



JOHN WAYNE
AIRPORT
ORANGE COUNTY

Barry A. Rondinella,
A.A.E./C.A.E.
Airport Director

March 20, 2017

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: *2016 AQMP for the South Coast Air Basin*

Clerk of the Board:

As Director for John Wayne Airport, Orange County (SNA) ("JWA"), I am writing to provide comments on issues related to the recent adoption of the 2016 Air Quality Management Plan ("AQMP") by the South Coast Air Quality Management District ("SCAQMD") and the California Air Resources Board's ("CARB") possible inclusion of the AQMP into the State Implementation Plan ("SIP") for submittal to the U.S. Environmental Protection Agency ("EPA"). I am writing to express my concerns regarding, and opposition to, the inclusion of an Indirect Source Rule (ISR) for airports in any SIP submittal to EPA unless and until further discussions and analysis is provided by SCAQMD that indicates that ISR represents the appropriate approach for emission reductions from airports in the South Coast Air Basin.

The voluntary mobile source emission reduction measure for airports (MOB-04) was developed in a fair and transparent manner and was included in the Draft AQMP, after extensive coordination efforts with airports and other stakeholders. At the March 3, 2017, SCAQMD Board meeting, however, certain Board members expressed different opinions relative to the terms and conditions that should be included in MOB-04. Unfortunately, in light of these differences, substantive Board amendments were made *after* the close of public testimony, and action was taken to include consideration of an ISR for airports in the Basin. Because of these last minute changes that modify MOB-04 in a substantive manner, I do not believe that CARB can or should recommend, at this time, that MOB-04 be included in the submittal of the SIP to the EPA.

The last minute amendment of MOB-04, altering it from a voluntary emission reduction measure to a possible regulatory ISR for airports, occurred without any public review or opportunity to provide comment and is not supported by either the analysis or discussion provided in the Draft AQMP or the environmental impact report ("EIR") that was prepared for the Draft AQMP consistent with the requirements of the California Environmental Quality Act ("CEQA"). This important legal obligation that should be met prior to CARB moving forward with the submittal of the measure to EPA.

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Further, the District may not regulate airports, including JWA, under an “indirect source review program” as currently proposed by MOB-04 because the authority to do so rests with the Administrator of the EPA. Federally-assisted airports are exempt from state-promulgated indirect source review programs because the EPA has the exclusive authority to promulgate, implement, and enforce regulations respecting ISR programs that apply to federally-assisted airports.

The administrative record does not provide the legal authorities that the District is relying on relative to approval of the modified MOB-04. Where an emission source category, like airports, is subject to federal and/or state regulatory controls, the associated regulatory framework must be described and analyzed to allow for the proper formulation of the “policy choices” prior to approval.

JWA continues to support and believe that a *voluntary* emission reduction strategy working group process for airports in the Basin represents the approach that best protects the residents impacted by emissions in the Basin. This working group process does not rule out consideration of modifications to a voluntary approach. However, consideration of any variations should be discussed in the context of the airport working group and should be contingent upon adequate CEQA analysis.

Thank you again for the opportunity to provide comments on these critically important air quality issues.

Sincerely,



Barry A. Rondinella, A.A.E./C.A.E.
Airport Director

cc: Shawn Nelson, Orange County Board of Supervisors
Frank Kim, County Executive Officer, County of Orange
Wayne Nastri, Executive Director, South Coast Air Quality Management District
Jim Lites, Executive Director, California Airports Council