



Airlines for America[®]

We Connect the World

December 15, 2017

Submitted via email to brett.rude@ecy.wa.gov

Brett Rude
Environmental Specialist, Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Re: Proposed Volkswagen Beneficiary Mitigation Plan

Dear Mr. Rude:

Airlines for America[®] ("A4A")¹ would like to thank the Department of Ecology for the opportunity to comment on the State's Proposed Volkswagen Beneficiary Mitigation Plan and commend the State for including airport ground support equipment ("GSE") electrification projects as an eligible mitigation action in its proposal.

A4A and its members are committed to environmental progress and view the Volkswagen Environmental Mitigation Trust ("Trust") as a unique opportunity to accelerate those efforts, particularly in disproportionately impacted communities. Our industry looks forward to working with Ecology and the State to optimize this opportunity and offer these comments on the Proposed Beneficiary Mitigation Plan ("Proposed Plan").

Mitigation Plan Goals, Principles, and Priorities

A4A lauds Ecology's goals, principles, and priorities for its use of the Trust funds, and would like to note, as evidenced in our March 13, 2017 letter, that GSE projects closely align with these stances. Washington's first goal is to "reduce emissions from diesel engines in the state where the 2.0 and 3.0 liter Volkswagen vehicles, were, are, or will be operated."² Over 38 percent of subject vehicles are registered in King County, where SeaTac is located, and A4A members are interested in GSE projects at SeaTac airport. Consequently, providing funding for GSE projects will promote this goal.

Furthermore, the Proposed Plan notes the following principles to guide Washington's selection of eligible mitigation actions: (1) "improve air quality for communities that have historically borne a disproportionate share of the air pollution burden in Washington," (2) maximize air quality co-benefits beyond nitrogen oxide reductions, and (3) maximize public health benefits.³ Investing in GSE projects align well with these

¹ A4A's members are: Alaska Airlines, Inc., American Airlines, Inc., Atlas Air, Inc., Federal Express Corporation, Hawaiian Airlines, JetBlue Airways Corp., Southwest Airlines Co., United Continental Holdings, Inc., and United Parcel Service Co. Air Canada, Inc. is an associate member.

² Proposed Plan, at p. 12.

³ *Id.*

guiding principles. GSE projects are often located in areas that receive a disproportionate quantity of air pollution from diesel fleets simply because airports are major hubs of economic activity. As demonstrated in Figure 3 of the Proposed Plan, SeaTac is located in a region that has historically received a disproportionate quantity of the diesel nitrogen oxide (“NOx”) burden in Washington. GSE projects by definition completely eliminate NOx emissions from this diesel equipment because they are replaced or repowered with all electric versions. This not only means that GSE projects will provide substantial reductions in NOx for these communities, but they will also provide substantial co-benefits because converting GSE to all-electric forms will eliminate all associated emissions of other local air pollutants such as carbon monoxide, volatile organic compounds, oxides of sulfur, and particulate matter, as well as all associated greenhouse gas emissions. And, because GSE are only operated on airport grounds, these reductions will maximize the public health benefits not only for the local communities surrounding the airports but also the workers on airport grounds.

Lastly, Washington should prioritize GSE projects because they follow the priorities Ecology has outlined in the Proposed Plan. Specifically, GSE projects will accelerate the adoption of electric equipment by their very definition in the Consent Decree. They will also accelerate fleet turnover to all-electric—the cleanest—engines and assist in achieving substantial additional emission reductions because, absent trust funding, GSE turnover is low due to the equipment’s generally long useful life. In addition, investing in GSE projects will ensure cost-effectiveness as A4A noted in its March 13 letter and is further supported by other states’ cost-benefit analyses.⁴

Our member airlines recognize that as non-government entities they will share the capital costs of replacing airline-owned GSE with all-electric alternatives. To be sure, electric GSE cannot be deployed without supporting infrastructure such as onsite power distribution and sufficient point of use recharging equipment, which typically is owned and operated by airport operators. SeaTac has already begun installing electric infrastructure to support GSE electrification for several of our members, and providing additional financial support will allow Washington to leverage the matching funds airlines will provide for this highly beneficial eligible mitigation action.

Funding Allocation

While A4A commends Ecology and the State for including GSE projects as mitigation actions eligible for funding, we would encourage you to consider increasing the percent allocation of funding toward these projects. As shown above, GSE projects align with the State’s goals, principles, and priorities. Furthermore, while Ecology acknowledges that non-road equipment generates 12% of NOx emissions in Washington, the same figure as marine vessels and switch locomotives, it allocates significantly less funding to airport GSE. Similarly, while noting that GSE projects will reduce up to 0.4 tons of NOx per piece of equipment, a figure substantially similar to the effectiveness of replacing on-road, heavy-duty vehicles, Ecology again allocates significantly less funding to airport GSE. As such, we believe that GSE projects are more effective at reducing NOx emissions than is recognized by their funding allocation.

Importantly, Ecology acknowledges that projects near and at SeaTac represent the type of projects that deserve priority consideration given that the communities surrounding the airport and along the I-5 corridor have historically borne a disproportionate share of the air pollution burden in the State.⁵ SeaTac is one of the fastest growing airports in the nation, growing by 50 percent in the last decade. In fact, the Port of Seattle has forecasted an additional 5 percent increase in airport passengers for the airport, already the ninth busiest in the country. Additional passengers directly translates into additional use of

⁴ Notably, Utah conducted an analysis that indicates GSE projects are one of the more cost-effective mitigation actions available under the Consent Decree. See “DEQ’s Cost-Per-Ton Analysis of Eligible Vehicles/Equipment Replacement Projects,” <https://deq.utah.gov/ProgramsServices/programs/air/volkswagen-settlement/index.htm> (last accessed Nov. 29, 2017).

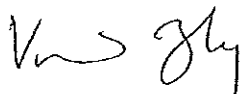
⁵ Proposed Plan, at p. 17.

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GSE. Consequently, GSE projects merit additional funding so that airlines and airports can take advantage of the benefits these projects will bring not only to their businesses but to their employees' health and the communities surrounding the airports.

Thank you for your consideration of our comments. Please let us know if you have any questions, and we look forward to working with Ecology and the State moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "V Bradley".

Veronica Bradley
Manager
Environmental Affairs
Airlines for America

CC: Tristan Atkins, Director, Washington Aviation Division, Department of Transportation,
atkinstk@wsdot.wa.gov

