

APPENDIX H

Comment Letters

South Central Fresno CERP

San Joaquin Valley Air Pollution Control District
September 19, 2019

Strategy #	Strategy Type	Description	Agencies Involved
1.	Enforcement New Rules and Regulations	The Air District will form an “Implementation Sub-Committee” with members from the existing and/or new applicant Steering Committee members 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 when a permit for an industrial land-use or source that triggers either the New Source Review or Indirect Source Rule is submitted within the AB617 area and have the opportunity to provide recommendations on how to mitigate negative impacts; c) Receive updates on the Community Air Monitoring Network (CAMN) and vote on any proposed changes to the CAMN; d) Define and implement Green Zone practices	Air District
2.	Enforcement	The Air District and CARB will evaluate the following facilities: Rio Bravo, Vitro Flat Glass, Calco Gen, Western Co-Gen, SFPP, M&R Company (Lodi), Certainteed, Holz Rubber (Lodi), Gallo Glass (Modesto), Diamond Foods (Lodi), at the minimum for compliance with existing Air district rules and regulations including but not limited to an updated Health Impact Assessment (HIA) for both cancer and non-cancer health effects. Each entity will update its existing OEHHA Fact Sheet(s) and toxic inventory, report and share findings with the AB 617 steering committee and if needed, create an enforcement plan to bring the facility up to compliance. Should deficiencies and/or increased health risks be identified, the facility will develop a schedule for correction and/or mitigation and report back to the committee on a scheduled basis until the facility has reached compliance. Carb & The Air district will earmark	Air District, CARB

		facility for periodic, random auditing for a period of time to review and audit compliance.	
3.	Enforcement	The Air District will add an “Enforcement” web-link to the AB617 Community website. This site will have a User-Friendly form to allow the public to make complaints regarding any type of air quality issue. Once a complaint has been filed, the website will allow the public to follow the process through the status of inspection, cited violation or justification, resolution and outcome. All complaints should be made public and the community have access to see what facility/business’ history of violations.	Air District
4.	Enforcement	CARB will work with the Air District to review if the City of Fresno” fleet maintenance schedule compliance.Scheduled fleet inspections shall be conducted at no less than once a year intervals. Buses that are ready to be put out of commission are replaced with electric buses. CARB and the Air District will work with the Fresno City Department of Transportation Services to 1st) establish an EV conversion work group. This workgroup would have at least two members from the AB 617 Fresno Community Steering Committee; 2nd) The working group will develop a time-line and schedule for complete fleet conversion to electric vehicles; 3rd) The working group will report progress to the Steering Committee at regular intervals.	Air District CARB Fresno/County
5.	Land Use	A Memorandum of Understanding will be formed between the City of Fresno, Fresno County, and the Air District regarding the overlaying plans of the AB617 Community Air Monitoring Plan, the AB617 Community Emissions Reduction Program, the Transformative Climate Communities (Transform Fresno) program, the Southwest Fresno Specific Plan, the South Industrial Priority Area Specific Plan, and the Southeast Central Fresno Specific Plan. The objectives are to: prioritize environmental mitigation efforts that are required by CEQA and the Environmental Impact Reports of each of these plans; to	Air District City of Fresno/County

		create transparent and public communication between community members, each agency and the departments that manage these plans; to collectively find funding sources that benefit the communities and areas that are covered under these specific plans; to create true and robust community engagement by having community meetings that openly discuss and create actions of how these plans affect each other and work in tandem. The City of Fresno, the County of Fresno and the Air District will have a dedicated staff member to fulfill the objectives of this MOU.	
6.	Land Use	<p>The Air District and CARB will engage in environmental review processes for industrial development projects in South Central Fresno which will include coordinating with community partners and lead City and County agency staff, providing data and technical assistance, and reviewing and commenting on CEQA documents.</p> <p>The Air District shall monitor and take all necessary measures to secure timely compliance by developers with CEQA mitigation measures and permit conditions requiring compliance with Air District rules and/or necessitating Air District involvement for implementation. For example, such mitigation measures include but are not limited to commitments to comply with the Indirect Source Rule and commitments to enter into a Voluntary Emissions Reductions Agreement (VERA) for purposes of reducing air emissions below the CEQA significance threshold. In order to implement this commitment by the Air District, the Air District shall work to establish a communication protocol with the City of Fresno and the County of Fresno to obtain mitigation monitoring and reporting for projects containing mitigation measures involving the Air District.</p>	Air District City of Fresno/County, CARB
7.	Enforcement	If the Air District fails to receive necessary information from the City or the County regarding mitigation compliance, the Air District shall seek to obtain the information directly from	Air District

		the applicant. To the extent that developers fail to comply with mitigation measures, the Air District shall pursue enforcement actions through all means available to it.	
8.	Land Use	Reassess and revise the Air District's CEQA and Health Risk Analysis thresholds of significance for criteria air pollutants and toxic air emissions for neighborhoods disproportionately impacted by air pollution, taking into consideration the rule under CEQA that projects located in areas already impacted by environmental degradation and with sensitive land uses are subject to a lower threshold of significance.	Air District City of Fresno/County
9.	Land Use New Rules and Regulations	Require the use of funds paid pursuant to Air District Rule 9510 (Indirect Source Review) and the Voluntary Emissions reductions Agreement (VERA), to be spent on emissions reductions within the neighborhoods in which the project is located. Through a community process and in collaboration with community stakeholders, develop a list of criteria and sample projects which would qualify for funding and publicize the availability of the targeted ISR funding.	Air District
10.	Land Use	The Air District will stop issuing permits that allow drive-throughs in restaurants located within the AB617 area.	Air District City of Fresno/County
11.	Land Use	The City of Fresno/Fresno County shall abide by AB2447. Community members shall receive a public notice with at least 30 days of comment period on any relevant planning or land-use decisions not currently subject to such notice. According to Rule 9510, Indirect Source Review, for industrial projects that can have an impact on air quality in a community, the Air District will enforce that the City/County of Fresno will notify residents that are within a 1 mile of the 617 community boundary.	Air District City of Fresno/County

12.	Land Use Incentives	The Air District will work with the City of Fresno/ Fresno county to install solid barriers or vegetative buffers between emissions sources/locations and sensitive receptors such as schools, daycares, medical offices, residences within the 617 community.	Air District City of Fresno/County
13.	Land Use	Air district will work with the city planner's office to advocate for changes in the classification within the City's general plan to rezone communities, such as the SC Fresno AB 617 community, to stop certain facilities to enter into the area that are identified as facilities that are prone to cause negative health impacts. The Air District will promote other possibilities by considering alternative land-use plans. The Air District will enter into a memorandum of understanding (MOU) with the City of Fresno/and or county to be involved in the rezoning	Air District City of Fresno/County
14.	Land Use	The Air district will be an active partner in the implementation of the current City of Fresno plans and programs within the South Central AB617 community boundary. Such programs are the Southwest Specific Plan and the Transformative Climate Community Program and the Active Transportation Plan. These plans address aspects of air quality, greenhouse reductions, and heavily impacted disadvantaged communities. The Air District will uphold the zoning that has been established in the Southwest Specific Plan. The Air District will partner with the City of Fresno and the County of Fresno to identify funding sources and participate in any environmental study completed by the City or County.	Air District City of Fresno/County
15.	Land Use	The Air District will follow and be an active partner in the creation of the Southeast Specific Plan and the South Industrial Priority Area Plan. As a public health agency, the Air District will advocate for the reduction of air pollution and	Air District City of Fresno/County

		improved health outcomes in the 617 South Central Fresno communities.	
16.	Land Use	The Air District will review current buffer zones for facility “standards” that are in place, as defined by the MOU, within the AB617 area for future commercial or industrial planning to take place around sensitive areas such as existing schools, daycares, convalescent homes, etc.	Air District City of Fresno/County
17.	Land Use	Air District will recommend Green Zone practices, such as those referenced in the Minneapolis MN Green Zones Initiative (http://www.ci.minneapolis.mn.us/sustainability/policies/green-zones), as well as mitigation factors to the City that are appropriate for incoming industrial development businesses to implement as a requirement when accepting tax incentives from the City and or County of Fresno. The Air District will work with the Implementation Sub-Committee and the City and County of Fresno to enact and define a Green Zones Fresno Initiative.	Air District City of Fresno/County
18.	Land Use	According to the Mitigation Fee Act (California Government Code Sect. 66000) and the City of Fresno Southwest Specific Plan (Chapter 8, page 8-4), new development pays Development Impact Fees. The Air District will review and audit the City of Fresno to confirm the city is using the Developer’s Impact fees for infrastructure improvements that prioritize the reduction of emissions and health impacts. ie: truck re-routes, vegetation/tree canopy barrier walls, air filtration systems in sensitive receptor buildings/residences.	Air District City of Fresno/County
19.	Land Use	The Air District will follow the South Industrial Specific Area Plan developments and identify Community Benefits Agreements that the City of Fresno should create with incoming businesses. The Community Benefits Agreement will prioritize any action that improves air quality and lowers	Air District City of Fresno/County

		the health impacts of residents from the pollution caused by heavy industry. The Air District will have dedicated staff to engage and give input in public workshops held by the City/County of Fresno. When a new or adjusted permit is being applied for, the Air District will initiate a Health Risk Assessment.	
20.	Transportation Mitigation	The Air District and CARB will propose a plan to monitor near road diesel pollution as part of a complete study of-air pollution and health effects of truck traffic on the highways 99, 41 and 180 with special focus on graded on and off ramps, as well as all roadways where sensitive uses receptors and populations are located and which are used as truck routes (e.g., Jensen, Central, and North Avenues). Monitor data will be available on CARB's "Air Now" and Air Districts RAAN air quality mapping software. Based on the findings, the Air District and CARB will review existing diesel mitigation strategies and update them through a public process in partnership with the Fresno Steering Committee. The combined agency and SC will present the information along with new strategies and designs to the City/County that they can adopt to improve air quality (such as limiting the use of red lights and stop signs for cars).	Air District CARB City of Fresno/County
21.	Transportation Mitigation	The Air District will work with the City of Fresno and/or the County of Fresno Air to reroute heavy-duty truck traffic around sensitive receptors such as schools, daycares, and residences. The Air District will work with the city/county of Fresno to create a schedule for heavy-duty trucks routing to exclude certain times of operations such as school pick-up and drop-off times to reduce emission exposure.	Air District City of Fresno/County
22.	Transportation Mitigation & Incentives	The City of Fresno, the County of Fresno and the Air District will apply as co-applicants to state funding sources to mitigate pollution and climate impacts within the 617 Boundary and improve livability, such as but not limited to:	Air District City of Fresno/County

		Greenhouse Gas Reduction Funds(GGRF), Electric Program Investment Charge (EPIC) Sustainable Transportation Planning Grant Program-Sustainable Communities, Office of Safety Grants, Environmental Enhancement and Mitigation Program, Urban and Community Forestry Grants, Low Carbon Transportation, Active Transportation, Low Carbon Transit Operations, Affordable Housing and Sustainable Communities, Climate Change Research, Transformative Climate Communities, Woodsmoke Reduction, Low-Income Weatherization, Urban Greening, Wildfire Response and Readiness, Waste Diversion, Training and Workforce Development, Healthy Soils, Renewable Energy for Agriculture, Food Production Investment and the others as project leads of the same program. The agencies involved will attempt to pursue funding from these multiple programs as the primary source of funding to implement the Fresno CERP. State budgeted Community Air Protection Program (CAPP) funding should be reserved for projects and programs that cannot be funded through other means, or when as a match when required. CAPP funding may also be utilized to leverage significant state and federal funding if required.	
23.	Transportation Mitigation	The Air District will work with the City of Fresno/County of Fresno to revise business licensing procedures to require current and proposed businesses to disclose truck visits per day and works with Caltrans to determine the number of trucks that park in the Caltrans right-of-way near South Central Fresno. These efforts would help to better understand emissions and exposure in South Central Fresno.	Air District City of Fresno/County
24.	Transportation Mitigation	The Air District will recommend/ coordinate with CalTrans, Fresno City Department of Public Works;Transportation and Planning, and Fresno County Transportation Authority (FCTA), the installation of both vegetative and mechanical barriers near adjacent to state and local goods movement	Air District City of Fresno/County Caltrans

		<p>corridors that are in close proximity to sensitive receptors in South Central Fresno CAPP. The District, in coordination with the City or County of Fresno will apply for funds from the various agencies and sources listed in #22, to install these barriers. Proposed locations include but not be limited too:</p> <ul style="list-style-type: none"> • Along the 99 highway, especially near the 99 and 180 interchange and alongside the south side of the 99 between the 180 and 41. • Along the 41 within the AB 617 boundary • Along Maple, Jensen Avenue, Chestnut and Divisadero/Tulare 	
25.	Mitigation	The Air District will require all facilities identified in the technical assessment and emissions inventory to incorporate mitigation measures such as planting shrubs, greenery, trees around the perimeter of their facilities, to exclude entry and exit points.	Air District City of Fresno/County
26.	Mitigation	The San Joaquin Valley Air District, in coordination with the Fresno Department of Health, will review the accessibility and reach (language access, technology access) of their RAAN program, and make updates as needed. Report back to the Implementation Sub-Committee.	The Air District
27.	Mitigation	The San Joaquin Valley Air District will increase outreach and education for RAAN within the 617 community.	The Air District
28.	Facility Risk Audits	The Air District will schedule audits for the facilities identified as the main polluters in the area by the technical assessment. The Air District will provide the "Implementation" Sub-Committee with a list of the sources and scheduled dates of audits. The Air District will report findings back to the steering committee and CARB at the	Air District

		same time - within 10 days of audit. The Air District will then discuss plans of actions with CARB and the steering committee to be voted on by the "Implementation" committee. The Air District will then provide an implementation schedule and report to the steering committee no less than once a quarter until the facility changes have been made and emissions have been reduced.	
29.	Incentive	The Steering Committee will approve incentives on a case-by-case basis for stationary sources. Permitted facilities that need BACT/BARCT upgrades and have a history of compliance will receive priority for incentives. Permitted facilities that have a history of being cited, then pay their penalties and fines but do not stop the violations will be reviewed for shutdown.	Air District
30.	Incentives	The Air District will offer financial incentives and technical support to low-income households within the AB617 area to install air filters and consider other strategies they will both reduce emission from the home to the outside air and keep pollution in the outside air from entering the home and mitigate indoor air pollution.	Air District
31.	Incentives	The Air District will grant incentives for air-quality related programs on a sliding scale. For instance, incentives for clean cars should be higher for lower-income residents, and lower for higher-income residents. The AB 617 Fresno Implementation Sub-Committee can help the Air District determine incentive tiers.	Air District
32.	Incentives	The Air District will offer financial incentives and technical support to schools within the AB617 area to install air filters that mitigate indoor air pollution	Air District
33.	Incentives	The Air District will work in tandem with Fresno EOC, State Center College District, Fresno Unified School District and	Air District and Fresno EOC

		other recognized educational institutions, to create a local Youth Training and Employment Program that focus on youth residing/working in the AB617 area that will train them in the implementation of the mitigation strategies included in the CERP.	
34.	Incentives	The Air District and the City/County of Fresno will apply for state funds for urban greening and forestry to improve tree cover in the AB 617 community, especially within residential neighborhoods that currently lack coverage.	Air District, City/County Fresno
35.	New Rules & Regulations And Incentives	The Air District will create a new rule and develop and incentive program which will require commercial landscapers must use electric gardening equipment (i.e. lawn mowers, leaf blowers, etc.) by a date to be negotiated but not more than five years from approval of this plan. Residential leaf blowers need to transition to alternative vacuums to decrease dust pollution.	Air District
36.	New Rules & Regulations And Incentives	The Air District will increase the stringency of Wood Burning rule 4901 to ban fireplaces in the City of Fresno and their sphere of influence as well as prohibit non-essential woodburning. For residents that have only wood burning fireplaces as the sole source of heat, the Air District will prioritize and target low-income communities for appropriate and energy efficient replacement incentives. The Air District will conduct outreach to 617 low-income community residents.	Air District
37.	New Rules & Regulations, Enforcement	Any fines given to Valley residents by the Air District related to the enforcement of rules and regulations should be administered on a sliding scale according to income. The SJV Air District will establish a working group that includes members of the AB 617 Fresno Implementation Sub-Committee to advise the districts review and update of the "San Joaquin Valley Unified Air Pollution Control Districts's Mutual Settlement Policy; Communication #1165; (ref: CH&SC 42403)," dated February 6th, 2018. Goals	Air District

		include but are not limited to: 1) Development of an income based sliding scale for fines. 2) Strategically evaluating where funding generated from these fines should best be utilized to reduce emissions from these sources.	
38.	New Rules & Regulations	The Air District will work with The City of Fresno/County to ban the use and/or sell of fireworks in AB 617 affected area	Air District City of Fresno/County
39.	New Rules & Regulations	The Air District will expedite the timeline for the development of a rule and implementation schedule for under-fired charbroilers (Rule 4692) located within the AB 617 community.	Air District
40.	New Rules & Regulations	Ban all untarped applications of 1, 3-D toxic air contaminant pesticide. 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 seen in certain sections. Make Notices of Intent (NOIs) required for restricted pesticide applications publicly available online, along with CAC approvals/ denials of these NOIs. Ban all aerial applications of pesticide TACs. Establish 24/7 buffer zones of a 1 mile for all pesticide TACs for all sensitive receptor sites, including homes, hospitals, labor camps and schools. Ask for an evaluation of all carcinogenic TACs including pesticides, and then create emissions reduction plans in line with that analysis. Ask for an evaluation of all reproductive toxicity TACs, including pesticides, and then create emissions reduction plans in line with that analysis.	Air District

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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

Ms. Heather Heinks

August 22, 2019

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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:

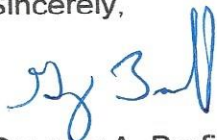
CARB will work with the Air District to review if the City of Fresno is in compliance with their fleet maintenance schedule by performing scheduled fleet inspections no less than once a year. Buses that are ready to be put out of commission are replaced with electric buses.

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 me directly at 621-1520.

