

California Department of Transportation

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May 20, 2024

FRE-VAR-VAR
South-Central Fresno AB 617 Community
Truck Reroute Study-Truck Routing
and Implementation Strategies Report

SENT VIA EMAIL

Ms. Jill Gormley, TE
Assistant Director, Traffic Engineering Division
City of Fresno
2600 Fresno Street
Fresno, CA 9372

Dear AB617 Truck Reroute Study Committee:

Caltrans has completed a review of the South-Central Fresno AB 617 Community Truck Reroute Study-Truck Routing and Implementation Strategies Report dated April 2024 and prepared for the City of Fresno. To assist the South-Central Fresno community, the City of Fresno and the San Joaquin Valley Air Pollution Control District (SJVAPCD) are working to create creative and workable mobility solutions and initiatives. We provide the following comments:

Caltrans District 6 Comments:

Section 5:

- In addition to the proposed closure of Belmont Ave Interchange (IC) at State Route 99, McKinley Ave IC will also be closed.
- It appears the preparers of the report have done good work both appropriately scoping the study and synthesizing the data, but the maps are difficult to read at the scale presented in the report. Insert maps may be helpful. In addition, a map combining or cross-referencing the information in Figures 3 and 4 could be very informative. There is also a concern about some of the proposed re-routes being co-located with a higher number of proposed crosswalks, however, this may not be a valid concern since we cannot read the map at that level of detail and are left to trust the narrative.
- Also, should the total number of proposed improvements on Page 9 be 237, not 236?

Ms. Jill Gormley, TE

May 20, 2024

Page 2

Section 7.1:

- Any proposal to restrict truck access through the freeway ramps must follow the truck route restriction process and be approved by the California Department of Transportation.

Page 41 of the PDF:

- Active Transportation Program (ATP), Cycle 5: please include the agency the ATP Cycle 5 program is referring to. If it is California Transportation Committee, then it is cycle 7 and the deadline is June 2024.
 - o <https://dot.ca.gov/programs/local-assistance/fed-and-state-programs/active-transportation-program>

General comment – Any truck reroute strategy that will potentially impact the freeway ramp intersection operation will require further evaluation.

Caltrans commends the project for evaluating strategies to help to create complete street(s) where all modes can travel safely along the transportation network.

If you have any other questions, please me at (559) 905-9371 or dave.padilla@dot.ca.gov.

Sincerely,



Mr. David Padilla, Branch Chief,
Transportation Planning – North



CENTRAL CALIFORNIA
ENVIRONMENTAL JUSTICE NETWORK

Central California Environmental Justice Network (CCEJN)
1907 N. Gateway Blvd
Fresno, CA 93727

Ryan Hayashi
San Joaquin Valley Air Pollution Control District
1990 E Gettysburg Ave,
Fresno, CA 93726

Sent Via Email

Re: Concerns and recommendations regarding AB617 South Central Fresno Truck Reroute Study

Central California Environmental Justice Network (CCEJN) alongside the undersigned community-based organizations and residents of South-Central Fresno neighborhoods submit the foregoing comments to Katherine Padilla & Associates, the Arcadis Firm, the San Joaquin Valley Air Pollution Control District (SJVAPCD), the Truck Reroute Study Community Advisory Group (CAG) and Technical Steering Committee, the City of Fresno, and Fresno County. We are pleased to have received and reviewed the final version of the Fresno Health Impact Assessment (HIA) and an updated Truck Route Map in the Truck Rerouting and Implementation Strategies Report (TRISR) draft. Nonetheless, we would like to raise a series of concerns and recommendations to both reports to ensure the final recommendations effectively protect the livelihood and health of South Fresno residents and reduce their proximity to pollution sources.

The undersigned organizations and individuals, many of whom reside in some of the most environmentally burdened neighborhoods of Fresno and the state, work in partnership to eradicate decades of environmental racism and to advocate for policies and practices that create a healthy, breathable South Fresno for low-income, community members of color. Residents in South Fresno experience high rates of respiratory and cardiovascular health issues, elevated pollution burden levels, poor air quality, and increasing heavy duty truck traffic through the overconcentration of industrial facilities and development within the region. These impacts are magnified by inequities in access to opportunity and lack of investments in critical infrastructure, services, and amenities compared to neighborhoods located in the less polluted, wealthy neighborhoods of North Fresno. The recommendations provided by both the Truck Rerouting

and Implementation Strategies Report (TRISR) draft and the Fresno Health Impact Assessment (FHIA) hold the power to significantly reroute truck traffic away from neighborhoods and sensitive receptors and to reduce pollution exposure to communities that have experienced long-term disinvestment and unjust environmental practices.

1. Both reports must develop policy recommendations that address the land use planning patterns that concentrate heavy duty truck traffic within the South Central Fresno AB617 community boundary.

Though the focus of both reports is to reduce exposure to heavy duty truck traffic, they fail to identify the main sources that generate this type of traffic: industrial facilities located within South Central Fresno. The primary goal of the Truck Reroute Study (TRS) is to determine whether heavy-duty trucks traveling within the community can be rerouted to reduce emissions exposure of South-Central Fresno community residents; meanwhile, the Fresno Health Impact Assessment (HIA) measures the impacts of air pollution and proximity to truck traffic on the risk of common health outcomes such as infant mortality, preterm delivery, asthma, and cardio cerebral vascular events. The Fresno HIA does an exceptional job in quantifying and comparing the impacts of these outcomes for individuals who live within and outside the AB617 community boundary. Meanwhile, the Truck Rerouting and Implementation Strategies Report (TRISR) provides a number of recommendations such as new crosswalks, truck focused signage, and traffic signalization improvement to increase the safety of residents who live near truck routes. However, the recommendations set forth by both reports fall short in spite of the larger picture of industrial facilities located in proximity to South Central neighborhoods that facilitate truck trips.

