

March 20, 2017

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814**Electronic Submittal Via:** <http://www.arb.ca.gov/lispub/comm/bclist.php>**Re: 2016 Air Quality Management Plan for Ozone and PM2.5 for the South Coast Air Basin and the Coachella Valley**

This letter is written and submitted on behalf of Southwest Airlines Co. (Southwest) to urge the California Air Resources Board (CARB) to withdraw the recent amendment to 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). Southwest supports and incorporates by reference the comments submitted by Airlines for America® (A4A) on the Final AQMP and SIP Strategy. In particular, Southwest objects to the South Coast Air Quality Management District Governing Board's (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.¹

The District Board's decision to direct District Staff to develop an ISR was made without providing stakeholders a meaningful opportunity to evaluate and provide comments on the decision to amend measure MOB-04. Southwest has worked cooperatively with CARB since the early 1990's to implement zero and low emission equipment throughout the State of California to bring emissions associated with our ground support equipment fleet to levels well below fleet emission standards. Much of this progress has been made on a voluntary basis, often in consultation and cooperation with the industry and the regulators, and we feel that the District Board's proposal is contrary to our past positive working relationship.

Southwest understands and recognizes the significant and difficult responsibility CARB and the District Board have in developing and implementing clean air regulatory measures and respectfully urges CARB to direct the District Board to work cooperatively with affected

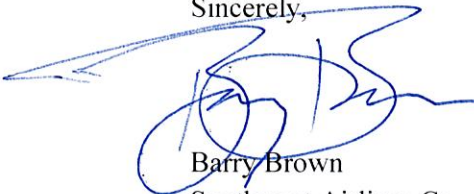
¹ The text of the motion adopted by the District Board is available here:
<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/2016aqmpamend.pdf?sfvrsn=6>.

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stakeholders to engage in an open and meaningful review of options for airport emission mitigation measures.

Southwest appreciates your consideration of these comments and would welcome any questions or comments you might have.

Sincerely,



Barry Brown
Southwest Airlines Co.