Sincerely,

A handwritten signature in blue ink, appearing to read "Greg Barfield", with a stylized flourish at the end.

Gregory A. Barfield,
Director of Transportation

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.

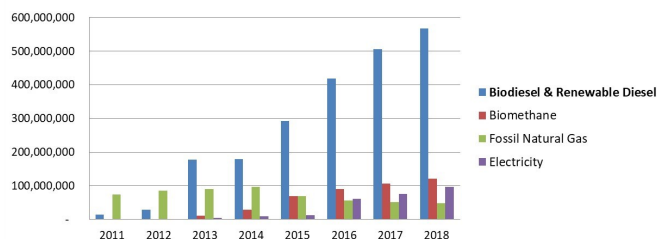
AB617 has increased the communities understanding of the air pollution sources. Unfortunately not to a level to make informed decisions regarding land use, CEQA, enforcement or industrial permitting. These issues should be addressed by professional air quality decision makers and management. This subject 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.

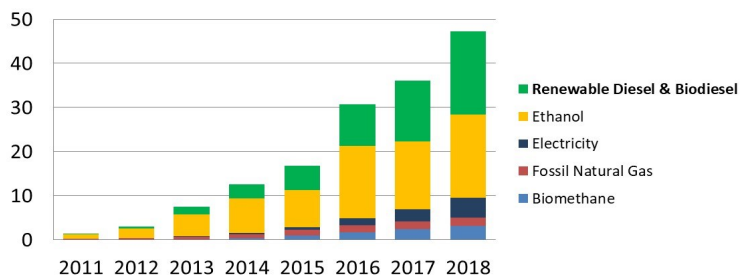
While it is important to continue progress forward, other interim solutions should be added to the CERP and developed. CARB refers to diesel as one product, ultra low sulfur petroleum diesel. This was driven home many times during the AB617 steering committee meetings. The reality is there are three distinctly different diesel formulations. ULSD Petroleum diesel, bio-mass diesel as B20 blend and renewable diesel. According to CARBs 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,



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 Industry Representative
 AB617 Steering Committee
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August 28, 2019

Ms. Heather Heinks
San Joaquin Valley Air Pollution Control District
1990 E. Gettysburg Ave.
Fresno, CA 93726

Re: Draft CERP; South Central Fresno
August 14, 2019

Via email: heather.heinks@vallleyair.org

Dear Ms. Heinks:

The following are my comments to the Draft Community Emissions Reduction Program:

Page 94, 2nd para from the bottom says: "The District does not have the authority to regulate the use of leaf blowers or other lawn and garden equipment operating throughout the Valley."

What I understand is the District can regulate the emission from the engine but not the what they spew into the air in our local neighborhoods, schools, parking lots, commercial properties and public spaces.

Perhaps some improvements on engine exhaust are being made with the California Air Resources Board regulations on small engines, "SORE" for short, but this does not solve the health threat of airborne fugitive dust created by leaf blowers. Battery operated devices have been in development over the past several years, but I have never seen one used by the landscaping crew on the condo development where I live in Central Fresno. They also don't hold a charge long and probably don't have a nozzle air speed over 200 mph, like gas-driven units.

<https://ww2.arb.ca.gov/our-work/programs/small-off-road-engines-sore>

I believe that science has shown that breathing the PM stirred up by leaf blowers can cause asthma in children and early mortality in older people. The PM also leads to more deadly lung infections and neurological diseases when the PM goes through the lungs and enters the blood stream, traveling throughout the body.

Regulation VIII covers Fugitive Dust, but gardening equipment is not covered. Leaf blowers should be added to this category and added to emissions inventory. The blown PM from leaf blowers might not register on area monitors as well as construction, demolition and excavation activities with waves of dust, but the health risks are present. Leaf blowers might not throw up a cloud over the city in order to register on existing monitors, however blowers are used for more than blowing leaves and they are more of a local neighbor by neighborhood threat rather than a large single area threat to public health. Leaf drop lasts for 3 to 4 months, whereas blowers operate year-round, to mainly blow dust to disperse and displace it for the moment. Commercial landscapers use blowers to make their job faster and easier than sweeping, raking, gathering and disposing of the debris. Going slower would keep the cloud of dust under greater control and lower to the ground. Blowers seem to be used on "full-power" and raise the

dust 30 to 40 feet above the ground, better able to enter homes and other residences, parked and moving vehicles, commercial and government buildings, through and around windows, front doors, garage doors, swamp coolers etc.

www.quietcommunities.com , according to their website, is a national organization that says “Our mission is to transition landscape maintenance to low noise, zero emissions practices with positive solutions to protect the health of workers, children, the public and the environment. One of their articles online is:

<https://www.quietcommunities.org/wsj-article-doesnt-explain-distress/>

It speaks to the noise and exhaust emissions of gas powered leaf blowers but also mentions the industry growth over the past years, where over a year ago it states there were “...over 40 million pieces (of gardening equipment) now operating in the US- one for every 8 Americans.” It then mentions “...the pesticides, fertilizers, etc, they disperse into the air.” The Outdoor Power Equipment Institute is the industry’s main trade/lobbying group that pushes back on legislation on gardening equipment. Quiet Communities, Inc. says that “The outdoor power equipment industry recommends only one gas leaf blower be used at a time, never at full throttle in residential areas, and not for moving dust. But this is rarely the case.”

Leaf blowers are archaic: Who in their right mind would use leaf blowers to clean inside their home? Alan Kandel, a local blogger on science issues agrees:

<https://alankandel.scienceblog.com/2019/08/27/willy-nilly-careless-dust-blowing-like-sweeping-dirt-under-the-rug/>

Leaf blower options:

Sweep, rake pick up and dispose or vacuum with well-regulated filters for PM2.5.

Ban Fireworks:

The main objection is that many organizations raise funds for their activities for the year with sales of fireworks for the 4th of July. The PM spikes when these are ignited, usually for two weeks around the 4th and 2 weeks leading up to New Year’s. This is also a nightly activity during baseball season in downtown Fresno.

Option:

Many of the fundraising concerns are churches or other tax-exempt associations. They can raise funds in other ways, by passing-the-hat or by selling some other safe and sane, non-harmful product.

Sincerely,

Larry Taylor, Resident Member AB617 South Central Fresno Steering Committee

2600 Fresno Street, Third Floor, Room 3065
Fresno, California 93721-3604
(559) 621-8003

**Jennifer K. Clark, AICP, HDFP
Director**

Samir Sheikh
San Joaquin Valley Air Pollution Control District
1990 E Gettysburg Ave
Fresno, CA 93726

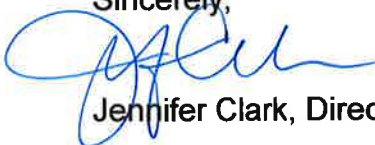
Dear Mr. Sheikh,

Thank you for the opportunity to comment on the Draft AB617 Community Emissions Reduction Program for South Central Fresno. We have reviewed the Draft and have the following recommendations for additions to the document:

- **HD11: Heavy Duty Truck Rerouting – suggested addition:**
City will support a detailed study of vehicular trips within the AB617 geographic footprint to include but not limited to number and type of each vehicle, destination/origin of each vehicular trip, time of day/week analysis, vehicle miles traveled and emissions. This would then be used to assess current truck routes, evaluate alternatives and calculate the increase/decrease in VMT, GHG, and Air Quality per CEQA. The City would be willing to lead the study if funding is identified. Estimated cost: \$500,000+
- **LU2: Provide Assistance During the CEQA Process – suggested addition:**
City of Fresno commits to include the Air District in its pre-application process which may include written comments and/or attendance at Development Review Committee (DRC) meetings for projects that will result in construction within the AB617 area. This will offer an opportunity to the District to discuss the proposed project with the applicant(s) including (if project description has sufficient detail) potential impacts and mitigation measures in advance of final decision making and prior to formal application acceptance.

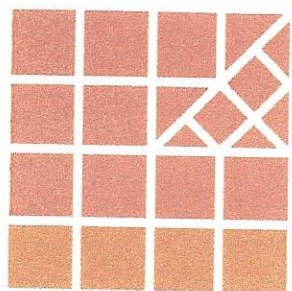
We appreciate the robust engagement that has taken place and the willingness of the District to include the City in providing information to stakeholders throughout the process. Please let me know if you have any questions or need clarification.

Sincerely,



Jennifer Clark, Director

cc: Wilma Quan, City Manager



SOUTHWEST FRESNO SPECIFIC PLAN

FINAL PLAN • ADOPTED ON OCTOBER 26, 2017

Alternate formats of this document will be provided by the City upon request.

To request alternate formats contact
Shannon M. Mulhall, Certified Americans with Disabilities Act Coordinator at (559) 621-8716.

5 TRANSPORTATION

A. INTRODUCTION

Since Southwest Fresno has a relatively low level of development, there is significant opportunity for future transportation improvements. Currently, Southwest Fresno's patchwork pattern of development, with residential neighborhoods separated by vacant or agricultural lands, has created a sporadic street infrastructure network. This has led to disconnected neighborhoods in the Plan Area and transportation inefficiencies. To increase mobility within the Southwest Fresno Specific Plan Area (Plan Area), transportation improvements for various modes of travel are critical to improve the convenience and facilitation of how people travel within and beyond Southwest Fresno. Improvements to the transportation network will not only help bring existing Southwest Fresno neighborhoods up to par with the rest of the city, but will also serve future anticipated development and residents in Southwest Fresno.

This chapter describes proposed improvements to the transportation network in Southwest Fresno to support all modes of travel, including transit, active forms of transportation like walking and biking, automobile, and goods movement. Considering all modes of travel for Southwest Fresno will enable a comprehensive and balanced network of streets that thoughtfully considers traffic congestion, greenhouse gas emissions, and the abilities of all users of the transportation network.

The Chapter is organized into the following sections:

- A. Introduction
- B. Transportation Improvements
- C. Complete Streets Design Guidelines
- D. Goals and Policies



8. Elm Avenue: California Avenue to North Avenue.

Two lanes are sufficient to serve future traffic demand. The existing 4-lane cross-section could be repurposed to provide a more multimodal corridor, including the following possible options:

- Enhanced streetscape with wider sidewalks
- Enhanced bikeways (i.e., cycle track or buffered bike lane)
- Increased on-street parking
- Transit-only lanes to support future bus rapid transit (BRT)

These improvements would support the Corridor/Center Mixed-Use and Neighborhood Mixed-Use land use designations along the Elm Avenue corridor.

9. Jensen Avenue: Elm Avenue to SR 41.

Traffic demand on this segment indicates that six lanes would be necessary to serve traffic demand traveling to/from SR 41 at LOS D or better. However, right-of-way constraints, on-street parking demand, and balancing the mobility needs with the City's focus on supporting walking, biking, and transit to create a multimodal network would make widening to six lanes infeasible. Therefore, the Plan maintains the existing four-lane configuration.

10. North Avenue: Martin Luther King Jr. Boulevard to Elm Avenue.

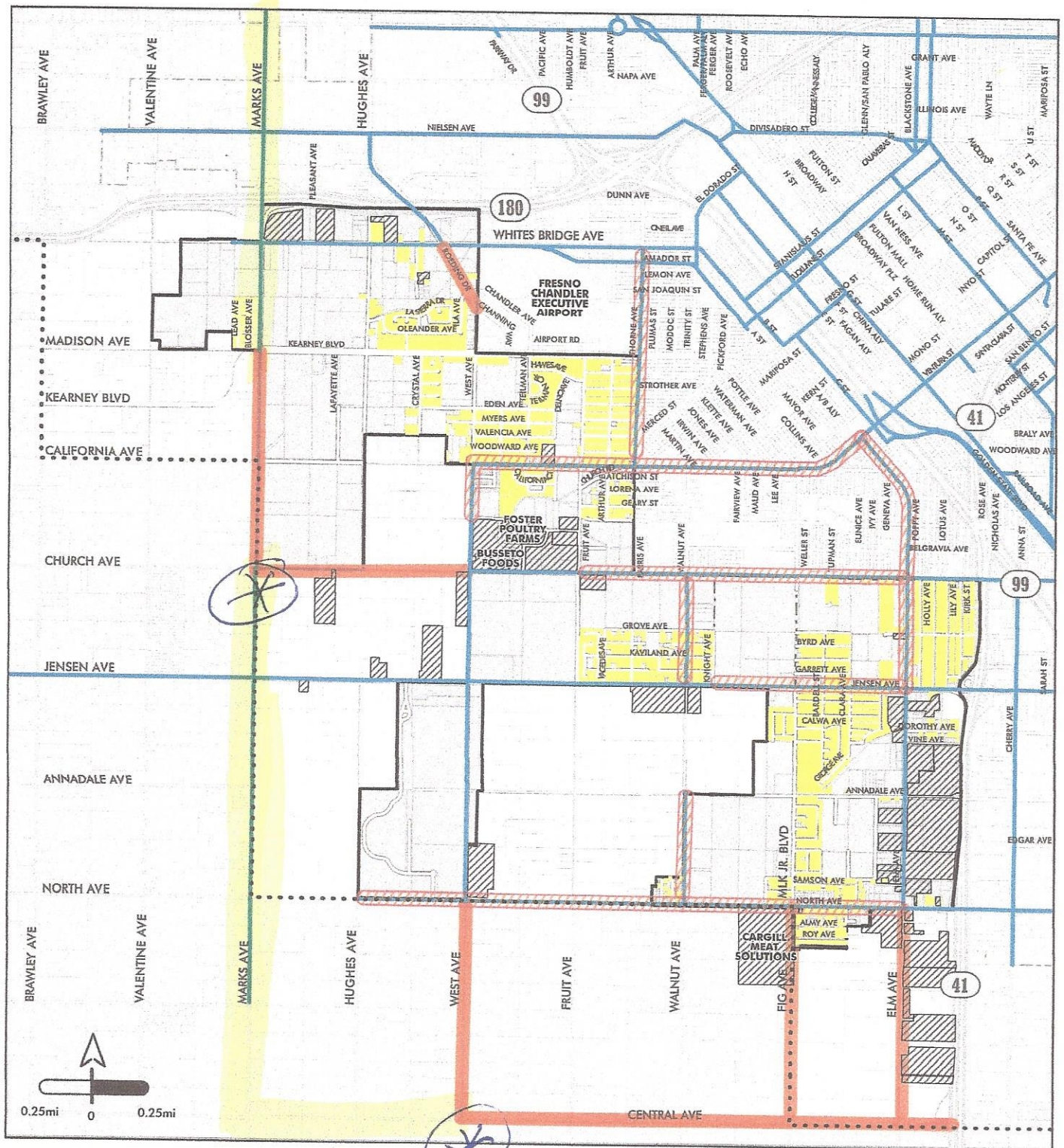
The 41+North Corridor Complete Streets Plan changed the plan for North Avenue from a 4-lane divided roadway (in the General Plan MEIR) to a 2-lane with a TWLTL configuration. Our initial traffic analysis shows that the 2-lane with TWLTL configuration is at the upper end of the capacity for this configuration. However, due to right-of-way constraints, the Plan is proposing this scaled-down configuration.

TRUCKS

With the significant amount of industrial uses situated within Southwest Fresno, multiple truck routes pass directly through existing residential areas. The frequent truck traffic reduces comfort levels for residents, especially for pedestrians and bicyclists who share the roadway with truck drivers. Figure 5-6 shows a map of existing truck routes that pass through the Plan Area and the existing industrial uses within the Plan Area and Sphere of Influence (SOI) that these routes serve. Existing residential areas are also shown on the map to highlight the proximity of truck traffic to many existing residential neighborhoods in Southwest Fresno. Existing truck routes are located along city and county streets.

The Plan recommends the rerouting of existing truck routes that pass through large swaths of existing residential neighborhoods. These eliminated routes should be rerouted to street segments that do not or minimally intersect existing residential areas, while still providing access and service to existing industrial businesses. Recommended truck reroutes are shown in Figure 5-6 and include the following:

- The truck route on California Avenue should be eliminated to avoid existing residential areas and to provide a more pedestrian-, bicycle-, and transit-friendly environment along the Mixed-Use Corridor.
- The truck route on North Avenue should be eliminated to avoid existing residential areas. Trucks should be rerouted from Highway 41 to Central, West, and Fig Avenues. This reroute is consistent with the recommendation from the recently completed Highway 41 + North Corridor Complete Streets Plan.
- A new or rerouted truck route along Marks Avenue should be considered to provide a direct connection from State Route 180 to existing industrial uses connecting to a new extended truck route along Church Avenue; the GP MEIR plans to widen Marks Avenue to have four lanes of travel.



Source: City of Fresno

FIGURE 5-6 Existing, Planned, and Recommended Truck Routes

Handwritten signature: R. G. S.

■ The truck routes along Jensen Avenue between Knight and Elm Avenues and along Church Avenue between Fruit and Elm Avenues should be eliminated to avoid passing through multiple residential neighborhoods and schools. The parallel truck route along Central Avenues should be used as an alternative. Jensen and Church Avenues east of Elm Avenue should remain truck routes so that trucks can access Highway 41 and the industrial areas in the "reverse triangle" between Highways 41 and 99. Jensen Avenue west of Knight Avenue should remain a truck route to service existing industrial and future office uses south of Jensen Avenue.

■ The existing truck route along Elm Avenue north of Jensen Avenue to Ventura Street should be eliminated to avoid passing through residential neighborhoods. Highway 41 and the parallel truck route along Cherry Avenue should be used as an alternative to access industrial areas in the "Reverse Triangle" and industrial uses in Downtown. The existing truck route south of Jensen Avenue should remain to service existing industrial uses along Elm Avenue south of Jensen Avenue.

