

March 20, 2017

Clerk of the Board - California Air Resources Board

Submitted Electronically to <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Comments on 2016 Air Quality Management Plan for Ozone and PM2.5 for the South Coast Air Basin and the Coachella Valley and 2016 State Strategy for the State Implementation Plan

American Airlines, Inc. (“American”) appreciates this opportunity to submit comments on the 2016 Air Quality Management Plan for Ozone and PM2.5 for the South Coast Air Basin (“Final AQMP”) and the 2016 State Strategy for the State Implementation Plan (“SIP Strategy”).

American makes this submittal in support of the comments submitted by Airlines for America (“A4A”) on the Final AQMP and SIP Strategy, and incorporates those comments by reference here. As set forth in the A4A comments, the District Board’s decision to amend measure MOB-04 – Emissions Reductions at Commercial Airports (“MOB-04”) by adding a sentence directing District Staff to develop an Indirect Source Rule (“ISR”) for commercial airports, was made without providing the required public notice and opportunity to comment. Further, insufficient notice and comment has been provided to the public on MOB-04 as amended in the present proceeding, to support a State Board decision to approve MOB-04 as amended.

The District Board’s amendment imposing the ISR process runs counter to the fundamental provisions of MOB-04 under which a working group is to be convened with affected stakeholders “to discuss airport emissions related issues and provide input to identify actions and develop mechanisms to implement this measure.” In American’s view, this stakeholder input is critical to the process of identifying and evaluating potential meaningful mitigation measures. Approving MOB-04 as amended would unjustly and improperly validate a pre-determined outcome to any such evaluation, and would foreclose any stakeholder input with respect to those measures.

American therefore respectfully requests that the State Board decline to approve the final sentence of MOB-04 as amended. At a minimum, the State Board should clarify that MOB-04 is not intended to preclude consideration of other, alternative mechanisms to the ISR in the MOB-04 stakeholder process or to preclude District Staff from presenting such alternatives to the District Board for its consideration.

Thank you for your consideration of these comments.

Sincerely,

/s/ James T. Johnson

James T. Johnson

