



December 13, 2016

Mr. Mark Williams, Air Pollution Specialist
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Public Comment on Volkswagen's \$800 million 10-year zero emission vehicle (ZEV) Investment Commitment in California

Dear Mr. Williams,

On behalf of the San Diego County Regional Airport Authority (Authority), I am writing to submit comments on the Volkswagen (VW) \$800 million 10-year zero emission vehicle (ZEV) Investment Commitment in California.

The Authority operates San Diego International Airport, the busiest single-runway commercial service airport in the nation. In 2015, the airport served over 20 million passengers, a new passenger record. As operators of the San Diego International Airport, the Authority has prioritized sustainability in its decision-making and capital investments. Since 2009, the Authority has been actively implementing an Air Quality Management Plan to help improve regional air quality and to reduce greenhouse gas emissions. More recently, the Authority completed the \$1 billion "Green Build" project at the San Diego International Airport that included new gates to reduce terminal congestion, enhanced curbside check-in to expedite the passage process, and a dual-level roadway to relieve curb-front traffic congestion. The project remains the only LEED Platinum-certified commercial terminal in the world. As the third largest international airport in the State, the Authority appreciates the opportunity to submit comments on the guidance document the Air Resources Board will be developing to communicate California's priorities to VW.

First, the Authority believes that VW funds for ZEV infrastructure should be prioritized for projects in non-attainment areas for Ozone (which is caused by NOx) under federal and state air quality regulations. It is vital that non-attainment areas are able to put in place infrastructure to meet air quality goals, especially the stricter 2015 National Ambient Air Quality Standards for Ozone. We urge the ARB to include in the guidance document the prioritization of VW investing in non-attainment areas that need assistance in improving air quality for human and environmental health.

Second, the Authority believes VW should prioritize ZEV infrastructure projects located in disadvantaged community zip codes, rather than census tracts, similar to other California transportation grant programs. Zip codes allow a broader, more regional approach to addressing environmental justice concerns and offer more opportunities to identify projects that could benefit vulnerable populations. We urge the ARB to include in the guidance document the use of zip codes for disadvantaged community eligibility.

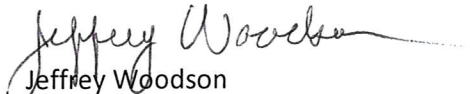
Finally, the Authority believes that VW funding should include opportunities for zero emission technologies for off-road and medium/heavy-duty applications. Off-road and medium/heavy-duty operations contribute large amounts of emissions and have not historically been the focus of California's clean transportation initiatives. As such, we urge the ARB to include these vehicle classes in the investment priorities in order to maximize GHG emission reductions.

The Authority believes there are several potential projects at the San Diego International Airport that would be wise investments for VW. Those opportunities include:

- DC Fast Chargers in valet parking lots and Taxi/Transportation Network Company hold lots.
- Level 2 Chargers in passenger & employee parking lots.
- Chargers at aircraft gates to power Ground Support Equipment (such as pushback tractors and baggage tugs).

We appreciate the ARB's consideration of these comments and the inclusion of these suggestions in the guidance document that will be provided to VW. Should there be any questions about our suggestions, please feel free to contact me at (619) 400-2510 or jwoodson@san.org or contact Brendan Reed, Director of Environmental Affairs at (619) 400-2785 or breed@san.org.

Sincerely,



Jeffrey Woodson
Vice President, Development
San Diego County Regional Airport Authority

JW/km