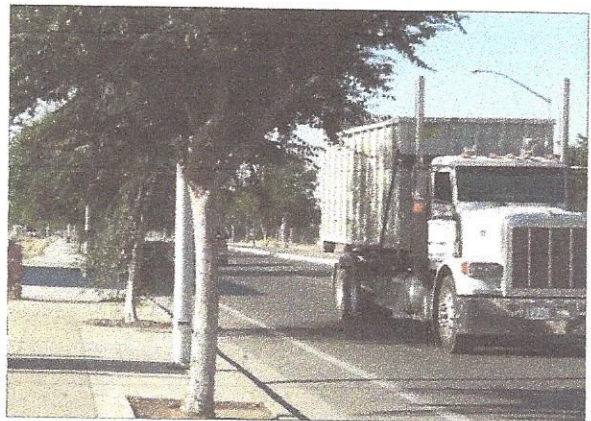
■ The existing truck route along Elm Avenue should be extended south to Central Avenue to serve existing industrial uses and provide better connectivity between Elm Avenue and the recommended Central Avenue truck route.

■ A new truck route along Roeding Drive from Whites Bridge Avenue to Channing Way should be considered to provide truck service access to the Fresno Chandler Executive Airport. The GP MEIR plans to widen Roeding Drive to have four lanes of travel. Establishment of this truck route is necessary for Fresno Chandler Executive Airport and the surrounding businesses.

■ North-south truck routes that connect to recommended eliminated truck routes, such as Thorne Avenue, Walnut Avenue, and West Avenue from California Avenue to Florence Avenue, should also be eliminated.

The recommended rerouting of truck traffic should be thoroughly discussed between existing industrial business stakeholders, existing residents, potentially affected agencies such as County of Fresno and Caltrans, and the City's traffic engineers. The recommended streets that would accommodate new truck traffic should be evaluated to determine whether the roadway's current pavement condition can withstand truck traffic over time and whether the roadway's width can accommodate truck movement.

If it is determined that new truck routes cannot accommodate these factors, the City should prioritize the recommended street(s) for the needed improvements or should determine sufficient alternative routes that are agreeable among existing residents, industrial stakeholders, and agency stakeholders. Since this Plan proposes to eliminate some existing truck routes, the City should reconsider any future planned truck routes that extend or connect to these eliminated truck routes.



Truck traffic through Southwest Fresno.

TABLE 8-7 (CONTINUED) Implementation Action Plan Matrix: Mobility

SP GOAL/ POLICY	MEASURE NUMBER	MEASURE NAME	DESCRIPTION	RESPONSIBLE PARTY; SUPPORT PARTIES	TIME FRAME	FUNDING
Policy T-6.2	M-9	Public Transit	Conduct an annual meeting with FAX to review development activity and projects in the entitlement process in order to ensure FAX transit routes adequately connect existing and future residential areas to key destinations, including schools, retail, employment, and recreation and to ensure the establishment of bus rapid transit routes along Elm Avenue and California Avenue when warranted and feasible	DARM	2018	Redirection of existing resources; would not require additional funding
Policy T-9.1	M-10A	Establish Truck Routes	Complete a comprehensive planning process to engage Fresno County, business owners, schools, and residents to confirm appropriate truck routes in Southwest Fresno as shown in the Plan. Then, adopt an ordinance establishing agreed upon routes.	Mayor / City Manager; Public Works	2018	General redirection of existing resources for ordinance
Policy T-9.1	M-10B	Truck Route Improvements	Program needed truck route improvements into the capital improvement plan and construct the improvements as funding is available and work with the County to provide improved truck routes on County land, including on Central Avenue	City and County Public Works	Include in the budget for FY2019	Capital improvement program for truck route improvements within the City's jurisdiction
Policy T-3.5	M-11A	Safe Routes to School Plan	Develop safe routes to school plans for schools serving the Plan Area:	DARM; Public Works	FY2019	General fund, \$45,000

REVISIONS TO THE DRAFT EIR

TABLE 4.14-11 PEAK HOUR FREEWAY OFF-RAMP QUEUING – EXISTING PLUS PROPOSED PLAN CONDITIONS (2017)

Freeway Off-Ramp	Ramp Length ^a	Deceleration Length ^b	Peak Hour	95 th Percentile Queue ^{b,c}	
				Existing Conditions (2017)	Existing Plus Proposed Plan (2017)
3. SR-99 Southbound Off-Ramp at Jensen Ave.	1,440 ft.	420 ft.	AM	625 ft.*	650 ft.*
			PM	450 ft.*	475 ft.*
4. SR-99 Northbound Off-Ramp at Jensen Ave.	1,050 ft.	420 ft.	AM	225 ft.*	400 ft.*
			PM	250 ft.*	475 ft.*
5. SR-41 Southbound Off-Ramp at North Ave.	1,575 ft.	270 ft.	AM	250 ft.	400 ft.*
			PM	75 ft.	100 ft.
6. SR-41 Northbound Off-Ramp at North Ave.	1,700 ft.	270 ft.	AM	25 ft.	50 ft.
			PM	50 ft.	50 ft.
7. SR-99 Southbound Off-Ramp at Fresno St.	1,030 ft.	270 ft.	AM	100 ft.	400 ft.*
			PM	150 ft.	225 ft.
8. SR-99 Northbound Off-Ramp at Fresno St.	1,070 ft.	270 ft.	AM	75 ft.	100 ft.
			PM	100 ft.	125 ft.

Note: * = 95th percentile volume exceeds capacity; the actual queue may be longer than reported.

a. The ramp length is estimated by measuring the distance from the gore point where the off-ramp departs from the mainline to the limit line at the ramp terminal intersection with the local street, as measured from aerial imagery. Distance is reported in feet.

b. The ramp deceleration length is estimated based on data from the table presented with Figure 504.2B in Caltrans Highway Design Manual. The deceleration length is measured from the ramp gore point where the off-ramp departs from the mainline.

c. 95th Percentile Queue calculated using Synchro software. Queue is reported in feet and rounded up to the nearest 25-foot interval.

Source: Fehr & Peers, 2017.

The second paragraph on page 4.14-46 of the Draft PEIR is hereby amended as follows:

As described above, the Proposed Plan would have a *less than significant* effect on roadway operations, intersection operations, and freeway off-ramp queuing. While the Proposed Plan would add trips to the roadway network, the resulting roadway, intersection, and freeway off-ramp conditions would not conflict with applicable plans, ordinances, or policies establishing measures of effectiveness (i.e., delay, LOS, and queue lengths) for the performance of the circulation system. Therefore, this impact is *less than significant*.

The third through eighth policy text on page 4.14-49 of the Draft PEIR are hereby amended as follows:

Goal T-910: Create a healthy environment for Southwest Fresno residents by intentionally routing truck traffic away from sensitive areas such as residential areas, parks, and schools.

Policy T-910.1: Work with existing industrial and heavy commercial businesses to identify alternative truck routes that limit negative impacts on sensitive areas while maintaining an efficient movement of goods.

REVISIONS TO THE DRAFT EIR

Policy T-910.3: Improve conditions of existing and rerouted truck routes for pedestrians and bicyclists by implementing pedestrian and bicycle facilities such as reduced corner radii at intersections to slow turning vehicular traffic, protected signal phasing for truck left-turns, enhanced high-visibility crossings, protected bikeways, and wide sidewalks.

Goal T-101: Create an accessible and well-connected “complete streets” transportation network that serves community members of all ages, income groups, and abilities, and balances travel by all modes of travel such as by car, bus, bicycle, foot, or wheelchair.

Policy T-101.2 Identify streets with excessive vehicular ROW that are opportunities to implement traffic calming and other improvements to slow traffic and provide options for multi-modal travel.

Policy T-101.3 Encourage lower vehicular travel speeds for collector and local streets in the Plan Area. This could be accomplished through traffic calming measures, narrower travel lanes, reducing the number of travel lanes, neighborhood speed watch/traffic management programs, or speed enforcement programs.

The fourth through sixth bullets on page 4.14-52 of the Draft PEIR are hereby amended as follows:

Goal T-910: Create a healthy environment for Southwest Fresno residents by intentionally routing truck traffic away from sensitive areas such as residential areas, parks, and schools.

Policy T-910.3 Improve conditions of existing and rerouted truck routes for pedestrians and bicyclists by implementing pedestrian and bicycle facilities such as reduced corner radii at intersections to slow turning vehicular traffic, protected signal phasing for truck left-turns, enhanced high-visibility crossings, protected bikeways, and wide sidewalks.

Goal T-101: Create an accessible and well-connected “complete streets” transportation network that serves community members of all ages, income groups, and abilities, and balances travel by all modes of travel such as by car, bus, bicycle, foot, or wheelchair.

Policy T-101.1 When feasible, design new roadways and retrofit existing roadways within magnet cores, complete neighborhoods, and along special corridors to prioritize travel by walking, bicycling, and riding transit, using the complete streets design guidelines contained in this chapter. For example, if adequate or excessive vehicle traffic capacity is available, create wide sidewalks, provide pedestrian amenities, and install bicycle facilities such as separated bikeways or bike lanes, bike parking, and signage. This could be in the form of a “road diet” to transform certain corridors into multi-modal streets.

4. STRATEGIES TO REDUCE THE CUMULATIVE EXPOSURE BURDEN IN SOUTH CENTRAL FRESNO

COMMUNITY IDENTIFIED AIR QUALITY PRIORITIES

Throughout the AB 617 process, the Community Steering Committee and members of the public have participated in a variety of facilitated exercises to identify and rank their top source categories of concern. Meeting materials and exercise worksheets were also been sent to committee members and posted on the District's community page <http://community.valleyair.org> to allow additional opportunity to participate in identifying sources of concern. Some top source categories of concern in South Central Fresno include:

Top Community Sources of Concern



Heavy Duty Trucks



High Polluting & Idling Cars



Residential Wood Burning



Land-Use/Industrial Development



Illegal Burning



Industrial Processes

To provide additional information about existing control programs for community members not familiar with ongoing air pollution control efforts, District staff prepared an informational document titled, "*Existing Control of Air Pollution Sources of Concern*," (included for reference as Appendix D), and gave several presentations about existing District control programs. Additionally, the District held "World Café" style meetings, where Steering Committee members and the public could have conversations and question and answer sessions with staff from various agencies. These informative meetings served to build capacity to assist in developing new emission reduction measures for implementation in the community.

In partnership with community members and other agencies, District staff have developed a suite of targeted measures to reduce emissions from community identified

168, contributing a significant amount to the mobile source emissions in the community. The population in the San Joaquin Valley is expected to be one of the fastest growing regions in the state. The Demographic Research Unit of the Department of Finance released interim revised population growth projections in March 2019 and expects approximately 22% population growth in Fresno County during the 2019 to 2039 period¹.

The majority of emissions impacting the South Central Fresno community come from passenger vehicle and heavy-duty truck emissions from major freeways, interchanges, and main regional roads that run through the community. In addition to the emissions originating from mobile sources in the area, this community also includes industrial development and area-wide sources of pollution such as gas stations, commercial cooking, and consumer products that also contribute significantly to the community's emissions levels. Based on emissions inventory and current air monitoring data in this community, pollutants of concern include particulate matter less than 2.5 micrometers in diameter (PM_{2.5}), Black Carbon (BC), Oxides of Nitrogen (NO_x), Carbon Monoxide (CO), Ozone and Volatile Organic Compounds (VOCs). Refer to the *South Central Fresno Community Air Monitoring Plan* for further details.

The South Central Fresno community is impacted across a number of health indicators. The following table summarizes the average and highest percentile scores (based on statewide comparison) from CalEnviroScreen among the census tracts located with the community boundaries for a number of key indicators. As this summary indicates, the South Central Fresno community includes high average percentiles among its census tracts within the majority of indicators, with many averages exceeding the 90th percentile for the state. Specifically, the average Overall CalEnviroScreen Score and Population Characteristics values are both above the 97th percentile.

Table 3-1 Summary of Health Indicators among Census Tracts in South Central Fresno Community (Source: CalEnviroScreen 3.0)

Health Indicator	Average Percentile of Census Tracts in Community	Highest Percentile of all Census Tracts in Community
Overall CES Score	97.59	100.00
Asthma	91.15	98.00
Cardiovascular Disease	87.18	99.00
Low Birth Weight	83.50	100.00
Poverty	74.84	92.10
Unemployment	84.97	99.00
Population Characteristics	96.62	100.00
Pollution Burden	89.59	100.00
Diesel Particulate Matter	80.15	97.00
Traffic Density	30.94	73.00
Toxics Releases from Facilities	84.21	100.00

¹ State Population Projections (2010-2060). Total Population by County (1-year increments). (2018, January) Retrieved from: <http://www.dof.ca.gov/Forecasting/Demographics/Projections/>

SUMMARY

Zip Codes	Fresno's 40 Census Tracts	CES 3.0 Score	Population
93706	01100, 00200, 01000, 00902, 00800, 00300, 00901, 00700, 01800, 01900	Avg. 76.25 (94.09)	34,864
93725	01500, 01201, 01202, 01700, 01410	Avg. 72.77 (82.03)	27,708
93721	00400, 00600, 00100, 00501	Avg. 72.48 (78.53)	18,179
93702	01301, 02502, 01303, 02601, 02702, 02701, 02062	Avg. 64.44 (70.56)	33,868
97322	03805, 03809, 04205, 03807	Avg. 58.97 (65.41)	20,873
93703	02800, 02400, 03400, 02501, 03202	Avg. 58.20 (63.65)	25,082
93728	02000, 02100, 02300, 02200	Avg. 57.55 (71.34)	19,006
93727	03001, 01407, 02905, 02903, 03003, 01411	Avg. 54.98 (66.11)	24,517
93726	05202, 05100	Avg. 51.26 (52.17)	9,342
93705	04701, 03701, 03702, 04703, 04802	Avg. 50.68 (54.74)	23,746
93701	00502,	OL. 68.97	3,606
93650	04404,	OL. 60.38	3,556
93710	05408,	OL. 50.63	1,276
93704	03500,	OL. 48.41	5,674

Notes:

Strategic Growth Council (SGC), City of Fresno (TCC Lead Applicant) and Co-Partner with the Central Valley Community Foundation have decided to focus Fresno TCC Program Funding toward three areas of Fresno, which fall amongst the highest rated CalEnviroScreen 3.0 Scores, which are Southwest Fresno, Chinatown, and Downtown.

Of all the Targeted Pollution Burdened Areas Southwest Fresno by far has the largest population, geographical area, and heaviest pollution burden of all Fresno County Census Tracts and have the most people per capita being negatively affected by the 20 indicators of the CalEnviroScreen 3.0 Pollution Burden and Population Characteristics.

CalEnviroScreen 3.0 Four Board Categories: 1. **Pollution Burden** - Ozone, PM2.5, Diesel PM, Pesticide Use, Traffic, Drinking Water Contaminants, Toxic Releases from Facilities. 2. **Population Characteristics** - Asthma, Cardiovascular Disease, Low Birth-Weight Infants 3. **Environmental Effects** - Solid Waste Sites and Facilities, Cleanup Sites, Groundwater Threats, Impaired Water Bodies, Hazardous Waste Generators and Facilities. 4. **Socioeconomic Factors** - Poverty, Unemployment, Educational Attainment, Linguistic Isolation, Housing Burdened Low Income Households

Heavy Duty Trucks:

“HD.11: HEAVY DUTY TRUCK REROUTING

Overview: Some Steering Committee members have suggested that heavy duty trucks be rerouted off of Jensen Avenue to other streets to reduce emissions exposure of South Central Fresno community residents.

Jurisdictional Issues: It should be noted that the District has no authority over how agencies allow land under their jurisdiction to be used. These so-called “land-use” decisions, such as truck rerouting, are historically the responsibility, under state law, of cities and counties, or, in some cases, state and federal agencies responsible for transportation corridors, state and federal parks, and other properties. AB 617 does not provide the District with new land-use regulatory authority, so land-use authority remains with cities, counties, and state and federal land-use agencies, as discussed in CARB’s Blueprint (see “Who Has the Authority to Implement Actions?”, page 26 of the Blueprint). However, **the Air District will create a Memorandum of Understanding (MOU) with the City and the County of Fresno to create specific objectives and agreements to reroute heavy-duty truck traffic around sensitive areas such as schools, daycares, and residences.** The District has made available to the responsible agencies the various land-use strategies that have been presented by the Committee for potential inclusion into the CERP for responsible agency’s input and response in the South Central Fresno Community Emissions Reduction Program.

Implementing Agency: City, County, Caltrans *Type of Action:* Partnership

Timing: Unknown

Description of Proposed Actions: The District will work with the City, County, Caltrans, and all other appropriate land-use and transportation agencies **to conduct a joint assessment that will evaluate streets where heavy duty trucks could be rerouted, identify new routes and recommend a course of action to the Fresno City Council and Fresno County Board of Supervisors. AB617 funds will be used to cover the cost of the aforementioned assessment.** ~~communicate this Steering Committee suggestion and receive agency feedback and response about this measure for potential inclusion in the CERP.”~~

Older/Higher Polluting Vehicles:

“C.2: INCENTIVE PROGRAM FOR THE REPLACEMENT OF PASSENGER VEHICLES WITH BATTERY ELECTRIC OR PLUG IN HYBRID VEHICLES

Overview: The goal of this strategy is to reduce emissions associated with passenger vehicles operating in the South Central Fresno community. The District's Drive Clean in the San Joaquin Replacement program provides incentives up to \$9,500 to low to moderate income residents of disadvantaged communities to replace their older, high polluting vehicle with a newer, cleaner, model. Emission reductions from passenger vehicles provide benefits to area residents as well as assist in reducing ozone formation in the Valley.

Implementing Agency: SJVAPCD *Type of Action:* Incentives *Implementation:* 2019

Description of Proposed Actions: This strategy would provide incentive funding to South Central Fresno residents to replace their older vehicles with newer, cleaner and more fuel efficient vehicles including conventional gas powered vehicles, hybrid, plug in hybrid and battery electric vehicles. **Incentives will be offered using a sliding-scale with different tiers so incentives will be higher for lower-income residents and lower for higher-income residents.**

Enhanced outreach would be conducted in the South Central Fresno community to ensure that residents are fully aware of available incentive options and community residents would be provided priority access through the program in order to complete projects as quickly as possible. This measure would provide \$1,600,000 for the replacement of 220 vehicles. This measure is expected to achieve 1.98 tons of NOX, 0.07 tons of PM2.5, and 0.46 tons of VOC emission reductions in the community.”

