

2019 South Central Fresno AB 617 Steering Committee CERP Recommendations– Ed Ward

General Observations

AB617 has given the community, industry and regulatory staff a great opportunity to learn about each other and the community needs. Through hard work and listening many ideas have been proposed to reduce community emissions. The goal of reduced emission is beginning with what we learn from community monitoring. Innovative ways to reduce the transportation corridor emission will likely need to be the focus as we learn more from community air monitoring.

Electrification and the adoption of zero emission vehicles is an important goal that will reduce air emissions. Currently according to the American Society of Civil Engineers (ASCE, see attached) report card, California gets a D– for the current condition of the State’s electrical power grid. This fact and the lack of planning on how to address 20,000 plus existing petroleum industry jobs that pay a family wage and the difficulty of how to close hundreds of billions of dollars in existing infrastructure indicate that this is not well planned and there will be significant delays in bringing these technologies that are so needed to South Central Fresno Community.

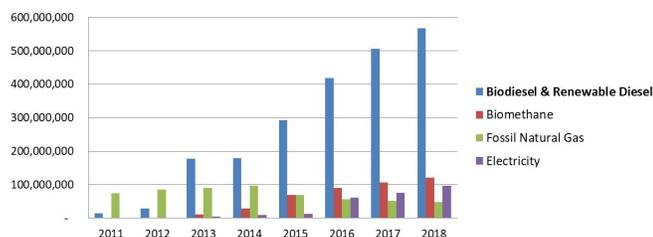
AB617 has increased the communities understanding of the air pollution sources. Unfortunately not to a level to make informed decisions regarding land use, CEQA, enforcement or industrial permitting. These issues should be addressed by professional air quality decision makers and management. This subject is too important to the development of real/quantifiable reductions in community emissions.

In reality as AB617 progresses in South Central Fresno ultimately the best decisions/methods will come from what we learn from continuous air monitoring. We will need to continue to look for the best solutions.

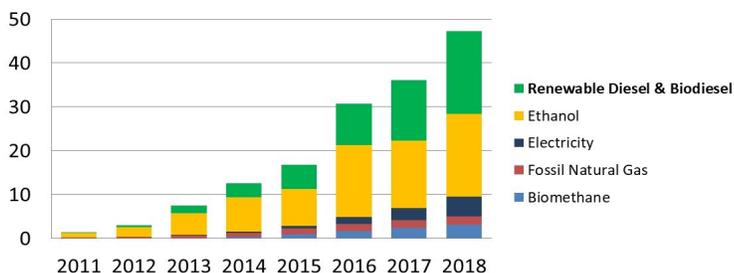
While it is important to continue progress forward, other interim solutions should be added to the CERP and developed. CARB refers to diesel as one product, ultra low sulfur petroleum diesel. This was driven home many times during the AB617 steering committee meetings. The reality is there are three distinctly different diesel formulations. ULSD Petroleum diesel, bio-mass diesel as B20 blend and renewable diesel. According to CARB’s own studies, significant reduction in tailpipe emissions can be and has been attributed to the transportation industries use of bio-mass alternative diesels. The pairing of biomass fuel and new generation engines have and will continue to be one of the most effective (and underrated) ways to reduce Greenhouse Gas emissions from the transportation corridor.

When the proposed CERP talks about alternative fuels, biomass product does not appear to be included or encouraged for an interim solution. I would propose an addition to the CERP that states all City/County/ School Buses/ Emergency response vehicles be required to operate on bio mass fuel as ethanol, biodiesel as B20 or renewable diesel.

Consumption of Advanced Biofuels: (Gallons of gasoline equivalent)
SOURCE: California Air Resources Board



Cumulative CO2 Reductions (million tons)
SOURCE: California Energy Commission, Low Carbon Fuel Standard Dashboard



In review of grant funding Table 3.3 thirteen programs with 100 ton reduction or more of the 56 incentive programs account for about 93% of the grant funding. As far as tons of emissions reductions these thirteen programs would potentially remove about 96% of the targeted emissions. It is my opinion that at least initially we should focus on fewer measures that can have the highest impact South Central Fresno air quality.

The following thirteen grant funding investments produce the highest return for the dollar spent.

• Burn Cleaner wood stove	602.02
• HD Ag Engine Alt fuel to electric	110.74
• HD Ag engine diesel to diesel	674.45
• HD Ag engine diesel to electric	737.21
• HD off road AG vehicle replacement	2254.00
• HD off road engine re-power	363.55
• HD off road low dust harvester replacement	117.56
• HD on road engine re-power	176.63
• HD on road engine retrofit	287.84
• HD on road new vehicle	932.76
• HD on road Prop 1B locomotive replacement	1151.33
• HD on road Prop 1B vehicle replacement	2401.34
• HD on road TVP vehicle replacement	441.72

The following existing initiatives potentially could have significant effects on air quality

- Implement pilot incentive program for truck emissions repairs program incentive
- Incentive funding for new school buses
- Incentive funding for new transit buses
- Incentives for locomotives/ railcar movers/switchers
- Residential burning reduction of PM2.5
- All learning modules that would increase community knowledge of air pollution
- Incentives for installation of green barriers near or around sensitive areas

The following proposed CARB measures are not likely to add to community air reductions and are more likely to create confusion in industry/community.

- Advanced Truck and Bus regulation
- Real emissions assessment logging system
- Freight handbook

The opportunity to serve on the AB617 South Central Fresno Steering Committee has been rewarding. I am humbled by the kindness and respect I have been ultimately shown by the Community, Community Activists and the Air District. It is my hope that all the hard work of the committee will actually result in quantifiable reductions in community air emissions. I look forward to working with the steering committee to leverage the knowledge we will gain to develop better ways to reduce community emissions.

Respectively Submitted,



Ed Ward
 Industry Representative
 AB617 Steering Committee
 Valley Pacific Petroleum
 152 Frank West Circle
 Stockton, CA 95206
 Ed.ward@VPPS.net
 209 479-9697