

APPENDIX I

Comments and Responses

Shafter CERP

San Joaquin Valley Air Pollution Control District
September 19, 2019

SUMMARY OF SIGNIFICANT COMMENTS AND RESPONSES

Shafter Community

IMPLEMENTATION OF CERP:

- 1. COMMENT** (Gustavo, et al., Jun 4, 2019)¹: Form an “Implementation Sub Committee” with members from the existing Steering Committee that will monitor and support in the implementation of the CERP through the following actions: a) Recommend the use of funds for mitigation projects within the AB617 area; b) Receive notification from City/County and Air District any time a permit is submitted within the AB617 area that will have impacts in air quality to provide recommendations on how to mitigate these impacts; c) Receive updates on the Community Air Monitoring Network (CAMN) and vote on any proposed changes to the CAMN.

RESPONSE: As the District implements the CERP for Shafter and operates the community air monitoring network, frequent community steering committee meetings will continue to be held to allow the District an opportunity to provide progress reports to the full committee and the public. These updates will include progress reports on implementing emissions reduction measures specified in the CERP, and summaries of collected air monitoring data. These regular meetings could also include discussion on how to invest additional funding for emission reduction projects, potential changes to the community air monitoring network, as well as other relevant and current air quality issues.

- 2. COMMENT** (Meeting, Aug 5, 2019): For this CERP, please analyze the proposed incentive funding in relation to the cost-effectiveness of each measure to assist in determining the best way to spend the funding.

RESPONSE: [See Chapter 4 for cost-effectiveness of each incentives measure](#)

- 3. COMMENT** (Meeting, Aug 5, 2019): With the incentive funding being made available for the Shafter CERP, consider placing more funding into programs designed for use by residents, and less funding for incentive programs made available to businesses.

RESPONSE: [See measures UG.1, IAQ.1, VB.1, RB.1, LG.1, C.1, C.2, and SD.1](#)

The CERP reflects community-established priorities and suggestions, including committing to finding funding for a number of high-priority exposure reduction measures to target urban greening, weatherization and energy efficiency upgrades, residential solar and electrification, and vegetative barriers. Furthermore, many of the measures outlined in the CERP provide direct funding to residences, including incentives for replacing residential wood burning

¹ (Gustavo, et al., Jun 4, 2019) Comments submitted by members of the Shafter Community Steering Committee on June 4, 2019 through the CERP development process.

devices, lawn and garden equipment, and electric vehicles. Chapter 4 describes how much funding is allocated or needed for each measure. Furthermore, throughout the implementation of AB 617, frequent community steering committee meetings will continue to be held to allow the District an opportunity to provide progress reports to, and receive input from, the full committee and the public, including prioritizing measures to receive immediate or accelerated action.

PASSENGER VEHICLES:

4. **COMMENT** (Gustavo, et al., Jun 4, 2019): 100 electric car replacements for private vehicles 15 years or older including SUV's. There are at least 2,000 light passenger vehicles of this age registered in Shafter. Qualifying low- income residents with these vehicles can turn them in for an EV at no cost. The EV would be similar to the basic Nissan Leaf with 150 mile range which costs around \$30,000. An electric vehicle charging outlet will also be provided either in their garage or in a driveway or curbside so the vehicle may be charged overnight. Main expenses of the recipient are the cost of electricity for charging, insurance, registration fees and vehicle maintenance. The federal tax credit, current trade-in programs, CA and SJV rebates, will already cover \$20,000 of the total cost. This program would need another \$10,000 to \$15,000 per vehicle.
5. **COMMENT** (Meeting, Aug 5, 2019)²: Consider providing incentive funding for plug-in hybrid vehicles and not just fully electric cars, as residents can use standard electrical outlets at their homes to charge plug-in hybrids.

RESPONSE 4-5: [See measures C.2, C.3, and C.4](#)

Measures C.2, C.3, and C.4 discuss the District's commitment to provide incentives, test-drives, and charging stations for EV's in Shafter.

6. **COMMENT** (Gustavo, et al., Aug 9, 2019)³: **Incentives for Electric Vehicles and Hybrid Plug-in Vehicles. 100 vehicles \$1,950,000.** We recommend this proposal generally. Hybrid vehicles should not be part of this program. We recommend the total funds to be at least \$10 million to ensure full participation in the first round of funding for at least 200 vehicles. The extra \$10,000 on top of current incentives is ok if residents can take advantage of current federal rebates which are in the form of a tax credit. If not, then additional incentive funding may be needed to cover that rebate. Additional funding may be needed on top of the \$800 PG&E rebate for installation of a 240 volt, 40-50 amp, electric circuit for vehicle charging. In some cases a new circuit may be needed out to the front

² (Meeting, Aug 5, 2019) Written comments submitted at the Shafter Community Steering Committee meeting on August 5, 2019.

³ (Gustavo, et al., Aug 9, 2019) Comments submitted by members of the Shafter Community Steering Committee on August 9, 2019 through the CERP development process.

curb of the home. Also, upgrades to electrical boxes may be needed. This should all be 90% funded by this program.

7. **COMMENT** (Gustavo et al., Aug 26, 2019)⁴: For Electric Vehicles increase the proposal from \$2.02 million to \$6 million

RESPONSE 6-7: [See measure C.2](#)

The District increased funding amount for Measure C.2 (Incentive Program for the Replacement of Passenger Vehicles with Battery Electric or Plug-in Hybrid Vehicles) from originally proposed \$725,000 to \$6 million.

8. **COMMENT** (Meeting, Aug 5, 2019): Why would only low-income residents qualify for the additional incentive for the electric vehicles?

RESPONSE: [See measure C.2](#)

The proposed CERP measure would be open to all residents of the Shafter community.

9. **COMMENT** (Gustavo, et al., Aug 9, 2019): **Tune-in, Tune-up events in Shafter, \$400,000.** We recommend one such event and leftover funds applied to electric vehicle programs in Shafter.

RESPONSE: [See measure C.1](#)

The District will host an event in Shafter. As noted in the CERP, funding amounts for each measure are intended to be estimates and may vary based on the availability of cost-effective projects and finalized program guidelines.

10. **COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for Public EV charging stations, 17 units \$100,000.** We recommend this proposal generally. We recommend that at least 8 of these charging stations be level 3 for faster charging. All of them should be publicly accessible and non-profit based. The charging rate should be as low as practical to cover the actual rate of electricity used. Each school site in Shafter should have two of these chargers. Businesses with more than 30 employees, except for schools, should not be given this incentive unless they are within the original proposed Shafter boundary or in one of the outlying residential areas such as the Mexican Colony.

