

Taylor Williams - CERP Feedback

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*Page/Text from the CERP

*Notes of Air District

Resolved

- General
 - Please include a list of definitions and acronyms/initialisms at the top of the CERP
- Page 53
 - The above programs are available to community members, and have helped residents and school administrators take health protective action during poor air quality episodes.
 - Please provide hyperlinks to these resources
- Page 61
 - Committee input on these considerations, and discussions about funding availability and cost-effectiveness of projects, may lead to adjustments to strategy goals and/or funding amounts to achieve overall emission reduction targets of the CERP.
 - Again, a good time to input language about the CAMP and how data gathered in a parallel process of CERP implementation may affect the CERP document. Also please include language about strategies themselves changing and being added/removed, as that was a detail the air district shared several meetings ago (not just goals/budget allotments).
- All strategies under Chapter 4
 - In addition to implementing agency, budget allocation, etc. and the two comments above, can we include identified projects going on in Stockton at the moment? Eg, HACSJ for charging infrastructure or STEP for bike share.. Again, this addition would make this a more effective decision-making document
- Page 88
 - The emission reductions associated with this measure will be calculated at a later time.
 - Doesn't this emissions source fall under an identified category of sources in figures such as 3-5? Why is there no estimate for this reduction?
- Page 91
 - The District will work with the City of Stockton and other appropriate agencies to seek funding to support this study.
 - Wouldn't the funding come from AB617 dollars? The partnership would be one of process not funding, correct?
- Chapter 4
 - Can these strategies be listed in the order in which the CSC prioritized them? There is no reference to the CSC's specific priorities for these strategies
- Page 74
 - Tagalog, not Tagalong - this appears multiple times in this document, please correct throughout
- Page 101-102
 - RB.5: ENHANCED ENFORCEMENT TO REDUCE ILLEGAL BURNING OF RESIDENTIAL WASTE

- Did the CSC not decide that we were only doing education and outreach for this strategy? Otherwise, we are disproportionately targeting low-income communities and unsheltered persons
 - Mariah Looney commented as such during the January 19, 2021 meeting
 - Other CSC members' (including my own) comments are captured below:

02:07:43 R - Jennifer Flores: yes!

02:08:06 CSC Melissa Vargas - Catholic Charities: Great point, Mariah

02:08:36 Irene Calimlim - CSC: I agree with Mariah also

02:10:25 CSC - Jonathan Pruitt - Catholic Charities: I agree with Mariah. It defeats the purpose of Environmental justice if we aren't also aware of communities already burdened

02:10:49 CSC - Taylor Williams: Same. Enhanced enforcement on residential woodburning seems like it would have an undue burden on low income residents.. I agree education and outreach is the better option

02:11:55 CSC - Matt Holmes: Also sounds like an existing successful program that can benefit from the new Ed & Outreach efforts we are already committed to funding.

Unresolved

- General
 - I have not seen any reference to climate pollutants (except in background info about CARB). There should be a substantial passage somewhere in this document that addresses how climate will influence decisions throughout CERP strategies. For instance, please delete reference to “near-zero” anything in this document.
- Page 27
 - Additionally, most of the community is within the “Rise Stockton” Transformative Climate Community boundary, which allows the District and community to leverage resources to maximize benefits under AB 617.
 - This should be the “Stockton Rising” boundary, not Rise Stockton. Rise Stockton is a coalition of EJ partners, while Stockton Rising is the CoS TCC implementation project.
- Page 31
 - Developing community-scale emission inventories for understanding existing baseline emissions and tracking future emission reductions within communities selected for Community Emission Reduction Programs and community air monitoring plans is an important piece of AB 617.
 - This document must reference how the CAMP influences the CERP as we get more data on air quality. Many of these strategies lack specificity in historical data, so adding data in real-time from the CAMP will be instrumental in measuring air quality strategies in the CERP.
- Page 32
 - Figure 3-6, where does this data come from? Can it be made available in a table with real figures (rather than only percent values)?