“C.5: INCENTIVE PROGRAM FOR EDUCATIONAL TRAINING FOR ELECTRIC VEHICLE MECHANICS AND OTHER EDUCATIONAL OPPORTUNITIES RELATED TO THE MITIGATION STRATEGIES INCLUDED IN THE CERP

Overview: The goal of this strategy is to provide incentive funding to develop and advance the education of personnel on the mechanics, safe operation and maintenance of alternative fuel vehicles and infrastructure, as well as equipping residents of the AB 617 area with skills needed to implement some of the mitigation strategies included in the CERP such as adoption of vegetative and mechanical barriers; installation of filters in schools and homes, among others.

The District currently offers an alternative fuel mechanic training incentive program that would be utilized for this measure. With a deployment of electric vehicles in the South Central Fresno community it will be necessary to have qualified, trained personnel available to provide service as needed to these vehicles.

Implementing Agency: SJVAPCD, Fresno EOC

Type of Action: Incentives *Implementation:* 2019-2021

Description of Proposed Actions: This strategy would provide up to \$75,000 for 5 alternative fuel mechanic training course provided by an appropriate entity. Additional outreach will be conducted to identify projects that would provide a benefit to the South Central Fresno community. There are no direct emission reductions associated with this measure, however, this measure supports the emission reductions associated with electric vehicle deployment.”

Incentives will also be offered so Fresno EOC can create a local Training and Employment Program that will focus on youth and young adults residing in the AB617 area to teach them skills needed to build vegetative and mechanical barriers to reduce air pollution as well as installing filters in schools and homes to improve indoor air quality.

Residential Wood Burning:

“RB.2: EDUCATE PUBLIC ABOUT HARMFUL IMPACTS OF RESIDENTIAL WOOD BURNING

Overview: The goal of this strategy is to conduct outreach in the community to educate residents about the health impacts of wood burning and the importance of reducing it. Wood burning education is important because airborne particles produced by wood smoke (such as PM 2.5) negatively impact human health, especially sensitive populations such as children or seniors who may live in homes that burn wood for heating, cooking, or recreation. This strategy’s focus includes providing information about programs available to support the transition to natural gas and electric devices as well as the Check Before You Burn program and Rule 4901.

Implementing Agency: SJVAPCD *Type of Action:* Outreach *Implementation:* 2019-2024

Description of Proposed Actions: The Air District will create an advisory group made up of Public Health professionals (MPHs), health care providers, social scientists, communications experts, and interested community residents that can assist with the development of a behavior-changing curriculum. The Air District will additionally work with local community-based organizations to recruit community residents that will test the curriculum before release to the entire community to ensure the information is both accessible and tailored to the community demographics. After which, there This strategy would be a series of public workshops to educate South Central Fresno residents about wood burning topics and to address questions and concerns interactively and accessibly within a forum setting. Workshops would take place in locations commonly available to the public, such as libraries, schools, and community, health, or recreation centers. Wood burning infographics and educational materials would also be circulated to at least fifteen (15) community spaces throughout South Central Fresno, with the goal of continuing to spread awareness of the health effects of wood burning, creating a “no burn” culture instead of burning less or burning cleaner as well as increasing applications for incentive funds supporting the transition to natural gas and electric devices.

“RB.3: ENHANCED ENFORCEMENT OF WOOD-BURNING CURTAILMENTS UNDER DISTRICT RULE 4901

Overview: The goal of this strategy is to limit the potential for localized PM_{2.5} impacts associated with the failure to comply with mandatory episodic wood burning curtailments under District Rule 4901. Currently, to optimize rule effectiveness and reduce the public health impact of wood smoke, the District dedicates extensive staffing resources to operate a robust Rule 4901 enforcement program covering all aspects of the rule. The District's strategy focuses on both compliance assistance and enforcement activities. On all curtailment days, the District dedicates significant staffing resources to conducting surveillance in neighborhoods and responding to complaints from members of the public to ensure compliance with the rule. The District treats fireplace surveillance and complaint response as the highest priority enforcement activity. On each curtailment day, a substantial number of the District's inspection staff are assigned to perform surveillance with a focus on areas where non-compliance with the rule has been historically high and/or where public complaints regarding burning have been common. Notwithstanding this focus, the District works to ensure that surveillance is conducted regularly in all areas subject to regulatory curtailments. In addition to the surveillance and complaint response conducted during normal business hours, the District also conducts surveillance and complaint response on weekends, holidays, and during nighttime hours.

Implementing Agency: SJVAPCD *Type of Action:* Enforcement

Description of Proposed Actions: Upon implementation of this strategy, District staff will allocate additional resources toward the enforcement of District Rule 4901 episodic curtailment requirements in the South Central Fresno community. Specifically, District staff will conduct at least four (4) hours of surveillance within the South Central Fresno community on each declared curtailment day for the next five (5) winter seasons to enhance the enforcement of District Rule 4901. The District will work with the Community Steering Committee to focus surveillance efforts in areas where wood burning is more prevalent. **The Air District will increase outreach and education for the identified areas within the AB617 boundaries where violations occur frequently to work with identifying why a violation has occurred.**

“RB.4: REDUCE ILLEGAL BURNING THROUGH RESIDENTIAL OPEN BURNING EDUCATION

Overview: The goal of this strategy is to reduce illegal burning of residential waste through outreach and education. It is important for residents to understand both the unlawfulness of burning garbage and its negative health impacts on all. Smoke from burning trash, yard waste, or burn barrels may contain air toxins among other pollutants that are especially harmful to human health. Education is critical to effectively reducing this dangerous practice.

Implementing Agency: SJVAPCD *Type of Action:* Outreach *Implementation:* 2020-2024

Description of Proposed Actions: The Air District in coordination with the steering committee will plan and conduct a series of five (5) public workshops to educate South Central Fresno residents about the illegality the health impacts of burning waste, and to address questions and concerns interactively and accessibly within a forum setting. Workshops would take place in locations commonly available to the public such as libraries, schools, and community, health, or recreation centers. This strategy would also invest funds into geo-targeted outdoor ads in areas with frequent violations, which can include the following: four (4) billboards, three (3) pieces of street furniture (such as bus shelters or kiosks), and two (2) buses routed through relevant locations. Additionally, two (2) postcard mailers would be sent to county residents in rural areas. Additionally, the Air District will devote resources to evaluate alternatives for residential trash burning for low-income residents.

“RB.5: ENHANCED ENFORCEMENT TO REDUCE ILLEGAL BURNING OF RESIDENTIAL WASTE

Overview: The goal of this strategy is to limit the potential for localized PM2.5 and toxic impacts associated with the illegal open burning of residential waste.

Pursuant to District rules and state law, the burning of residential waste is illegal in the San Joaquin Valley. Recognizing both the potential for localized exposure and regional air quality impacts associated with the burning of residential waste, the District promptly responds to all complaints regarding illegal burning, conducts regular area surveillance for the purpose of enforcing open burn prohibitions, and works closely with local fire agencies to encourage interdepartmental cooperation and cross-reporting of incidents.

Implementing Agency: SJVAPCD *Type of Action:* Enforcement *Implementation:* 2020-2024

Description of Proposed Actions: Building on the District’s existing surveillance and complaint response efforts, the District will conduct additional targeted surveillance efforts in the South Central Fresno community at least once per quarter for the next five (5) years. Residents who are in violation of burning waste will first receive a warning to be followed by education and outreach efforts to include identifying the source and reason why the violation occurred. Should a fine occur after the violation, low-income residents will pay subject to a sliding scale.

AGRICULTURAL OPERATIONS:

“AG.1: INCENTIVE PROGRAM FOR DEPLOYING ON-FIELD ALTERNATIVES TO THE OPEN BURNING OF AGRICULTURAL MATERIALS

Overview: The goal of this strategy is to limit the potential for localized PM_{2.5} impacts associated with open agricultural burning by providing enhanced access to funding for the District’s Alternative to Agricultural Open Burning Incentive Program for growers within South Central Fresno and the surrounding areas.

The San Joaquin Valley, in adherence with applicable state laws instituted under SB705 (2003 Florez), has the toughest restrictions on agricultural burning in the state. District regulations no longer allow the burning of all field crops (with the exception of rice), almost all prunings, and almost all orchard removals. The District also operates a comprehensive Smoke Management System which only allows the limited amount of burning that is still permissible to take place on days with favorable meteorology and in amounts that will not cause a significant impact on air quality.

Until 2014, the restrictions imposed by the District resulted in an 80% reduction in the open burning of agricultural waste. The exceptional drought conditions that the Valley recently experienced and the demise of the biomass power industry has resulted in an increase in the open burning of wood waste and threatens the District’s ability to continue to maintain broad restrictions on open burning of agricultural waste into the future.

While modeling conducted for the District’s *2018 PM_{2.5} Plan* indicates that reducing emissions from the open burning of agricultural materials does not significantly impact the Valley’s peak urban PM_{2.5} locations that drive the Valley’s federal attainment mandates, the District is committed to implementing strategies to reduce localized PM_{2.5} community impacts.

In January of 2019, the District commenced one such strategy, a pilot incentive program to help fund the implementation of on-field practices, such as soil incorporation, that may provide alternatives to open burning of agricultural material from orchard removals. The purpose of the program was to demonstrate the feasibility of utilizing chipped agricultural material for soil incorporation or as a surface application as alternatives to burning. The cost of these practices can be prohibitive and questions remain regarding the ability to adapt these practices across all agricultural applications, but where

feasible analysis shows that on-field soil incorporation of woody biomass has the potential to result in significant emission reductions when compared to open burning of agricultural material. To date, the District's program has been well subscribed with applications received totaling over \$2 million in funding valley-wide.

Implementing Agency: SJVAPCD *Type of Action:* Incentives Implementation: 2020-2022 followed by regulatory backstop (2023)

Description of Proposed Actions: This strategy would provide enhanced access to District's Alternative to Agricultural Open Burning Incentive Program for growers within South Central Fresno and the surrounding area by providing access to \$375,000 in dedicated funding. This strategy would fund up to 700 acres of alternative practices." In 2020, the Air District will begin

Industrial Sources:

“IS.1 : PROVIDE INCENTIVES TO PLATING OPERATIONS TO FURTHER REDUCE CHROME EMISSIONS

Overview: The goal of this strategy is to provide incentives to Chrome Plating operations to further reduce emissions of chromium, using new state funding guidelines for chrome plating facilities **to promote the use of Best Available Control Technology (BACT) and/ or Best Available Retrofit Control Technology (BARCT) ~~switching to trivalent chrome or controlling emissions beyond rule levels.~~** District Rule 7011 already contains stringent requirements for chrome plating operations. The state identified hexavalent chromium as a Toxic Air Contaminant (TAC) in 1986. Hexavalent chromium is currently known to be the second most potent carcinogen identified by the state.

Implementing Agency: SJVAPCD, **CARB** *Type of Action:* Incentive and Outreach
Implementation: 2021

Description of Proposed Actions: The District will discuss the incentive availability with all chrome plating facilities in the SC Fresno community and fund all willing partners, as feasible. **The District will work with CARB and the community steering committee in order to identify qualifying/specific facilities. In order to aid the District, CARB must revive the Stationary Sources Division to determine the most feasible conversion in a timely manner. Once feasible conversions to BACT and/or BARCT have been made CARB’s Stationary Source Division shall be maintained and will serve as an oversight authority for current and future facilities. Facilities using Best Available BACT and/or BARCT ~~willing to convert to the use of trivalent chromium instead of using hexavalent chromium~~** may be funded for up to 90% of eligible costs. Facilities installing advanced control technologies to reduce chromium emissions beyond current rule levels may be funded for up to 80% of eligible costs with a \$300,000 cap. This measure will reduce toxic chromium emissions

IS.3: EVALUATE FEASIBILITY OF FUNDING FURTHER EMISSIONS REDUCTIONS FROM GLASS MANUFACTURING PLANTS (INCLUDE MOBILE SOURCES)

Overview: The goal of this strategy is to reduce NOx and PM2.5 emissions from Glass Manufacturing facilities. Glass Plants are already subject to stringent requirements from District Rule 4354. However, despite achieving significant emissions reductions through decades of implementing the most stringent stationary and mobile regulatory control program in the nation, NOx emissions in the Valley must be reduced by an additional 90% in order to attain the latest federal ozone and PM2.5 standards that now encroach on natural background levels. This air quality challenge is unmatched by any other region in the nation.

Implementing Agency: SJVAPCD, CARB *Type of Action:* Incentive
Implementation: 2021

Description of Proposed Actions: This strategy would evaluate the feasibility of creating an incentive program for glass manufacturing plants to fund the installation of Best Available Control Technology (BACT) and/ or Best Available Retrofit Control Technology (BARCT) technologies that further reduce emissions, including those from mobile sources. In order to achieve further emissions the District must work with the Vitro facility and CARB. CARB will serve as an oversight authority to ensure BACT and/or BARCT is being applied. CARB will serve this role through the revival of the Stationary Sources Division and will maintain this role beyond implementation date to ensure continuous emissions reductions. The District will work with Vitro and CARB's revived Stationary Sources Division to identify potential emission reduction opportunities, through BACT and/or BARCT and consider technologies, such as replacing on-site mobile equipment (front end loaders, etc.) with new units, planting trees/green belt/vegetation on the southeastern facility boundary, or significantly reducing the amount of material stored in the outdoor cullet glass storage piles if the CARB Stationary Source Division sees fit to use. The District will identify available grant funding to assist implementation and will quantify PM2.5 and NOx emissions reductions as reduction opportunities are finalized.

IS.4: ENHANCED STATIONARY SOURCE INSPECTION FREQUENCY

Overview: The goal of this strategy is to limit the potential for localized air quality impacts at permitted facilities associated with the failure to comply with emission standards established by District permit, rule, or regulation. The District conducts inspections and investigations of both permitted sources to determine compliance with a multitude of health-protective local, state, and federal air quality regulations targeting both criteria and toxic pollutants. These include (1) District rules and permit requirements; (2) statewide Airborne Toxic Control Measures; (3) statewide greenhouse gas regulations; and (4) federal New Source Performance Standards, National Emission Standards for Hazardous Air Pollutants, and Maximum Available Control Technology standards. The District closely monitors such sources and strictly enforces applicable requirements. Compliance evaluations are unannounced whenever possible and involve both a physical inspection of the facility and a review of operating and monitoring records. When a violation of a District permit, rule, or regulation is identified, the District takes an appropriate level of enforcement action.

During the review of the enforcement history for the South Central Fresno community and 7-mile buffer area, the District determined that 44 enforcement actions were issued to facilities (not including gas stations) for violations resulting in excess emissions. These violations occurred at 24 permitted facilities in the area. The District has also issued 18 enforcement actions to gas stations for violations resulting in excess emissions. These violations occurred at 10 gas stations in the area. The District believes that more frequent inspections for these 34 facilities would be prudent to limit the potential for air quality impacts associated with failure to comply with emission standards established by District permit, rule, or regulation.

Implementing Agency: SJVAPCD, **CARB** *Type of Action:* Enforcement
Implementation: 2020

Description of Proposed Actions: The District will increase the frequency of inspection at each facility within the South Central Fresno community that has had an emission violation over the past three (3) years. These facilities will be inspected at least twice per calendar year for the next five (5) years or until the facility has four (4) consecutive inspections without an emission violation, whichever occurs first. **The District will present the inspection findings to CARB. In order for these records to be maintained for accuracy, CARB will revive the Stationary Sources Division and aid the District with resources needed to conduct more frequent inspections. Additionally, CARB's Stationary Source Division in collaboration with the Air District will make the inspection findings public.**

IS.6: PROVIDE INCENTIVES TO INSTALL ADVANCED CONTROL TECHNOLOGY

Overview: The goal of this strategy is to reduce NOx and PM2.5 emissions from stationary source operations through the installation of advanced controls. During the rule development process the District conducts when amending existing rules or adopting new rules; there are times where advanced control technologies are identified that could potentially achieve additional emissions reductions, but those technologies are identified as not cost-effective at the time of rule adoption. While the District's current regulations are some of the most stringent regulations in the nation and have achieved significant emissions reductions, NOx emissions in the Valley must be reduced by an additional 90% in order to attain the latest federal ozone and PM2.5 standards that now encroach on natural background levels. This air quality challenge is unmatched by any other region in the nation.

Implementing Agency: SJVAPCD, CARB *Type of Action:* Incentive, Outreach

Implementation: 2020-2024

Description of Proposed Actions: This strategy would provide incentives for stationary sources within the South Central Fresno community to install **Best Available Control Technology (BACT) and/ or Best Available Retrofit Control Technology (BARCT)** ~~advanced control technology, beyond existing controls,~~ that would not otherwise be economically feasible to install. The state is currently developing funding guidance for such projects. The District will work with interested parties, including the Steering Committee, **and CARBs revived Stationary Source Review Division** to identify types of facilities and controls not otherwise identified in the CERP and will work with partners to implement **BACT and/or BARCT** ~~these advanced controls~~. The District will also identify available grant funding to assist implementation, the number and types of projects to be funded, and will quantify emissions reductions as reduction opportunities are finalized. **CARBs revived Stationary Source Review Division will serve as an oversight authority and provide assistance for the conversion to BACT and/or BARCT for interested parties.**

Land Use:

“LU.2: PROVIDE ASSISTANCE DURING THE CALIFORNIA ENVIRONMENTAL QUALITY ACT PROCESS

Overview: The purpose of this strategy is to provide assistance during the California Environmental Quality Act (CEQA) process with guidance to land use agencies, project proponents, and the public on how the project may impact air quality in the San Joaquin Valley, and information on how air pollution impacts can be reduced.