11. **COMMENT** (Gustavo et al., Aug 26, 2019): **EV Chargers \$100,000 to \$850,000** for incentives and subsidies for chargers at homes. There should be several level 3 chargers installed in Shafter for public use and 4 or more level 2 chargers at each school site for employees to use while at work

⁴ (Gustavo et al., Aug 26, 2019) Comments submitted by members of the Shafter Community Steering Committee on August 26, 2019 through the CERP development process

- 12. COMMENT** (Meeting, Aug 5, 2019): Where will the new public EV chargers be placed in the community? Will they be located at businesses?

RESPONSE 10-12: [See measure C.3](#)

As a part of implementing measure C.3, the District will work with the Steering Committee and community to help identify locations and consider types of charging infrastructure for measure C.3, including the guidelines and suggested locations described above.

Additionally, the District increased funding for Measure C.3 (Incentive Program for Installation of EV Charging Infrastructure) from the originally proposed \$100,000 with a goal of installing 17 chargers, to \$850,000 to fund approximately 78 Level 2 and Level 3 chargers.

- 13. COMMENT** (Gustavo, et al., Aug 9, 2019): **Training for EV mechanics 2 events \$30,000.** We assume this is mostly for mechanics already working in Shafter to upgrade their skills. We approve this proposal.

RESPONSE: [See measure C.4](#)

Thank you for your comment and support. Yes, this would be for local mechanics.

- 14. COMMENT** (Gustavo, et al., Jun 4, 2019): Place 20 EV's around Shafter neighborhoods with charging stations. These vehicles with 150 to 250 mile range are made available for rent at a subsidized cost by low-income residents. A cost of 20 cents per mile should be reasonable. Many Programs like this already exist all over the State of California.

- 15. COMMENT** (Meeting, Aug 5, 2019): Investing in 20 EVs for the car sharing program seems like too many, consider funding only 10 EVs.

- 16. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentive for car share program \$250,000.** We recommend this proposal but see that more money is needed to make these cars more affordable for qualifying residents. The price per mile should be subsidized for the first two years for lower middle-class and low-income residents. We want to incentivize the use of these vehicles. We propose \$1 million, if necessary, to keep the rental cost per mile down to 25 cents per mile for most residents for the first two years. We understand the current price of these programs elsewhere may be as high as 40 cents per mile.

- 17. COMMENT** (Gustavo et al., Aug 26, 2019): **Car shares \$300,000 to \$500,000** to make it very affordable for a trial period of at least three years.

RESPONSE 14-17: [See measure C.5](#)

The District increased funding allocation for Car Share Program from originally proposed \$250,000 to \$500,000 to support the launch of a car share program, and to support reduced ridership costs. As the District works with a partner to establish this program in Shafter, consideration will be made regarding how many vehicles will be made available for the program launch.

- 18. COMMENT** (Gustavo, et al., Aug 9, 2019): **Community EV test-drive program. \$200,000.** We generally recommend this proposal. It needs more clarification how it would work and how the money is actually spent.
- 19. COMMENT** (Meeting, Aug 5, 2019): \$200,000 investment into the “Test Drive” program is too costly, consider using this funding elsewhere within the CERP.

RESPONSE 18-19: [See measure C.6](#)

The District will work with the Steering Committee throughout the implementation of the CERP to further develop guidelines and better-define measure C6. As the District develops the “Test Drive” program with a local partner, considerations will be made regarding the amount of funding and number of vehicles to be made available upon program launch.

SOLAR DEPLOYMENT:

- 20. COMMENT** (Gustavo, et al., Jun 4, 2019): Install solar panels on 250 low-income homes. The federal tax credit and the DAC-SASH program would pay nearly 100% of the cost. This funding should be made available with either current sources or AB617 funds. Homes receiving this solar will also have an electric heat pump installed for heating and cooling, electric hot water heater and an electric induction stove.
- 21. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for installing solar power and energy storage for homes and businesses. \$0 proposed.** There should be a monetary amount set aside for this category. The energy storage is not necessary and should be removed. Shafter does not need to help balance the grid with energy storage projects at this time.

We recommend **\$15 million** of the proposed \$45 million budget just for this category. These funds would be on top of any other subsidies available which the air district has proposed to coordinate. This will ensure that lower income residents who own a home can participate and help lower middle class homeowners to also participate, perhaps with slightly less subsidy or incentive. To go with this program, there should be funding to convert homes and businesses to electric heat-pump cooling and heating. These heating units, together with solar

electricity, pay for themselves very quickly and eliminate the need for natural gas in the home. The inventory shows that NOx emissions from heating buildings in Shafter are significant. Since these emissions are concentrated into the four months of the year when PM2.5 levels are at their worst, reducing these emissions with electric heat-pumps, will have a magnified impact when compared to other emissions in the inventory which are spread out for most of the year or just in the summer. Electric water heaters and electric induction stoves or stove tops should be included and made very affordable to any home receiving solar electricity. A community solar sharing system should be set up for renters and run by City of Shafter. Purchase of land may be included.

22. COMMENT (Gustavo, et al., Jun 4, 2019): The Community Solar Green Tariff program should be put in place in Shafter. Low income residents subscribing should also receive electric heat pump installations for heating and cooling, an electric hot water heater, and an electric induction stove.

23. COMMENT (Gustavo et al., Aug 8, 2019)⁵: We request that the air district, through AB617 funding, support the electrification of homes in Shafter with incentives covering at least 75% of the cost for electric heat-pump heating, electric high-efficiency water heaters, and electric induction stoves or stove tops. We feel that \$750,000 would be a good start for this program.

24. COMMENT (Gustavo et al., Aug 26, 2019): **Solar Panels** \$1.5 million should be increased to \$8.5 million. This includes community solar for renters which the City of Shafter may be able to oversee. We also stated that Energy Storage should be something saved for the future

RESPONSE 20-24: [See measure SD.1](#)

State and District funding under this proposal would total up to \$15 million for residential solar in Shafter, contingent on successful advocacy for state funding. The District will consider providing up to \$1.5 million in District funding as 10% match towards new State program (\$15 million total) for community solar deployment. A funding proposal would leverage new CARB/PUC/CEC programs to provide incentives for residential solar (DAC-SASH, DAC-GT) and zero/near-zero emission appliances (new BUILD, TECH, and other programs), as described below. The District will continue to work with Steering Committee and other partners to advocate for new state funding to support proposed measure. The District also commits to convening a community meeting with PG&E and community partners to discuss available resources and potential strategies.

