

**JOHN WAYNE
AIRPORT**
ORANGE COUNTY

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

December 4, 2017

Lisa Williams, Mobile Source Control Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on CA Planning for VW Beneficiary Mitigation Plan

Dear Ms. Williams:

On behalf of John Wayne Airport (JWA), the only commercial service airport in Orange County, California with a service area of more than three million people within the 34 cities and unincorporated areas of Orange County, we would like to thank you and the California Air Resources Board for the opportunity to submit comments on California's planning for the Volkswagen (VW) Environmental Mitigation Trust Beneficiary Mitigation Plan.

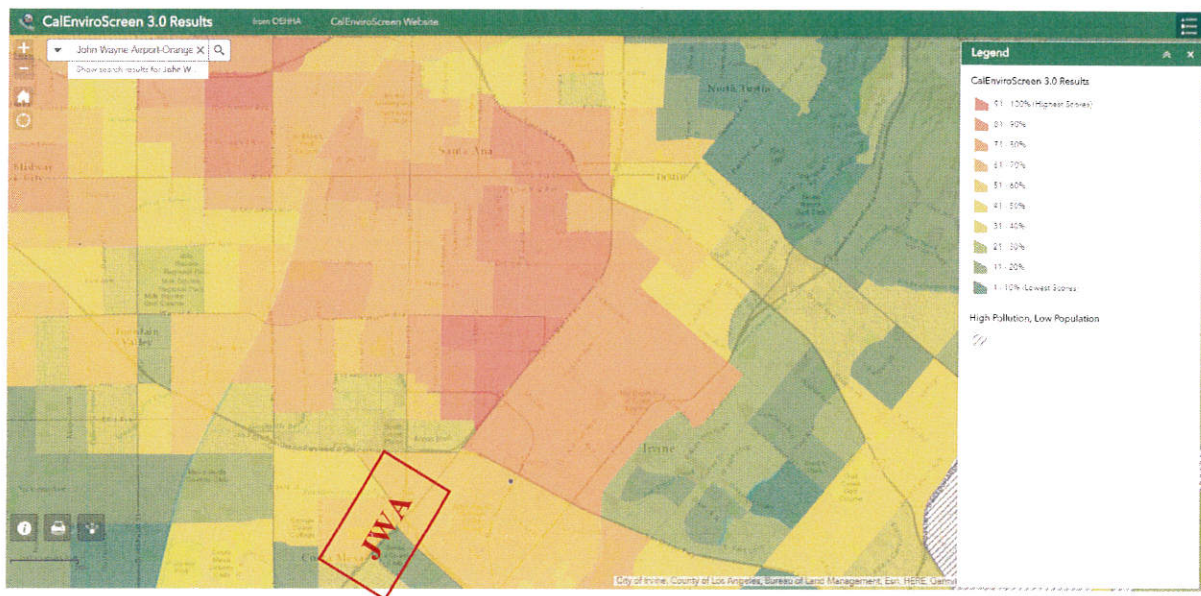
In 2016, John Wayne Airport served over 10 million passengers, providing both commercial passenger service, air cargo service, and also local law enforcement air operation support, including medical and mercy flights. JWA is the gateway through which millions of passengers travel each year to their homes, their families, their vacations, and their businesses. Moreover, JWA is also an economic engine for the County, nearby communities, and the state as a whole directly generating over 40,000 jobs and having an economic output of over \$6 billion dollars.

