

COLTON



Public Utilities

October 1, 2015

The Honorable Janice Rutherford
8675 Haven Avenue
Rancho Cucamonga, CA 91730

Subject: South Coast Air Quality Management District (SCAQMD) 2016 Air Quality Management Plan (AQMP) City of Colton Review and Comments.

Supervisor Rutherford:

The City of Colton recognizes that cities play an integral role in attaining the State and Federal standards to reduce ozone and particulate matter collaboratively working with SCAQMD, CARB, U.S. EPA and the transportation industry. The western Inland Empire is a logistics center for the distribution of goods throughout Southern California. The movement of goods is through trains and trucks which contributes to the poor air quality in the region. Air has no boundaries and air pollution that is emitted in one city will affect the health of all residents in the region.

Many surrounding cities around Colton have adopted, or are in the process of adopting, a climate action plan to reduce greenhouse gas emissions (GHG's) and provide a sustainable future for its community. The Inland Empire provides an economic benefit for the goods movement section but like all other regions have been tasked to reduce its GHGs to be in compliance with AB32. The health and wellbeing of the community is always the number one priority for the City of Colton and therefor supports additional NOx reductions from federal transportation source of locomotives. Colton has more than 120 trains a day pass through Colton and without being required to use the cleanest technologies, Colton is left to mitigate the emissions.

Passenger Transportation Sector White Paper comments:

Colton supports continuing incentives for deployment of zero and near-zero emission technologies. Colton's Electric Department has developed energy efficiency programs and additional incentives to encourage Electric Vehicle (EV) purchasing with an EV rate and providing incentives for EV charging. Currently the City has 5 public electric vehicle charging stations available for residents, one under construction and three EV chargers available for staff electric vehicle

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charging. The City will continue to actively seek grants but would like to see neighboring cities providing EV infrastructure and incentives through subvention funds and MSRC grants. The more cities invest in EV infrastructure the more residents are likely to invest in EV's.

Particulate Matter (PM) Controls

Colton recognizes that Particulate Matter in the basin is largely due to human activity. In Southern California the drought is a key factor in PM_{2.5} levels not meeting attainment of the 2012 AQMP 24 hour PM_{2.5}. Heavy Duty Diesel Trucks continue to be the largest contributing factor for NOx and PM_{2.5} in the Inland Empire with the large logistics operations expanding all over the Inland Empire. More programs should be developed to encourage Heavy Duty Diesel Trucks to retrofit to alternative clean fuel to reduce PM_{2.5} and NOx.

The City supports focused communication campaigns and enhanced public outreach to help educate the community on the continuing efforts all cities collaboratively can achieve to meet the required reductions of PM.

Colton supports the plan to provide more effective mitigation for construction and demolition PM and paved road dust emissions.

Volatile Organic Compounds (VOC) Controls

Colton supports NOx- Heavy Controls and Tiered VOC Reductions as recommended and concluded in the study.

Goods Movement

Two areas the City is directly impacted in the Goods movement is on-road heavy-duty trucks and freight locomotives.

Emissions Reduction Scenarios- Even if all the trucks on the road were all turned over to meet the lowest standards established by the US EPA and CARB they still would not achieve the 65% equal share of emissions or 75% NOx emissions reductions to attain the federal ozone air quality standards. In this scenario it is too challenging to have equal share of emission with technology being a challenge and willingness of sectors to participate.

Cities need to collaborate with private industry, county and state government to develop and implement programs that will mitigate the environmental impacts of the goods movement in the Inland Empire. With the collaboration of all engaged parties the recommendations of the 2016 AQMP can have a positive outcome.

Off-Road Equipment

Colton supports the recommendations of the technology related and equipment deployment recommendations and the operational efficiency recommendations.

Residential and Commercial Energy

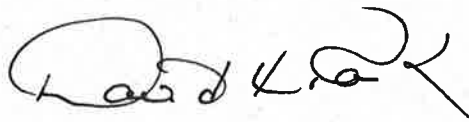
The Colton Electric Department agrees with the findings under “Current Practices and Barriers to Implementation”. Many customers in the City get pressured by door to door solar generation sales that they do not think about more cost effective efficiency measures that can be implemented in their home at a much lower cost. The Colton Sustainability division has been developing many programs and solutions that alleviate the barriers to implementing energy saving measures and renewable generation for its residential and commercial customers.

The Colton Electric Utility recognizes that AB1103 does assist tenants leasing commercial buildings with the past energy usage but at the same time does not demonstrate what the energy behavior patterns the previous tenant has had or how much equipment one business might have used versus another. State legislation making landlords and property owners accountable for efficiency once purchasing a property would be far more effective in achieving a faster decline in energy consumption from existing older buildings.

The City of Colton supports the 2016 AQMP development, staff is recommending for the inclusion of the actions specified in the “Residential and Commercial Energy” white paper.

The City of Colton thanks you for the opportunity to provide comments on the proposed Clean Air Plan. If you have any additional questions for the City, please contact myself or Jessica Sutorus.

Respectfully,



David X. Kolk, Ph.D.
Electric Utility Director

C: Mayor Richard Delarosa and Colton City Council Members
Bill Smith, City Manager
Mark Tomich, Development Services Director