- Page 49
 - Emissions from stationary sources have been reduced by 85%, cancer risk from exposure to air pollutants has been reduced by 95%, population exposure to elevated PM2.5 levels have been reduced by 85%, and population exposure to elevated ozone levels have been reduced by 90%.
 - Please provide tables/figures for pollutant reductions over time and links to these data sets. As mentioned in a previous comment, we lack high resolution data for air quality in Stockton. What historical data we do have needs to be explicit so readers are operating from the same baseline as the author.
- Page 52
 - AB 617 legislation requires that CARB develop and maintain a state-wide Technology Clearinghouse for BACT and T-BACT. Once available, District staff will review the Technology Clearinghouse as an additional resource when updating the District's BACT Clearinghouse.
 - Please include when this clearinghouse is going to be made available.
- Page 51
 - Can you please link to further information on Risk Management Reviews?
- Page 51
 - Can you please link to further information on Ambient Air Quality Analysis for both federal and state standards?
- Page 55-56
 - Table 3-6 is confusing. Is this money that has already been spent from the Stockton AB617 community pot? If so, that is a whole other issue of expending unauthorized funds. If not, please amend the language for clarity. Also, please indicate on what timeline these investments were made/measured.
- Page 60
 - ... and enhanced enforcement in the community, these local measures provide accelerated emissions reductions in the community.
 - Can you provide here a definition of "enhanced enforcement"?
- Page 84
 - Mobile sources account for more than 85% of the NOx inventory...
 - For the reasons stated in page 49's comment, can you provide references for all stats about pollution sources?
- Page 86
 - This strategy would provide enhanced outreach and access to incentive funding
 - This funding should be used to replace trucks. It is clear from your language around the district's outreach in the past, that you are reaching enough people to replace equipment (given your continual communication with permitted facilities). This money should be used to replace equipment, not pay personnel for outreach. How much will be used for outreach, and how much will be used for actual incentive funding? Please make that clear in the language.
- Chapter 4 - general
 - Does the air district identify the original source of these strategies? The vast majority of them were presented as options to the CSC, and a few were added

on as ideas born of CSC members' input. At the top of chapter 4, can we include why these strategies were included/voted on in the first place?

- Page 71
 - The Stockton community made recommendations to ensure significant efforts are made to conduct outreach and education in support of this measure and to increase compliance rates with District Rules 4901 – Wood Burning Fireplaces and Wood Burning Heaters and Rule 4103 – Open Burning.
 - Please include that the CSC also wanted to DE-emphasize the use of enhanced enforcement
- Page 99
 - The goal of this strategy is to reduce the impact of PM2.5 pollution associated with residential wood burning by replacing approximately XX wood burning devices in Stockton with new natural gas devices or electric heat pumps.
 - For the same reason the CSC wanted to see only zero emission trucks (not near zero), I'd like to see only electric heat pumps provided through this program. Would be willing to bring this up as a general area of concern during the next CSC meeting.
- Page 103
 - In 2017, nearly 4.7 million tons of cargo moved through the Port of Stockton, and that number is expected to continue to grow.
 - This passage should mention what the expected growth looks like. The Port should have plenty of language on their plans for expansion
- Page 106
 - COLLABORATING TO FACILITATE ENHANCED PLATFORMS FOR DISCUSSION AND INFORMATION SHARING BETWEEN THE COMMUNITY AND THE PORT OF STOCKTON AS PORT-RELATED PROGRAMS AND PROJECTS ARE DEVELOPED
 - I don't recall voting on this. I didn't see it in the list of strategies on which the CSC voted or provided comment. Where did this come from?
 - This description also has very little language about impactful community input.. Mostly about raising awareness. If the Port is interested in setting up a meaningful community engagement committee, it should have enough teeth to actually impact projects proposed by the port -- through amendment or preclusion.
- Page 113
 - Compliance inspections are unannounced whenever possible and involve both a physical inspection of the facility and a review of their records.
 - "Whenever possible"? When reviewing records, are those made publicly available? If so, where?
- Page 74
 - Implementing Agency: SJVAPCD, partner agencies such as San Joaquin County Human Services Agency: Home Energy Assistance Program (HEAP)
 - I highly recommend that the air district reach out to both Rising Sun Center for Opportunity and/or GRID Alternatives to help message out this program. Both

serve in the Project Area for AB617 and do installation work akin to weatherization. Happy to make that connection whenever appropriate.