District will assist in coordinating with the CA Public Utilities Commission and utilities to increase community awareness of and accessibility to available incentives for local businesses and homeowners to install rooftop/community

⁵ (Gustavo et al., Aug 8, 2019) Comments submitted by members of the Shafter Community Steering Committee on August 26, 2019 through the CERP development process.

solar power and energy storage systems, including working with PG&E to facilitate community member subscriptions to the following programs:

- **DAC-Green Tariff (DAC-GT)** program procures 100 percent renewable energy on behalf of customers while providing them a 20 percent discount on their otherwise applicable utility rate. The 20 percent discount can be applied as a discount to CARE rates. The DAC-GT program will begin in 2020 and will be run through the utility company (Pacific Gas and Electric).
- **Community Solar Green Tariff (CSGT)** is similar to the DAC-GT program in that it procures 100 percent renewable energy on behalf of the customers while providing a 20 percent rate reductions. However, under this program the projects providing the solar energy must be sited within a top 25 percent DAC and the subscribers must reside within a top 25 percent DAC and live within 5 miles of the solar project. The program is approved to serve up to 41 megawatts of power and serve 6,800 customers. In order to enroll in the program communities must contact their utility (Pacific Gas and Electric).

25. COMMENT (Meeting, Aug 5, 2019): Consider allowing middle-income residents to participate in the DAC-SASH and SOMAH incentive programs.

26. COMMENT (Meeting, Aug 5, 2019): To assist the local economy, could local companies be used to install the solar power and electrical systems that are funding through the Community Solar Green Tariff program?

RESPONSE 25-26: As these solar panel programs are managed by the CA Public Utilities Commission, the District does not have authority to change program requirements. The District will make available to the CA Public Utilities Commission this recommendation for their consideration, and hopes to provide their input in the Shafter Community Emissions Reduction Program.

The District will coordinate with the CA Public Utilities Commission to explore the possibilities of using local companies to install funded solar power and electrical systems through the DAC-GT and CSGT programs.

27. COMMENT (Meeting, Aug 5, 2019): Electric units and solar should be installed to cool and warm people's homes, so that they can keep their windows closed to protect themselves from dust. Add more trees and improve quality of life in Shafter.

RESPONSE: [See measures UG.1, IAQ.1, and SD.1](#)

The proposed measures regarding the installation of residential solar and zero/near-zero home appliances for homes (as supported by new state programs) and trees in the community will assist in reaching these goals.

HEAVY DUTY SOURCES:

- 28. COMMENT** (Gustavo, et al., Jun 4, 2019): Heavy duty trucks using Laredo Hwy through the two stop signs adjacent to Golden Oak Elementary must be routed somewhere else. Perhaps Tulare and Riverside Avenues may be used for westbound and eastbound routes respectively.

RESPONSE: [See measure HD.9](#)

City of Shafter has committed to evaluate truck routing as a part of the development of the Environmental Justice Element of the General Plan. The District and the City of Shafter will continue to work with the Steering Committee to report back on this evaluation.

- 29. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentive funding for Heavy Duty Truck replacement with zero and near-zero emission technology. 60 trucks \$6,000,000.** It is not clear what is meant by near-zero emission technology. We support any replacement of heavy duty trucks with zero emission trucks if they operate daily in Shafter (the original boundary) for at least part of each work day and they are based in Shafter. 60 trucks is too many for Shafter alone. We recommend this proposal be cut to **\$3 million** and ensure that the trucks are all based in Shafter. Zero emission trucks should have the highest priority.

RESPONSE: [See measure HD.1](#)

In order to maximize and accelerate emission reductions in the Shafter area, the District is focused on getting diesel trucks off the roads in and around Shafter. For larger class 7 and 8 heavy duty trucks, there are no electric alternatives available. Near-zero natural gas engines are 90% cleaner than the current available diesel trucks and are the only clean alternative for some applications. We will work to ensure that measure HD.1 targets trucks that operate a majority of their time within the community boundary and prioritize electric trucks when feasible.

CERP funding for heavy duty trucking reduced to \$4,000,000, with a goal of replacing 40 heavy duty trucks that operate in and around the community of Shafter

- 30. COMMENT** (Gustavo, et al., Aug 9, 2019): **Public Fleet Vehicle incentives # of units? \$100,000 per vehicle? No total amount proposed.** The total amount for this proposal and the type of vehicles needs more explanation. We would recommend that the Post Office receive electric vehicles to replace those old polluting vehicles used currently to deliver mail. We would approve five of those for **\$500,000** assuming all would be used within the City of Shafter. This money

should not be used to simply upgrade old internal combustion vehicles to new internal combustion vehicles.

RESPONSE: [See measure PF.1](#)

The District will work with the Shafter Steering Committee and appropriate agencies to help identify the number and types of public fleet vehicles to replace with cleaner units, including the suggested vehicles above, with a priority on zero-emission vehicles where appropriate.

The Kern County Public Works Department (Pope, C., Aug 23, 2019)⁶ also commented that they would be willing to consider this opportunity.

31. **COMMENT** (Gustavo, et al., Jun 4, 2019): Shafter community transportation services, Dial-a-ride, should receive two EV's. There are programs like these already in the Central Valley that work great.
32. **COMMENT** (Meeting, Aug 5, 2019): Consider making the Dial-a-ride program free of cost for Shafter residents.
33. **COMMENT** (Gustavo, et al., Aug 9, 2019): **Electric vehicle(s) for Dial-a-Ride ? units \$400,000.** We recommend this proposal.

RESPONSE 32-34: [See measure HD.5](#)

Thank you for your support.

ZERO-EMISSION SCHOOL BUSES:

34. **COMMENT** (Gustavo, et al., Jun 4, 2019): Richland Elementary should receive 5 electric school buses.
35. **COMMENT** (Gustavo, et al., Aug 9, 2019): **Electric School Buses 8 units \$3,200,000.** We recommend this proposal. There might also be justification for the Rio-Bravo School and Maple School to receive electric buses for transporting students who live in Shafter to these school locations in the country. Currently, dozens of personal vehicles are transporting these students who live in town, morning and afternoon, in a very inefficient way. Budget could be increased to \$4,000,000 for that purpose if shown to be appropriate.
36. **COMMENT** (Meeting, Aug 5, 2019): Consider providing electric school buses to Shafter High School and Grimmway Academy.

⁶ (Pope, C., Aug 23, 2019) Comments received from Craig Pope on behalf of the Kern County Public Works Department in response to a draft CERP.

RESPONSE 34-36: [See measure HD.4](#)

The District increased the goal to replace 10 buses in and around Shafter, with targeted outreach to Maple School, Rio Bravo School, Shafter High School, and Grimmway Academy. Increased funding for measure to \$4,000,000.

STATIONARY SOURCES:

- 37. COMMENT** (Gustavo, et al., Jun 4, 2019): Oil wells and related equipment within the 7 mile radius which use stationary internal combustion engines should convert to electric motors if the electrical grid is available within 1,000 feet.
- 38. COMMENT** (Guinn et al., Aug 2, 2019)⁷: The incentive to convert should be available to anybody who wants it.

