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Gregory A. Barfield, Director

August 23, 2019

Ms. Heather Heinks
San Joaquin Valley Air Pollution Control District
1990 East Gettysburg Avenue
Fresno, California 93726

Dear Ms. Heinks:

Please accept the following comments from the City of Fresno Department of Transportation regarding the August 14, 2019, DRAFT - Community Emissions Reduction Program, which stems from the South Central Fresno AB617 community process.

As you know the Department of Transportation oversees the City's Public Safety Fleet, Municipal Fleet, and Fresno Area Express (FAX) and its fleet. The FAX fleet is all CNG powered and has no diesel buses, while the municipal fleet ranges from LNG, solid waste vehicles to backhoes, and everything in between. Finally, the Public Safety fleet covers all police and fire vehicles.

Here are our comments on the plan:

1) HD8: Develop Incentive Program for the Replacing Older Diesel Transit Buses with Zero or Near Zero Emission Transit Buses. (Page 49)

We agree with the need to remove diesel buses, but FAX currently has zero diesel buses in its inventory and has an all CNG fleet; therefore, we would recommend this incentive program be expanded to also include moving CNG to electric (zero emission). This would allow us to move faster toward an electric fleet when the FAX CNG buses reach their end of life at about 12-15 years of age.

2) C5: Incentive Programs for Educational Training for Electric Vehicle Mechanics (Page 58)

Strongly support this effort as Fresno City College, FAX, and Proterra are partnering to bring a state-of-the-art facility to the new Fresno City College West Fresno Center, which is inside the South Central Area

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footprint, using Measure C New Tech funds to start the project. However, there needs to be a sustained effort to encourage people into the training, starting at the high school level, with such programming as the Duncan Poly Tech Heavy Duty Maintenance program.

In addition, there is a concern with comment No. 4 submitted by Monica Limon on behalf of community advocates and some members of the AB617 community that states:

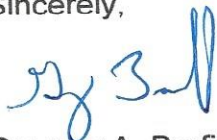
CARB will work with the Air District to review if the City of Fresno is in compliance with their fleet maintenance schedule by performing scheduled fleet inspections no less than once a year. Buses that are ready to be put out of commission are replaced with electric buses.

In regards to this comment, the City of Fresno fleet is regularly inspected by enforcement agencies, including the CHP and Caltrans who require us to keep updated records on maintenance, as well as having to report to state and federal funders, including the FTA, on the state of our fleet. We believe the additional inspections are just too burdensome and may take away from keeping our fleet in a state of good repair.

We appreciate the opportunity to comment on the draft plan and clear the air about our current inspection programs.

Should you have any questions, please feel free to contact my directly at 621-1520.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Barfield".

Gregory A. Barfield,
Director of Transportation