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August 23, 2019

Jessica Olsen, Program Manager
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93716

RE: AB617 Shafter Draft CERP Comments

Dear Ms. Olsen,

Thank you for the opportunity to comment on the Draft Community Emission Reduction Program (CERP) for Shafter. Kern County Public Works (KCPW) currently participates in the AB 617 Steering Committee to collaborate on clean air strategies and work cooperatively with local leadership in addressing environmental justice concerns, particularly through transportation modes that affect disadvantaged communities in Kern County.

The Kern region of the San Joaquin Valley has one of the highest cumulative exposure burdens for criteria pollutants and toxic air contaminants in the state. KCPW is committed to improving public health and safety by constructing infrastructure improvements that reduce air pollution helping the region meet clean air mandates. KCPW is willing to partner with the community to identify opportunities to reduce fugitive dust and vehicle miles traveled by paving unpaved roadways, constructing new sidewalks, increasing street sweeping, and improving public fleet vehicles. Specific strategy comments and recommendations are as follows:

RD. 2 – ROAD DUST: ROAD PAVING AND SIDEWALK INSTALLATIONS:

The County agrees that road paving is an effective strategy to reduce dust in the community; however, no funding commitment or incentives are recommended in the CERP. Over the last 10 years, this Department has completed over 80 Congestion Mitigation and Air Quality (CMAQ) funded projects. More than 200 miles of dirt roads and shoulders have been paved within Kern County to improve the quality of life for all residents countywide. Due to the various federal requirements of this funding source (NEPA compliance, prevailing wages, DBE goals, etc.), the average construction cost for paving one (1) mile of dirt road is approx. \$1,500,000 per mile within a 2-3 year time period. These costs can increase up to \$4,000,000 per mile if the project requires the purchase of right-of-way, a sump and applicable drainage facilities. CMAQ is the only funding source that provides funding for large-scale projects. This grant funding averages \$10-15 million per year on a competitive basis specifically within Kern County.

Using the CARB calculator, paving one (1) mile of a dirt road, yields an:

- Average annual reduction of $PM^{10} = 186.3$ tons
- Average annual reduction of $PM^{2.5} = 27.9$ tons
- Cost effectiveness = \$3,756 per ton (over the 20 year life of the road)

There are seven proposed measures totaling over \$27,000,000 in incentives for programs that will yield a cumulative reduction of 28.96 tons of $PM^{2.5}$ (CERP Table 4-3, “Estimated Reductions by Measure”, Measures HD.2, HD.4, HD.6, HD.7, C.2, A.1 and A.7.) Paving one (1) mile of a dirt road achieves the same proposed benefit (for $PM^{2.5}$), respectively. Paving dirt roads is one of the most cost effective strategies to reduce emissions within the AB 617 community; however, no construction funding or incentives are proposed for such improvements.

Constructing sidewalks may not be as cost effective as paving a dirt road, but they are important for health and transportation equity in disadvantaged areas. Mexican Colony is the only area that has curb, gutter and drainage facilities that result in minimizing fugitive dust problems. Most areas currently have with dirt shoulders with no sidewalk or drainage facilities. After rain events, the dirt shoulders where residents park their vehicles and walk are either flooded or full of mud which gets tracked into their homes and on their clothes. Mud is a tripping hazard that reduces the potential for residents to use alternate modes of transportation such as walking or biking, increasing their reliability on vehicles. Complete street improvements are needed to enable safe convenient travel and access for all users of the road, including pedestrians and bicyclists for all ages and abilities.

There are several grant funding sources that KCPW has been successful in securing; however, these are on a competitive basis. On average, we construct 2-3 sidewalk projects per year. The average construction cost for one (1) mile of sidewalk is approx. \$2,000,000 per mile for roads with dirt shoulders requiring complete street improvements. These costs can increase up to \$2,500,000 per mile if the project requires the purchase of right-of-way for a sump and applicable drainage facilities.