Both reports do not explore how existing and planned land uses have disproportionately concentrated heavy duty truck traffic in South Central Fresno. The placement of facilities that generate heavy duty truck traffic is rooted in historically discriminatory land use planning and development that concentrated industrial uses within communities of color. During the early and mid 1900s, the City participated in the racist practice of redlining, the classification of neighborhoods as most and least desirable based on its racial and ethnic makeup. In Fresno, the Home Owners' Loan Corporation used a map to shade in red certain neighborhoods of the City. Neighborhoods such as Southwest Fresno with large minority populations were shaded red, denied mortgages, and labeled undesirable.¹ As a result, west Fresno had difficulties attracting quality development, and instead, became a magnet for siting heavy industrial facilities and low-cost housing.² This practice is still evident today. As of 2020, the majority of the South

¹ [Fresno's Mason-Dixon Line. The Atlantic.](#)

² [Southwest Specific Plan. p.I-6.](#)

Central Fresno area comprises a majority of communities of color with a demographic breakdown of 70.7% Hispanic, 8.9% Asian, and 8.17% Black or African American residents.³ Adopted in 2018, the City of Fresno General Plan Land Use and Circulation Map places the burden of light and heavy industrial zoning within the southern part of the City, as evidenced by the light gray and dark gray areas in *Figure 1*. These zoning sites are more likely to have heavy duty truck fleets and also are situated directly within the South Central Fresno AB617 community boundary. Thus, the City's land use decisions and patterns contribute to disproportionate amounts of heavy duty truck traffic and increased air pollutant exposure within disadvantaged neighborhoods.

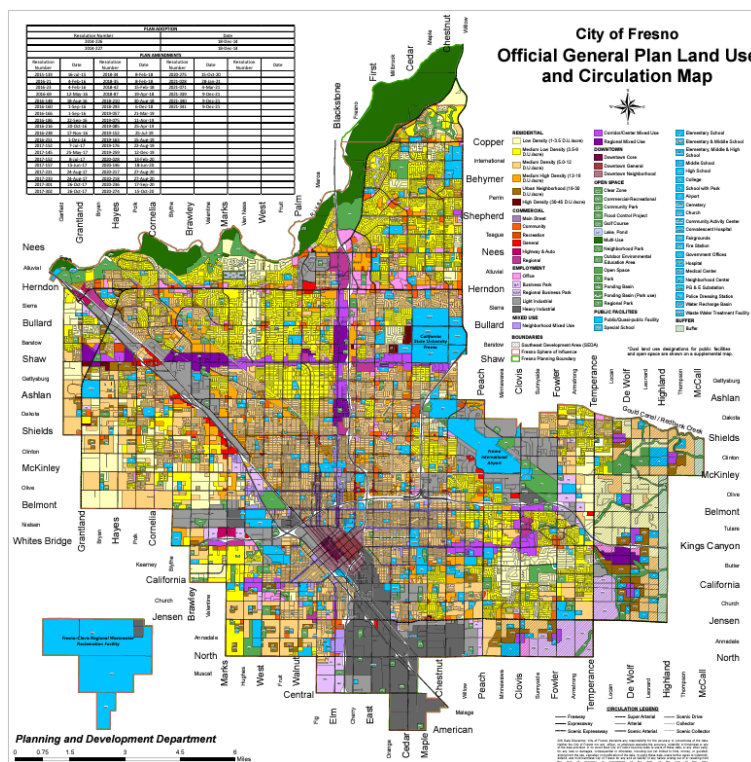


Figure 1. City of Fresno General Plan Land Use Map⁴

The effects of land use zoning have resulted in significant health disparities between South Fresno and North Fresno that need to be addressed. The Fresno HIA shares several findings that highlight the unequal pollution burden that South Central Fresno residents face. For example, it found that within the boundary, the number of asthma ED visits was 870.06 per 10,000 people and the number of asthma hospitalizations was 156.41 per 10,000 people; meanwhile, outside of the boundary, the numbers were 521.01 and 78.44.⁵ These rates

³ [South-Central Fresno Truck Reroute Study Existing Conditions Report, p.15.](#)

⁴ [City of Fresno General Land Use Map](#)

⁵ [Fresno Health Impact Assessment, p. 39](#)

demonstrate the greater health risks of living within the AB617 boundary. Furthermore, the study further explores the role of PM2.5 in adverse health outcomes within this community. PM2.5, or particulate matter 2.5, refers to a type of air pollution that consists of microscopic solid or liquid particles that are 2.5 micrometers or less in diameter.⁶ These particles are emitted from sources such as cars, trucks, wood burning, and windblown dust from agriculture and construction.⁷ The concentration of industrial zoning in South Central Fresno makes it a prime hotspot for PM2.5. The Fresno HIA explored the correlation between PM2.5 and asthma related issues. During the cold season, a 5 unit increase in PM2.5 exposure was associated with approximately a 2% increased risk of having an asthma ED visit 2-6 days later; during the warm season, the same unit increase was associated with a 3-4% increase of an ED visit within one day of exposure.⁸ Thus, if PM2.5 exposures were to be reduced, the number of asthma ED visits and hospitalizations would be reduced as well. This emphasizes the need to address how light and heavy industrial zoning overexposes surrounding communities to air pollutants.

In order to reduce the impacts of discriminatory land use practices that concentrated heavy duty truck traffic within the South Central Fresno boundary, we stress the importance of including a set of policy recommendations that prioritize equitable land use planning. To reduce PM2.5 and its health impacts, industrial facilities must be sited far away from disadvantaged communities. Though the Fresno HIA recommends the placement of a 1000 ft buffer between neighborhoods and truck routes, the proximity of residents to industry will significantly minimize the effectiveness of a buffer.⁹ Thus the recommendation of a 1000 ft buffer should not only apply to truck reroutes but also to how the City is zoning the land.

2. The Proposed Truck Routes and Truck Regulated Areas map must route trucks away from all disadvantaged communities to reduce their pollution burden.

Though the proposed map eliminates four existing truck routes, it adds five more routes within the same AB617 South Central Fresno community boundary and therefore continues to concentrate heavy duty truck traffic in overburdened communities. For example, the map eliminates truck routes on Church Ave, Central Ave, and Jensen Ave; however, it leaves Belmont Ave as a truck route and adds another route near Marks Ave; it extends the North Ave truck route all the way to the intersection on Peach Ave near Malaga; and lastly, it adds another route on Cedar Ave running through Belmont and Ventura Ave. It also adds 2 new reroutes. The goal of the TRS should not be to pass heavy duty traffic to other disadvantaged communities within the

⁶ [California Air Resource Board, Inhalable Particulate Matter and Health \(PM10 and PM2.5\).](#)

⁷ [California Air Resources Board, Sources of Air Pollution.](#)

⁸ [Fresno Health Impact Assessment, p.39.](#)

⁹ [Fresno Health Impact Assessment, p.46.](#)

AB617 community. However, the new placements of these routes will do just that. An equitable approach would be to not just reroute trucks away to other disadvantaged neighborhoods but to move routes entirely away from people.