RESPONSE 37-38: [See measure IS.2](#)

District will evaluate the feasibility of providing incentives for the conversion of internal combustion engines driving pump jacks to electric motors for oil wells and related equipment within the 7 mile radius.

- 39. COMMENT** (Gustavo, et al., Jun 4, 2019): No new oil wells will be drilled within 2,500 feet of residents, schools and all environmental sensitive locations.
- 40. COMMENT** (Guinn et al., Aug 2, 2019): This proposal is clearly under the jurisdiction of the local planning agency for several practical reasons.
- 41. COMMENT** (Meeting, Aug 5, 2019): The setback of new oil wells from sensitive locations will not reduce emissions. There are no incidents of exposure occurring, this is not an issue. In some instances oil wells are already in place before schools and homes are built around them. The public needs to be better educated on this topic.

RESPONSE 39-41: [See measure LU.3](#)

The City of Shafter responded that Kern County has adopted an ordinance establishing setback requirements based on health risks evaluated in the Environmental Impact Report (EIR) prepared for the County. Mitigation measures are required to avoid potential significant impacts from oil production facilities on sensitive uses. The City of Shafter Zoning Ordinance also establishes setback requirements.

⁷ (Guinn et al., Aug 2, 2019) Comments submitted by members of the Shafter Community Steering Committee “not aligned with environmental justice groups” on August 2, 2019 through the CERP development process.

City of Shafter has committed to review the EIR and health studies prepared by the County and to consider standards for preparation of health risk assessments to avoid creation of significant impacts from oil production facilities on sensitive uses.

(Oviatt, L., Aug 19, 2019)⁸ Kern County Department of Planning and Natural Resources also responded and referenced technical, peer-reviewed data in EIR for further information about impacts of oil and gas permitting in Kern County:

<https://kernplanning.com/planning/kern-county-oil-gas-permitting-3>

- 42. COMMENT** (Gustavo, et al., Jun 4, 2019): JP Oil must reduce current flaring levels, averaged over the past five years, by 90%.
- 43. COMMENT** (Guinn et al., Aug 2, 2019): We do not agree with singling out any particular company currently complying with all requirements without adequate data to substantiate that the community will actually benefit from the increased restriction. In this case air monitoring will take place at the source and the nearest community providing data that may or may not support additional measures in the future.
- 44. COMMENT** (Meeting, Aug 5, 2019): Provide incentives for facilities to purchase low NOx flares to reduce emissions from these activities.
- 45. COMMENT** (Gustavo, et al., Aug 9, 2019): While we recommend less flaring by the oil industry within the 7-mile radius, this should be nearly eliminated by current regulation being developed. Replacing IC pump engines with electricity should perhaps be minimally incentivized if they are within the 7 miles but paying the oil industry to reduce their emissions is generally contrary to our other proposals which strive to reduce the use of fossil fuel in Shafter. We propose that these multi-billion dollar companies do the right thing for the health of Shafter residents and electrify all their pump engines voluntarily. Maximum amount proposed is **\$100,000** for 20 IC pump engine replacements in the CRC and JPOil production areas located within the 7 mile radius.

RESPONSE to the above comments 42-45: [See measures IS.1-IS.6](#)

For decades the District has adopted the most stringent possible regulatory requirements that are cost-effective at reducing pollutants at stationary sources, such as those addressed in the comment above. To achieve the incremental additional reductions beyond those regulatory requirements, incentive funding is likely required, due to high cost and diminished potential reductions. Furthermore, the District is currently undergoing a process to amend Rule 4311 (Flares) as committed to in the 2018 PM2.5 Plan to further reduce emissions

⁸ (Oviatt, L., Aug 19, 2019) Comments submitted by Lorelei Oviatt on behalf of the Kern County Planning and Natural Resources Department on the Draft CERP on August 19, 2019.

from flaring activities. The feedback received from the Shafter community steering committee will be incorporated into this process, and members of the committee and the public are encouraged to be involved in the rule amendment process for Rule 4311.

- 46. COMMENT** (Gustavo, et al., Jun 4, 2019): Conduct monthly inspections of Plains LPG and maximum fines imposed for each violation over the next five years.
- 47. COMMENT** (Guinn et al., Aug 2, 2019): We do not agree with singling out any particular company currently complying with all requirements without adequate data to substantiate that the community will actually benefit from the increased restriction. In this case air monitoring will take place at the source and the nearest community providing data that may or may not support additional measures in the future.

RESPONSE to above comments 46-47: [See Enforcement Plan in CERP](#)

District staff will inspect each facility that has had an emission violation over the past 3 years at least twice per calendar year for the next 5 years or until the facility has 4 consecutive inspections without an emission violation, whichever occurs first.

AGRICULTURAL SOURCES:

- 48. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives to replace diesel tractors with cleanest available equipment. 100 units \$5,000,000.** We recommend this proposal if every tractor replaced is used 50% of the time or greater within the 7-mile radius. Since this is not likely, in our opinion, this amount should be reduced to 50 units and \$2,500,000.
- 49. COMMENT** (Gustavo et al., Aug 26, 2019): Replacing Ag tractors is already an ongoing program valley-wide for many years. It is impossible to spend \$5 million extra in the 7-mile radius. This amount should be reduced to \$2 million.

RESPONSE to above comments 48-49: [See measure A.6](#)

The District will ensure that tractors targeted by this measure operate the majority of the time within the 7-mile radius.

- 50. COMMENT** (Gustavo, et al., Jun 4, 2019): Farmers using internal combustion engines to pump water within the 7 miles and located within 500 feet of the electrical grid should be given a 90% subsidized electric motor conversion opportunity for a period of one year. These farmers have not taken advantage of current programs to replace these engines. After one year, if they have not

converted to electricity, they will lose all opportunity to participate in any incentive program for such conversions and hopefully state programs will force them to convert in the future.

- 51. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives to replace diesel pump engines with electricity 10 engines \$230,000.** We recommend this proposal but add replacement of natural gas engines also. This proposal should be prioritized to engines closest to Shafter.