- Page 69
 - The measure would also include an on-going maintenance program with the city.
 - This is an absolutely critical piece. Glad to see it here, but it requires more detail on what maintenance entails. I.e, who covers watering, trimming, siting, etc. and at what frequency? When do maintenance costs get moved back over to the City, when funding runs out from the AB617 pot of dollars
- Page 160
 - CARB staff installed two Aeroqual sensors at the George Washington Elementary School and data was collected from July 30, 2019 to August 28, 2019. These sensors measured PM2.5, ozone and NO 2 concentrations in the community.
 - Please articulate what happened to these sensors
- Page 181
 - To better leverage community involvement, the District and CARB will also assign a dedicated team to work with the Community Steering Committee to follow-up on community concerns, and to conduct community-level compliance assistance, outreach, and education related to compliance and enforcement of local and state rules and regulations.
 - Instead of resourcing an external body, we'd like to direct those dollars to hire a local organization. Some organizations in Stockton have been fighting for environmental justice for decades, so the facilitation of these meetings would be most skillfully and aptly conducted by those groups.
- Page 186
 - METRICS TO TRACK PROGRESS
 - This section absolutely must reference the Community Air Monitoring Plan. The CAMP should inform how we make decisions about the CERP strategies over time, and how we measure the impact of those strategies over time. Given the CERP is subject to change over time, this will allow CSC members to see which strategies they should double down on, reconsider, or continue monitoring.
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New Feedback

- General
 - For all incentive measures, in addition to the amount of money the district is offering in incentives per unit, please include anticipated total unit cost. This will help the CSC understand the cost burden for implementation.
- BUDGET
 - Please include a summary budget for all incentive and non-incentive measures at the top of Chapter 4.
 - I have included a basic summary budget for the funding allocations in this CERP. That document is attached to this email.

- Direct Reductions Estimate (DRE): To what emissions does this column refer?
 - There are substantial inconsistencies between the allocations/DREs shared with the CSC on February 16th and the allocations included in this draft of the CERP. Those differences are notated in RED on the budget included on this email
 - Because of the inconsistencies of DREs and funding allocations, I'd like to see an independent Technical Advisory Group implemented in the CERP. This group would help the CSC understand strategy efficacy, cost/benefit analysis, and implementation options for given strategies
- Including feedback for the appendices below, as I have not seen any update to them. But please correct me if I am missing something..

APPENDICES

- C-2
 - The District relies on the regulated facility owners and operators to submit accurate process rate and/or fuel use data, and identify the approved emission factors as well identify necessary updates to those emission factors.
 - Is there detail in any of these documents about the District's standards for gathering data? Is there common methodology for data collection processes, and does the District audit the equipment and methodology used by regulated facilities?
- D-11
 - Table includes the replacement devices for wood burning stoves, but I don't see any electric options for replacement subsidies. If the CSC agrees, I would like to see AB617 dollars allocated to replacing these devices with truly clean (electric) ones, not natural gas, pellet stoves, etc.
- D-14
 - Currently 959 schools in the Valley utilize the District's air quality notifications to adjust outdoor activities and notify staff, students and parents
 - Please include some detail of your relationship with schools in Stockton, and what the air district and school district do to collaboratively communicate with students and their families. What duties of outreach/communication fall to which district?
- D-29
 - To ensure that the emission reduction projects funded by the District's incentive programs are real and permanent, the District monitors the pre-project and post-project contract performance of grant recipients.
 - This is fantastic, and the details of those incentive programs should be included in this CERP. The efficacy of the programs for which the CSC eventually votes is crucial information.

- Appendix G - general
 - It is helpful to know how the pollutants you are measuring affect human health. But these must be tied back to specific strategies. Wherever possible, the CERP document should refer back to health impacts -- whether in the main text or in appendix G.