Communities residing near Belmont Ave, Calwa, and Malaga are impacted across a number of health indicators which emphasizes the importance of routing truck traffic far away from residents. The decision to keep and expand the existing truck route on Belmont will continue to expose surrounding communities to air pollutants from trucks. Belmont Ave is a primarily pedestrian street that is situated between residential neighborhoods, stores, and Fresno Chaffee Zoo. The surrounding neighborhoods on Belmont Ave contain some of the highest census tracts with pollution burden in CalEnviroScreen 4.0. For example, census tract 6019002400 has a CalEnviroScreen score of 99% and a PM2.5 score of 97%. Census tract 6019002300, which is located to the left of the previously mentioned tract, has a 94% CalEnviroScreen score and a PM2.5 score of 97%. Due to the high rates of pollution burden within these surrounding communities, no truck routes should be placed on Belmont Ave at all. This also applies to other newly added routes. The route added in between North and Peach Ave is located near Malaga, census tract 6019001500, which has a 99% CalEnviroScreen score. It also has a PM2.5 score of 96%. Lastly, the newly added route through Cedar (near Calwa Ave and Belmont Ave) is located near Southeast Fresno, a disadvantaged community. It runs through multiple census tracts – two of which have CalEnviroScreens scores of 95% and 99% (Census Tracts 6019002602 and 6019001301).

By keeping existing routes and adding new routes within the boundary, the Truck Reroute Study further comprises the health of pregnant people within South Central Fresno communities. Specifically, the Fresno HIA found that pregnant people who lived within 1000 feet of a freeway, 1000 feet of truck route, or 300 feet of a major road had significantly higher risk of adverse pregnancy outcomes, including preterm birth and infant mortality, due to their proximity to air pollutants. Furthermore, compared to the rest of the City, preterm birth and infant mortality were higher among residents in the South Central Fresno boundary.¹⁰ Rates of PTB were 9.7% inside the AB617 community boundaries and 8.5 for the rest of the city, rates of IM were 8.9 per 1,000 inside and 6.0 per 1000 outside of the boundaries. In order to truly prioritize the health of community members and the future generation, truck routes must be routed entirely out of disadvantaged neighborhoods.

3. The City must adopt a stringent enforcement plan for Truck Regulated Areas (TRAs).

¹⁰ [Fresno Health Impact Assessment, pg. 8.](#)

As part of its toolkit, the Truck Reroute Study recommends the adoption of Truck Regulated Areas (TRAs). Their purpose is to create a boundary around sensitive receptors that can be used to limit truck bypass, either by time of day, or at all times.¹¹ In the development of the TRAs, a 1000 ft buffer was placed around designated truck routes to guide where the TRAs would be most beneficial to residential areas. Though TRAs intend to remove existing routes established under the 2005 Fresno Truck Route Map, it still allows the passage of trucks if their origin or destination resides within the boundary. This highlights the contradictory nature of the TRA. It is meant to reduce the risk of adverse health outcomes mentioned throughout the Fresno HIA but still allows for trucks to disregard the 1000 ft recommended buffer if it needs to enter the area. Thus, the 1000 ft buffers work for the new facilities that will be sited but not for existing facilities that are currently operating in close proximity to sensitive receptors. This will continue to increase the community's exposure to PM_{2.5} and ozone. This serves as an example as to why the Study needed to consider how land use planning and development has inextricably intertwined neighborhoods and industries together. Routes will be eliminated but zoning allows trucks to continue to enter and exit local streets due to the existing land uses.

In order for TRAs to be effective in protecting the health and livelihood of residents living within South Central Fresno, it must incorporate the following items. Firstly, the City must adopt the Study's recommendation to adopt an amended truck route ordinance that updates Section 14-1303 of the City of Fresno Municipal Code, the code that establishes the official list of truck routes.¹² The proposed amended truck ordinance would further regulate truck routes by establishing the truck regulated areas proposed by this study. This would be in alignment with the California Vehicle Code 35701, 35702, 35703, 35712 and 35714, which provides the legal basis for restricting truck access and providing alternative routes.¹³ Secondly, clear guidelines need to be drafted, distributed, and enforced regarding the consequences of a non-permitted truck driving through a TRA. The City must mandate a specific department to lead in patrolling and issuing violations to businesses and truck drivers. Thirdly, the City must develop a reporting system that allows all residents to report unpermitted trucks. The City must provide a mechanism, either through phone, email, or an online system, where residents can report this information. The City must also follow up with the resident regarding what actions were taken to address the report. Lastly, the City must work with the AB617 Community Steering Committee to regularly report on the status of Truck Regulated Areas (TRAs) and what enforcement actions have been taken.

¹¹ [Truck Routing and Implementation Strategies Report, pg. 7.](#)

¹² [Truck Routing and Implementation Strategies Report, pg. 28.](#)

¹³ [Truck Routing and Implementation Strategies Report, pg. 33-34.](#)

4. The Study must include meaningful outreach and engagement in South Central Fresno, Calwa, and Malaga.

The last three workshops of the Truck Reroute Study were held online, in Southwest Fresno, and near Downtown Fresno, but failed to engage the whole AB617 community. As a result, many who have been pushing for a Truck Reroute Study will not have a formal presentation given by a consultant within their community. The South Central Fresno community is approximately 29 square miles, which spans across Southwest Fresno, Southeast Fresno, and Downtown Fresno, and has a population of approximately 97,000 people.¹⁴ The outreach consultants did not hold workshops for communities living near Central Ave and Orange Center Elementary nor in Calwa and Malaga. All of these communities are heavily impacted by heavy duty truck traffic and truck bypass. Due to the distance between all communities and lack of transit options, workshops must be held in all the different communities that comprise the AB617 community boundaries.

5. This Study must make policy recommendations to improve the South Central Specific Plan for communities, not just industrial land stakeholders.

The Study must focus on the protection of people more than its priority to the Technical Advisory Committee's goals of continuing industrial growth in South Fresno. The City of Fresno is in the process of drafting its South Central Specific Plan (SCSP), a plan that will affect the zoning of the land in South Central Fresno. During the development of this plan, industrial land stakeholders have pushed for the increased industrial zoning of South Central Fresno; meanwhile the community has fought for neighborhood zoning that decreases their exposure to industrial resources. The Study must consider the development of the SCSCP and how it will impact residents living within this area.