Per the CARB calculator, constructing 1 mile of sidewalk, yields an:

- Average annual reduction of $PM^{10} = 0.16$ tons
- Average annual reduction of $PM^{2.5} = 0.02$ tons
- Reduction in Vehicle Miles Traveled = 88.98 miles

Estimated construction cost for complete streets in the AB 617 area, is as follows:

AB 617 Community Area	Length (miles)	Estimated Cost
Mexican Colony plus paving 3 alleys	1.30	\$3,250,000
Smith’s Corner	1.70	\$4,250,000
Cherokee Strip	0.83	\$2,075,000
Thomas Lane	0.78	\$1,950,000
Misc. residential pockets	2.47	\$6,175,000
TOTAL	7.08	\$17,750,000

No construction funding or incentives are proposed for sidewalk improvements; however, there is one proposed CERP measure totaling \$2,000,000 in incentives for a program that will yield a reduction of 0.03 tons of PM^{2.5} (Measure C.2-Replacement of passenger vehicles with Battery Electric.) Paving one (1) mile of a sidewalk achieves a similar benefit (for PM^{2.5}), respectively.

RECOMMENDATION: Provide grant funding for paving dirt roads, shoulders and construction of sidewalks in the amount of \$20,000,000.

D.1 – STREET SWEEPING:

The County agrees that an increase in the frequency of street sweeping would be an effective strategy to reduce dust in the community. There are approx. 131 miles of roads within the AB 617 service area of which 75 miles are within the county, 46 miles within the city and 10 miles along state routes; however, no funding commitment or incentives are being recommended. Kern County currently has 2 street sweepers that are aging. Incentives to modernize street sweepers would be supported; however, a Community Service Area (CSA) is required to establish fee-based services such as street sweeping, sewer service and street lights. This is an environmentally and economically disadvantaged community. Any increase to costs for services in this area would further increase this burden. Two previous attempts to form CSAs in this area have been rejected because the residents cannot afford to pay these additional fees.

Significant amounts of mud are tracked onto the road after rain events that leaving the road covered in mud that results in an increase of fugitive dust emissions. In order to reduce particulate matter through street sweeping, more road shoulders need to be paved.

RECOMMENDATION: Provide \$1,000,000 incentive funding to pay for a monthly contracted street sweeping service for the entire AB 617 service area for 10 years.

PF.1 – INCENTIVE PROGRAM FOR REPLACING FLEET VEHICLES:

The goal of this strategy is to increase outreach to public agencies operating vehicles within the community as well as prioritized funding for projects in the community. Depending on the types and cost of vehicles replaced, the proposed funding amount of \$100,000 would cover the replacement of up to 5 vehicles at an incentive of \$20,000 each.

The County supports this measure and would be willing to consider this opportunity; however, it is suggested that the service area be expanded to include the Shafter/Wasco Landfill and Wasco Road Maintenance Yard, both within the vicinity of the service boundary so that the County would be eligible for this benefit. Vehicles within both of these facilities provide services specifically for this area.

RB.2 and RB.4: EDUCATION AND OUTREACH FOR ILLEGAL RESIDENTIAL OPEN BURNING

The goal of this strategy is to reduce illegal burning of residential waste through outreach and education so that residents understand both the unlawfulness of burning garbage and its negative health impacts on all.

The County supports this measure to provide focused advertising regarding its residential waste services. Educational materials are currently available regarding free residential trash disposal and free recycling at county landfills. Our staff is willing to work with the Air District to consolidate mailings and participate at community events.

Fugitive Dust was identified as one of the top community sources of concern throughout the AB 617 process and KCPW is most equipped to help with strategy RD.2, to reduce road dust. KCPW is committed to leveraging AB 617 funds with County Road Funds to pay for environmental, design, public contracting and implementation of the project. A commitment of funding for these strategies would provide significant reductions in fugitive dust to improve air quality in our Valley and move toward attainment of state and federal air quality standards. KCPW is excited for the opportunity to progress our existing partnership with the Air District, community members and advocacy groups from planning to implementation of the Draft CERP.

Sincerely,

A handwritten signature in black ink that reads "Craig M. Pope". The signature is written in a cursive style with a large initial "C" and a long horizontal stroke at the end.

Craig M. Pope
Public Works Director