Measure Category	Incentives Cost	Direct Reductions Estimate (Tons)	Original
Lightweight Mobile	\$2,625,000.00	7.6	
Heavy Duty Mobile	\$21,930,000.00	768	
Community	\$800,000.00	34	
Port	\$5,000,000.00	202	
Mitigation	\$5,252,500.00	3.4	
Total	\$35,607,500.00	1015	

Measure Category	Incentives Cost	Direct Reductions Estimate (Tons)	Updated CERP
Lightweight Mobile	\$2,625,000.00	3.9	
Heavy Duty Mobile	\$22,480,000.00	777	
Community	\$800,000.00	60	
Port	\$5,000,000.00	273	
Mitigation	\$5,252,500.00	0.8	
Total	\$36,157,500.00	1114.7	

Measure #	Community Suggested Measures	Unit Type	Incentive Cost per Unit	Proposed # of Units	Allocation Amount	Direct Reductions Estimate (Tons)	Notes
TP.1	Targeted Tune-In Tune-Up Events within Community	Events (400 cars per event)	\$60,000.00	5	\$300,000.00	6	3.7 in DRE
TP.2	Drive Clean Vehicle Replacement	Cars	\$8,000.00	100	\$800,000.00	1.6	flexible? 0.2 in DRE
TP.3	EV Charging Stations (to support residents transitioning to EVs)	Chargers	\$25,000.00	15	\$375,000.00	-	Where does the unit count come from? Where will they go?
TP.4	EV Mechanic Training	Trainings	\$15,000.00	10	\$150,000.00	-	The district should talk to Delta College about putting this funding towards their program.
TP.5	Car Share Program	Program	\$1,000,000.00	1	\$1,000,000.00	-	
					\$2,625,000.00		

Measure #	Community Suggested Measures	Unit Type	Incentive Cost per Unit	Proposed # of Units	Allocation Amount	Direct Reductions Estimate (Tons)	Notes
HD.1	Zero & Near-Zero Emission Heavy Duty Trucks (priority zero emission)	Trucks	\$200,000.00	50	\$10,000,000.00	227	Zero emissions only, local to Stockton, short-haul only 209 Tons in DRE
HD.3	Heavy Duty EV Charging Infrastructure	Fueling Stations	\$1,000,000.00	1	\$1,000,000.00	-	Where is this one station being installed? Is it dependent on the truck reroute study?
HD.5	Truck Idling Plug-Ins	Plug Stations	\$10,000.00	33	\$330,000.00	10	Where are these 33 stations being installed? Is it dependent on the truck reroute study? 0 Tons in DRE
HD.10	Locomotive Switchers (operating majority of time in community)	Locomotive Switchers	\$1,700,000.00	4	\$6,800,000.00	521	546 Tons in DRE
HD.11	Truck Reroute Study	Study	\$350,000.00	1	\$350,000.00	-	Why did this total change? Who is conducting the study? How do we guarantee implementation of study findings?
HD.4	Electric School Buses	Buses	\$400,000.00	10	\$4,000,000.00	10	22 Tons in DRE
					\$22,480,000.00		

Measure #	Community Suggested Measures	Unit Type	Incentive Cost per Unit	Proposed # of Units	Allocation Amount	Direct Reductions Estimate (Tons)	Notes
LU.2	Bike Paths and Infrastructure (match funding with planning agencies)	Bike Paths	\$100,000.00	5	\$500,000.00	11 Tons in DRE	What does a unit include? Does it factor in the cost of siting projects? This number seems extraordinarily low given the cost of 13 other bike infrastructures projects
RB.1	Incentives to Replace Wood Burning Devices (with electric or natural gas)	Devices	\$3,000.00	100	\$300,000.00	49 Tons in DRE	This money should absolutely not go to 21 natural gas devices
					\$800,000.00		

Measure #	Community Suggested Measures	Unit Type	Incentive Cost per Unit	Proposed # of Units	Allocation Amount	Direct Reductions Estimate (Tons)	Notes
	Zero and Near-zero Emission						
PO.2	Technology at the Port	Vehicles	\$200,000.00	10	\$2,000,000.00	57	3 Tons in DRE
PO.3	Tug Boat	Boat	\$1,000,000.00	1	\$1,000,000.00	25	30 Tons in DRE
PO.4	Marine Exhaust Intake	Project	\$2,000,000.00	1	\$2,000,000.00	120	240 Tons in DRE
					\$5,000,000.00		