During community workshops and during the City Council meeting of May 23, 2024, staff stated that the proposed TRAs routes include Cherry Ave where Orange Center Elementary School is located. On the interactive version of the Final Implementation Strategies Map, the rerouting of trucks off of this portion of Cherry Ave is not included and even if were included, it would only be a temporary solution. The land all along Cherry Ave between North Ave and Central Ave has been annexed into the City from the County as Heavy Industrial and many parcels are currently still non developed agricultural lands. So while trucks are stated to not use this as a bypass to and from North Ave and should only traverse this area, if the endpoint is a business on that street portion, there will eventually be Heavy Industrial businesses allowed to be cited there because no

¹⁴ [California Air Resource Board, South Central Fresno.](#)

recommendations were made to decrease the intensive zoning uses in the SCSCP. There is still time to make these recommendations before the final South Central Specific Plan is adopted.

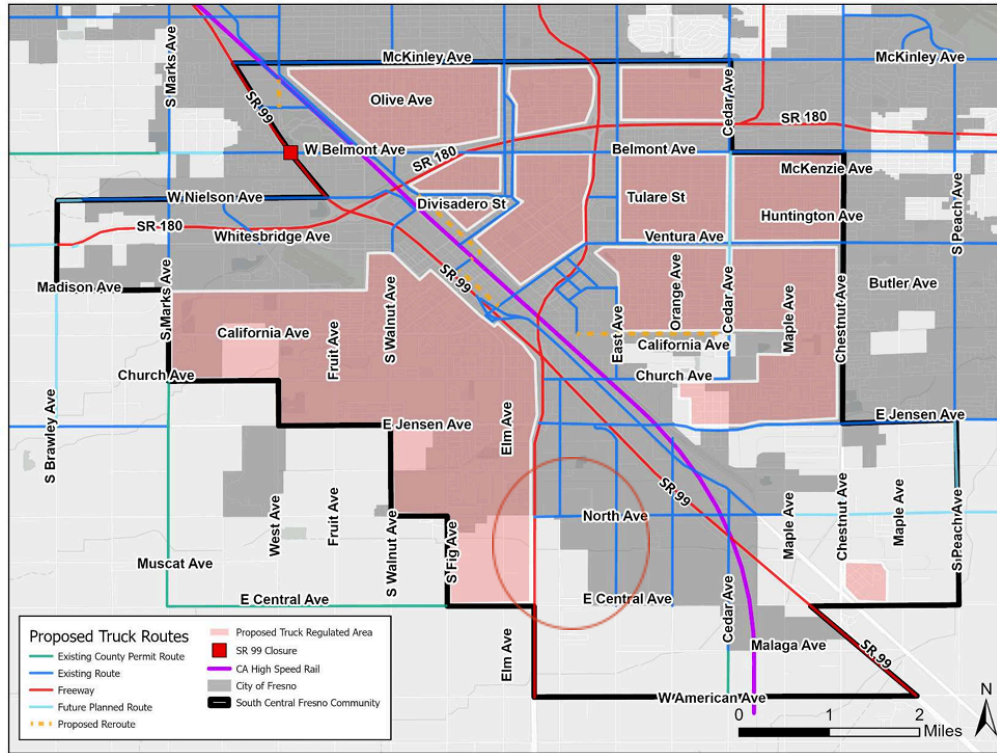


Figure 2. Proposed Truck Routes and Truck Regulated Areas. As indicated by the red circle above, the intersection of Cherry and Central Ave, where Orange Center Elementary School is located, does not fall within a TRA.

The strategies recommended within the Truck Reroute Study must meaningfully reflect the Fresno HIA and must take into consideration the impacts of historic, discriminatory land use planning and practices. The Fresno HIA confirms what community members in South Fresno have shared for decades regarding the impacts of industrial zoning, truck traffic, and pollution on their health and living environment. It lays out the data for local and state governments to review and take the necessary actions to protect the health of disadvantaged communities. In a community-based health survey with responses of 1,766 South Central Fresno residents, the Fresno HIA asked, “Considering your household and community needs, how important will it be for the government to address the following environmental issues within the next few years?”¹⁵ Most respondents believed that addressing these issues is somewhat or very important. 84% of residents reported that they would like their government to address the issue of air quality in the next few years.¹⁶ These results emphasize how residents are relying on their government to take the appropriate actions to protect their health and improve their neighborhoods. The Truck Reroute Study serves as an opportunity to prioritize community’s voices and to take a step in reversing the discriminatory land use practices that have plagued the community and instead, build a healthier, livable South Central Fresno.

We look forward to continuing our collaboration on AB 617 efforts to foster transparency and accountability in the timely implementation of the Truck Reroute Study. If you would like to discuss this letter further, please contact Natalie Delgado at natalie.delgado@ccjen.org.

Sincerely,

Natalie Delgado
Policy Advocate
Central California Environmental Justice Network

Ivanka Saunders
Regional Policy Manager
Leadership Counsel for Justice and Accountability

Edith Rico
Project Director

¹⁵ [Fresno Health Impact Assessment, p.66.](#)

¹⁶ [Fresno Health Impact Assessment, p.66.](#)

Building Healthy Communities

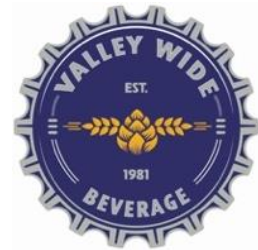
Dr. Catherine Garoupa
Executive Director
Central Valley Air Quality Coalition

Lilia Becerril
Familias en acción

CC: Ryan Hayashi, Deputy APCO, San Joaquin Valley Air Pollution Control District
Katherina Padilla, Principal, Katherine Padilla & Associates
Cristina Martinez, Transportation Planner, Arcadis Group
Samir Sheikh, Executive Director, San Joaquin Valley Air Pollution Control District
Deldi Reyes, Director of the Office of Community Air Protection, California Air Resources Board
Sandy Ha, Assistant Professor of Public Health
Miguel Arias, Councilmember District 3, City of Fresno
Jill Gormley, Assistant Director, Traffic Engineering Division



Strengthening the Voice of Business



June 10, 2024

Jill Gormley, TE
Assistant Director, Traffic Engineering Division
Public Works Department
City of Fresno
2600 Fresno Street
Fresno, CA 93721
AB617TruckRerouteStudy@fresno.gov

Submitted Electronically

RE: South Central Fresno AB617 Community Truck Reroute Study and Related Health Assessment

Dear Assistant Director Gormley,

INVEST Fresno and the undersigned are writing today to express our strong concern with the Truck Routing and Implementation Strategies Report (Report), as currently proposed.

We are aligned in our position with the letter and recommendations submitted by John Kinsey, with Wanger Jones Helsley PC, on May 22, 2024.

South Central Fresno is the city's economic engine, generating approximately \$13 billion in economic activity, more than \$100 million in tax revenue, which supports essential city services like public safety, parks, and infrastructure improvements, and 25% of the City's full-time employment.