RESPONSE to above comments 50-51: [See measure A.5](#)
District has expanded measure A.5 (Incentive Program for Replacing Older Diesel Agricultural Irrigation Pump Engines with Electric Motors) to include the electrification of natural gas-powered Ag pump engines

- 52. COMMENT** (Gustavo, et al., Jun 4, 2019): No agricultural burning will be allowed within the 7-mile radius. A subsidy will be available for grinding this material including small amounts of material due to attrition.
- 53. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for alternatives to agricultural burning 2,000 acres \$2,000,000.** We recommend this proposal and the monetary amount generally. But, there must be assurances that all 2,000 acres are within the 7-mile radius. Additionally, the fine must be increased from the current \$500 per acre for burning variances, to at least \$1,000 per acre, with the money added to the \$2,000,000 for all fines paid within the 7-mile radius. Additionally, there should be no incentive for chipping where the chips are sent to a biomass incinerator. The \$1,000 per acre is more expensive than the cost of chipping and hauling the chips to a biomass incinerator. The incentives should only be provided for soil incorporation of the chips.
- 54. COMMENT** (Meeting, Aug 5, 2019): Consider expanding the alternatives to agricultural burning program to farmers outside of the 7-mile radius.
- 55. COMMENT** (Guinn et al., Aug 2, 2019): We agree with the inclusion of incentives to grid and till material into the soil but cannot support the elimination of all burning opportunities under current rules. Another option is to fund a study for how best to dispose of agricultural material.

RESPONSE to above comments 52-55: [See measure A.3](#)

It is this District's intention that the \$1,000,000 included in this measure will be used to fund projects within the 7-mile radius. This funding will be executed under the District's Alternative to Open Agriculture Burning Incentive Program guidelines. To be eligible for funding under this program, the chipped material must be used for soil incorporation or land application on agricultural land as an alternative to the open burning of the agricultural materials. The program does

not fund removals that are sent to a biomass facility or to be used at any other nonagricultural facility.

The incentives for this program are already available throughout the entire Valley, however, the amount of funding proposed in this measure will be set aside specifically for the community of Shafter within the boundary, as well as the area within the 7-mile radius. Farmers outside of the 7-mile radius are still eligible to be involved in the Valley-wide alternatives to agricultural burning incentive program.

- 56. COMMENT** (Gustavo, et al., Jun 4, 2019): High Speed Rail construction within the 7-mile radius must use Tier 4 engines in all off-road construction equipment.

RESPONSE: [See measure LU.4](#)

The District will work with the California Air Resources Board and the California High Speed Rail Authority, who are the agencies responsible for establishing construction equipment emissions requirements, to communicate community concerns regarding emissions generated from the construction of the high speed rail.

- 57. COMMENT** (Gustavo, et al., Jun 4, 2019): The almond huller just north of Shafter on Hwy 43 will be given incentives of 80% to purchase two electric yard trucks.

- 58. COMMENT** (Gustavo, et al., Aug 9, 2019): **Zero emission yard trucks and truck refrigeration units. 30 \$4,000,000.** We have recommended 2 yard trucks for the Almond Huller north of Shafter and next to the Labor Camp. \$250,000 is all that is needed. Please explain where the proposed 30 units would be. If they are in Shafter we would consider a greater amount of funding.

RESPONSE 57-58: [See measure HD.2](#)

The funding for this measure was reduced to \$1,500,000 with a goal of replacing 10 units that operate in or around Shafter. Thank you for recommending specific units for replacement under this measure. As CERP implementation begins, the District will work with the community to help identify other yard trucks and TRU's for incentives that operate the majority of their time in the community.

- 59. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for low-dust nut harvesters. 25 units \$2,500,000.** This should say "almond" harvester, not nut. We generally recommend this proposal, but only if there are assurances that these 25 units will each be used more than 50% of the time within the 7-mile radius. We do not recommend this proposal if we do not begin this August, 2019, with PM10 monitoring in Shafter so that when these machines are put into use

next year, in 2020, we can see if there is a significant decrease in PM10. \$0 dollars recommended if no PM10 monitoring begins in August, 2019.

RESPONSE: [See measure A.2](#)

The District deployed PM10 monitoring within the Shafter community in August 2019. Although PM10 monitoring will help determine dust impacts on the community, there is already significant evidence to prove that low-dust nut harvesters reduce PM10 and PM2.5 emissions from harvest activities. The District will focus the CERP low-dust nut harvesting program on harvesting activities that occur in or around Shafter.

60. COMMENT (Public Comment, Aug 12, 2019)⁹: We farm in the area of influence. All business face the challenges of rising costs and the governmental restrictions of their industry in their area. My concern is that restrictions will be put on the businesses in the area of influence and that our neighbor just outside the border will not have the extra cost and restrictions applied to their farm. As farmers we all need good sunshine, clean water, and good air quality to grow our crops. We should all strive to provide this to our community, future farmers, and our families. We farm on the edge of town... it used to be the country. We did not move closer to the town, the town moved closer to our farm. I worry that we will have a disadvantage because of where our farm is located. That others just down the road will have an unfair advantage.

RESPONSE: [See all agricultural measures in Chapter 4](#)

The CERP includes many voluntary incentives measures available to many businesses and residents within the AB 617 boundary, including a number of agricultural measures providing funding to help replace older tractor, truck, and Ag engine equipment with clean air equipment. The District will continue to work closely with businesses in and around Shafter to explore potential opportunities for partnering to reduce emissions.

PESTICIDES:

61. COMMENT: Ban all untarped applications of 1, 3-D (very important for Shafter where 1, 3-d is the primary pesticide TAC problem).

62. COMMENT: Reduce 1, 3-d annual township cap (the cap is currently 136,000 pounds per 6x6 mile township) and/or establish cap reductions on a more granular basis to address 1, 3-d spikes we see in certain sections. Approximately 14 million pounds of the carcinogenic fumigant TAC 1, 3-dichloropropene were applied to California fields in 2016, with similar amounts

⁹ (Public Comment, Aug 12, 2019) Comments submitted to the District from member of the public in response to CERP development process

applied in prior years. In addition to being a TAC, 1, 3-d produces Volatile Organic Compounds, contributing to the development of ozone. Just this year, the Superior Court of Alameda County found that the Department of Pesticide Regulation had improperly adopted an underground regulation, which had resulted in a relaxed cancer risk level of 0.56 ppb, which is 4.4 times DPR's previous cancer risk level of 0.14 ppb and 5.6 times higher than OEHHA's recommended level of 0.1 ppb to protect children. This underground regulation raised township caps from 90,250 pounds of 1, 3-d that could be used per township to now 136,000 pounds per township. It is vital that for the public's health, this township cap be reduced to coincide, at least, with OEHHA's recommended safety level of 0.1 ppb.

