



JOHN WAYNE
AIRPORT
ORANGE COUNTY

Lawrence G. Serafini, P.E.
Acting Airport Director

April 23, 2015

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

Subject: Sustainable Freight: Pathways to Zero and Near-Zero Emissions, Discussion Draft

Clerk:

This comment letter is submitted by John Wayne Airport (SNA) ("Airport" or "JWA"), the only commercial service airport and one of only two airports that accommodate general aviation in the Orange County portion of the South Coast Air Basin. The Airport is owned and operated by the County of Orange. By this letter, JWA provides its preliminary input on the discussion draft of the California Air Resources Board's *Sustainable Freight: Pathways to Zero and Near-Zero Emissions* report ("draft *Sustainable Freight* report").

To begin, the aviation sector, as broadly defined to include airports, aircraft and related emission sources (e.g., terminal buildings), has demonstrated a long-term commitment to reducing air pollutants in a manner that integrates federal, state and local controls in concert. Indeed, in an effort to be a "good neighbor," JWA has a rich history of implementing design features and operational practices that serve to reduce its contribution of air pollutants. JWA remains committed to working with this Board, and the regional air district (South Coast Air Quality Management District), in order to continue to improve air quality in the South Coast Air Basin.

When developing regulatory standards and policies intended to reduce the freight transport system's air pollutants, we encourage this Board to be mindful of its regulatory limits and authorities, as well as the relative contributions of individual emission sectors to California's air pollutant inventories. As to the former, it is well established that the aviation sector is subject to a complex system of federal controls, with the regulation of aircraft emissions squarely and solely within the purview of the U.S. Environmental Protection Agency. And, as to the latter, we caution against the loss of context (see Tables 6 through 8 in Appendix A of the draft *Sustainable Freight* report) – fair-share principles and proportionality are not irrelevant, and must be considered when evaluating the feasibility and fairness of regulatory burdens.

Before finalizing the draft *Sustainable Freight* report, we encourage this Board to direct its staff to schedule additional public outreach meetings, including meetings with individual and/or collective categories of stakeholders, in order to ensure that the report is informed by practical, real world data. In the case of the aviation sector, we respectfully request that the Board's staff meet with representative airports, airlines, and industry organizations (e.g., California Airports Council). Relatedly, we also request that the technology assessments relevant to the aviation sector be made available to these parties prior to

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completion of the draft *Sustainable Freight* report. Our ability to provide informed, reasoned input on the concepts and objectives articulated in the draft report will be greatly enhanced if we are able to review and consider the findings of the technology assessments.

Please include John Wayne Airport on notices of all subsequent actions proposed and taken by this Board relative to the development of its sustainable freight policies. Our point of contact is: Ms. Kari Rigoni, Planning Manager, John Wayne Airport, 3160 Airway Avenue, Costa Mesa, CA, 92626 or krigoni@ocair.com.

In closing, we appreciate this opportunity to provide input to the Board on the draft *Sustainable Freight* report, and look forward to working with you to feasibly reduce air pollutants from California's freight transport system while simultaneously protecting vital aspects of California's and the nation's economy.

Sincerely,

A handwritten signature in black ink, reading "Lawrence G. Serafini". The signature is fluid and cursive, with a prominent "L" and a stylized "S" at the end.

Lawrence G. Serafini
Acting Airport Director

cc: County Executive Officer, County of Orange
Chief Operating Officer, County of Orange