As you know, California and the South Coast Air Basin have laid out some ambitious, near-term goals to electrify ground transportation and ground service equipment at airports, and JWA serves as an eager partner in working with the state to get ahead of these forthcoming regulations that will enable a zero emission transition more quickly. However, we cannot get there alone. The cost of going electric, and so suddenly, far exceeds our financial capabilities to purchase new vehicles and infrastructure, so we are looking to the Federal Aviation Administration Grant Programs, as well as our local air district and the state for help in getting there. In the California State Implementation Plan (SIP), the state has outlined that it would like to "complement existing programs to achieve NOx and GHG emission reductions through use of zero-emission technology" and to "increase the penetration of the first wave of zero-emission heavy-duty technology." The funding opportunity presented by VW's Environmental Mitigation Trust represents an ideal chance for airports like JWA to partner with the California Air Resources Board (CARB) to achieve emissions reduction and also to serve as a showcase for medium and heavy duty electric vehicle deployment. In order to achieve these goals, we would recommend the following three approaches to the state's planning efforts:

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1. **Allocate a pollution-burdened impact share of funds versus a population share.** The actions of by VW led directly to increased criteria pollutants throughout the areas in which the affected 2.0L and 3.0L vehicles were domiciled and traveled. In the South Coast Air Basin, we had the highest number of these vehicles within our communities and thereby South Coast Air Basin deserves the highest share of funding as a result to help us in our collective efforts to mitigate those emissions.
2. **Direct funding to areas that benefit disadvantaged communities.** Airports throughout the state tend to not be located in areas that are ranked within the top 25% of disadvantaged communities under CalEnviroScreen 3.0, however allocating funding to airports will provide air quality benefits to those communities. The map below displays the CalEnviroScreen results for JWA and the surrounding areas. The areas to the north and downwind (given prevailing winds) of JWA are heavily impacted by pollution. Supporting the transition of ground support equipment and other airport vehicles to cleaner technologies will positively impact the adjacent communities. In addition to potential airport emission wind dispersed contributions, a good portion of airport trips traverse these disadvantaged communities to business and vacation destinations. Accordingly, supporting the transition of airport shuttles, local delivery trucks and other vehicles that service the airport to cleaner technologies will also benefit adjacent disadvantaged communities.



3. **Complement state rulemaking efforts in transportation electrification at airports.** CARB has a unique opportunity to utilize funding from the VW Environmental Mitigation Trust to quickly achieve some of its ambitious goals on airport emissions reductions that they are considering with rulemaking. We would encourage that CARB take this opportunity to accomplish these goals through this source of funding in a way that does the following:
 - a. **Creates a set-aside for airports to ensure airport projects become a priority.** If funding is directed into one state fund across all projects, there is no guarantee that airport projects make it to the top of the list. This can be achieved through an airport-only program or through a categorical allocation in a larger program.

- b. Enables funding for airport projects, including:**
 - i. Electric vehicle supply equipment (EVSE):**
 - 1. Light duty EVSE that services passengers, fleets, and workers at airports.
 - 2. EVSE to accompany medium and heavy duty equipment replacements.
 - ii. Electric shuttle buses**
 - iii. Electric forklifts and cargo handling equipment**
 - iv. Electric ground support equipment**
- c. Makes it easy to combine other funding sources to leverage VW funds even further.** The state has several other funding sources that will be key in reducing emissions during the voluntary phase of airport transportation electrification. In this stage, we would encourage that the state make it easy to deploy other funding sources in addition to the VW funding sources to further accelerate transportation electrification. These other sources include, but are not limited to Carl Moyer, HVIP, and AB 2766.

Should CARB effect rules requiring shuttle or GSE electrification at airports, the main funding source we've utilized to date to reduce our vehicle and equipment emissions—the Federal Aviation Administration Voluntary Airport Low Emissions (VALE) Grant Program—will be going away as they will not provide funds for non-voluntary measures. VW Funding can accelerate airport efforts, thereby reducing emissions at some of the state's primary transportation hubs as quickly as possible. Therefore, we respectfully request that CARB consider and incorporate the three approaches we've outlined into the state's planning efforts.

We appreciate the opportunity to submit these comments and to work with CARB on efforts to reduce emissions at airports like JWA. Please do not hesitate to reach out to Melinda McCoy, Airport Environmental Manager, via email at MMcCoy@ocair.com or by phone at 949-252-5267 if you have any questions or need any additional information on the comments submitted herein.

Sincerely,



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