CEQA is a state statute that requires public agencies such as state and local agencies to identify the significant potential environmental impacts of a proposed project and to avoid or mitigate such impacts, if feasible. A public agency must comply with CEQA when it undertakes an activity defined by CEQA as a "project". A project is an activity undertaken by a public agency or a private activity which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

Land use decisions are critical to improving air quality within the San Joaquin Valley Air Basin because land use patterns greatly influence transportation needs while motor vehicle emissions are the largest source of air pollution in the San Joaquin Valley. It is important to note that local air districts do not have authority over land use. Land use decisions are directly under the authority of Land use Agencies. **However, a Memorandum of Understanding between the Air District, the City and County of Fresno will be formed regarding the overlaying plans of the AB617 Community Air Monitoring Plan, the AB617 Community Emissions Reduction Program, the Transformative Climate Communities (Transform Fresno) program, the Southwest Fresno Specific Plan, the South Industrial Priority Area Specific Plan, and the Southeast Central Fresno Specific Plan. The draft of the Memorandum of Understanding will be reviewed by the Community Steering Committee to ensure that the objectives of the MOU meet the priorities of the community.** The design of development projects in a community significantly influences how people travel. Land use agencies (e.g. City and County government agencies) have jurisdiction over land use, and as such develop land use plans and make decisions about how they grow and expand. Even though the District does not have land use authority, **however a Memorandum of Understanding will allow**

~~as a public agency~~ the District **to** takes an active role in the intergovernmental review process under CEQA. Providing District assistance during the **pre-application permitting and** CEQA process allows land use agencies and project proponents to enhance project design by identifying feasible mitigation measures in the early stages of the planning process for a better overall project with minimized impact on air quality.

In carrying out its duties under CEQA, the District may act as a Lead Agency, a Responsible Agency, or a Trustee/“Commenting” Agency. The role the District under CEQA is dependent upon the extent of the District’s discretionary approval power over the project. The District is typically not the Lead Agency for proposed new projects because project approval is generally required by other public agencies with broader authority, such as land use agencies. A Lead Agency is the public agency with the broadest authority for approving or carrying out the project and therefore has the principal responsibility for carrying out or approving a project subject to CEQA. Lead Agencies are responsible for complying with CEQA by ensuring that all potential environmental impacts of proposed projects are adequately assessed, and environmental damage is avoided or minimized where feasible. **With a Memorandum of Understanding, the City, County and the Air District will prioritize environmental mitigation efforts that are required by CEQA and the Environmental Impact Reports of each of the above mentioned overlaying plans.**

The District is more often a Responsible Agency or a “Trustee Agency” (more commonly known as a “Commenting Agency”). A Responsible Agency is a public agency, other than the Lead Agency, that has responsibility for carrying out or approving a project subject to CEQA. While a Lead Agency must consider all of the potential impacts of a project, a Responsible Agency may only consider those aspects that are within the agency’s area of expertise or which are required to be carried out or approved by the agency. A “Commenting Agency”, is an agency that has “jurisdiction by law” over a particular natural resource but does not have discretionary approval power over the project. In this role, the District is advising Land use Agencies and provides technical expertise in characterizing project related impacts on air quality when reviewing projects of various land uses (i.e., residential, commercial, and industrial). In addition to reviewing a project’s impact on air quality, the District may review and comment on other sections of the environmental document that relate to air quality impacts, for example traffic and health risks. As such, when serving as a Commenting Agency, the District may provide the Lead Agency with comments on the adequacy of the air quality analysis, identify District rules, which apply to the project, and recommend potential mitigation measures for the Lead Agency’s consideration. **The Memorandum of Understanding will create transparent and public communication between community**

members, each agency and the departments that manage these plans and where new land use development projects occur.

The air quality considerations that warrant particular attention during early consultation between Lead Agencies and project proponents include consistency with applicable District rules and permit requirements and incorporation of all feasible measures to reduce a project's impact on air quality. As such, addressing issues in relation to land use and project design while a proposed project is still in the planning stages provides project proponents opportunities to incorporate project design features to minimize project's impacts on air quality.

Implementing Agency: SJVAPCD, City, County *Type of Action:* Land use, Partnership
Implementation: 2019

Description of Proposed Actions: The District will work with the City and County on active CEQA coordination with the land use agencies and project proponents for proposed projects within the South Fresno Community. This strategy will result in enhancing project designs in the early stages of the planning process for a better overall project with minimized impact on air quality and early identification of feasible mitigation measures. “ With the Memorandum of Understanding, the District, City, and County will: collectively find funding sources that benefit the communities and areas that are covered under the aforementioned plans; and create true and robust community engagement by having community meetings that openly discuss and create actions of how these plans affect each other and work in tandem.

Solar Deployment:

“SD.1: INCENTIVE PROGRAM FOR INSTALLING SOLAR IN THE COMMUNITY

Overview: The goal of this strategy is to increase the amount of solar photovoltaic (PV) systems installed in the community by connecting community members with programs that provide financial incentives for the installation of solar photovoltaic (PV) systems. A variety of programs are available to provide incentives for the installation of PV systems or for preferred rates for green energy in the community.

Jurisdictional Issues: It should be noted that oversight of energy usage, including implementation of community energy efficiency programs, is the jurisdiction of the

California Public Utilities Commission, the public utilities, cities, and counties. AB 617 does not provide the District with new regulatory authority over energy programs, as discussed in CARB’s Blueprint (see “Who Has the Authority to Implement Actions?”, page 26 of the Blueprint). However, the District will make available to the responsible agencies the below strategy, as suggested by the Committee for potential inclusion into the CERP, for input and response in the South Central Fresno Community Emissions Reduction Program.

Implementing Entities: California Public Utilities Commission, Pacific Gas and Electric Company, GRID Alternatives, SOMAH Nonprofit Administrative Partnership (SNAP)

Type of Action: Partnership

Implementation: 2019-2024

Description of Proposed Actions: The Air District, in collaboration with stakeholders and the Community Steering Committee will identify areas where solar deployment would take place . After which, the Air District in collaboration with stakeholders and the Community Steering Committee will help to coordinate meetings with entities that offer incentives for solar photovoltaic (PV) installation and other green energy programs that have the potential to reduce utility rates in the community. The following is a summary of programs that can benefit the community:

DAC-Single Family Solar Homes (DAC-SASH) program provides assistance in the form of up-front financial incentives for the installation of rooftop solar generating systems for income-qualified owners of single family homes in disadvantaged

communities. The program is administered by GRID Alternatives and has an annual budget of \$10 million from 2019 through 2030.

Solar on Multifamily Affordable Housing (SOMAH) program provides financial incentives for installing solar photovoltaic (PV) energy systems on multifamily affordable housing in dis-advantaged communities (DAC). The program has \$100 million annually and has a goal of installing 300 megawatts of generating capacity by 2030. The program is administered by the SOMAH Nonprofit Administrative Partnership (SNAP).

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)."

Lawn & Garden Equipment:

“LG.2: INCENTIVE PROGRAM FOR THE REPLACEMENT OF COMMERCIAL LAWN AND GARDEN EQUIPMENT

Overview: The goal of this strategy is to reduce NOx and PM2.5 emissions from commercial landscaping operations by replacing existing gas powered equipment with battery powered zero emission models. Advancing clean technology in the area of commercial lawn care can provide meaningful health benefits to San Joaquin Valley residents who are directly impacted and exposed on a daily basis to air pollution generated from lawn care equipment. Emissions from commercial lawn care providers occurs in the South Central Fresno community, directly impacted equipment operators and community residents. The District currently offers a commercial lawn and garden replacement program and provides incentives for the replacement of gas powered equipment with battery operated zero emission technology. These incentives range from \$200-\$15,000 depending on the equipment type and cost of the new units. In addition, the program provides incentive funds for additional batteries and chargers to ensure that the equipment is capable of operating for a full day of work.

Implementing Agency: SJVAPCD/**CARB** **Type of Action:** Incentives, **Regulatory Backstop**

Implementation: 2019-2024

Description of Proposed Actions: **CARB will revisit the small off-road engines (SORE) regulation as it pertains to lawn equipment so as to consider further regulations.** ~~This strategy will provide commercial lawn care providers operating in South Central Fresno with enhanced outreach and access to available incentives offered by the District.~~ **After which, the Air District will create a new rule which will require commercial landscapers must use electric gardening equipment (i.e. lawn mowers, leaf blowers, etc.). Residential leaf blowers need to transition to alternative vacuums to decrease dust pollution.** The goal of this measure is to **provide regulation that will require commercial landscapers to utilize electric gardening equipment and use alternative to leaf blowers to decrease emissions and pollution.** This strategy will also provide incentives to replace 60 pieces of commercial grade gas powered lawn and garden equipment at an expected cost of \$75,000 **prior to regulatory backstop.** Emission reductions associated with this measure will be calculated at a later time.

Public Fleets:

***“PF.1: INCENTIVE PROGRAM FOR REPLACING OLDER PUBLIC FLEET VEHICLES WITH NEW, CLEAN-VEHICLE TECHNOLOGY*”**

Overview: To provide increased outreach and access to incentive funding for the replacement of older, higher polluting public fleet vehicles operating within and surrounding South-Central Fresno with new clean vehicle technology.

Replacing older public fleet vehicles is important to reduce the public’s exposure to vehicle emissions including NOx and PM2.5. These pollutants negatively impact human health, especially for sensitive populations such as children. These are new clean vehicle technologies, including plug-in hybrid, battery electric and natural gas that are significantly cleaner than conventionally-powered gasoline and diesel vehicles.

State and Federal requirements control emissions from passenger vehicles. The Valley Air District does not have jurisdiction over these sources. However, due to the large amount of air pollution that originates from passenger vehicles in the Valley, including public fleet vehicles, the District has implemented a suite of programs to reduce pollution from public fleets:

The Public Benefit Grants Program - <http://valleyair.org/grants/publicbenefit.htm>. This program is operated by the District. The purpose of this program is to fund the purchase of new electric, plug-in hybrid, or alternative fuel vehicles for public agencies to promote clean air alternative-fuel technologies and the use of low-or zero-emission vehicles in public fleets. This program is currently open and accepting applications on a first-come-first-served basis.

Employer Based Trip Reduction (District Rule 9410) requires large employers to implement measures to encourage employees to take alternative transportation to work through the establishment of an Employer Trip Reduction Implementation Plan (eTRIP).

- o An eTRIP is a set of measures that encourages employees to use alternative transportation and ridesharing for their morning and evening commutes

- o Each measure contributes to a workplace where it is easier for employees to choose to use ridesharing or alternative transportation

o Through this rule, single-occupancy vehicle trips are reduced, thus reducing emissions of oxides of nitrogen (NOx), volatile organic compounds (VOC) and particulate matter (PM).

Implementing Agency: SJVAPCD *Type of Action:* Incentives *Implementation:* 2019-2021

Description of Proposed Actions: The goal of this action is to work closely with public agencies, including the City of Fresno and Fresno County, to replace vehicles through the District's Public Benefit Grants Program. This includes increased outreach to public agencies operating vehicles within the community as well as prioritized funding for projects in the community. **CARB will work with the Air District to review if the City of Fresno and the County 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 only with electric buses.** Depending on the types and cost of vehicles replaced, the proposed funding amount of \$8,000,000 would cover the replacement of up to 400 vehicles at an incentive of \$20,000 each.

Exposure Reduction Strategies for Sensitive:

“SC.1 INCENTIVE PROGRAM TO INSTALL ADVANCED AIR FILTRATION SYSTEMS IN COMMUNITY SCHOOLS

Overview: The goal of this strategy is to reduce the impact of air pollution on children at schools and daycare facilities. Air filtration reduces the concentration of particulate contaminants from indoor air and is an important component of a school's Heating Ventilation and Air Conditioning (HVAC) system. Reducing airborne particles (such as PM 2.5) is important because particulate matter negatively impacts human health, especially that of sensitive populations such as children. Older HVAC systems and basic air filtration used in some schools only remove a small fraction of particles in the air that are smaller than 0.3 microns (μm). More efficient HVAC air filters and standalone air cleaners are important for creating healthier air in school classrooms. Implementing Agency: SJVAPCD Type of Action: Incentives Implementation: 2019-2024 Description of Proposed Actions: This strategy would provide up to \$100,000 in incentive funding for schools and daycares in South Central Fresno to install advanced air filtration systems. Proposed funding amounts would provide a pilot group of schools with funding to install HVAC filters with a MERV rating of 14 or greater. Schools with older HVAC systems may receive up to 100% of the cost of approved standalone air cleaner units with HEPA rated filters and a Clean Air Delivery Rate (CADR) appropriate for the classroom size. Schools that receive high-efficiency HVAC filters may also receive up to 100% of the cost of one (1) set of replacement HVAC filters, and schools that receive standalone air ventilation units may also receive up to 100% of the cost of one (1) set of replacement HEPA filters per unit.”

Implementing Agency: SJVAPCD

Type of Action: Incentives Implementation: 2019-2024

Description of Proposed Actions: **This strategy would provide \$1 million in incentive funding for all public schools in South Central Fresno to install advanced air filtration systems** (HVAC filters with a MERV rating of 14 or greater). Schools with older HVAC systems may receive up to 100% of the cost of approved standalone air cleaner units with HEPA rated filters and a Clean Air Delivery Rate (CADR) appropriate for the classroom size. Schools that receive high-efficiency HVAC filters may also receive up to 100% of the cost of one (1) set of replacement HVAC filters, and schools that receive standalone air ventilation units may also receive up to 100% of the cost of one (1) set of replacement HEPA filters per unit. **Additionally, advanced air filtration systems will be provided to homes of residents with existing medical conditions that predispose them to harm from PM exposure (e.g. asthma, heart disease).**

Urban Greening:

“UG.1 INCREASED URBAN GREENING AND FORESTRY TO IMPROVE AIR QUALITY

Overview: The goal of this strategy is to improve air quality in the community of South Central Fresno through urban greening and forestry programs. This measure is supported by scientific studies that have shown urban trees and forestry can help with the removal of air pollutants and reduced emissions of volatile organic compounds (VOC's). The effects of urban trees on fine particulate matter (PM2.5) was modeled for ten U.S. cities, with total annual PM2.5 removal varying from 5.2 tons in Syracuse to 71.1 tons in Atlanta. Overall air quality improvements attributed to urban trees ranged between 0.05% in San Francisco to 0.24% in Atlanta (Nowak, Hirabayashi, Bodine, Hoehn, 2013). Based on a study to assess the effects of urban trees on air quality have found that urban vegetation can attribute to temperature reduction, removal of air pollutants, reduce emissions of VOCs, and building energy conservation (United States Department of Agriculture Forest Service, 2002).

The District has long been supportive of the public benefits provided from planting of trees and vegetation. The District's Fast Track Action Plan, adopted by the Governing Board to reduce ozone pollution in the Valley, identified strategic use of tree and vegetation planting as a potential measure to reduce ozone. There has also been significant efforts at the federal, state, and local levels to promote and increase urban greening and forestry through funding opportunities, programs, and projects.

Jurisdiction Issues: It should be noted that the District has no authority over how agencies allow land under their jurisdiction to be used. These so-called “land-use” decisions, such as whether to allow or require accelerated urban greening efforts, are historically the responsibility, under state law, of cities and counties, or, in some cases, state and federal agencies responsible for transportation corridors, state and federal parks, and other properties. AB 617 does not provide the District with new land-use regulatory authority, so land-use authority remains with cities, counties, and state and federal land-use agencies, as discussed in CARB's Blueprint (see “Who Has the Authority to Implement Actions?”, page 26 of the Blueprint). However, the District has made available to the responsible agencies the various land-use strategies that have been presented by the Committee for potential inclusion into the CERP for responsible

agency's input and response in the South Central Fresno Community Emissions Reduction Program.

Implementing Agency: City and County, SJVAPCD *Type of Action:* Partnership, Incentives

Implementation: 2019-2024

Description of Proposed Actions: This goal of this measure is to identify and support efforts to increased urban greening and forestry to improve air quality and overall quality of life for residents in the community of South Central Fresno. The Air District will provide incentive funds to the City of Fresno to conduct a study to facilitate urban greening in the AB 617 area. The Air District will allocate funds for the City of Fresno after the results have been reviewed with the community steering committee. The Community Steering Committee will decide where urban greening should occur. Additionally, the Air District will provide the Community Steering Committee and the City of Fresno with the most up to date/ current mitigation measures to be informed by current and citable research and scientific thought. This measure would involve efforts to partner, collaborate, and engage with other agencies to fulfil the need for increased urban greening and forestry in the community. “

Vegetative Barriers:

“VB.1: INCENTIVE PROGRAM FOR THE INSTALLATION OF VEGETATIVE BARRIERS AROUND/NEAR SOURCES OF CONCERN

Overview: The purpose of this strategy is to provide incentives for the installation of vegetative barriers around/near sources of concern to reduce particulate matter, odor, and other emissions, as feasible. Based on community interest in vegetative barriers, the District will be partnering with other agencies to funnel available grant funding to the community to support the installation of vegetative barriers at/near industrial facilities and along major transportation and goods movement corridors. The District will also work with the National Resources Conservation Service (NRCS) to evaluate the feasibility of installing vegetative barriers near agricultural farms and identify potential additional funding sources.

Jurisdiction Issues: It should be noted that the District has no authority over how agencies allow land under their jurisdiction to be used. These so-called “land-use” decisions, such as whether to allow or require vegetative barriers in specific locations, are historically the responsibility, under state law, of cities and counties, or, in some cases, state and federal agencies responsible for transportation corridors, state and federal parks, and other properties. AB 617 does not provide the District with new land-use regulatory authority, so land-use authority remains with cities, counties, and state and federal land-use agencies, as discussed in CARB’s Blueprint (see “Who Has the Authority to Implement Actions?”, page 26 of the Blueprint). However, the District has made available to the responsible agencies the various land-use strategies that have been presented by the Committee for potential inclusion into the CERP for responsible agency’s input and response in the South Central Fresno Community Emissions Reduction Program.

