARB. In-Use Off-Road Diesel-Fueled Fleets Regulation. Accessible at: *https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation*

[22] CARB. Fact Sheet: Renewable Diesel Fuel Requirements. Accessible at: *https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-renewable-diesel-fuel-requirements*

[23] In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*

comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

CARB appreciates the opportunity to comment on the NOP for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your State Clearinghouse list of selected State agencies that will receive the DEIR as part of the comment period. If you have questions, please contact Alejandro (Alex) Sanchez, Air Pollution Specialist via email at *alex.sanchez@arb.ca.gov*.

Sincerely,

Matthew O'Donnell

Matthew O'Donnell, Chief, Risk Reduction Branch

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