- 63. COMMENT:** Make Notices of Intent (NOIs), required for restricted pesticide applications, publicly available online, along with CAC approvals/denials of these NOIs. Provide real-time 48-hour notification via text and email on an opt-in basis for all drift-prone applications within a mile of schools.
- 64. COMMENT** (Gustavo, et al., Jun 4, 2019): Ban all aerial applications of pesticide TACs.
- 65. COMMENT** (Gustavo, et al., Jun 4, 2019): Establish 24/7 buffer zones of 1 mile for all pesticide TACs for all sensitive sites, including homes, hospitals, labor camps and schools.
- 66. COMMENT** (Gustavo, et al., Jun 4, 2019): Ask for an evaluation of all carcinogenic TACs including, pesticides, and then create emissions reduction plans in line with that analysis.
- 67. COMMENT** (Gustavo, et al., Jun 4, 2019): Ask for an evaluation of all reproductive toxicity TACs, including pesticides, and then create emissions reduction plans in line with that analysis.
- 68. A.11 COMMENT** (Gustavo, et al., Aug 9, 2019): **Pesticides \$?.** We recommend our proposals be implemented and money be made available for the notification system setup. **\$250,000** for a notification system setup and operation.
- 69. COMMENT** (Gustavo et al., Aug 26, 2019): For the Pesticides Measure we request that a notification process be built and deployed in Shafter.

RESPONSE 61-69: [See measure A.10](#)

DPR has released measures to reduce community exposure to pesticides. The District has included a commitment to help secure \$250,000 in funding for DPR and CARB to develop a pesticide notification system for the Shafter community (with District match funding of up to 50%). Updates to Steering Committee and community members will be ongoing by CARB and DPR.

DAIRIES:

70. COMMENT (Gustavo, et al., Jun 4, 2019): The ten factory dairies to the west of Shafter will agree not to empty or aerate their manure lagoons during the months of December and January to reduce ammonia in the air during the worst months of PM2.5. An incentive may be appropriate initially and if effective a rule should be made.

71. COMMENT (Gustavo, et al., Aug 9, 2019): **Support Alternative Manure Management at dairies.** We do recommend this proposal for inclusion and want the state, through CDFA and CARB, to put all methane reduction subsidy programs at dairies into this category. This would greatly reduce ammonia emissions, allow for recycling of nitrogen as fertilizer, greatly reduce methane emissions, and reduce groundwater contamination with nitrates.

RESPONSE 70-71: [See measure A.9](#)

As repeatedly verified by CARB and EPA, ammonia is not the driver for ammonium nitrate formation in the Valley (nitrogen oxides are the driver), so large reductions in ammonia will not significantly reduce PM2.5 concentrations. However, the District will support state efforts to implement manure management alternatives, including the installation of dairy digesters to control manure lagoon emissions. In addition, reductions in emissions from dairies are addressed by several other proposed District measures for the Shafter area: feed mixer electrification; conservation management education and outreach; irrigation pump conversions to electric; and alternative manure management strategies.

72. COMMENT (Gustavo, et al., Aug 9, 2019): **Support dairy digesters.** We will not put our names to a document recommending support for dairy digesters with the massive subsidies currently proposed by the state. These digesters are not a solution to reducing methane (GHG) emissions at dairies. They are not proven to work. They subsidize a broken, unsustainable system of milk production. They actually increase our local air pollution levels. They do not reduce ammonia emissions except temporarily. There is a false statement about that in the accompanying document or slides associated with these CERP proposals.

RESPONSE: [See removal of measure A.8](#)

73. COMMENT (Gustavo, et al., Aug 9, 2019): **Incentives for electric dairy feed mixing equipment 5 units \$6,500,000. We do not recommend this proposal.** The five dairies within the 7 mile radius should all have electric feed mixing equipment by regulation. Several of them already have large installations of solar panels. These are big polluters but we do not have the details of their pollution until there is thorough monitoring of these dairies for a period of one year. Monitoring for total NOx, VOC, PM2.5 and ammonia must be done from fence line

or onsite locations. Monitoring for toxic emissions such as methanol, and GHG emissions such as methane and Nitrous oxide should be done. Soil NOx needs to be monitored. Mobile source emissions need to be calculated. Until this information is available from monitoring the committee cannot recommend any money be spent on dairies. \$0 proposed.

- 74. COMMENT** (Gustavo et al., Aug 26, 2019): No dairy feed mixers! The dairies are among the biggest polluters in the area but they are installing their own solar panels because they know it will save them money. They can electrify their feed mixers and make money as well. We are also waiting for dairy monitoring to be part of the CAMP.

RESPONSE 73-74: [See removal of measure A.1](#)

Dairy electric feed mixing equipment is very expensive and achieves significant criteria and toxic emissions reductions by replacing many pieces of diesel equipment. Due to the expense and the significant emissions reductions achieved, the District believes these incentive dollars would be well spent, and the District will continue to seek and provide funding for these projects through the existing Valleywide program (\$10 million in funding currently included in 2019-20 District Budget). However, based on committee feedback, Measure A.1 was deleted from the CERP.

- 75. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for the replacement of dairy trucks with zero or near-zero emission trucks. 20 trucks \$2,000,000.** We recommend against this proposal for several reasons. First, the same reasons against proposal A.1 apply here. Second, we will not recommend proposals for natural gas trucks. Third, we do not think these 20 dairy trucks would be used enough in the 7-mile radius reducing local pollution levels, to justify this expenditure. \$0 recommended.

RESPONSE: [See removal of measure A.7](#)

As described above, the District is focused on getting diesel trucks off the roads in and around Shafter to maximize and accelerate emission reductions in the Shafter area. Some applications are not suitable for battery electric replacement. Near-zero natural gas engines are 90% cleaner than the current available diesel trucks and are the only clean alternative for some applications. However, based on community feedback, the District removed funding for A.7 and deleted the measure from the CERP. Funding for zero and near-zero trucks will still be available under measure HD.1 and Valleywide funding under the District's Truck Replacement Program.

- 76. COMMENT** (Meeting, Aug 5, 2019): Since \$2 million is proposed to be invested in emissions controls for dairies, air monitoring and truck traffic analysis for these

facilities would be a good first step to understand their impact on air quality in the area.

RESPONSE: The District plans to conduct air monitoring at a number of locations across the area to better understand the air quality variation across the community.

RESIDENTIAL AND URBAN SOURCES:

77. COMMENT (Gustavo, et al., Jun 4, 2019): No more EPA wood stoves or inserts will be subsidized in Shafter for the replacement of old wood stoves and fireplaces. These new stoves are still large sources of pollution. Instead, no burn days will be strictly enforced in the Shafter area and all fines collected. Likewise, no natural gas inserts will be subsidized, instead electric heat pumps will be subsidized at 75% of their total cost for everyone and 100% of their total cost for low-income residents.

78. COMMENT (Gustavo, et al., Aug 9, 2019): **Enhanced incentives to replace wood burning devices. 200 units \$600,000.** We propose a full incentive for installing an electric fireplace in the space of the wood burning fireplace. Our emphasis on converting heating in homes to electricity does not include incentivizing residents to burn natural gas. This item could be cut to **\$300-400,000** and cover the full cost of 200 electric fireplaces.