Implementing Agency: SJVAPCD, CDOT, NRCS, other local partners *Type of Action:* Partnership, Incentives

Implementation: 2020-2024

Description of Proposed Actions: The District will work closely with the community **Community Steering Committee**, City of Fresno, California Department of Transportation, Natural Resource Conservation Service and others to investigate and identify areas suitable for installation of vegetative barriers. **The Air District will**

additionally provide incentive funds for vegetive barriers once locations and areas have been identified by the participatory entities involved such as the Community Steering Committee, City of Fresno, California Department of Transportation, Natural Resource Conservation Service, and the Air District. Type and location of projects will be developed with the input of the Community Steering Committee, and funded as requested by the Community Steering Committee. ~~funding sources are identified.~~”

Community Outreach:

“O.1: OUTREACH TO INCREASE COMMUNITY AWARENESS AND KNOWLEDGE OF AIR QUALITY

Overview: The goal of this strategy is to provide additional information to the community about real-time air quality conditions and measures the public can take to protect themselves during episodes of poor air quality. An understanding of what conditions constitute poor air quality, the relative seriousness of a given episode, and any potential health impacts is necessary for the public to make informed decisions about how and when to limit their exposure. It is critical for the public to have widespread knowledge of tools available to inform them of real-time conditions, assist with the interpretation of such conditions, and to describe what actions may be taken to protect themselves.

Implementing Agency: SJVAPCD *Type of Action:* Outreach *Implementation:* 2019-2024

Description of Proposed Actions: This strategy would increase community awareness of available tools to keep informed of real-time changes in air quality through social media campaigns and a series of partner workshops. Social media campaigns would be launched on three platforms: Facebook, Twitter, and Instagram. A partnership with local civic and community organizations would be established to host workshops at locations commonly available to the public such as libraries, schools, and community, health, or recreation centers. Both the social media outreach and live workshops would promote real-time tools such as my RAAN, the Valley Air App, the Real-time Outdoor Activity Risk (ROAR) Guidelines, the wildfire page of the District’s website, as well as information about general air quality education, wildfire smoke impacts, health effects, and similar. This strategy would aim to increase myRAAN registrations, Valley Air App downloads, and social media followers among members of the community. **To ensure the effectiveness of this strategy, the Air District will review and improve the language and accessibility of RAAN”**

“O.3: JOINT ADVOCACY FOR CONTINUED/ADDITIONAL FUNDING TO SUPPORT AIR QUALITY IMPROVEMENT MEASURES

Overview: Continued state funding is key to continued progress addressing community level air pollution and completing the work necessary to engage with the community, monitor emissions, and implement community emission reduction strategies. Over the past three years, the state has provided significant funding for incentive programs to reduce emissions and for completing the work necessary to develop community based emission reduction plans. This funding has largely been from the Greenhouse Gas Reduction Fund that is funded by the Cap and Trade Program. In each of the last two state budgets, the state has allocated \$245 million for emission reduction incentives, \$50 million for local air district implementation of AB 617, and \$10 million for technical assistance grants for community based organizations.

Going forward, there is concern that this funding might be reduced as the Greenhouse Gas Reduction Fund faces additional competition from other non-air quality related state programs. There is no other known funding source to replace this funding if it is lost. To ensure that the goals of the AB 617 legislation are met, CARB, the District, and local communities and other interested parties, must work together to advocate for continued/additional state funding to support the implementation of health protective local measures that reduce community exposure to criteria pollutants and toxic air contaminants.

Implementing Agencies: CARB, SJVAPCD, Local Community Groups *Type of Action:* Outreach and Advocacy

Implementation: Ongoing

Description of Proposed Actions: CARB and the Air District will work with Steering Committee and other interested parties to advocate for additional and continuing funding from the state to implement AB 617 and to fund emission reduction efforts in disadvantaged communities. The Air District, City of Fresno and County of Fresno will apply as co-applicants for state and federal funding sources to mitigate air pollution impacts within the AB167 boundary and improve livability. CAPP funding will be reserved for projects and programs that cannot be funded through other means.



August 28, 2019

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

Dear Ms. Heinks,

As a state-designated Regional Transportation Planning Agency and the federally-designated Metropolitan Planning Organization for Fresno County, Fresno Council of Governments welcomes the opportunity to provide comments regarding the Draft Community Emissions Reduction Program, published on August 14, 2019 by the District as a product of the South Central Fresno AB617 community process.

Here are our comments on the draft plan:

1. FD.2: Street Sweeping

Description of Proposed Actions: The District, through partnerships with other entities (including City of Fresno, Fresno County, and Fresno Council of Governments), will work to identify opportunities to identify street sweeping efforts in the community.

Fresno COG wishes to clarify that we have no authority or responsibility to implement street sweeping efforts in the community. However, we can provide funding opportunities to the City of Fresno and County of Fresno for the purchase of cleaner-technology and lower-polluting street sweeping equipment.

We appreciate the opportunity to comment on the draft plan and make clarifications to the proposed strategies.

Sincerely,

Braden Duran
Assistant Regional Planner
559-233-4148 Ext. 217

City of Clovis
City of Coalinga
City of Firebaugh
City of Fowler
City of Fresno
City of Huron
City of Kerman
City of Kingsburg
City of Mendota
City of Orange Cove
City of Parlier
City of Reedley
City of San Joaquin
City of Sanger
City of Selma
County of Fresno



August 29, 2019

via electronic mail

Samir Sheikh
Executive Director/APCO
San Joaquin Valley Air Pollution Control District

RE: Comments on the South Central Fresno Draft Community Emission Reduction Plan

Dear Mr. Sheikh,

The above noted environmental justice organizations, along with the undersigned members of the South Central Fresno Community Steering Committee, respectfully submit the following comments regarding concerns related to the South Central Fresno Draft Community Emission Reduction Plan (hereinafter Draft CERP). These comments build on past written correspondence and comments and questions raised during steering committee meetings throughout this process.

San Joaquin Valley Air District Authority to Adopt Rules and Regulations

Our comments on the Draft CERP dated July 22nd included a number of recommendations that call on the Air District to review and strengthen existing rules and regulations to reduce air emissions and exposure to sensitive receptors within the AB 617 South Central Fresno boundaries. At the stakeholder meeting on August 27th, the Air District stated that it lacks the authority to strengthen its rules and regulations identified in our comment letter and must follow

state and federal law in response to our request that the Air District go above and beyond existing rules. The Air District has significant discretion to shape its rules and regulations related to stationary and area sources. State and federal laws set reduction targets which the District's rules must help achieve, but do not prohibit the Air District from adopting new measures to protect vulnerable populations and communities. In fact, more rules and regulations would help the region attain clean air standards and thus support compliance with federal law. We believe that review and potential revision of the rules and regulations identified in our letter is warranted simply to ensure that those rules and regulations are adequate to satisfy the Air District's obligations.

We request the Air District establish a review committee which includes Community Steering Committee members and Air District staff, to assess opportunities to strengthen Air District rules and regulations identified in our letter to reduce exposures within the South Central Fresno boundaries as part of the final CERP.

Clarify that the CERP Relates to the Specified Area, Not Simply Existing Facilities and Emission Sources in and Impacting the Specified Area

While not specifically addressed in the Draft CERP, we would like the Air District to confirm through the updated CERP that the CERP's programs, policies, and emission reduction mandates relate specifically to the AB 617 area adopted by the Steering Committee, not sources far outside the area or simply the existing facilities and emission sources in and impacting the subject neighborhoods. The purpose of AB 617 is to protect the most vulnerable communities in California from continued exposure to unhealthful levels of toxic air contaminants and criteria pollutants. To create a plan that reduces pollution from existing sources, yet does nothing to prevent harm from new emitters and new pollution sources, undermines the purpose of the legislation and represents an insult to the communities AB 617 is designed to elevate and protect.

Furthermore, within the included incentive-based strategies, many do not specify that the eligible industrial business applicants (trucking companies, manufacturing facilities, agriculture equipment, etc.) must be located or operated within the South Central Fresno boundary. We respectfully request written confirmation in the CERP that programs and policies will address future impacts to the community, and incentives are reserved for benefits within the community.

Draft CERP does not Establish Clear Quantifiable Emission Reduction Targets

With respect to quantifiable emission reduction targets, the Draft CERP acknowledges that final reduction targets have yet to be finalized. The CERP must include quantifiable reduction targets that will allow the Air District and community at large to monitor and measure progress. Additionally, the Draft CERP states that while emissions and/or exposure reductions from

emission reduction strategies are expected, there will not be a quantifiable target for certain measures including for older/high polluting passenger cars, residential burning, agricultural open burning, industrial sources, land use and urban sources and exposure reduction strategies. The Air District provides no analysis or discussion as to why this is the case. As required by AB 617, the Air District must establish quantifiable emission reduction targets.

The Draft CERP Relies Too Heavily on Incentive-based Strategies

The Blueprint states that “Each community-level emissions and exposure control strategy should incorporate a combination of mechanisms to adequately reduce emissions and exposure [...] includ[ing] an assessment of strategies in six categories: regulations, facility risk reduction audits, air quality permitting, enforcement, incentive programs, and land use, transportation and mitigation strategies” (CARB Blueprint, Appendix C, p.C-21). Of the 47 strategies listed in the draft CERP, 22 are incentive strategies, of which many are already in existence through other Air District’s programs.

Additionally, many of the existing incentive programs that were included in the draft CERP are part of the PM2.5 State Implementation Plan (SIP), which relies heavily on incentive funding to reach its PM2.5 attainment goals, as well as the Carl Moyer and Prop 1B programs.

Unfortunately, the amount that was allocated for the SIP in the current state budget is not enough to fulfill the attainment strategies included in the SIP. What we have learned from this experience is that we cannot rely solely on incentives to fix our air problems. Furthermore, the objective of the AB 617 Community Air Protection program and funds for implementation is to fulfill local community priorities and meaningfully reduce emissions at a local level and not support existing Plans.

With respect to levels of funding, the steering committee needs clarification and transparency from the District on the amount of AB 617 funds that are specifically available to the South Central Fresno community. The Draft CERP estimates that \$67 million could potentially be appropriated to CERP strategies. However, as the Draft CERP notes, these resources are not secured nor is there any guarantee of resources being available. As we have asked in the past, what is the total amount of incentive funding that the Air District currently has secured for the CERP strategies? If no sources are secured, what sources will be identified and what time frame will this funding be available?

Community Concerns and Requests Remain Unaddressed

The Community Steering Committee members of South Central Fresno have repeatedly explained that their main pollution concerns are heavy-duty trucks traveling through their

communities; the pollution from stationary sources like the biomass incinerator, the glass manufacturing facility, the petroleum terminal, and MB technology; the impacts of the City's planned increase in industrial development in and next to their community; the need for mitigation efforts and other programs that directly benefit their community; and the need for stronger enforcement and improved regulations.

Members of the Community Steering Committee created and submitted a list of 40 strategies for incorporation into the Draft CERP to address these concerns. The proposed strategies focus and accelerate actions to provide direct emission reductions within the community to maximize reductions in exposure to applicable toxic air contaminants, area wide sources and direct PM_{2.5} (CARB Blueprint, Appendix C, p. C-17). The strategies fall into the noted six required categories established in the Blueprint. The Air District incorporated only 1 of the 40 recommended strategies drafted by community residents into the draft CERP released on August 14, 2019. After careful review of the draft CERP, our concerns and suggestions remain the same. We therefore resubmit our proposed Draft CERP strategies for incorporation into the final CERP as they will enable the Air District to meet the Community Air Protection Program objectives that were set forth in the Blueprint.

The Community Steering Committee members have also continuously asked for the inclusion of a detailed analysis of the cumulative health impacts and to include targets in this CERP that are specific to the sensitive receptor locations that need reduced exposure. The census tracts that fall within the South Central Fresno boundary have high rates of respiratory and heart disease and high mortality in both adults and infants. The current draft CERP does not address the concerns of the community with focused actions.

Land Use, Transportation and Mitigation

Many of the strategies the members of the Community Steering Committee proposed relate to land use, transportation, and mitigation strategies. While we acknowledge that most land use authority lies within the jurisdiction of the City or County of Fresno, the Air District should still include these types of strategies in the CERP and creating a plan to commit to and implement them. Furthermore, as noted above, the Air District has discretionary authority to adopt rules and regulations that protect communities from exposure to harmful pollution. The Air District must go above and beyond what they are accustomed to implementing, and work to create a new nexus of measures, relationships, and plans. That is why the Steering Committee suggests the strategy to create a Memorandum of Understanding between the City, County, Air District, and CARB. This would also allow for careful review of existing Air District rules and regulations to identify opportunities to strengthen and/or expand existing rules.

The Blueprint states that, “CARB recognizes that, in many cases, the authority for implementing these goals will reside with local government agencies. Air districts (and CARB where appropriate) will identify appropriate strategies and approaches to engage with these agencies in an effort to obtain these goals where the air district’s regulatory authority is limited.” (CARB Blueprint, Appendix C, p. C-19). Furthermore, the Blueprint states that the Air District must, “Identify and include engagement strategies and implementation mechanisms to promote the identified land use, transportation and mitigation strategies [... and] as appropriate, consider: Development of Memoranda of Understanding with cities, counties, transportation agencies, other public agencies, or facility owners or equipment operators” (CARB Blueprint, Appendix C, p C-27). By creating a Memorandum of Understanding with the City and County of Fresno, these strategies as listed in the Blueprint can be achieved.

Enforcement

The Community Air Protection Blueprint states that “CARB and the Air District staff will partner together to build on existing enforcement efforts and identify the best path forward for enforcing air quality rules and regulations within and directly surrounding the community” (CARB Blueprint, Appendix C, p C-29).

The current Draft CERP includes 5 enforcement strategies that rely on methods that the Air District already implements. However, the community steering committee members believe that the current enforcement methods are not curtailing illegal residential and agricultural burning, illegal idling near schools, noxious fumes/flaring from facilities near homes, or heavy diesel truck idling in neighborhoods, to name a few. For example, for facilities found in violation, the Air District should require the implementation of enforceable written inspection and maintenance programs. Furthermore, we believe that implementation of the few enforcement strategies that were included in the draft CERP must be transparent and easily accessible to the public.

While the inclusion of Appendix F of the CERP, Enforcement Plan Attachments, is greatly appreciated, a common pattern found in the complaints received is the resolution outcome which shows either ‘no violation’ or ‘unable to confirm’. Of the hundreds of complaints received and witnessed by community citizens, few violations were cited. This corresponds with the fact that the community wants stronger regulations as either the current enforcement methods or regulations are not curtailing the problems that the community continues to complain about.

Furthermore, the expanded efforts need to confirm and account for improved results of emissions reductions. AB617 states that an approvable plan must include “emissions reduction targets, specific reduction measures, a schedule for the implementation of measures, and an enforcement

plan.” (Health & Safety Code: 44391.2(c)(3) While the draft CERP provides a table giving the estimate emission reductions by each measure (p 140 of Draft CERP), a timeline must be included to show when the measure will be implemented and provide the year that the reductions will be achieved.

Inclusion of Pesticide Reduction Strategies

The draft CERP does not acknowledge pesticides as a community priority other than noting regulatory authority of other agencies. As just one example, in Southwest Fresno, within the AB 617 boundary and within a one mile quadrant of Edison High School, there are 35,000 pounds of toxic air contaminant pesticides used annually. This does not include the additional amounts of pesticides used towards the southern and southeast border of the 617 community boundary. The use of 1,3 Dichloropropene (1,3-D) as a fumigant pesticide causes cancer. The steering community proposed the following strategies be included in the CERP:

Ban all untarped applications of 1,3-Dichloropropene toxic air contaminant pesticides. 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 seen in certain sections. Make Notices of Intent (NOIs), required for restricted pesticide application publicly available online, along with County Agriculture Commissioner (CAC) approvals/denials of these NOIs. Ban all aerial applications of pesticide TACs. Establish 24/7 buffer zones of a 1 mile for all pesticide TACs for all sensitive sites, including homes, hospitals and schools. Request an evaluation of all carcinogenic TACs including pesticides, and then create emissions reduction plans in line with that analysis. Request for an evaluation of all reproductive toxicity TACs, including pesticides, and then create emissions reduction plans in line with that analysis.

