

June 1, 2025

Shawn Wang, Program Supervisor, Planning, Rule Development & Implementation
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

**RE: Los Angeles International Airport South Coast Air Quality Management
District Memorandum of Understanding Annual Report for Calendar Year 2024**

Dear Mr. Wang:

Los Angeles World Airports (LAWA) has prepared the 2024 annual report (see attachments) for Los Angeles International Airport (LAX) to the South Coast Air Quality Management District (SCAQMD). This report is required by a Memorandum of Understanding (MOU) between SCAQMD and LAWA. The annual report quantifies the estimated emission reduction benefits of the three voluntary LAX measures from LAX's Air Quality Improvement Measures (AQIM) in the South Coast Air Basin. This MOU does not create State Implementation Plan (SIP) creditable reductions, but it identifies specific voluntary measures and provides the means for the SCAQMD to quantify the emission reductions from the MOU Measures to obtain SIP credits.

The LAX MOU consists of three measures related to non-aircraft commercial passenger mobile sources. LAWA monitors the implementation of the MOU Measures and provides data and annual emissions inventory reports to SCAQMD as specified in MOU Attachment A for Measures 1 to 3. The report does not apply to any source or operation not specifically identified in the MOU Measures.

MOU Measure No. 1 – Ground Support Equipment Emissions Reduction Policy

MOU Measure No. 1 is an emission reduction program for ground support equipment (GSE). This measure requires that all ground support equipment operators at LAX achieve fleet average hydrocarbon + nitrogen oxide (NOx) emission factors of 1.8 and 1.0 grams per brake horsepower-hour (g/bhp-hr) by January 1, 2023, and January 1, 2031, respectively. To achieve this measure, LAWA has been working with Airport tenants to achieve the performance targets by specified dates through accelerated turnover to cleaner equipment.

The 2024 report shows the fleet average NOx emission factor for commercial GSE at LAX is 0.96 g/bhp-hr, which is lower than the 2017 AQIM baseline fleet average NOx emission factor of 2.24 g/bhp-hr and exceeded (i.e., is better than) both the 2023 and 2031 targets. LAX has committed \$500,000 to accelerate adoption of zero-emission electric ground support equipment (eGSE). As of May 2025, 80 percent of funds have been awarded to four recipients, enabling the replacement of 27 conventional units with eGSE. The fully subscribed program will replace 32 units in total, cutting emissions and prioritizing the retirement of older, high-polluting equipment, such as pre-2010 gasoline and Tier 0/1 diesel models. These efforts will help grow the eGSE fleet at LAX in the years ahead. LAWA is continuing to work with GSE operators to encourage the continued replacement of older



GSE and will support any future electrical infrastructure changes that may be necessary. LAWA took a significant additional step towards a cleaner future on January 18, 2024, by adopting the LAX Zero-Emission Ground Support Equipment Policy. This policy outlines a phased approach to transitioning all GSE at LAX to zero-emission alternatives by 2033.

MOU Measure No. 2 – LAX Alternative Fuel Vehicle Incentive Program

MOU Measure No. 2 is an incentive program to replace heavy-duty diesel vehicles with zero or near-zero emission heavy-duty vehicles at LAX. Under the MOU, LAWA will implement an incentive program that will distribute up to \$500,000 dollars in funding to applicants based on the "incremental cost" differential of the zero or near-zero emission vehicles as compared to conventionally-fueled equivalents with a Gross Vehicle Weight Rating (GVWR) of 14,001 pounds or greater by December 31, 2021.

In 2024, no further progress was made on this measure. LAWA previously distributed \$325,000 in incentives to support the deployment of 15 vehicles in 2019. However, ongoing challenges related to COVID-19 recovery and persistent supply chain disruptions have prevented adding additional incentive-funded vehicles after 2020.

LAWA has remained committed to advancing clean transportation. Since the original incentive cycle concluded before reauthorization could be secured from the Board of Airport Commissioners (BOAC), LAWA took proactive steps in 2024 by initiating the development of a new incentive program. In April 2025, BOAC approved this incentive program. This new effort aims to allocate the remaining \$175,000 in unspent funds, ensuring continued support for zero-emission heavy-duty vehicle deployment at LAX.

MOU Measure No. 3 –Zero-Emissions Bus Program

MOU Measure No. 3 focuses on transitioning LAWA-owned buses at LAX to zero-emission buses. The Measure requires LAWA to replace 20% and 100% of the LAWA-owned and operated buses with zero-emission buses by January 1, 2023 and January 1, 2031, respectively.

For 2024, LAWA is reporting a fleet of 40 buses, which is the same as last year. Of the 40 buses, 20 are electric, which represents 50 percent of the LAWA-owned bus fleet. These electric buses are typically dedicated for use on the airfield and on occasion are used on-road to transport passengers. LAWA is concluding a procurement of up to 27 (13 with an option to purchase 14 more) electric buses, and its parking lot management company is looking to add 11 electric buses in 2025.

LAWA remains actively committed to these agreements and is dedicated to achieving air quality improvements in the South Coast Air Basin.

Sincerely,



Crystal Lee
Deputy Executive Director
Airport Development Group
Sustainability, Energy, Environmental and Development Services

CL:CA:lp

Attachments:

- LAX MOU RY2024 Summary and Data Report.pdf
- 1. 2024 LAX GSE Emission Calcs_20250601.xlsm
- 1. SCAQMD MOU RY24 M1.xlsm
- 2. LAX Clean Fleet Alt Fuel Incentive 2024.xlsx
- 2. SCAQMD MOU RY24 M2.xlsx
- 3. LAX Clean Fleet Bus 2024_AQMD (Fleet as of Dec 31).xlsb
- 3. SCAQMD MOU RY24 M3.xlsx

Cc: Vinita Waskow
Carter Atkins
Genevieve Lahey
Lauren Paladino
Amylou Canonizado
Ian MacMillan (SCAQMD)
Elaine Shen (SCAQMD)
Daniel C. Hernandez (SCAQMD)
Valerie Al Rwais (SCAMD)
John Pehrson (CDM Smith)
Jeremy Gilbride (CDM Smith)