79. COMMENT (Gustavo et al., Aug 26, 2019): Specify in writing there will be no replacements of fireplaces or wood stoves with EPA certified wood stoves in Shafter. Electric and gas only. This is the only place we reluctantly say gas can replace wood but electricity is preferred.

RESPONSE 77-79: [See measure RB.1](#)

In order to maximize reductions of toxic wood smoke in the Shafter community, the District will not be reducing the total funding proposed for measure RB.1. Instead, the District will focus on replacing wood-burning devices with clean-burning natural gas units or electric devices.

80. COMMENT (Gustavo, et al., Jun 4, 2019): 1,000 appropriate trees will be planted in Shafter residential lots with willing residents paid to care for them for 5 years. Total cost of \$500 per tree.

81. COMMENT (Gustavo, et al., Aug 9, 2019): **Tree Planting 1,000 trees \$0.** We recommend this proposal but with money allocated for 5 years of maintenance for each tree planted by the City of Shafter as a green barrier between major pollution sources and sensitive location. We assume appropriate trees will be provided free. $\$50 \text{ per tree/yr} \times 5 \text{ yr} \times 1,000 = \$250,000$ Contrary to the question posed by one un-informed person in the audience on 8/5/19, trees will not

increase water use within Shafter because they cool the air reducing transpiration rates of all local plants, they will often replace grassy areas which use even more water than trees, and they will incentivize residents to walk more instead of driving vehicles. And, of course, they reduce air pollution levels by absorbing significant pollution.

82. COMMENT (Meeting, Aug 5, 2019): As a part of the urban greening measure, drought resistant plants should be placed in the Shafter community. Will these plants and trees be placed at the homes of Shafter residents?

83. COMMENT (Meeting, Aug 5, 2019): Require that homeowners in the Shafter community transition their landscaping from grass to desert or drought resistant lawns.

84. COMMENT (Gustavo et al., Aug 26, 2019): \$0 to \$250,000 \$50 per tree x 5 years x 1000

RESPONSE 80-84: [See measure UG.1](#)

The District has committed \$250,000 for urban greening projects, including planting and maintenance (with a District 20% funding match, up to \$50,000). Additionally, the CERP includes \$5,000 for study by San Joaquin Green (formerly Tree Fresno) and Tree Foundation of Kern to identify planting locations/irrigation plans. The District will work directly with Shafter residents, community groups, and other partners to support efforts to obtain currently available state funding (from Natural Resources Agency, Caltrans, etc.).

85. COMMENT (Gustavo, et al., Aug 9, 2019): **Underfired char-broiler filter systems. \$300,000.** The air district already has funding set aside for this program. We recommend the worst offending restaurant in Shafter receive one of these filtration units using AB617 funding and hopefully one more restaurant can participate using the other funding already available.

Reduce the amount proposed to \$150,000

RESPONSE: [See measure CC.1](#)

Measure CC.1 (Commercial Charbroiling) updated based on the above comments and now has a goal of 1 restaurant with a total \$150,000 funding allocation

LOCOMOTIVES AND SWITCHERS:

86. COMMENT (Gustavo, et al., Jun 4, 2019): Focus on the trains that constantly pass through here. Instead of providing an incentive, can you take a look at trains that do not meet the standard? Ask the company to change their engines.

- 87. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for replacing old diesel locomotives with clean diesel locomotives 2 units \$5,200,000.** This would be such a tiny benefit to Shafter that we recommend it be removed and the money spent elsewhere. \$0
- 88. COMMENT** (Gustavo et al., Aug 26, 2019): No money should be spent on train locomotives for Shafter. It cannot be justified. BNSF trains and locomotives travel through Shafter but also to Chicago, Atlanta, Houston, and Seattle.
- 89. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentive for replacing old diesel railcar switchers with clean diesel switchers. 3 units \$4,100,000.** We do not recommend any money spent on this proposal. There are no switch yards in Shafter. They are long gone with the potato and carrot sheds. The distribution center south of Shafter at Seventh Standard seldom uses this type of vehicle. \$0 dollars.
- 90. COMMENT** (Gustavo et al., Aug 26, 2019): 1 electric train yard switcher locomotive is supported by the committee but only if located within the 7-mile radius and it has to be electric, not natural gas or diesel.

RESPONSE 86-90: [See removal of measure HD.6](#)

There are locomotives that travel through Shafter on a regular basis. Replacing these high emitting units with the cleanest engine technology could result in significant NOx and PM2.5 emission reduction benefits to the Shafter community. However, based on Steering Committee input, measure HD.6 was removed from the CERP. Funding for switchers and railcar movers that operate primarily in Shafter is available under HD.7.

LAND USE:

- 91. COMMENT** (Gustavo, et al., Jun 4, 2019): Improve upon city structure and infrastructure. Include communities within 7 mile zone, Mexican Colony, Smith's Corner, Cherokee Strip, Labor Camps along Route 43, etc.
- 92. COMMENT** (Meeting, Aug 5, 2019): Develop more sidewalks in my neighborhood, due to the high school being near my house.
- 93. COMMENT** (Gustavo et al., Aug 26, 2019): **Road dust/ Improvements/ Sidewalks.** There needs to be substantial AB 617 money to reduce PM 10 and dust via paved roads and sidewalks. The amount should be above 10 million dollars.

RESPONSE 91-93: [See measure LU.5 and updates to measure RD.2](#)

The CERP has allocated \$1 million to support City of Shafter efforts to implement bicycle lanes. Through coordination with City of Shafter and community members, the District and the community will work together to identify locations for bicycle lane installation projects, consistent with City of Shafter General Plan and Bicycle Plan, and inform public about project implementation status.

In collaboration with Kern County Public Works Department¹⁰, City of Shafter, and Kern County Planning Department, the CERP includes a new allocation of \$2,775,000 to leverage additional local, state, and federal funds for the installation of sidewalks, road paving efforts, and other projects that reduce particulate matter and vehicle miles traveled in and around the community.

The Kern County Public Works Department (Pope, C., Aug 23, 2019) also supports the District's commitment in RD.1 to explore the feasibility of funding street sweeping around the Shafter community.

LAWN AND GARDEN:

- 94. COMMENT** (Meeting, Aug 5, 2019): Consider increasing the amount of funding to be invested into the lawn and garden equipment replacement program for both residential and commercial use. Increase from \$100,000 to \$300,000.
- 95. COMMENT** (Meeting, Aug 5, 2019): Would commercial gardeners be able to receive incentive funding from the lawn and garden replacement program for both their business and their personal residence?

¹⁰ (Pope, C., Aug 23, 2019) Comments received from Craig Pope on behalf of the Kern County Public Works Department in response to a draft CERP.