As we have noted in past written correspondence and steering committee meetings, application and exposure to harmful pesticides, many of which are toxic air contaminants, is a community priority and the Air District must respond accordingly.

~~~~~

The undersigned acknowledge the time and effort the Air District has devoted to the AB617 Community Air Protection Program, however, the current Draft CERP relies too heavily on incentive programs, does not incorporate enough rules and regulations, and does not address

many community concerns and thus does not meet the requirements as stated in the Blueprint nor fulfill the intents of AB617.

We look forward to continuing to work with the Air District staff on fulfilling the requirements of AB 617.

Sincerely,

Ivanka Saunders  
Leadership Counsel for Justice and Accountability

Nayamin Martinez,  
Central California Environmental Justice  
Network (CCEJN)

Monica Limon  
Central Valley Air Quality Coalition

Kevin Hamilton, RRT  
Central California Asthma Collaborative  
(CCAC)

Samuel Molina  
Mi Familia Vota

Sandra Celedon  
Fresno Building Healthy Communities

Laura Moreno  
Friends of Calwa

Oralia Maceda  
Binational Center for the Development  
Oaxacan Indigenous Communities

Members of the South Central Fresno 617 Community Steering Committee:

Estela Ortega

Bertha Menchaca

Dalia Arenas Mondragon

Lidia Vega

Irma Reyes

Lilia Becerril

Isabel Vargas

Larry Taylor

Kimberly McCoy

Sylvesta M. Hall

Oralia Maceda

Genevieve Gale

CC: Karen Magliano, Director of the Office of Community Air Protection

| Strategy # | Strategy Type                                | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Agencies Involved         |
|------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| 1.         | <b>Enforcement New Rules and Regulations</b> | The Air District will form an “Implementation Sub-Committee” with members from the existing and/or new applicant Steering Committee members 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 when a permit for an industrial land-use or source that triggers either the New Source Review or Indirect Source Rule is submitted within the AB617 area and have the opportunity to provide recommendations on how to mitigate negative impacts; c) Receive updates on the Community Air Monitoring Network (CAMN) and vote on any proposed changes to the CAMN; d) Define and implement Green Zone practices                                                                                                                                                 | <b>Air District</b>       |
| 2.         | <b>Enforcement</b>                           | The Air District and CARB will evaluate the following facilities: Rio Bravo, Vitro Flat Glass, Calco Gen, Western Co-Gen, SFPP, M&R Company (Lodi), Certainteed, Holz Rubber (Lodi), Gallo Glass (Modesto), Diamond Foods (Lodi), at the minimum for compliance with existing Air district rules and regulations including but not limited to an updated Health Impact Assessment (HIA) for both cancer and non-cancer health effects. Each entity will update its existing OEHHA Fact Sheet(s) and toxic inventory, report and share findings with the AB 617 steering committee and if needed, create an enforcement plan to bring the facility up to compliance. Should deficiencies and/or increased health risks be identified, the facility will develop a schedule for correction and/or mitigation and report back to the committee on a scheduled basis until the facility has reached compliance. Carb & The Air district will earmark | <b>Air District, CARB</b> |



|    |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                   |
|----|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
|    |                    | facility for periodic, random auditing for a period of time to review and audit compliance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                   |
| 3. | <b>Enforcement</b> | The Air District will add an “Enforcement” web-link to the AB617 Community website. This site will have a User-Friendly form to allow the public to make complaints regarding any type of air quality issue. Once a complaint has been filed, the website will allow the public to follow the process through the status of inspection, cited violation or justification, resolution and outcome. All complaints should be made public and the community have access to see what facility/business’ history of violations.                                                                                                                                                                                                                          | <b>Air District</b>                               |
| 4. | <b>Enforcement</b> | CARB will work with the Air District to review if the City of Fresno” fleet maintenance schedule compliance.Scheduled fleet inspections shall be conducted at no less than once a year intervals. Buses that are ready to be put out of commission are replaced with electric buses. CARB and the Air District will work with the Fresno City Department of Transportation Services to 1st) establish an EV conversion work group. This workgroup would have at least two members from the AB 617 Fresno Community Steering Committee; 2nd) The working group will develop a time-line and schedule for complete fleet conversion to electric vehicles; 3rd) The working group will report progress to the Steering Committee at regular intervals. | <b>Air District<br/>CARB<br/>Fresno/County</b>    |
| 5. | <b>Land Use</b>    | A Memorandum of Understanding will be formed between the City of Fresno, Fresno County, and the Air District regarding the overlaying plans of the AB617 Community Air Monitoring Plan, the AB617 Community Emissions Reduction Program, the Transformative Climate Communities (Transform Fresno) program, the Southwest Fresno Specific Plan, the South Industrial Priority Area Specific Plan, and the Southeast Central Fresno Specific Plan. The objectives are to: prioritize environmental mitigation efforts that are required by CEQA and the Environmental Impact Reports of each of these plans; to                                                                                                                                      | <b>Air District<br/>City of<br/>Fresno/County</b> |

|           |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                             |
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|           |                    | create transparent and public communication between community members, each agency and the departments that manage these plans; to collectively find funding sources that benefit the communities and areas that are covered under these specific plans; to create true and robust community engagement by having community meetings that openly discuss and create actions of how these plans affect each other and work in tandem. The City of Fresno, the County of Fresno and the Air District will have a dedicated staff member to fulfill the objectives of this MOU.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                             |
| <b>6.</b> | <b>Land Use</b>    | <p>The Air District and CARB will engage in environmental review processes for industrial development projects in South Central Fresno which will include coordinating with community partners and lead City and County agency staff, providing data and technical assistance, and reviewing and commenting on CEQA documents.</p> <p>The Air District shall monitor and take all necessary measures to secure timely compliance by developers with CEQA mitigation measures and permit conditions requiring compliance with Air District rules and/or necessitating Air District involvement for implementation. For example, such mitigation measures include but are not limited to commitments to comply with the Indirect Source Rule and commitments to enter into a Voluntary Emissions Reductions Agreement (VERA) for purposes of reducing air emissions below the CEQA significance threshold. In order to implement this commitment by the Air District, the Air District shall work to establish a communication protocol with the City of Fresno and the County of Fresno to obtain mitigation monitoring and reporting for projects containing mitigation measures involving the Air District.</p> | <b>Air District<br/>City of<br/>Fresno/County,<br/>CARB</b> |
| <b>7.</b> | <b>Enforcement</b> | If the Air District fails to receive necessary information from the City or the County regarding mitigation compliance, the Air District shall seek to obtain the information directly from                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Air District</b>                                         |

|     |                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                          |
|-----|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|     |                                          | the applicant. To the extent that developers fail to comply with mitigation measures, the Air District shall pursue enforcement actions through all means available to it.                                                                                                                                                                                                                                                                                                                                     |                                          |
| 8.  | Land Use                                 | Reassess and revise the Air District's CEQA and Health Risk Analysis thresholds of significance for criteria air pollutants and toxic air emissions for neighborhoods disproportionately impacted by air pollution, taking into consideration the rule under CEQA that projects located in areas already impacted by environmental degradation and with sensitive land uses are subject to a lower threshold of significance.                                                                                  | Air District<br>City of<br>Fresno/County |
| 9.  | Land Use<br>New Rules and<br>Regulations | Require the use of funds paid pursuant to Air District Rule 9510 (Indirect Source Review) and the Voluntary Emissions reductions Agreement (VERA), to be spent on emissions reductions within the neighborhoods in which the project is located. Through a community process and in collaboration with community stakeholders, develop a list of criteria and sample projects which would qualify for funding and publicize the availability of the targeted ISR funding.                                      | Air District                             |
| 10. | Land Use                                 | The Air District will stop issuing permits that allow drive-throughs in restaurants located within the AB617 area.                                                                                                                                                                                                                                                                                                                                                                                             | Air District<br>City of<br>Fresno/County |
| 11. | Land Use                                 | The City of Fresno/Fresno County shall abide by AB2447. Community members shall receive a public notice with at least 30 days of comment period on any relevant planning or land-use decisions not currently subject to such notice. According to Rule 9510, Indirect Source Review, for industrial projects that can have an impact on air quality in a community, the Air District will enforce that the City/County of Fresno will notify residents that are within a 1 mile of the 617 community boundary. | Air District<br>City of<br>Fresno/County |

|            |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                   |
|------------|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>12.</b> | <b>Land Use Incentives</b> | The Air District will work with the City of Fresno/ Fresno county to install solid barriers or vegetative buffers between emissions sources/locations and sensitive receptors such as schools, daycares, medical offices, residences within the 617 community.                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Air District<br/>City of<br/>Fresno/County</b> |
| <b>13.</b> | <b>Land Use</b>            | Air district will work with the city planner's office to advocate for changes in the classification within the City's general plan to rezone communities, such as the SC Fresno AB 617 community, to stop certain facilities to enter into the area that are identified as facilities that are prone to cause negative health impacts. The Air District will promote other possibilities by considering alternative land-use plans. The Air District will enter into a memorandum of understanding (MOU) with the City of Fresno/and or county to be involved in the rezoning                                                                                                                                       | <b>Air District<br/>City of<br/>Fresno/County</b> |
| <b>14.</b> | <b>Land Use</b>            | The Air district will be an active partner in the implementation of the current City of Fresno plans and programs within the South Central AB617 community boundary. Such programs are the Southwest Specific Plan and the Transformative Climate Community Program and the Active Transportation Plan. These plans address aspects of air quality, greenhouse reductions, and heavily impacted disadvantaged communities. The Air District will uphold the zoning that has been established in the Southwest Specific Plan. The Air District will partner with the City of Fresno and the County of Fresno to identify funding sources and participate in any environmental study completed by the City or County. | <b>Air District<br/>City of<br/>Fresno/County</b> |
| <b>15.</b> | <b>Land Use</b>            | The Air District will follow and be an active partner in the creation of the Southeast Specific Plan and the South Industrial Priority Area Plan. As a public health agency, the Air District will advocate for the reduction of air pollution and                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Air District<br/>City of<br/>Fresno/County</b> |

|     |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                          |
|-----|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|
|     |          | improved health outcomes in the 617 South Central Fresno communities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                          |
| 16. | Land Use | The Air District will review current buffer zones for facility “standards” that are in place, as defined by the MOU, within the AB617 area for future commercial or industrial planning to take place around sensitive areas such as existing schools, daycares, convalescent homes, etc.                                                                                                                                                                                                                                                                                                                                                                   | Air District<br>City of<br>Fresno/County |
| 17. | Land Use | Air District will recommend Green Zone practices, such as those referenced in the Minneapolis MN Green Zones Initiative ( <a href="http://www.ci.minneapolis.mn.us/sustainability/policies/green-zones">http://www.ci.minneapolis.mn.us/sustainability/policies/green-zones</a> ), as well as mitigation factors to the City that are appropriate for incoming industrial development businesses to implement as a requirement when accepting tax incentives from the City and or County of Fresno. The Air District will work with the Implementation Sub-Committee and the City and County of Fresno to enact and define a Green Zones Fresno Initiative. | Air District<br>City of<br>Fresno/County |
| 18. | Land Use | According to the Mitigation Fee Act (California Government Code Sect. 66000) and the City of Fresno Southwest Specific Plan (Chapter 8, page 8-4), new development pays Development Impact Fees. The Air District will review and audit the City of Fresno to confirm the city is using the Developer’s Impact fees for infrastructure improvements that prioritize the reduction of emissions and health impacts. ie: truck re-routes, vegetation/tree canopy barrier walls, air filtration systems in sensitive receptor buildings/residences.                                                                                                            | Air District<br>City of<br>Fresno/County |
| 19. | Land Use | The Air District will follow the South Industrial Specific Area Plan developments and identify Community Benefits Agreements that the City of Fresno should create with incoming businesses. The Community Benefits Agreement will prioritize any action that improves air quality and lowers                                                                                                                                                                                                                                                                                                                                                               | Air District<br>City of<br>Fresno/County |



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|     |                                                   | the health impacts of residents from the pollution caused by heavy industry. The Air District will have dedicated staff to engage and give input in public workshops held by the City/County of Fresno. When a new or adjusted permit is being applied for, the Air District will initiate a Health Risk Assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                            |
| 20. | <b>Transportation Mitigation</b>                  | The Air District and CARB will propose a plan to monitor near road diesel pollution as part of a complete study of-air pollution and health effects of truck traffic on the highways 99, 41 and 180 with special focus on graded on and off ramps, as well as all roadways where sensitive <del>uses</del> receptors and populations are located and which are used as truck routes (e.g., Jensen, Central, and North Avenues). Monitor data will be available on CARB's "Air Now" and Air Districts RAAN air quality mapping software. Based on the findings, the Air District and CARB will review existing diesel mitigation strategies and update them through a public process in partnership with the Fresno Steering Committee. The combined agency and SC will present the information along with new strategies and designs to the City/County that they can adopt to improve air quality (such as limiting the use of red lights and stop signs for cars). | <b>Air District<br/>CARB<br/>City of<br/>Fresno/County</b> |
| 21. | <b>Transportation Mitigation</b>                  | The Air District will work with the City of Fresno and/or the County of Fresno Air to reroute heavy-duty truck traffic around sensitive receptors such as schools, daycares, and residences. The Air District will work with the city/county of Fresno to create a schedule for heavy-duty trucks routing to exclude certain times of operations such as school pick-up and drop-off times to reduce emission exposure.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Air District<br/>City of<br/>Fresno/County</b>          |
| 22. | <b>Transportation Mitigation &amp; Incentives</b> | The City of Fresno, the County of Fresno and the Air District will apply as co-applicants to state funding sources to mitigate pollution and climate impacts within the 617 Boundary and improve livability, such as but not limited to:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Air District<br/>City of<br/>Fresno/County</b>          |

|     |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                |
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|     |                                  | Greenhouse Gas Reduction Funds(GGRF), Electric Program Investment Charge (EPIC) Sustainable Transportation Planning Grant Program-Sustainable Communities, Office of Safety Grants, Environmental Enhancement and Mitigation Program, Urban and Community Forestry Grants, Low Carbon Transportation, Active Transportation, Low Carbon Transit Operations, Affordable Housing and Sustainable Communities, Climate Change Research, Transformative Climate Communities, Woodsmoke Reduction, Low-Income Weatherization, Urban Greening, Wildfire Response and Readiness, Waste Diversion, Training and Workforce Development, Healthy Soils, Renewable Energy for Agriculture, Food Production Investment and the others as project leads of the same program. The agencies involved will attempt to pursue funding from these multiple programs as the primary source of funding to implement the Fresno CERP. State budgeted Community Air Protection Program (CAPP) funding should be reserved for projects and programs that cannot be funded through other means, or when as a match when required. CAPP funding may also be utilized to leverage significant state and federal funding if required. |                                                                |
| 23. | <b>Transportation Mitigation</b> | The Air District will work with the City of Fresno/County of Fresno to revise business licensing procedures to require current and proposed businesses to disclose truck visits per day and works with Caltrans to determine the number of trucks that park in the Caltrans right-of-way near South Central Fresno. These efforts would help to better understand emissions and exposure in South Central Fresno.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>Air District<br/>City of<br/>Fresno/County</b>              |
| 24. | <b>Transportation Mitigation</b> | The Air District will recommend/ coordinate with CalTrans, Fresno City Department of Public Works;Transportation and Planning, and Fresno County Transportation Authority (FCTA), the installation of both vegetative and mechanical barriers near adjacent to state and local goods movement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Air District<br/>City of<br/>Fresno/County<br/>Caltrans</b> |

|            |                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                   |
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|            |                             | <p>corridors that are in close proximity to sensitive receptors in South Central Fresno CAPP. The District, in coordination with the City or County of Fresno will apply for funds from the various agencies and sources listed in #22, to install these barriers. Proposed locations include but not be limited too:</p> <ul style="list-style-type: none"> <li>• Along the 99 highway, especially near the 99 and 180 interchange and alongside the south side of the 99 between the 180 and 41.</li> <li>• Along the 41 within the AB 617 boundary</li> <li>• Along Maple, Jensen Avenue, Chestnut and Divisadero/Tulare</li> </ul> |                                                   |
| <b>25.</b> | <b>Mitigation</b>           | The Air District will require all facilities identified in the technical assessment and emissions inventory to incorporate mitigation measures such as planting shrubs, greenery, trees around the perimeter of their facilities, to exclude entry and exit points.                                                                                                                                                                                                                                                                                                                                                                    | <b>Air District<br/>City of<br/>Fresno/County</b> |
| <b>26.</b> | <b>Mitigation</b>           | The San Joaquin Valley Air District, in coordination with the Fresno Department of Health, will review the accessibility and reach (language access, technology access) of their RAAN program, and make updates as needed. Report back to the Implementation Sub-Committee.                                                                                                                                                                                                                                                                                                                                                            | <b>The Air District</b>                           |
| <b>27.</b> | <b>Mitigation</b>           | The San Joaquin Valley Air District will increase outreach and education for RAAN within the 617 community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>The Air District</b>                           |
| <b>28.</b> | <b>Facility Risk Audits</b> | The Air District will schedule audits for the facilities identified as the main polluters in the area by the technical assessment. The Air District will provide the "Implementation" Sub-Committee with a list of the sources and scheduled dates of audits. The Air District will report findings back to the steering committee and CARB at the                                                                                                                                                                                                                                                                                     | <b>Air District</b>                               |

|            |                   |                                                                                                                                                                                                                                                                                                                                                                                           |                                    |
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|            |                   | same time - within 10 days of audit. The Air District will then discuss plans of actions with CARB and the steering committee to be voted on by the "Implementation" committee. The Air District will then provide an implementation schedule and report to the steering committee no less than once a quarter until the facility changes have been made and emissions have been reduced. |                                    |
| <b>29.</b> | <b>Incentive</b>  | The Steering Committee will approve incentives on a case-by-case basis for stationary sources. Permitted facilities that need BACT/BARCT upgrades and have a history of compliance will receive priority for incentives. Permitted facilities that have a history of being cited, then pay their penalties and fines but do not stop the violations will be reviewed for shutdown.        | <b>Air District</b>                |