As proposed, the Report puts family-sustaining jobs and critical tax revenue at risk. The City of Fresno is currently facing a roughly \$47 million budget deficit, it is crucial to avoid policies that hinder businesses in the area's ability to efficiently access their facilities, add potentially costly monitoring programs, and open the door to more onerous restrictions.

Specifically, the Report recommends the removal of Central Avenue, among others, as a designated truck route. Central Avenue is the primary route for two of the City's largest sales tax revenue generators and job providers. According to the City's budget, just two of the distribution centers located along Central Avenue, generate roughly \$30 million in sales tax revenue annually and nearly 8,000 jobs, all of which bolsters the City's General Fund.

Additionally, the removal of Central Avenue forces traffic to North Avenue, when in many cases, Central Avenue is the most direct and efficient route – increasing emissions and vehicle miles traveled (VMTs). Particularly as there is pending litigation to halt much-needed infrastructure improvements to revitalize and expand the North Avenue interchange (Caltrans South Fresno State Route 99 Corridor Project), which will reduce traffic congestion and facilitate a smoother and more efficient flow of traffic along a main arterial of Highway 99.

Moreover, the City is currently in the process of updating the South Central Specific Plan, intended to inform future land use planning and policy within South Central Fresno. While the Environmental Impact Report is still under development, the currently proposed "Blended Plan" proposes primarily employment uses south of Central Avenue, which will be left without a direct truck route.

Furthermore, there is a lack of clarity regarding the "Truck Regulated Areas." We understand and respect the City's attempt to reduce pass-through traffic, especially near sensitive receptors. However, we are concerned that the lack of a truck route adjacent to or near businesses in the area will be utilized to restrict potential future new or existing expansion project approvals and discourage new operators from entering the city.

The reality of living in the Central Valley is that due to Valley's topography, the air we breathe is dirtier than elsewhere in the state and nation (except for the LA basin). But over the past 40 years, we have seen historic reductions in air pollution – leading to a 95% reduction in cancer risk for Valley residents from exposure to air pollutants according to the San Joaquin Valley Air Pollution Control District.

There are two factors driving the Central Valley's improving air quality. First, a growing, more prosperous economy that innovates and can afford to transition to newer, cleaner technologies. Second, sensible rules and regulations. Since 1992, San Joaquin Valley Air Pollution Control District has implemented nearly 650 rules

and regulations that along with California's nation-leading regulations on cars and trucks are helping to steadily improve the air quality in the Valley.

However, these two factors: a growing economy and sensible air quality regulations have to work in tandem. For instance, the transition to zero-emission heavy-duty trucks cannot be achieved if policies that stunt Fresno's economic growth, which is necessary to afford this new technology, are enacted.

We appreciate your time and consideration and respectfully urge staff to revise the proposed Report to instead provide recommendations that support existing businesses and create an environment that encourages a diverse, sustainable economy, fostering economic development and growth.

If you would like to discuss this matter further, please do not hesitate to contact Ben Granholm at info@INVESTFresnoCA.com. We look forward to working with you and staff to help keep Fresno's economy moving.

Sincerely,

Ben Granholm
INVEST Fresno

Buzz Oates
Cedar Avenue Recycling & Transfer Station
Central Valley Business Federation
Cossette Investment
Diversified Development Group
Don Pickett & Associates
Fresno Chamber of Commerce
GraybaR®
Newmark Pearson Commercial
Pickett Solar
Precision Civil Engineering
Strategic Freight Network, LLC
Sunnyland Mills
Valleywide Beverage

cc: Jerry Dyer, Mayor
City Council
Georgeanne White, City Manager

VIA EMAIL

Andreina Aguilar
Public Works Department
CITY OF FRESNO
2600 Fresno Street, Room 4019
Fresno, CA 93721-3623

Re: AB617 Truck Reroute Study

Dear Ms. Aguilar:

Penny Newman Grain (“PNG”) is a leading merchant in the market for grain and feed both the United States and worldwide. Founded in 1878 as a mercantile store in Fresno, PNG is a proud long-time member of the local community and the second-oldest business in the County of Fresno. PNG has operated continuously for several decades at the property bounded by E. Jensen Avenue to the north, W. Cedar Avenue to the west, and E. Annandale Ave. To the south, Fresno County APN 487-150-41S (the “PNG Property”).

PNG has reviewed the Draft South Central Fresno AB 617 Community Truck Reroute Study (the “Study”). As a long-time business within the borders of the South Central Fresno Community that employs local residents, PNG believes it is important to enhance the interface between industrial landowners and sensitive land uses, while at the same time fostering an environment that allows local businesses and job creators to thrive. PNG does not believe these objectives are mutually exclusive and supports any effort that will further these twin objectives.

The City Should Not Mandate the Deployment of Zero Emissions Vehicles (ZEVs)

Conversely, the City should not take any action that would subvert or undermine these twin objectives. Unfortunately, the proposed ZEV requirement in the Study does just that. A ZEV requirement would be infeasible; duplicative of efforts already underway at the California Air Resources Board (CARB); and, if implemented, frustrate the very outcomes the Study seeks to achieve.

First, ZEVs remain widely unavailable in California, and those that are available are far more expensive than those with conventional engines and require expensive onsite infrastructure upgrades. There is likewise a lack of available infrastructure on local roadway networks for the transition to electric trucks, and it is unclear whether and when any such infrastructure will be available. This is of particular concern given that the LA Times has reported that the price tag for the infrastructure upgrades needed to accommodate zero emissions trucks will be \$1 trillion.¹

Second, CARB’s Advanced Clean Truck and Advanced Clean Fleets regulations already mandate the deployment of ZEVs at an accelerated rate. In other words, it is unclear how any such requirement would differ from the rules already on the books. More disconcerting, however, is the prospect that the

¹ <https://www.latimes.com/environment/story/2024-03-19/how-much-will-shift-to-zero-emissions-trucks-cost>

Penny Newman Grain Co.

requirements will be more onerous than those already adopted by CARB, particularly given the substantial questions about how stakeholders will be able to comply with even those regulations.

Further, although ZEV engines are “zero emissions,” this does not necessarily mean they are better for local communities than existing combustion engines. Truck engines in California are already among the cleanest in the world, so any further decrease in emissions would be minimal. ZEVs, however, are approximately twice as heavy as ICEVs,² and thus result in greater wear and tear on local roadways. ZEVs also have a much lower hauling capacity, and reduce mileage range than ICEVs, resulting in more vehicles on the road and greater vehicle miles traveled.

