



February 19, 2019

Doug Melnick
Chief Sustainability Officer
City of San Antonio
1400 S. Flores
San Antonio, TX 78204

Dear Mr. Melnick,

SA Auto Dealers, Inc. (“SADA”), an organization representing more than 74 new car dealers in the San Antonio area, has reviewed the proposed City of San Antonio (“City”) Climate Action & Adaptation Plan (“CAAP”). On behalf of our members, who currently employ over 6,000 hard-working people in our community and represent nearly \$680,000,000 annually in local economic impact, we submit this letter with our comments on the CAAP.

SADA appreciates all of the effort that the City has made to draft the CAAP and to reach out to stakeholders. However, our industry is concerned with certain provisions of the CAAP that could negatively impact the ability to locate dealerships within the City, or would limit access to private vehicles. There are a number of references to reducing the number of privately owned vehicle on our roads, and identifying private vehicles as one of the primary causes of greenhouse gas emissions.

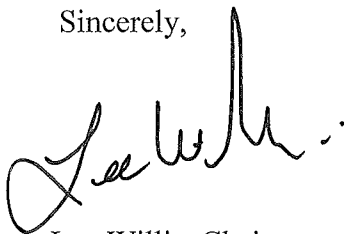
The CAAP has lofty goals, but the plan does not address the feasibility of achieving these goals. One of the goals is transitioning to carbon-free vehicles. “Transition to carbon-free transport by implementing strategies to accelerate the adoption of electric or other carbon-free personal vehicles, trucks, transit, and freight to reach 100% penetration by 2050.” However, there is no discussion in the CAAP of the current state of the technology or the market demand for such a transition. The CAAP should also distinguish the environmental impact of older vehicles versus new vehicles.

Another area of concern for SADA is that the CAAP does not have either a cost-benefit analysis, or any deep discussion of the potential negative economic impact that could result from the implementation of the CAAP goals. It is extremely challenging for the business community and our industry to support a plan without a full fiscal analysis. The CAAP does acknowledge the economic benefits of private vehicle ownership, and the economic disparity caused by lack of transportation.

“Reliable and affordable transportation is critical for meeting daily needs and accessing educational and employment opportunities.” SADA would like the City to further explore the benefits of private vehicle ownership.

SADA asks that the City revise the plan to address the issues noted above. We can provide volunteers from our industry to discuss in more depth: the feasibility and implementation of new technologies; the distinction between new vehicles and older vehicles in terms of environmental impact; and potential economic impacts resulting from the implementation of the CAAP goals. We look forward to working with you on this issue.

Sincerely,



Lee Willis, Chair
SA Auto Dealers



Pamela Crail, President
SA Auto Dealers

CC: SADA Board of Directors
Hunter Hale
April Ancira
Art Kiolbassa
Mike Trompeter
Rick Cavender