- 96. COMMENT** (Meeting, Aug 5, 2019): \$4,000,000 is too much money to be invested into yard equipment that is only used seasonally. Consider using some of this funding elsewhere.
- 97. COMMENT** (Gustavo, et al., Aug 9, 2019): **Free electric lawnmowers, hedge trimmers, and weed eaters for Shafter residents. \$100,000.** We agree with this proposal and amount of funding. No leaf blowers should be included. Give away brooms and rakes instead.
- 98. COMMENT** (Gustavo, et al., Aug 9, 2019): **Incentives for electric commercial lawn and garden equipment. \$40,000.** We agree but no leaf blowers. The City of Shafter may want to consider a ban on leaf blowers when there is any blowing dust involved in the activity.

RESPONSE 94-98: [See measures LG.1 and LG.2](#)

The District will not fund leaf blowers as a part of measure LG.1. In order to reduce PM2.5 and NOx emissions from the combustion engines from lawn and garden equipment used in commercial applications, the District is currently funding blowers as a part of the Commercial Clean Green Yard Machine program described in LG.2. The District has forwarded the suggested leaf blower ban to the City of Shafter for consideration.

MITIGATION AND EDUCATION:

- 99. COMMENT** (Gustavo, et al., Aug 9, 2019): **Mitigate indoor air pollution.** Money allocated here could be used to replace gas stoves with electric induction stoves. This was mentioned earlier as part of **SD.1**. Eliminates natural gas burning and gas leaks within homes. Better control of heat on the induction stove will lead to less burning or overcooking of food which causes large particulate emissions within the home. **\$1,000,000** should be allocated for **250 induction stoves** to replace natural gas stoves in Shafter if this becomes a separate program.

RESPONSE: [See measure IAQ.1](#)

The District has forwarded this suggested induction stove measure to CAPK (Community Action Partnership of Kern), the weatherization/energy efficiency upgrade agency supporting Kern County. See measure IAQ.1 for a full description.

- 100. COMMENT** (Gustavo, et al., Aug 9, 2019): **Air Filtration in Schools TBD units \$100,000.** We recommend this proposal but with a greater amount of money for more classrooms. **\$500,000.**

101. COMMENT (Meeting, Aug 5, 2019): Please consider increasing the funding for school air filtration systems.

RESPONSE 100-101: [See measure SC.1](#)

The District has increased funding to support pilot program for local schools to install HVAC filtration systems. Based on programs in other regions, the cost is estimated at up to \$25,000 per school, so the funding was increased from \$100,000 up to \$250,000 to fund upgrades at all interested schools in community.

102. COMMENT (Gustavo, et al., Aug 9, 2019): **Education and Enforcement RB.2-RB.5.** We recommend these proposals to take place in Shafter. No extra funding is proposed.

RESPONSE: Thank you for your comment and support.

ALTERNATE FUELING STATION

103. COMMENT (Meeting, Aug 5, 2019): Consider funding the development of more than 1 alternative fuel fueling station for the community of Shafter.

104. COMMENT (Gustavo et al., Aug 26, 2019): Eliminate the alternative fueling station. We do not support natural gas infrastructure

RESPONSE 103-104: [See measure HD.8](#)

The District will work closely with businesses, public agencies and fueling providers to support and incentivize the development of clean-vehicle fueling infrastructure in the area of the community. In this action, the District proposes to prioritize incentive funding to support the development and construction of new clean vehicle alternative fueling infrastructure within the community. This includes increased outreach to businesses and public agencies operating vehicles within the community as well as prioritized funding for projects that serve vehicles operating in the community. Depending on the size, throughput, and configuration of the fueling infrastructure, the proposed funding amount of up to \$1,000,000 would incentivize the development of one new natural gas fueling station.

GENERAL COMMENTS:

105. COMMENT (Meeting, Aug 5, 2019): How do you define low-income in regards to these incentives programs? Consider allowing middle class applicants to receive the same incentives.

RESPONSE: The District uses the poverty level defined by the federal government to determine whether an incentive program applicant is low-income. As these programs are developed for implementation in the community, the District will consider how non-low-income applicants could be involved and at what incentive level.

106. COMMENT (Gustavo, et al., Aug 9, 2019): No funding associated with the final three items IR.1, O.1, and O.2 but we support them.

RESPONSE: Thank you for your comment.

107. COMMENT (Oviatt, L., Aug 19, 2019)¹¹: The inclusion of barrier landscaping and wind break trees in projects can be an effective way to minimize dust and other pollutant issues. No permit is required to augment an agricultural zoned property for the inclusive of such a barrier, even on a dairy as long as it is outside the established road right of way. However, the implementation of the Sustainable Groundwater Management Act (SGMA) in this basin will limit the allocation of water that could be provided for such additional plantings. Further, the very agricultural use of the property may cease due to the loss of sufficient water to continue farming. The topic is very timely as the implementation of groundwater management will result in an approximately 500,000 acres San Joaquin Valley wide to become fallow and, if not managed properly, unstable. In Kern County, the number of acres that may become fallow and unplanted estimates range from 150,000 to over 250,000 acres. Besides vegetative barriers, the recommendation should include programs to ensure support for programs for property owners to stabilize their non-plantable fields to prevent dust storms and other impacts on the community. Such programs include support for planting native cover crops until they can become habitat or be used for alternative uses for the properties such as solar panels.

Adding any additional landscaping to an industrial project in the landscape area requires compliance with the Kern County Landscape ordinance which is mandated by the State to reflect the drought tolerant model ordinance. Such plantings, as shown in the examples, appear to be older plantings and may now be constrained by the Model Water Efficient Landscape ordinance (California Code of Regulations, Title 23 Waters, and Division 2 Department of Water Resources- Chapter 2.7 – 2015).

RESPONSE: [See measures VB.1 and A.4](#)

The District thanks Kern County Planning and Natural Resources Department for comments on the Shafter CERP. Throughout the implementation of the CERP,

¹¹ (Oviatt, L., Aug 19, 2019) Comments submitted by Lorelei Oviatt on behalf of the Kern County Planning and Natural Resources Department on the Draft CERP on August 19, 2019.

the District will continue to work with the Steering Committee, the City of Shafter, Kern County, and other partners to develop guidelines for many of the measures, including VB.1 for installing vegetative barriers around sources of concern. This measure commits to working with applicable partners to find funding for voluntary incentives projects for installation of vegetative barriers.

Furthermore, through the District's Conservation Management Practices (CMP) measure A.4, we will continue to work with local agricultural groups to conduct focused outreach to promote more widespread implementation of conservation tillage practices such as cover cropping, no till, low till, strip till, and precision agriculture.