The Study Should Include More East-West Corridors

PNG is also concerned about the lack of east-west corridors, which could result in longer truck trips and have other unintended consequences. While most of PNG’s traffic exits onto S.R. 99, PNG is concerned that there is no way for a truck to travel to and from its facility directly from the west, since E. Jensen Avenue has been removed as a truck corridor. For example, to travel from PNG’s facility to a location at or around E. Jensen and Brawley, the vehicle would need to travel 9.5 miles one-way (via S.R. 99 and S.R. 180) instead of 6.1 miles directly on E. Jensen Avenue. This makes very little sense from an operational, economic, or environmental perspective, and will ultimately result in trucks being on local roadways for longer periods of time. As a result, the Study should be revised to include a larger number of east-west corridors south of S.R. 180.

Conclusion

Thank you for your consideration of these comments.

Sincerely,



David Meeker

Date: 6/7/24

² American Transportation Research Institute (ATRI). 2022. Understanding CO2 Impacts of Zero Emission Trucks. May, available at: <https://truckingresearch.org/wp-content/uploads/2022/05/ATRI-Understanding-CO2-Impacts-of-Zero-Emission-Trucks-May-2022.pdf>.

From: Ernesto Franco
 To: AB617TruckRerouteStudy
 Cc: Jeanine Suskind; Aldi Ramirez; Ron Benefiel
 Subject: Re: AB617 Truck Reroute Study Feedback Notes
 Date: Friday, May 31, 2024 4:37:21 PM
 Attachments: jfranco.png; jfranco.png; jfranco.png; jfranco.png; shehadev-family-foods-190a80_bef7b062-5e1f-4cdd-8d67-beb554a2a67f.png; shehadev-family-foods-190a80_bef7b062-5e1f-4cdd-8d67-beb554a2a67f.png; Divisadero.pdf; Weber_connection.pdf

External Email: Use caution with links and attachments

Good afternoon,

Thank you for posting a map showing current and proposed routes in detail on google maps. Due to google maps only showing current street layouts, I wanted to include some details I found:

- The current map route shows Divisadero going Westbound across High-speed rail future build into G street. That stretch of Divisadero will be closed off in the future and will not be available as a truck route. See attached PDF labeled "Divisadero".
- Important to highlight that the future state of North Weber is shown to cross over through McKinley to make it a continued truck route. This is not highlighted on the map. See attached PDF labeled "Weber connection."

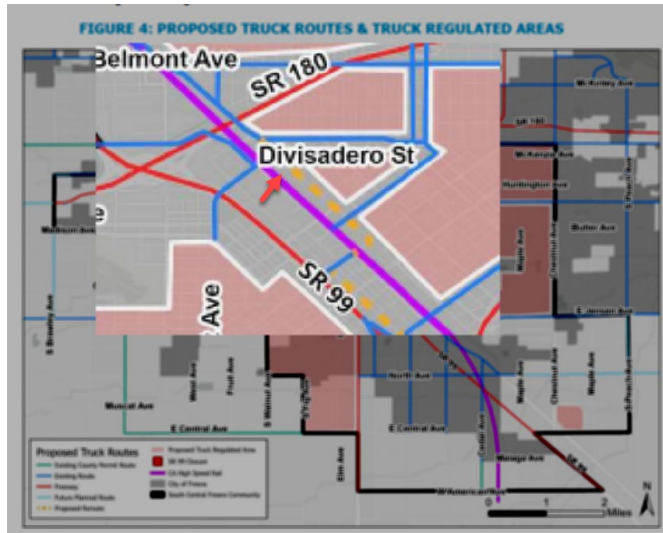
SHEHADEY Ernesto Franco | Director of Logistics
 Shehadey Enterprise Solutions
 Family Foods, LLC
 phone: 559.457.4674 | mobile: 559.351.8400
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From: Ernesto Franco <Ernesto.Franco@ShehadeyFoods.com>
 Sent: Tuesday, May 21, 2024 7:55 PM
 To: AB617TruckRerouteStudy@fresno.gov <AB617TruckRerouteStudy@fresno.gov>
 Cc: Jeanine Suskind <Jeanine.Suskind@ShehadeyFoods.com>; Aldi Ramirez <Aldi.Ramirez@ShehadeyFoods.com>; Ron Benefiel <Ron.Benefiel@Producersdairy.com>
 Subject: AB617 Truck Reroute Study Feedback Notes

Good evening and thank you for your time this afternoon at the community meeting in Maxie Parks Community Center. Here's the recap of our discussion with a couple of images:

1. With Divisadero not being a truck route across the train tracks to G street, It's important that the proposed (in yellow) route be moved forward to give businesses with trucks freeway access on that side of town. Additionally, I would request any proposed routes be mapped out individually to get a better understanding of truck flow not only for the businesses but the communities that will be impacted. The visual used now does not have enough details of the streets being proposed.



2. With the construction going on, it's important we highlight Weber's truck route going northbound and how the new ramps being built by high-speed rail will impact freeway access for those trucks. I'm not understanding if the path should be Northbound to Clinton as future state of Weber will go under the new bridges (Belmont, Olive) being built not giving freeway access until you get to Clinton. If that is the case, I would ask that we take a second look at the corner of Clinton and Weber to ensure traffic control measure will be able to take on the additional traffic. This would also include enough lanes for the additional traffic.



3. Weber street from Belmont to Clinton still has some development to be done in order to connect those 2 streets. Weber is also only a 2-way street with the street itself being in need of repairs as it has not been maintained. I would ask that we ensure we ask all entities working on projects around this street be part of the improvements that will be needed as this will be a busy truck route. With Golden State on the other side of the train tracks being closed down for high-speed rail, I would ask that we consider how that is going to impact traffic counts on Weber and who should be responsible for the improvements of the new traffic flow.

4. When it comes to Non-Infrastructure Strategies outlined from the study, it discusses trucks and plans related to CARB and San Joaquin Valley Air Pollution Control District. In a separate

meeting regarding Tower district and plans, the city took a stand that enforcement and monitoring regulations surrounding emissions is not within the city's purview and would collaborate with CARB and SJVAPCD. We asked that you please take that into consideration.