| <b>30.</b> | <b>Incentives</b> | The Air District will offer financial incentives and technical support to low-income households within the AB617 area to install air filters and consider other strategies they will both reduce emission from the home to the outside air and keep pollution in the outside air from entering the home and mitigate indoor air pollution.                                                | <b>Air District</b>                |
| <b>31.</b> | <b>Incentives</b> | The Air District will grant incentives for air-quality related programs on a sliding scale. For instance, incentives for clean cars should be higher for lower-income residents, and lower for higher-income residents. The AB 617 Fresno Implementation Sub-Committee can help the Air District determine incentive tiers.                                                               | <b>Air District</b>                |
| <b>32.</b> | <b>Incentives</b> | The Air District will offer financial incentives and technical support to schools within the AB617 area to install air filters that mitigate indoor air pollution                                                                                                                                                                                                                         | <b>Air District</b>                |
| <b>33.</b> | <b>Incentives</b> | The Air District will work in tandem with Fresno EOC, State Center College District, Fresno Unified School District and                                                                                                                                                                                                                                                                   | <b>Air District and Fresno EOC</b> |

|            |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                 |
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|            |                                                       | other recognized educational institutions, to create a local Youth Training and Employment Program that focus on youth residing/working in the AB617 area that will train them in the implementation of the mitigation strategies included in the CERP.                                                                                                                                                                                                                                                                   |                                                 |
| <b>34.</b> | <b>Incentives</b>                                     | The Air District and the City/County of Fresno will apply for state funds for urban greening and forestry to improve tree cover in the AB 617 community, especially within residential neighborhoods that currently lack coverage.                                                                                                                                                                                                                                                                                        | <b>Air District,<br/>City/County<br/>Fresno</b> |
| <b>35.</b> | <b>New Rules &amp; Regulations<br/>And Incentives</b> | The Air District will create a new rule and develop and incentive program which will require commercial landscapers must use electric gardening equipment (i.e. lawn mowers, leaf blowers, etc.) by a date to be negotiated but not more than five years from approval of this plan. Residential leaf blowers need to transition to alternative vacuums to decrease dust pollution.                                                                                                                                       | <b>Air District</b>                             |
| <b>36.</b> | <b>New Rules &amp; Regulations<br/>And Incentives</b> | The Air District will increase the stringency of Wood Burning rule 4901 to ban fireplaces in the City of Fresno and their sphere of influence as well as prohibit non-essential woodburning. For residents that have only wood burning fireplaces as the sole source of heat, the Air District will prioritize and target low-income communities for appropriate and energy efficient replacement incentives. The Air District will conduct outreach to 617 low-income community residents.                               | <b>Air District</b>                             |
| <b>37.</b> | <b>New Rules &amp; Regulations,<br/>Enforcement</b>   | Any fines given to Valley residents by the Air District related to the enforcement of rules and regulations should be administered on a sliding scale according to income. The SJV Air District will establish a working group that includes members of the AB 617 Fresno Implementation Sub-Committee to advise the districts review and update of the "San Joaquin Valley Unified Air Pollution Control Districts's Mutual Settlement Policy; Communication #1165; (ref: CH&SC 42403)," dated February 6th, 2018. Goals | <b>Air District</b>                             |



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|     |                                    | include but are not limited to: 1) Development of an income based sliding scale for fines. 2) Strategically evaluating where funding generated from these fines should best be utilized to reduce emissions from these sources.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                   |
| 38. | <b>New Rules &amp; Regulations</b> | The Air District will work with The City of Fresno/County to ban the use and/or sell of fireworks in AB 617 affected area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Air District<br/>City of<br/>Fresno/County</b> |
| 39. | <b>New Rules &amp; Regulations</b> | The Air District will expedite the timeline for the development of a rule and implementation schedule for under-fired charbroilers (Rule 4692) located within the AB 617 community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Air District</b>                               |
| 40. | <b>New Rules &amp; Regulations</b> | Ban all untarped applications of 1, 3-D toxic air contaminant pesticide. 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 seen in certain sections. Make Notices of Intent (NOIs) required for restricted pesticide applications publicly available online, along with CAC approvals/ denials of these NOIs. Ban all aerial applications of pesticide TACs. Establish 24/7 buffer zones of a 1 mile for all pesticide TACs for all sensitive receptor sites, including homes, hospitals, labor camps and schools. Ask for an evaluation of all carcinogenic TACs including pesticides, and then create emissions reduction plans in line with that analysis. Ask for an evaluation of all reproductive toxicity TACs, including pesticides, and then create emissions reduction plans in line with that analysis. | <b>Air District</b>                               |

## **Comments on South Central Fresno Draft Emission Reduction Plan**

Submitted by Mukasa Kezala

Thank for the opportunity to review and comment on the Draft South Central Fresno Community Emission Reduction Plan (CERP). In reviewing the CERP, the main interest was to verify that the proposed strategies go towards lowering some of the CalEnviroScreen Scores upon which the community was selected - poverty, unemployment and air pollution burden, etc. Comments follow:

1. Separate AB 617 from Carl Moyer and Prop 1B programs, to make it possible, down the line, to measure its achievements.

AB 617, adopted in 2017, is a unique program intended to reduce air pollution in selected communities. In order to measure its success, emission reductions attributable to AB 617 should be handled separate from those due to other incentive-based strategies, such as Carl Moyer, which has been around since 1998, and Prop 1B - Movement of Goods, adopted in 2006. Those two programs, Moyer and Prop 1B, are valleywide, and certain incentive-based emission reductions funded through those programs appear to have been hard-wired into the EPA-approved valleywide PM 2.5 Attainment Plan. They are a given.

The AB 617 community represents a very small fraction of the Central Valley, although it does not exist in a bubble - is not isolated. Some of the mission reductions in the community will contribute towards attainment of health-based air quality standards. The converse is also true. That said, for future accounting purposes on the success of AB 617 in South Central Fresno, valleywide emission reductions already credited or attributable to the PM 2.5 Plan should be identifiable and excluded, as they would have been realized through the PM 2.5 Plan. The Carl Moyer and Prop 1B programs should not be commingled with AB 617. AB 617 should stand on its own in order to be able to measure its achievements.

Along the lines of staying focused on what I believe was the original need for and intent of AB 617; to reduce emissions at the community level, following are some air emission categories, sources or activities within the AB 617 community, for the District to consider as candidates for emission reduction strategies:

- Crematoriums: District complaint records will confirm that they smoke. Their smoke emissions (toxics and PM) should be controlled, just like those from under-fired charbroilers. Grant funds can be used for installation of monitors and data loggers for key operating parameters; to allow the District to verify routine compliance. Perhaps, consider funding larger after-burners.
- Electric motor shops - toxic and PM emissions due to incomplete combustion wire insulation should be controlled. Require the same controls and self-inspections and recordkeeping as that for crematoriums.

- Compliance verification - CARB should do unannounced source tests for emission units not monitored by CEMs, such as baghouses. This will provide more representative emissions data for better inventories and exposure levels (as opposed to staged source tests)
- Vitro Flat Glass - consider the inquiry or suggestion made by a Hearing Board member, along the lines of **gradually** shifting planned maintenance from winter to spring or summer months, so as not to discharge about 2,000 LB of excess PM and about 3,000 LB of excess SOx emissions during the inversion layer period. It doesn't hurt to ask if that is an option.

The above are just examples of the many potential opportunities to reduce air emissions at the community level and/or to obtain or use emissions data representative of actual operations.

2. Require verifiable and enforceable inspection and maintenance program (I&M) for facilities found in violation, with recurrent air pollution related problem or creating a nuisance, and/or where appropriate. This will be along the lines of the District's Inspect Program, but required for good cause. Alternatively, impose monetary penalties, up to the amounts authorized under AB 617, to serve as a deterrent, with the fines collected going towards supplemental environmental projects within the AB 617 community.
3. Projects listed in the CERP as funded in the AB 617 community should be limited to only those funded from 2016 to present. It appears the list includes all projects funded in the past 10 years. Starting from 2016 is closer to the adoption date of AB 617 in 2017, and that makes it consistent with records in the Enforcement Section of the CERP - Appendix F, where a Summary of Complaints and inspections conducted, are listed starting in 2016. Projects funded up to 10 years ago may predate the CalEnviroScreen Scores used in selecting the community and may skew the information in CERP.
4. For grant-funded projects in South Central Fresno listed in Table 3-3, include the actual street addresses or UTM coordinates of each project location, for the CERP reader to understand where the emission reductions occurred and how they impact the AB 617 community. Provide the same level of detail as that for facilities listed in Appendix F. For the listed projects, state the one criteria used for listing them as part of the AB 617 community or City of Fresno, for example, distance from the community boundary or other reference point. Also, indicate the funding period - between when and when. Table 3-3 heading just says "...as of August 1, 2019".
5. Section 3-3 of the CERP, under Existing Air Quality Programs, Regulatory Measures, states, among other things, that:

*“ Many current rules are fourth or fifth generation, meaning that they have been revised and emissions limits have been lowered several times, as new emission control technology has become available and cost effective.*

*Building on decades of developing and implementing active and effective air pollution control strategies, District rules implement **the most stringent measures, best available control measures, and best available retrofit control technologies feasible** to require in the San Joaquin Valley.”* (Emphasis added)

Table le 3-2: District Rules Reducing South Central Fresno Air Pollution, lists a 1992 Rule 4201; *Particulate Matter Concentration*, among those rules. At industrial facilities, the rule applies to particulate matter scrubbers, baghouses (dust collectors), etc. For the purpose of this comment, scrubbers are not an issue. If permitted emission limits for large baghouses in the AB 617 community are based on Rule 4201, and the baghouses are allowed to operate with visible emissions up to 5% opacity, per APCD policy, we believe, emissions from those baghouses can be reduced. This is why:

Rule 4201 has not been revised since the creation of the APCD in 1992. It is not as stringent for PM control as South Coast AQMD Rule 1155 that has a particulate matter concentration limit for large baghouses of 0.01 grains/scf versus APCD Rule 4201 limit of 0.1 grains/scf, in the exhaust gases. That means, for a similarly-sized baghouse or dust collector, Rule 4201 allows 10 times as much pollution as a baghouse in the Los Angeles area. Also, the SCAQMD rule does not allow any visible emissions from a baghouse while APCD policy allows up to 5% opacity. Therefore, there is room for improvement.

To achieve the same PM emission control as that in the SCAQMD region, all that is required is to gradually install or retrofit the affected baghouses with better filter fabric. The baghouse proper would not be replaced, just replacement or retrofing the inside with better quality filtering fabric (just like changing the quality of bags for home vacuum cleaner, without buying a new vacuum cleaner).

Therefore, the District should determine the number of baghouses in the AB 617 community that meet the applicability criteria for the 0.01 gr/scf in SCAQMD Rule 1155, and consider revising Rule 4201 and/or not allowing the 5% opacity - visible dust in the baghouse vent stack (5% opacity can easily be mis-read up to 20%. But, “*no visible emissions*” - 0% is unmistakable).

6. Summary of Complaints in Appendix F: The font used for the 10 pages or so for those records is very small - not readable. Brought to the District’s attention in an Aug. 27, Request for Public Records seeking records in a format the font can be enlarged and/or the records sorted.

Would have liked to review and comment on the complaint records to determine whether there were potential candidates for the suggested inspection and maintenance program, under Comment # 2, above.

7. Funding for ride-share electric vehicles, carpools, Dial-A-Ride etc. The proposed funding of \$250,000 is a step in the right direction. Raising the funding to \$1 million or more would be justifiable in that, I believe, there is a great need for such transportation. And, that would be along the lines of reducing poverty in the AB 617 community, a CalEnviroScreen Score upon which the community was selected.

Lack of transportation can be a hindrance to economic opportunities. Some brave souls have to walk or ride bicycles, fighting off dogs, to go to jobs that start at 5:00 AM, because buses do not start running that early. Some are not able to go to evening classes to learn new skills because they can't make bus connections to get back home safely, after night-school. It may be difficult to understand why a person cannot afford to own a car until you understand their situation. Alternatively, one can try balance a family budget, assuming an income of minimum wage or even \$15 per hour, and with no benefits - medical, vacation, etc. That is poverty.

It is hoped that the District will work with the City of Fresno to come up reasonable public transportation options, to help some of the economically challenged folks to get to and from work and/or school, to improve their situations or to just get by. Millions of dollars are coming into the Valley on account of AB 617. From that, some entities will get subsidized farm tractors or big rig truck engines, electric or hybrid vehicles, etc. Unfortunately, most residents in the AB 617 communities, at least the ones I know, don't have money needed to participate in grant-funded incentive programs. And, for the improved air quality due to those incentive programs, and in particular the way the Draft CERP is crafted, all of us will benefit, regardless of where we live. So, what is in it for the AB 617 community residents?

Years from now, we want people to feel that AB 617 came to their community and made their lives better. Out of the millions of dollars coming into the valley, \$1 million spent on improved transportation to make transportation easier, is justifiable.

8. Proposed extra *Tune In Tune Up* event in the AB 617 community: Unless this is by invitation only or motor vehicle registrations will be checked for addresses, the event will be attended by residents from throughout the Central Valley. It will be just like all the others - not really "extra".
9. Weatherization, solar power, etc. -**[Placeholder - will make comments after looking into info learned at the Aug 28 Public Workshop, regarding available funding opportunities]**.

## **Comments on South Central Fresno Draft Emission Reduction Plan**

Submitted by Mukasa Kezala on September 2, 2019

Thank for the opportunity to review and comment on the Draft South Central Fresno Community Emission Reduction Plan (CERP). In reviewing the CERP, the main interest was to verify that the proposed strategies go towards lowering some of the CalEnviroScreen Scores upon which the community was selected - poverty, unemployment and air pollution burden, etc. Comments follow:

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Rule 4201 has not been revised since the creation of the APCD in 1992. It is not as stringent for PM control as South Coast AQMD Rule 1155 that has a particulate matter concentration limit for large baghouses of 0.01 grains/scf versus APCD Rule 4201 limit of 0.1 grains/scf, in the exhaust gases. That means, for a similarly-sized baghouse or dust collector, Rule 4201 allows 10 times as much pollution as a baghouse in the Los Angeles area. Also, the SCAQMD rule does not allow any visible emissions from a baghouse while APCD policy allows up to 5% opacity. Therefore, there is room for improvement.

To achieve the same PM emission control as that in the SCAQMD region, all that is required is to gradually install or retrofit the affected baghouses with better filter fabric. The baghouse proper would not be replaced, just replacement or retrofing the inside with better quality filtering fabric (just like changing the quality of bags for home vacuum cleaner, without buying a new vacuum cleaner).

Therefore, the District should determine the number of baghouses in the AB 617 community that meet the applicability criteria for the 0.01 gr/scf in SCAQMD Rule 1155, and consider revising Rule 4201 and/or not allowing the 5% opacity - visible dust in the baghouse vent stack (5% opacity can easily be mis-read up to 20%. But, “*no visible emissions*” - 0% is unmistakable).

6. Summary of Complaints in Appendix F & Response to Public Air Pollution Complaints:
- a. To help in understanding why no enforcement actions were taken for any of the odor complaints confirmed by the District, state the actual number of complaints the District must receive for nuisance odors or other complaints to be violations - to have caused “injury, detriment, nuisance, or annoyance” to a considerable number of people or the public. We understand this to be five (5) complaints from different individuals in a 24-hour period, etc. Providing this numeric value would be in line with all other numeric data, related to complaints, included in the Draft CERP.
  - b. A significant number of reported complaints, summarized in Appendix F, were not confirmed by the District. So as not to give the impression that members of the public file baseless or unfounded complaints, it should be pointed out that, sometimes, there is a significant lag time between the filing or calling-in of a complaint and the District’s field investigation. As a matter of fact, and based on information, a certain complaint was not investigated until the following day, long after the situation had changed. As such, it is important for the District to make the public and the AB 617 Committee fully aware that failure to confirm a complaints does not necessarily mean the complainant did not have a valid concern at the time the complaint was filed.
  - c. As District inspectors are sometimes not be able to respond to a complaint in a timely manner or “*as it is happening*”, in AB 617 communities, the District should use its discretion and consider complaints or situations confirmed by a Peace Officer - Fresno PD and/or certain Fire Department staff, as “public *nuisances*”. For example, a documented or logged release of gases or ammonia odors that affect many people, even if not experienced by a District inspector.
  - d. Resolution of complaints - there needs solutions and/or closure. Some of the reported complaints were confirmed by the District, however, the situations do not appear to have been resolved. For example, consider the listed odor complaints attributed to painting activities at automotive shops. No enforcement actions were taken for the two confirmed ones as the number of complaints received were less than the required minimum of five (5) in a 24-hour period, and there were no permit violations. While the complaints were real but no action taken, that means, that same odor situations will continue to recur, whenever vehicles are painted. Based on information, I have good reason to believe, when residents file complaints and nothing is done, they just give - don’t call the APCD again - why bother.
  - e. It suggested that when the District finds in AB 617 communities, nuisance-type complaints or situations attributable to a mis-match or incompatible land-use issues, the District should let the City of Fresno Planning Department know.

To illustrate, consider the complaint filed on 03/21/2019 attributed to the automotive garage, located at 804 “F” Street, Fresno, CA (China Town). Adjacent to the garage are about six (6) to

eight (8) second-floor single-room residences, with their windows above the garage level. These residents, in the greater majority of cases, do not have the means to move elsewhere.

In this situation, the odors complained of were confirmed by the District. However, as the odors were not reported by five different individuals, and the painting activities are exempted from permitting - not in violation, nothing was done about that situation - no solution - no closure. That means, every time cars are painted, the residents have to keep their windows closed - basically, held hostage in their single-room homes.

As suggested above, the District should let City planners know of such situations. Also, the AB 617 Committee should help in identifying other similar situations, consider potential solutions, and recommend using AB 617 funds; to help affected lawfully permitted businesses to control emissions - reduce the air pollution burden on the less affluent.(similar situations due to painting on Orange Avenue, Belmont, etc).

The undesirable alternative is to coach affected residents to organize, and to always make the five (5) calls in a 24-hour period; a prerequisite for a public nuisance.

The need to address and resolve air quality issues at the community-level was fundamental to the original intent of AB 617.

**804 "F" STREET, FRESNO, CA. AUTO SHOP BELOW RESIDENTS' WINDOWS**  
RE: 03//21/2019 NUISANCE ODOR COMPLAINT



View From "F" Street



View from Inyo Street

7. Funding for ride-share electric vehicles, carpools, Dial-A-Ride etc. The proposed funding of \$250,000 is a step in the right direction. Raising the funding to \$1 million or more would be justifiable in that, I believe, there is a great need for such transportation. And, that would be along the lines of reducing poverty in the AB 617 community, a CalEnviroScreen Score upon which the community was selected.

Lack of transportation can be a hindrance to economic opportunities. Some brave souls have to walk or ride bicycles, fighting off dogs, to go to jobs that start at 5:00 AM, because buses do not start running that early. Some are not able to go to evening classes to learn new skills because they can't make bus connections to get back home safely, after night-school. It may be difficult to understand why a person cannot afford to own a car until you understand their situation. Alternatively, one can try to balance a family budget, assuming an income of minimum wage or even \$15 per hour, and with no benefits - medical, vacation, etc. That is poverty.

It is hoped that the District will work with the City of Fresno to come up reasonable public transportation options, to help some of the economically challenged folks to get to and from work and/or school, to improve their situations or to just get by. Millions of dollars are coming into the Valley on account of AB 617. From that, some entities will get subsidized farm tractors or big rig truck engines, electric or hybrid vehicles, etc. Unfortunately, most residents in the AB 617 communities, at least the ones I know, don't have the money needed to participate in grant-funded incentive programs. And, for the improved air quality due to those incentive programs, and in particular the way the Draft CERP is crafted, all of us will benefit, regardless of where we live. So, what is in it for the AB 617 community residents?

Years from now, we want people to feel that AB 617 came to their community and made their lives healthier and economically better. Out of the millions of dollars coming into the valley, \$1 million spent on improved transportation to make getting around easier, is justifiable.

8. Proposed extra *Tune In Tune Up* event in the AB 617 community: Unless this is by invitation only or motor vehicle registrations will be checked for addresses, the event will be attended by residents from throughout the Central Valley. It will be just like all the others - not really "extra".
9. Post compliance and permitting information online. The AB 617 Committee should work with District, and the public, to identify and/or prioritize records that should readily be available to the general public via the Internet. Records posted by other large and smaller air districts can be used as a starting point.