



City of Banning

99 E. Ramsey Street · P.O. Box 998 · Banning, CA 92220-0998 · (951) 922-3125 · Fax (951) 922-3128

COMMUNITY DEVELOPMENT DEPARTMENT

July 27, 2012

sent via email

Steve Smith, Ph.D.
Program Supervisor
Planning, Rules, and Area Sources
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4182

Subject: Notice of Preparation (NOP) for the Draft Environmental Impact Report for 2012 Air Quality Management Plan (AQMP)

Dear Mr. Smith:

This letter is to provide comments on the NOP. The City is concerned that there are a number of regulations that are proposed in the 2012 AQMP that have direct impact on cities' operations resulting in negative fiscal impacts. These regulations must be off-set with incentives to ensure that there is a win-win situation between protecting the environment and maintaining a healthy fiscal environment so that cities can continue to provide services to their residents. Additionally, all aspects of the system that support a particular measure shall be analyzed to ensure that not only the measure contributes to clean-air but also provides sound fiscal investment and improves the current economy.

Measure ONRD-01 seeks acceleration of commercial deployment of partial zero-emission and zero emission vehicle penetration into the market. This measure proposes to continue the Clean Vehicle Rebate Project (CVRP) through 2023 which would provide incentives to a minimum of 1000 vehicles per year.

Although this measure proposes to provide incentives for the development, the incentives should also be provided for the systems that support the successful deployment of the vehicles in the future. This includes infrastructure, trained technicians, and technology that support the maintenance aspects of the vehicles. AQMD, State, and Federal EPA should partner with local colleges to provide hands on training for new technology. This could be done through the junior colleges and universities. The City of Banning has Mt. San Jacinto Junior College, which provides curriculums that tailored to the needs of the communities and future job markets. The College currently has a satellite campus which will eventually be built out and accommodate approximately 5000 students. This Junior College could be

a training ground for deployment of new technologies. In addition to the infrastructure and systems, the regulating agencies such as SCAQMD, State and Federal EPA should work closely with the association of building officials to ensure that permitting processes are addressed and incorporated into the building codes for ease of implementation and success in the deployment of partial zero-emission or zero emission vehicles.

Measure ONRD-02 seeks accelerated retirement of older light-duty and medium duty vehicles that are gasoline and diesel-powered up to 8,500 pounds gross vehicle weight (GVW). The measure proposes incentives up to \$2,500, which include a replacement voucher. The vehicles that are included are passenger cars, sport utility vehicles, vans, and light-duty pick-up trucks. This measure gives first priority to those vehicles identified as high emitters that are off-cycle to California Smog Check Program and Pre-1992 model year vehicles. This measure does not describe as to whether the incentive is available to individual consumers or fleet. It is recommended that incentives also be provided to fleet vehicles for public and private sectors.

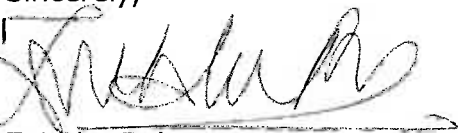
These are also measures in the AQMP that would affect existing businesses and land development and construction industries which lead to increase costs that would eventually be passed on to consumers or drives businesses out of the State of California. These include the following measures:

1. BCM-01 - Emission Reduction from Under-Fired Charbroilers
2. CTS-01 - Further VOC reduction from architectural coatings
3. CTS-02 - Further Reduction from Miscellaneous Coatings, Adhesives, Solvent, and Lubricant
4. CTS-03 - Further VOC Reductions from Mold Release Products
5. MCS-02 - Further Emission Reductions from Green Water Processing (Chipping and Grinding Not Associated with Composting).

These measures do not appear to have incentives. The concern is that these measures (regulations) will drive businesses out of the region and the State of California. Please analyze not only the positive impacts to the environment but also the fiscal impacts to the businesses and consumers if these measures are adopted.

If you have any questions regarding these comments, please call me at (951) 822-3131 or e-mail me at zabubakar@ci.banning.ca.us.

Sincerely,



Zai Abu Bakar
Community Development Director

cc: Andrew J. Takata, City Manager
Bill Manis, Economic Development Director