6) Non-Infrastructure Strategies

Education & Outreach Programming

- Ensures drivers are aware of routing changes and optimizes new routes



Truck Fuel-type, Emissions, and Idling Standards

- Allows trucks to operate efficiently and produce fewer emissions

Zero-Emission Trucks

- Transitioning to zero-emission commercial trucks minimizes GHG and NOx and is recommended by the UC Merced Health Impact Assessment



Truck-specific GPS Administration

- Provides info for critical route restrictions avoiding sensitive receptors

Time-of-Day Restrictions

- Minimizes peak time congestion and improves safety



Enforcement

- Helps maintain order and safety on roadways and deters violations

ARCADIS | SOUTH CENTRAL FRESNO ABBEY COMMUNITY TRUCK ROUTE STUDY

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From Tower Meetings:

Policy Recommendations

Q93 LU 5.3: Enforce and monitor regulations around emissions as set by the City of Fresno and San Joaquin Valley Air Pollution Control District. Collaborate with the San Joaquin Valley Air Pollution Control District to monitor emissions. Enforce and monitor regulations around emissions as set by the City of Fresno and San Joaquin Valley Air Pollution Control District. Staff Comments: Enforcing and monitoring regulations surrounding emissions as noted above is not within the City's purview. The City will continue to collaborate with CARB and the SJVAPCD, which are the agencies that regulate and monitor these standards.

Answered: 7 Skipped: 0

Thanks again for your time and consideration of the comments made above.

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From: [John Kinsey](#)
To: [AB617TruckRerouteStudy](#)
Cc: [Andreina Aguilar](#)
Subject: RE: Elm Avenue
Date: Monday, May 20, 2024 4:39:34 PM

External Email: Use caution with links and attachments

Thank you, Andreina. I will interface directly with the Elm Avenue landowners I represent: Span Development, SDG, and Buzz Oates.

I do not represent Mid-Valley Disposal, but they will also be affected, so you should probably reach out to them directly.

I also do not represent the individual businesses who occupy the properties on both the east and west sides of Elm between Vine Ave. and North Ave. You should likewise reach out to them directly, as they will likewise be affected by both the truck routes as well as any accompanying regulations.

Thanks,

John P. Kinsey, Esq.
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From: AB617TruckRerouteStudy <AB617TruckRerouteStudy@fresno.gov>
Sent: Monday, May 20, 2024 2:24 PM
To: John Kinsey <jkinsey@wjhattorneys.com>
Cc: Andreina Aguilar <Andreina.Aguilar@fresno.gov>; AB617TruckRerouteStudy

<AB617TruckRerouteStudy@fresno.gov>

Subject: RE: Elm Avenue

Good afternoon Mr. Kinsey,

I am following up on business/owner contacts along Elm Ave or anywhere else within the AB617 area.

Andreina Aguilar

Chief Engineering Technician

Active Transportation Coordinator

Public Works Department

Direct: (559) 621-8674

From: AB617TruckRerouteStudy <AB617TruckRerouteStudy@fresno.gov>

Sent: Friday, May 17, 2024 8:33 AM

To: John Kinsey <kinsey@wjhattorneys.com>; AB617TruckRerouteStudy <AB617TruckRerouteStudy@fresno.gov>

Cc: Andreina Aguilar <Andreina.Aguilar@fresno.gov>; Jill Gormley <Jill.Gormley@fresno.gov>

Subject: RE: Elm Avenue

Good morning Mr. Kinsey,

I would greatly appreciate your help. Yes, I will share the PPT slides when I have them posted online.

Thank you for your attendance at last night's meeting. Please share the attached flyer with the businesses in the area and along Elm Ave.; I hope they can attend.

Andreina Aguilar

Chief Engineering Technician

Active Transportation Coordinator

Transportation Planning

Traffic & Engineering Services Division,

Public Works Department

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Building a Better Fresno



From: John Kinsey <jkinsey@wjhattorneys.com>
Sent: Thursday, May 16, 2024 6:52 PM
To: AB617TruckRerouteStudy <AB617TruckRerouteStudy@fresno.gov>
Subject: Re: Elm Avenue

External Email: Use caution with links and attachments

Sorry for the multiple emails. Could you please also send me copies of the slides from today's presentations?

John P. Kinsey, Esq.
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From: John Kinsey <jkinsey@wjhattorneys.com>
Date: Thursday, May 16, 2024 at 6:46 PM
To: AB617TruckRerouteStudy@fresno.gov <AB617TruckRerouteStudy@fresno.gov>
Subject: Elm Avenue

My contact information is contained below. Given the significant amount of industrial/logistics space on Elm Avenue between North and Annadale, I think it would be a great idea for there to be additional outreach to the Elm Avenue landowners. I know they are concerned about there not being any truck route on Elm. I can help put you in touch with them for further information. Thanks,

John P. Kinsey, Esq.
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LYNN M. HOFFMAN

Writer's E-Mail Address:
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May 22, 2024

VIA EMAIL

Andreina Aguilar
Chief Engineering Technician
Active Transportation Coordinator
Public Works Department
CITY OF FRESNO
2600 Fresno Street, Room 4019
Fresno, CA 93721-3623

Re: AB617 Truck Reroute Study

Dear Ms. Aguilar:

I am writing to submit comments on the South Central Fresno AB 617 Community Truck Reroute Study: Truck Routing and Implementation Strategies Report (April 2024) (the "Report"). My law firm represents numerous businesses and landowners within and adjacent to boundary of the South Central Fresno Community identified in the maps accompanying the Report, many of which will be directly affected by the recommendations and strategies in the Report. To ensure the City of Fresno remains competitive in its ability to attract high-quality businesses, while at the same time promoting strategies that foster a healthy and respectful interface between those businesses and the neighborhoods they inhabit, several modifications to the Report are required.

WANGER JONES HELSLEY PC

Andreina Aguilar

City of Fresno

May 22, 2024

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A. The Report Should Be Amended to Include Arterials Adjacent to Properties Currently Occupied by Warehouse/Industrial Uses, Including Elm Avenue

Figure 4 of the Report illustrates the location of Proposed Truck Routes in South Central and Southwest Fresno. Although the City's General Plan designates Elm Avenue as an "arterial," and over 800,000 square feet of relatively new warehouse/industrial development exists along Elm Avenue between E. Vine Avenue and North Avenue, Figure 4 shows Elm Avenue deleted as a Truck Route. These light industrial/warehouse properties are also located in a "Proposed Truck Regulated Area."

Elm Avenue should be maintained as a Truck Route, and the area immediately to the west of S.R. 41 should be removed as a Proposed Truck Regulated Area. By removing Elm Avenue as a Truck Route, the Report ignores the reality that Elm Avenue is lined on both sides by long-standing light industrial and warehouse land uses whose businesses rely in large part on truck trips.¹ Moreover, it makes very little practical sense to include most of the land adjacent to S.R. 41 within the Proposed Truck Regulated Area, as the land bounded by S.R. 41, E. Vine Avenue, Elm Avenue, and E. North Avenue contains no residential areas or sensitive receptors. (Cf. Report at 8 ["The addition of truck regulated areas aims to reduce the number of truck routes present in residential areas."].)