Measure #	Community Suggested Measures	Unit Type	Incentive Cost per Unit	Proposed # of Units	Allocation Amount	Direct Reductions Estimate (Tons)	Notes
							0.5 Tons in DRE
							Are sound walls still considered in this measure? As this is the CSC's number one priority, I would like to see this allocation increased to \$2m. Also where are these
VB.1	Vegetative Barriers	Projects	\$250,000.00	4	\$1,000,000.00		2 projects sited?
UG.1	Trees and Urban Greening Residential Lawn & Garden	Projects	\$500,000.00	2	\$1,000,000.00		Will this project be conducted in tandem with the City's TCC project? How many - trees are included in a "project" unit?
LG.1	Equipment Commercial Lawn & Garden	Equipment	\$400.00	50	\$20,000.00	0.1	0.3 Tons in DRE
LG.2	Equipment	Equipment	\$20,000.00	5	\$100,000.00	1.3	0 Tons in DRE
SC.1	Air Filtration in Schools (all schools in the community)	Schools	\$80,000.00	33	\$2,640,000.00		-
IAQ.1	Air Filtration in Homes and Weatherization	Units	\$500.00	2000	\$1,000,000.00 \$5,760,000.00		If including weatherization/solar/etc should the unit price go up? Who are you partnering with in Stockton to conduct this - work?

From: [Ned Leiba](#)
To:

Cc: [AB 617](#)
Subject: Draft CERP - My recommendation.
Date: Wednesday, March 3, 2021 4:29:44 PM
Attachments: [AB 617 CERP SCHEDULE.pdf](#)

Hello all,

I have attached my schedule of the proposed emission reduction measures and proposed allocations.

My favored measures such as vegetative barriers, trees and urban gardening, air filtration for schools etc., seem to be fully funded. The proposed allocation, however, is weighted to heavy duty mobile sources, rail and port projects. I understand the reasons for the allocations but without cost benefit analyses, we cannot truly make rational decisions.

At this point, it seems we must move forward the proposal to the San Joaquin Valley Air Pollution Control Board (the Board) and the California Air Resources Board (CARB)

I strongly recommend we include the following recommendation in our proposal to the Board and CARB.

The selection of these CERP measures and the tentative incentive allocations should be subject to revision based on further information and analysis. While criteria pollutants have decreased to "historically low levels," we are especially concerned about the increasing incidence of childhood asthma in the Stockton AB 617 area. We urge the Board and CARB to work to implement proper scientific studies that will show the actual effect of the various measures on health generally and specifically on childhood asthma in our Stockton AB 617 community. We urge development of cogent, empirically sound cost benefit studies for each measure. With such studies, the selection of measures and allocation of funds should be revised in concert with participation by the Stockton AB 617 Steering Committee.

Ned Leiba
209 948-9119

VEGETATIVE BARRIERS	2.7%	1,000,000
TREES AND URBAN GREENING	2.7%	1,000,000
RESIDENTIAL LAWNS AND GARDEN EQUIP	0.1%	20,000
COMMERCIAL LAWN AND GARDEN EQUIP	0.3%	100,000
AIR FILTRATION SCHOOLS	7.1%	2,640,000
HOME WEATHERIZATION ETC FILTERS	2.7%	1,000,000
TARGETED TUNE IN	0.8%	300,000
DRIVE CLEAN VEHICLE REPLACEMENT	2.2%	800,000
EV CHARGING STATIONS	1.0%	375,000
EV MECHANICAL TRAINING	0.4%	150,000
CAR SHARE PROGRAM	2.7%	1,000,000
BIKE PATHS	1.3%	500,000
ZERO & NEAR ZERO EMISSION HD TRUCKS	27.0%	10,000,000
HD ELECTRIC VEHICLE CHARGING	2.7%	1,000,000
TRUCK IDLING PLUG INS	0.3%	100,000
ELECTRIC SCHOOL BUSES	10.8%	4,000,000
LOCOMOTIVE SWITCHERS	18.3%	6,800,000
TRUCK REROUTE STUDY	2.7%	1,000,000
INCENTIVES REPLACE WOOD BURNING	0.8%	300,000
ZERO & NEAR ZERO EMISSION TECHN AT PORT	5.4%	2,000,000
TUG BOAT	2.7%	1,000,000
MARINE EXHAUST INTAKE	5.4%	2,000,000
TOTALS	100.0%	37,085,000

