

## Community-Based Air Pollution Concerns with the 2023 Fresno County DPEIR and Zoning Ordinance Update

Our concerns are that the current and new Fresno County GNRA fail to protect the health and safety of residentially zoned areas in the unincorporated areas of Fresno County.

1. Current air pollution levels throughout our neighborhood as represented on CalEnviroScreen 4.0 show extremely unhealthy levels of air pollution in the 90th percentile and above.  
[https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4\\_0/](https://experience.arcgis.com/experience/11d2f52282a54cee6184203/page/CalEnviroScreen-4_0/)
2. There are no plans in the EIR on p. 4.3-19, 21, 25-26 to reduce this high level of toxic air and these plans will greatly increase the severity of what is already the worst air quality in the US. See also “Total Unmitigated Operational Emissions” on table 4.3-6 that shows inadequate measures to mitigate this extremely dangerous level of toxic air quality. Residents have life expectancies of an average of 15-20 years less.
3. Furthermore, Section 4.8 doesn’t provide any measures to reduce GHG emissions sufficiently quickly to impact better health outcomes from pollution-caused diseases. Performance-based standards (P-B standards), do not mitigate or decrease negative impacts of current conditions and the trajectory with increased growth in population, industrial and commercial activity that these plans encourage will never succeed in reducing GHG emissions. Current conditions will never be ameliorated or improved with the implementation of P-B standards. **Without lowering current air pollution levels through active air monitoring and implementing strong restrictions that lead to industrial and commercial compliance or shutting down operations *before* these planned expansions, the trajectory of the P-B standards cannot ever catch up with reducing GHG levels to improve human health, reduce premature mortality which is currently at 800-1000 annually (Prunicki and Nadeau, *Why Your Air Will Not Get Better*, Cade Kennedy, p. 6).**
4. The Fresno County Zoning Ordinance Update does not include any zoning regulations for trucking yards. As you can easily see on the Fresno County District 1 zoning map, my property at 3335 W. McKinley Ave is in a large area zoned Residential. There is one exemption within the block from Marks to Valentine for Ross Crane. Currently, King Holding, LLC, is attempting to turn the property on 3388 W. McKinley Avenue into a trucking yard in violation of zoning regulations. For the last several years, Royalty Freight at 3728 W. McKinley Avenue has been operating illegally accumulating multiple fines and citations and there are some 16 trucking yards in various stages of operation nearby. One is across from Hanh Tilley Elementary School near the corner of Valentine and W Clinton Avenue. These zoning ordinance updates provide no discussion, direction or solution for this problem which is growing very fast. Air pollution levels should dictate that trucking yards are one of the most serious violators of the Clean Air Act and, as they violate Residential zoning regulations, the Zoning Ordinance Update needs to make very clear that these operations will not be tolerated by Fresno County as they violate the rights of residents to clean air, safety on the roads and acceptable levels of noise. There is no protection from this at all.
5. Fresno County should not be seeking to develop growth plans because we are an area that

suffers from the worst air pollution in the nation and scarcity of water resources. Expanding the population of Fresno County along this trajectory may secure more funding based on the State of California's push to increase housing density to correct the low inventory of housing, but we do not have the natural resources to support this kind of growth. To knowingly do so in these conditions puts those of us who are here at greater risk of dry wells, even more toxic air and other dangerous conditions that will make Fresno County an even more undesirable area to live. We should see Fresno County place focus on improving air quality, reducing the strain on limited water resources and providing improved services for those who live here. Our resources are already stretched to the limit.

6. We need to see evidence that Fresno County and the Air Resources Board are working together stop the abuse of the air quality in areas zoned Residential. Provide plans for joint operations to Stop the proliferation of illegal industries in residential areas using strong data on air quality and Zoning laws to protect residents health and safety. Without a joint way of attacking the problem, it seems unlikely that anything will be done. We need action now, not during the next planning Cycle. We need higher fines that might actually shut down illegal operations in residentially zoned areas. This system is making people sic, die early and suffer extreme harm. We need Fresno County to have the jurisdictional authority to stop operations within 24 hours.

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Advocate Against Trucking Yards in Residentially Zoned Areas



JUN 29 2023

DEPARTMENT OF PUBLIC WORKS  
AND PLANNING  
DEVELOPMENT SERVICES DIVISION

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## List of Trucking Yard Addresses Starting Up on Residential Property

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To: Preet Bath <preet.bath@valleyair.org>  
Bcc: District 1 <District1@fresnocountyca.gov>

Mon, Jun 12, 2023 at 3:16 PM

Hi Preet! I thought it might be helpful to give you and the San Joaquin Valley Air Control District a list of properties where trucks are at various stages of creating trucking yards. Some of them are in full operation, such as the one located in the next block from me at, 3728 W. McKinley Avenue owned by Gurdeep Singh. The company is called royalty freight and it includes tractor trailers, charter, buses, and stretch limo's. This property has been operating for a number of years on residential is owned property. It has been fined, and Received numerous citations from the county, but nothing seems to be able to shut it down.

Since there are roughly 16 of said, trucking yards in use or about to be operational within a 5 mile radius of my house at 3335 W. McKinley Avenue this is going to have a major impact upon air quality very soon.

The property across from my house at 3388 W. McKinley Avenue is being prepared for a trucking yard. According to records I was able to verify through District 1 county supervisors office. This property is owned by King holding, Sandeep Sehla. The property is zoned residential and has not been approved nor even has anyone ever applied to have it re-zoned commercial. The property owner has installed an electrical panel on the corner of Ballantyne and McKinley without applying for or receiving a PG&E Permit.

In addition, no other applications for port, permits or approvals, have been filed with the county or anyone else. The activity there is very infrequent, and we assume that the owner is hoping to slowly move in without attracting much attention. I am serious, sincerely, hoping that the San Joaquin Valley Air District and the air resources board will be able to stop all of these properties from going forward. They are all illegal and none of us has the money as a residence to file legal in junctions against any of these companies.

The County receives constant complaints about them, but they do not have the resources to do more than send code enforcement letters to the properties. They are unable to inspect or enter any land for the purpose of noticing the owner of their violation.

- 3388 W McKinley Ave within 1/4 m of Tilley School
- 3728 " *Royalty Freight*
- 5666 " *Royalty Freight*
- 6377 " Auto Salvage Yard and dump
- 5178 " "
- 7490 " "
- 7028 " AG20 Zoning not Commercial or Industrial
- 7038 " "
- 4681 W Olive
- 4765 " Construction Company
- 5137 " "

All of these are zoning violations in residential areas, and except for those were expressly identified, they are or will become trucking yards.

2134 N Valentine Ave is right across from Tilley Elementary School near the corner of W Clinton Ave.

I hope this information is helpful. I have many other locations I can give you all in this Central West area of Fresno County. I really hope that it will be possible for you to contribute to stopping these polluting industries from operating illegally.

Thanks very much!

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