



July 28, 2015

Via E-Mail

Henry Hogo
Assistant Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765
hhogo@aqmd.gov

Re: 2016 AQMP White Papers

Dear Mr. Hogo:

This letter is collectively submitted by Burbank Bob Hope Airport (BUR), John Wayne Airport (JWA), Long Beach Airport (LGB), and Los Angeles World Airports (LAWA) to provide input on the South Coast Air Quality Management District (SCAQMD or Air District) staff's preliminary draft white papers for the goods movement, passenger transportation and off-road equipment working groups. As provided in the draft documents, these white papers have been prepared by staff to "illuminate policy choices relevant" to the formulation of the 2016 Air Quality Management Plan (AQMP).

To begin, each of the commercial airports represented in this letter is eager to engage with SCAQMD as staff moves closer to preparation and issuance of the draft 2016 AQMP later this year. We have a demonstrated history of collaborating with the Air District to secure emission reductions from sources within our control and jurisdictional authorities, and we wish to continue that relationship in order to achieve our mutual goals. As LAWA has indicated, obtaining facility-wide budgets is important to its future efforts under the Clean Air Act General Conformity regulations, and in that vein, LAWA has prepared both existing facility-wide inventories and will soon submit facility wide inventories for the 2023 and 2032 conditions.

We believe it is critical that each of the subject white papers clearly identify the legal authorities of the Air District relative to the categories of mobile sources contemplated therein. For example, where an emissions source category is subject to federal and/or state regulatory controls, the associated regulatory framework should be described to allow for the proper formulation of the "policy choices." For example, in the case of aircraft, it is important to stress the strong preemptive role played by the U.S. Environmental Protection Agency and Federal Aviation Administration. We also recommend that the white papers be revised to acknowledge that the emission reduction scenarios presented therein do not take into consideration potential economic, legal or technological constraints that will need to be considered as part of the 2016 AQMP adoption processes.

Finally, at this time, we encourage SCAQMD staff to engage in proactive and transparent processes relating to the formulation of the 2016 AQMP's baseline and forecast emissions inventories. Early coordination with each of the undersigned airports in the South Coast Air Basin, as well as the commercial airlines and other aeronautical users, is critical to ensuring that the inventories are accurate and that the control measures can be successfully implemented. Therefore, SCAQMD staff should coordinate with both the responsible federal agency (i.e., the Federal Aviation Administration) and commercial airlines to ensure that the emissions inventories are based on an accurate understanding of existing and proposed aeronautical conditions.

In closing, we appreciate the opportunity to participate in the development process for the 2016 AQMP, and look forward to working with you and other SCAQMD staff on this important regional plan. Please contact the following individuals from our respective staffs in furtherance of the coordination required to achieve the adoption of a viable 2016 AQMP: Mark Hardyment at Burbank Bob Hope Airport (mhardyment@bur.org), Kari Rigoni at John Wayne Airport (krigoni@ocair.com), Ron Reeves at Long Beach Airport (ron.reeves@longbeach.gov); and Steve Martin at Los Angeles World Airports (smartin@lawa.org).

Sincerely,



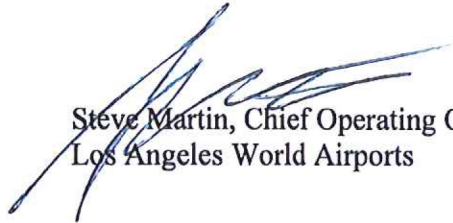
Dan Feger, Executive Director
Burbank-Glendale-Pasadena
Airport Authority



Lawrence G. Serafini, Acting Airport Director
John Wayne Airport



Bryant L. Francis, Director
Long Beach Airport



Steve Martin, Chief Operating Officer,
Los Angeles World Airports