Table 6-1 Emission Reduction Targets for Incentives Measures

Measure #	Community Suggested Measures	Unit Type	# of Units	Allocation Amount	Direct Reductions Estimate Lifetime (Tons)
Community					
VB.1	Vegetative Barriers	Projects	2	\$ 1,000,000	0.5
UG.1	Trees and Urban Greening	Projects	2	\$ 1,000,000	-
LG.1	Residential Lawn and Garden Equipment	Equipment	50	\$ 20,042,500	0.3
LG.2	Commercial Lawn and Garden Equipment	Equipment	5	\$ 100,000	-
SC.1	Air Filtration in Schools (all schools in community)	Schools	33	\$ 2,640,000	-
IAQ.1	Home weatherization, Solar, Electrification, Air Filtration in Homes	Units	2000	\$ 1,000,000	-
Older Vehicles					
TP.1	Targeted Tune-In Tune-Up Events within Community	Events (400 cars/event)	5	\$ 300,000	3.7
TP.2	Drive Clean Vehicle Replacement	Cars	100	\$ 800,000	0.2
TP.3	EV Charging Stations	Chargers	15	\$ 375,000	-
TP.4	EV Mechanic Training	Trainings	10	\$ 150,000	-
TP.5	Car Share Program	Program	1	\$ 1,000,000	-
Land Use					
LU.2	Bike Paths and Infrastructure	Bike Paths	5	\$ 500,000	11
Heavy Duty Mobile Sources					
HD.1	Zero & Near-Zero Emission Heavy Duty Trucks	Trucks	50	\$ 10,000,000	209
HD.3	Heavy Duty Electric Vehicle Charging Infrastructure	Fueling Stations	1	\$ 1,000,000	-
HD.5	Truck Idling Plug-Ins	Plug Stations	33	\$ 100,000	-
HD.7	Electric School Buses	Buses	10	\$ 4,000,000	22
HD.10	Locomotive Switchers	Locomotive Switchers	4	\$ 6,800,000	546
HD.11	Truck Reroute Study	Study	2	\$ 1,000,000	-
Residential Wood Burning					
RB.1	Incentives to Replace Wood Burning Devices	Devices	100	\$ 300,000	49
Port					
P.2	Zero and Near-Zero Emission Technology at Port	Vehicles	10	\$ 2,000,000	3
P.3	Tug Boat	Boat	1	\$ 1,000,000	30
P.4	Marine Exhaust Intake	Project	1	\$ 2,000,000	240

From: [deby provost](#)
To: [AB 617](#)
Subject: My Only Comment
Date: Wednesday, March 3, 2021 6:21:20 PM
Importance: High

Due to issues with service, I don't think my email went through.

This is my only concern with the Urban Greening, that we can give to low income individual homeowners the chance to have a tree planted in their own yard. I don't know if our CERP properly covers THAT part, that I have suggested whenever that point comes up for discussion. Please add language that we will be doing that kind of program, which multiple people on this committee supported this one idea! Thank you!

Deby Provost

Sent from [Mail](#) for Windows 10

From: [Mary Elizabeth](#)
To: [Ryan Hayashi](#); [AB 617](#)
Subject: Additional Language
Date: Thursday, March 4, 2021 7:05:57 AM

Please include in the additional paragraph a statement of commitment for ongoing community access to SJVAPCD and CARB Technical Staff.

Please send all members of the committee a copy of those slides that should have been made available before the meeting. I admit that I just read the emission report. I now know that I should direct my questions to Skott Wall at CARB but I wonder why those folks that collaborated on the emission report technical group including SJVAPCD, CARB, and USEPA Region 9 staff did not brief the AB617 Steering Committee. This leads to the impression of lack of transparency. I appreciate the collaborative process. We all have much to learn.

Thank goodness that folks want to help us develop capacity to lead efforts in Stockton to improve health and community outcomes, through environmental efforts to decrease emissions of pollutants leading to a sustainable future.

Lifelong learner.

Peace,

Community outreach and learning are critical to the success of all AB617 communities. CARB and the San Joaquin APCD have worked hard to provide the best information available. Unfortunately based on the aggressive timetable of CARB often, understanding is strained resulting in a lack of trust. I appreciate how difficult developing understanding is and applaud San Joaquin APCD for their efforts.

Many existing programs that CARB has developed parallel what the AB617 communities want. What we learn from our community air monitoring will complement the initiatives that CARB already has on the table. As our Stockton AB617 community begins to determine where incentives should go it will be important that our monies are used to support Stockton AB617 initiatives and not be used to supplant existing CARB programs.

