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MAYOR PRO TEM

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COUNCIL MEMBERS

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CITY MANAGER

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CITY CLERK

JAMES R. MILHISER  
TREASURER

September 29, 2015

*Via email*

Mr. Michael Krause  
Program Supervisor  
South Coast Air Quality Management District  
mkrause@aqmd.gov

## **Re: SCAQMD 2016 Air Quality Management Plan**

Dear Mr. Krause,

Thank you for the opportunity to comment on the white paper policies which will help shape the South Coast Air Quality Management District's 2016 Air Quality Management Plan. As a city with a thriving business community, but with recognized air quality issues, Ontario appreciates the balancing act that must be performed to improve air quality without impeding economic growth. As the SCAQMD tries to strike the right balance, it must consider that cities like Ontario have taken the lead in cultivating the region's flourishing logistics and supply chain industry. This industry is essential to the region's economic health, and, as such, there is much at stake in the regional employment market. The following points bear out several ways to account for these interests and achieve a balanced AQMP.

### **1. Seek out Continued Input from Small and Mid-sized Businesses**

In the "A Business Case for Clean Air Strategies" white paper, SCAQMD staff consults with businesses, utilities, and trade associations who are directly affected by clean air regulation. This effort is commendable, as such dialog is essential in order for SCAQMD to accurately ascertain the impacts of proposed regulation. As the AQMP is drafted, it is necessary to keep open this line of communication, and, additionally, to pay particular attention to small and mid-sized businesses.

Over ninety percent of Ontario's businesses are small to mid-sized companies with fewer than fifty employees. Because of their size, these businesses can be sensitive to changes in regulation, and they oftentimes do not have the resources to track regulation such as the AQMP. Any disruption to these businesses would cut to the core of our local economy.

Therefore, in addition to consultation with large businesses and trade associations, it is vital that the SCAQMD proactively and intentionally reach out to these small and mid-sized businesses. Their feedback will help ensure that the final AQMP does not impede the growth of local economies.

## **2. Encourage Optimization of Existing Infrastructure**

As the SCAQMD seeks ways to reduce pollution from mobile sources (*see* discussion in “Goods Movement” White Paper, pp. 23-25), the optimization of existing infrastructure should be pursued to the fullest extent.

Several optimization opportunities would seem to be a good fit in our region: intelligent transportation systems (ITS); traffic light synchronization; on-demand platforms, which pair truck drivers with nearby cargo and help reduce “deadhead” runs; dedicated truck lanes on State Route 60, which can encourage investment in zero- and near-zero emission trucks while increasing throughput on the freeway for all other traffic; and railroad grade separations, which reduce idling time for vehicles and increase train efficiency and safety.

To the extent that the SCAQMD can encourage these projects through regulation or financial support, it should do so.

## **3. Ensure that Airport Operations are not Impeded**

Airports are a critical component of our national transportation and security network. Additionally, they act as economic engines which power local and regional economies. As such, it is crucial that airport operations run properly.

Excessive environmental regulation has the potential to interfere with the proper operation of airports. Accordingly, the SCAQMD should consult with airlines and governing bodies such as the Ontario International Airport Authority (OIAA) before requiring zero- or near-zero emission technologies at airports.

There are no feasible zero- or near-zero emission technologies for aircraft at this time (*see* “Goods Movement” White Paper, p. 22), and there are only limited options for clean airport ground support equipment. Accordingly, there is currently little benefit to be found in regulation, but a distinct need for research and development.

The CLEEN Program from the Federal Aviation Administration (FAA) takes the lead on research and development, offering assistance with research and development of lower emitting aircraft engines. Ontario would encourage the SCAQMD to provide similar assistance, in lieu of premature regulation.

## **4. Subsidize Regulatory Compliance in Environmental Justice Communities**

The SCAQMD already recognizes the need to help small businesses in environmental justice (EJ) communities comply with regulation (*see* “A Business Case for Clean Air Strategies” White Paper, pp. 11-12). And it has already found success in helping these small businesses, *i.e.* its participation

in the U.S. EPA's Targeted Air Shed Grant Program. But with the expected introduction of more stringent regulation, there will be a need for SCAQMD to make more funding available.

The SCAQMD's proposed scenarios will have a significant impact on the logistics sector (generally defined by the wholesale trade, manufacturing, and transportation sectors). This impact is of potential concern because the logistics sector is economically integral to several EJ communities across the region, including the City of Ontario and the region as a whole. In 2012, Ontario's logistics businesses had approximately 35,000 employees. This represented 34% of the total employment in the City.

In order to mitigate any financial impact that new regulations might have on EJ communities, the SCAQMD should specifically allocate funding to the communities' small logistics businesses such as trucking outfits. This funding would help support compliance with the new regulations, and ensure that already burdened communities are not further burdened.

## **5. Provide Funding for Public Transportation**

In the coming years, Ontario plans to add up to 159,000 new residents. While the City has plans to widen existing streets and build new ones, public transportation will be needed to help accommodate the attendant traffic increases. Clean public transportation such as Zero Emission Buses, CNG-powered Bus Rapid Transit, and light rail will be needed to help curb traffic and to help reduce pollution.

Service providers such as OmniTrans and Metrolink will need a variety of funding sources to help initiate these services. While the City will be able to assist somewhat, there is much greater financial need than what a single city can afford. As such, there would be value in having SCAQMD dollars to leverage for state and federal funding. The SCAQMD dollars could make a difference in helping a project such as Bus Rapid Transit along Holt Boulevard to be built sooner, or for implementing direct rail access to Ontario International Airport.

## **6. Invest in Distributed Energy Infrastructure**

With the anticipated growth of electric vehicle (EV) passenger transportation, there is a critical need to upgrade infrastructure. In the coming years, the largest increase in energy demand is anticipated within the "Miscellaneous Energy Category," which includes commercial and residential vehicle charging (*see* "Residential and Commercial Energy" White Paper, p. 6).

But there is still potential, and a need, for more growth. Numerous businesses—including UPS, which operates its West Coast Region Air Hub out of Ontario—have expressed concerns with electric vehicles due to "range anxiety." A plan for distributed energy solutions coupled with an electric vehicle charging station installation plan would assuage these "range anxiety" concerns and help persuade more businesses and consumers to purchase the technology.

Accordingly, Ontario would urge the SCAQMD to commit in the AQMP to taking an active lead in this development. Dialog should continue between the energy industry and car manufactures regarding development of distributed clean energy, and this effort should be supported by a robust infrastructure incentive program.

## 7. Summary

The decisions made by the SCAQMD in the 2016 AQMP will greatly affect the air quality in our region. And they will also greatly affect business and the economic health, present and future, of cities. Ontario encourages the SCAQMD to consider the above policy points as it makes these weighty decisions.

Sincerely,

A handwritten signature in black ink that reads "Paul S. Leon". The signature is written in a cursive style with a large, looping initial "P" and a distinct "S" between the first and last names.

Paul S. Leon  
Mayor