I understand the City asserts that the removal of Elm Avenue as a Truck Route is only intended to limit bypass trips on Elm Avenue, and that the City does not intend to prohibit trips to a business from a freeway. While that might be accurate, my clients are concerned that the lack of a Truck Route adjacent to or near their properties and their location in a Truck Regulated Area will be used in the future by project opponents, the City, and other public agencies to assert that affected landowners and businesses should be denied discretionary approvals. They are likewise concerned about potential arguments that their present and future operations are inconsistent with the City's plan-level documents and policies, as well as the air pollution and exposure reduction strategies included in the AB 617 Community Emission Reduction Program. The City should at a minimum provide assurances that the location of a business within a Truck Regulated Area and/or the lack of an adjacent Truck Route shall not be used to limit, deny, or discourage an otherwise lawful land use.

In addition, from a practical perspective, eliminating arterials upon which significant industrial businesses are currently located as Truck Routes may actually impede the primary objectives of the Report. Specifically, one of the core objectives of the Report is the identification and prioritization of infrastructure designed to improve the interface between industrial and residential land uses—*i.e.*, the installation of bike lanes, crosswalks, sidewalks, and

¹ The same is true of other arterials, including E. Central Avenue, on which numerous light industrial land uses are located.

WANGER JONES HELSLEY PC

Andreina Aguilar

City of Fresno

May 22, 2024

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signage; the elimination of queuing; fixing damaged street surfaces and potholes; and synchronizing traffic signals. All areas within South Central Fresno that will continue to experience truck traffic should be prioritized for these improvements; however, by eliminating some of those areas—such as Elm Avenue—as Truck Routes, improvements that would benefit both residents and business owners are less likely to be identified, funded, and implemented. Rather than recommending the removal of Truck Routes on arterials where trucks are currently operating, and will continue to operate in the future, the Report should instead acknowledge existing and likely future conditions, and prioritize improvements in areas that could benefit most from those improvements.

B. The Lack of Linear East-West Bypass Routes South of S.R. 180 Will Result in Longer Vehicle Trips and More Trucks on Local Roadways

When the truck rerouting study was initially proposed, the San Joaquin Valley Air Pollution Control District asserted the Report would have “indirect benefits” if “the results of the study identify feasible alternative truck routes that have the potential to reduce resident’s [*sic*] exposure to emissions from heavy-duty vehicles without shifting emissions to another community or resulting in a significant impact to regional air quality through an increase in vehicle miles traveled (VMT)” (See San Joaquin Valley Air Pollution Control District Project Plan: South Central Fresno Community Emission Reduction Plan: HD.11 Heavy Duty Truck Rerouting at 3.)

Now that the Report has been released, this does not appear to be the case. Specifically, Figure 4 does not designate any east-west corridors as Truck Routes south of S.R. 180. This would eliminate the capability of trucks driving eastbound or westbound to drive through portions of the City without being forced to take lengthy detours, resulting in an increase in VMTs. For example, a truck traveling eastbound on Jensen Avenue (from the direction of Kerman) would be forced to turn right on Marks Avenue, going approximately two miles out of the way, before heading in an eastbound direction again on E. Central Avenue; however, because E. Central Avenue east of S.R. 41 is not designated as a Truck Route, the truck would then have to travel two miles northbound on S.R. 41 to get back to Jensen Ave. This is inefficient, contrary to the objectives of AB 617, and makes little practical sense. To the extent the Report recommends the elimination of all east-west corridors south of S.R. 180, the Report should be augmented to include an assessment of whether the location of the proposed Truck Routes and Truck Regulated Areas would increase VMTs.

C. The Report Should Not Include the New Recommendation that Would Mandate Deployment of Zero-Emissions Trucks

Based on recommendations contained in the UC Merced Health Impact Assessment, I understand the Report was recently modified to recommend that area businesses transition to Zero-Emissions Trucks. CARB has already adopted regulations such as the Advanced Clean Fleets regulation and the Advanced Clean Truck regulation to foster the transition to ZEVs, and any effort by the City to adopt similar regulations would substantially overlap with CARB’s

WANGER JONES HELSLEY PC

Andreina Aguilar

City of Fresno

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generally-applicable regulations. This would at best be a wasteful effort that is largely duplicative of CARB’s efforts. However, there is a greater danger that the City could create conflicting regulatory requirements that would result in confusion and extensive compliance costs for regulated industry. This is of particular concern since ZEVs (i) are not widely available; (ii) are vastly more expensive than trucks with combustion engines, (iii) cannot carry the same load as a truck with a combustion engine; and (iv) would require extensive infrastructure upgrades (both at individual project sites and across California’s roadway network).

To the extent the Report includes a recommendation to mandate ZEVs, the Report should be expanded to address the potential unintended consequences of such a mandate, including:

- Impacts associated with the increased number of ZEVs needed to haul the same amount of goods compared to combustion engines, including the impact of the increased number of ZEVs would have on VMTs.
- Because ZEVs are heavier than trucks with combustion engines, the impacts of such a mandate on the upkeep of local roadways.
- The economic and environmental impacts associated with area businesses being required to upgrade their facilities to accommodate ZEVs, including charging infrastructure.
- The economic impact on area businesses required to purchase ZEVs on an accelerated timetable.
- The availability (or lack thereof) of ZEVs in the marketplace.
- Whether regional charging infrastructure exists to accommodate ZEVs at this time, and when such infrastructure may be developed.

It is also questionable whether the City has the legal authority to require businesses to use zero emissions vehicles. Under Section 209(a) of the Clean Air Act, states and their political subdivisions are preempted from adopting or attempting to enforce standards relating to the control or emissions from new motor vehicles. (See *Engine Mfrs. Ass’n v. S. Coast Air Quality Mgmt. Dist.* (2004) 541 U.S. 246.) While states, such as California, can seek a waiver of 209(a)’s preemptive effect, Section 209’s waiver provisions apply only to states—not their political subdivisions.

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WANGER JONES HELSLEY PC

Andreina Aguilar

City of Fresno

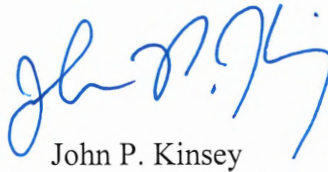
May 22, 2024

Page 5

D. Conclusion

Thank you for your consideration of these important comments.

Respectfully submitted,



John P. Kinsey