

Comment Letter #61



Ontario International Airport Administration Offices

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July 5, 2022

Dr. Sang-Mi Lee, Planning and Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

Dear Dr. Lee:

The Ontario International Airport Authority (OIAA) has submitted this comment letter on the Draft 2022 Air Quality Management Plan (Draft 2022 AQMP) to request that the 2022 AQMP be updated to accurately reflect the Ontario Airport (ONT) emissions inventory. Through the recent review of projected fleet mixes and operational levels, it was determined that some inputs included in the Draft 2022 AQMP are not indicative of the current or future operations at ONT (notably the forecasted aircraft activity and taxi time assumptions). Notably, the current assumptions underrepresent the emissions at ONT. We appreciate the effort that the South Coast Air Quality Management District (AQMD) has made to date, and the ongoing effort to address this issue.

The OIAA provides overall direction for the ownership, management, operations, development and marketing of ONT for the benefit of the Southern California economy and the residents of the airport's four-county catchment area (San Bernardino, Riverside, Orange, Los Angeles). ONT is located in San Bernardino County, approximately 35 miles east of Downtown Los Angeles in the center of Southern California and is considered part of the Inland Empire. Facilities on the Airport include two passenger terminals, general aviation facilities, air freight buildings, parking lots, and numerous airport and aircraft maintenance and support services.

OIAA has made and is continuing to make efforts to reduce emissions at the airport. In 2019, OIAA agreed to a Memorandum of Understanding to address air emissions from ground support equipment. Currently, OIAA is in the process of developing a Blueprint for integrating Medium and Heavy Duty (MHD) Zero Emission Vehicle (ZEV) infrastructure throughout the airport over the coming decade. The goal is to develop an actionable roadmap towards 100% MHD ZEV infrastructure equipment at ONT, which will significantly improve local air quality, promote job growth, and bolster the economy of this disadvantaged community (DAC). The Blueprint will serve as a replicable model that can be deployed at all major transportation hubs throughout California, including other airports, seaports, and urban centers.

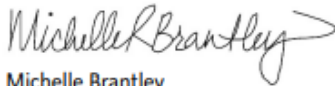
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OIAA began a review in late 2021 due to the ongoing COVID recovery trends and anticipated projects at ONT. These projects will provide emission reductions basin wide by providing additional transportation pathways to the inland empire. ONT airport's ability to address the current and growing demand will help minimize truck and vehicle traffic going from the inland empire to other airports in the basin. In the process of this review, OIAA discovered that data previously provided to AQMD was inaccurate and grossly outdated. These inaccurate assumptions lead to a severe underrepresented emissions inventory for ONT, and would impede OIAA from obtaining approvals from the Federal Aviation Administration (FAA) for even the most basic improvements to ensure the continued operation of ONT. In order to align the 2022 AQMP with the existing and anticipated future operations of ONT, OIAA is requesting an update to the Draft 2022 AQMP for the fleet mix and taxi time assumptions for ONT.

OIAA looks forward to working with AQMD to resolve this issue that currently exists in the Draft 2022 AQMP. We believe that the accurate reflection of ONT emissions inventory is important to allow AQMD to properly address the air quality issues in the South Coast Air Basin, and to ensure that ONT can continue to operate to provide important services for the benefit of the region.

Sincerely,



Michelle Brantley
Chief Capital Development Officer
Ontario International Airport