

June 1, 2026

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 2025**

Dear Mr. Wang:

Los Angeles World Airports (LAWA) has prepared the 2025 annual report (see attachments) for Los Angeles International Airport (LAX) for submittal to the South Coast Air Quality Management District (SCAQMD). This report is required by a Memorandum of Understanding (MOU) between SCAQMD and LAWA and quantifies the estimated emission reduction benefits of three voluntary LAX measures from LAX's Air Quality Improvement Measures (AQIM) program 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 2025 report shows the fleet average hydrocarbon (HC) + nitrogen oxides (NOx) emission factor for commercial GSE at LAX is 0.89 g/bhp-hr, which is lower than the 2017 AQIM baseline fleet average HC + NOx emission factor of 2.24 g/bhp-hr and exceeded (i.e., is better than) both the 2023 and 2031 targets. LAWA continues implementation of the LAX Zero-Emission Ground Support Equipment (ZE GSE) Policy adopted in January 2024, which outlines a phased approach to transitioning all GSE at LAX to zero-emission alternatives by 2033. LAWA also continued distributing funds through the LAX Electric GSE Incentive Program: as of June 2026, approximately \$440,000 (88 percent of the \$500,000 allocation) had been awarded to four recipients to replace 35 conventional GSE units with eGSE. 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.

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. This measure is based on the LAX Zero and Near-Zero Emission Heavy-Duty Vehicle Incentive Program and supports replacement of diesel-fueled heavy-duty trucks with a Gross Vehicle Weight Rating (GVWR) of 14,001 pounds or greater with zero- or near-zero-emission alternatives.

Through the original incentive cycle, LAWA distributed \$325,000 in incentives to support the deployment of 15 vehicles in 2019. After 2020, additional incentive-funded vehicles were not added due to ongoing implementation challenges, and remaining grant recipients ultimately chose not to proceed with their projects.

Following reauthorization of the LAX Alternative Fuel Vehicle Incentive Program in April 2025, LAWA launched a renewed zero-emission heavy-duty vehicle incentive effort using the remaining \$175,000 from the prior program cycle. LAWA conducted targeted outreach through email distributions, workshops, recurring presentations at



LAX Alternative Fuel Vehicle and GSE Manager meetings, and direct engagement with stakeholders. Although initial response was limited, these efforts increased tenant engagement and supported submitted applications and ongoing participation discussions, however no incentive funds were awarded in 2025.

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.

As of December 31, 2025, LAWA owned a fleet of 39 buses. One older shuttle bus used on the airfield by LAWA for ADA transport was scrapped in October 2025, reducing the in-service inventory from 40 buses. Of the 39 buses, 20 remain electric, which represents approximately 51 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. Thirteen additional zero-emission buses were received in 2025 and were placed into service in early 2026; therefore, they are not reflected in the December 31, 2025 in-service inventory totals above.

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

Sincerely,

Crystal Lee

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

CL:CA:lp

Attachments:

- LAX MOU RY2025 Summary and Data Report.pdf
- 1. 2025 LAX GSE Emission Calcs_20260601.xlsm
- 1. SCAQMD MOU RY25 M1.xlsm
- 2. LAX Clean Fleet Alt Fuel Incentive 2025.xlsx
- 2. SCAQMD MOU RY25 M2.xlsx
- 3. LAX Clean Fleet Bus 2025_AQMD (Fleet as of Dec 31).xlsb
- 3. SCAQMD MOU RY25 M3.xlsx

Cc: Vinita Waskow
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