I recently witnessed three communities stating they have the worst asthma rates in California. South Central Fresno, Stockton and most recently Senator Lena Gonzales indicated her district has the highest rates of asthma. Asthma is too serious a problem to allow for that level of rhetoric. It is critical that our understanding of the causes of asthma be clearly defined as we continue to develop new strategies for a quantifiable target to reduce those specific asthma rates.

My highest priority regarding the Stockton CERP is **vocational education**. The ability to train and develop mechanics who can repair electric equipment, warehouse forklifts to class 8 truck tractors have the highest potential. Good paying jobs will provide the Stockton Community a path to better and healthier life.

I believe we should focus on the highest returns regarding emissions reductions from **ocean going vessels, rail engine switchers and HD truck programs at the ports**. Unfortunately, all three of these incentives require huge infrastructure changes and will take many years to adopt. But any incentives to improve any of these areas will produce the highest amounts of reductions.

Transportation rerouting is important to reduce the community's exposure to truck emissions. **Truck Idling enforcement** is valuable with the summertime being the challenge for the trucking industry.

Urban greening and vegetative barriers have huge potential to assist in the reduction of emission in the transportation corridor. I am supportive of any growth or incentive to increase this area. The real benefits of greening are years away but essential.

Air filtration at area school. While AB617 is about emissions reduction, I am in favor of improving school filtration. Our learning centers should be a safe place for our children.

Fugitive dust, mold and pollen need more information. We need to understand their influence on health in the Stockton area.

Illegal burning and commercial cooking are good targets to reduce particulate emissions.

CARB initiatives regarding **HD Trucks and Transportation Refrigeration Units** will take years to achieve acceptance because the transportation supply chain across the United States will also have to embrace the same changes as California.

Enforcement is important. One of the victims of the time sensitive pace of development is a better understanding of existing compliance by business. Most community members would be astonished to

learn what business does to reduce emissions. I would like to see a greater understanding of business's role in community air quality. Allowing the largest businesses to present what their challenges are.

The value of **ZEV electrification**, while discussed at all meetings, is not a near reality. Electrical infrastructure is woefully insufficient and the process to upgrade the electrical grid is as of this date is several years away. This leaves the Stockton AB617 area with a hope and a wish and not real achievable reductions.

Electrification has many issues yet to be addressed. California already has the 4th highest cost for a KW hour. According to Next10 / Berkley "Designing Electricity Rates for An Equitable Energy Transition" and the PUC's report "Utility Costs and Affordability of the Grid of the Future" which are an evaluation of electric costs, rates, and equity issues. Both reports indicate extreme rate increases which will affect the poorest AB617 communities. Potentially overwhelming community resident's ability to work and live in Stockton.

The use of **Biomass Diesel fuel** which is almost carbonless holds high potential for immediate emission reductions as we develop new technologies. CARB's own study of the benefits of biodiesel have shown that California met the projected 2017 GHG emission goals four years ahead of schedule mostly due to the increased use of Biomass diesel fuel. The consideration of the use of biomass non fossil fuels has not been considered in this CERP. Biomass diesel fuel has the ability as a transition fuel to continue to lower emissions especially around the transportation corridors. Combining biodiesel and renewable diesel produces a cost-effective full replacement option for petroleum diesel. As a paired fuel, biodiesel and renewable diesel optimize petroleum displacement and cost, as well as particulate matter, carbon and nitrogen oxide reductions. In California, a blend of 80% renewable diesel with 20% biodiesel can reduce carbon emissions by 79%, reduce particulate matter by 29%, reduce aromatic compounds by 39%, reduce carbon monoxide by 23% and reduce NOx by 9%. Biomass diesel has displaced 4 billion gallons of fossil fuel in California since 2011. Biomass diesel accounts for 45% of LCSF carbon reduction, equaling 6.7 Tons of GHG reductions and a total of 14.6 Tons of carbon reduction or the equivalent of removing 1 million vehicles from our roads.

Certainly, incentives to accomplish the proposed new technologies are necessary to speed up change. Non-Fossil fuel will be the bridge that takes us to electrification. Electrification that is necessary for a clean air future.

A handwritten signature in green ink that reads "Ed Ward".

Stockton AB617 Steering Committee member

References

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