

Debra Jones - comments on MTP 2035 EIR

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Date: 12/20/2007 4:43:36 PM
Subject: comments on MTP 2035 EIR
CC: <ardie@northstatebia.org>, "Michael Smith" <MSmith@teichert.com>, "Stephen Miller" <SMiller@teichert.com>, "Steve Mitchell" <SMitchell@teichert.com>, "Nancy Moorhouse" <NMoorhouse@teichert.com>

We would like to see some word changes to ENE 1: Incentives for Energy conservation Practices to reflect some of the new regulations adopted by CARB and the changing engine standards.

Current language is:

- Construction equipment that meets the current emission standards criteria for new vehicles.
- Construction equipment that uses alternative fuels.
- Local services and materials that minimize energy consumption from transportation freight that requires long-distance travel.

- Renewable energy sources whenever feasible.
- Use the lowest feasible emitting construction equipment and fuels.
- Avoid unnecessary idling of construction equipment.
- Consolidate material delivery as much as possible to ensure efficient vehicle utilization.
- Schedule delivery of materials during non-rush hours to maximize vehicle fuel efficiency.
- Encourage construction workers to carpool.
- Maintain equipment and machinery, especially those using gasoline and diesel, in good working condition.

We would recommend the language be changed to the following (with justification in parenthesis).

- Construction equipment fleet that holds a current certification of reporting compliance from ARB. (It would be difficult to find equipment for a job where every piece is at the latest emission standard.)
- Encourage the use of construction equipment that uses alternative fuels wherever feasible and there are no emissions penalties. (Other than biodiesel there are not many options for alternate fueled construction equipment and current test indicates that biodiesel may increase some criteria pollutants.)
- Regional services and materials that minimize energy consumption from transportation freight that requires long-distance travel. (Some materials need to come from region not local source where the local source has limited supplies)
- Renewable energy sources whenever feasible and there is no emissions penalty. (Similar to alternative fuels if this means biodiesel otherwise solar powered sign boards are common)
- Use the lowest feasible emitting construction equipment and fuels. (Redundant statement with the first two items. Please remove this measure)
- Avoid unnecessary idling of construction equipment.
- Consolidate material delivery as much as possible to ensure efficient vehicle utilization.
- Schedule delivery of materials during non-rush hours to maximize vehicle fuel efficiency. (This should be

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cont.

changed to include "as appropriate and cost effective" because there can be extra charges for opening up asphalt plants or aggregate plants on weekends and off hours. Also local agencies need a policy to disregard nuisance complaints due to compliance with this mitigation measure.)

- Encourage construction workers to carpool.
- Maintain equipment and machinery, especially those using gasoline and diesel, in good working condition.

Thank-you for consideration of these comments.

If you have any questions or need clarification about any of these issues please feel free to contact me.

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