



March 1, 2018

South Coast Air Quality Management District
Governing Board
21865 Copley Drive
Diamond Bar, CA 91765

RE: Airport Facility-Based Measures (MOB-04)

On behalf of the California Airports Council (CAC), an association of the 33 commercial service airports in the state, including Los Angeles International Airport, John Wayne Airport-Orange County, Hollywood Burbank Airport, Ontario International Airport Authority, and Long Beach Airport, I write this letter to voice our support for staff's recommended action on MOB-04. We greatly appreciate the time and effort taken by SCAQMD staff to engage our industry and conduct a collaborative and transparent process to assess airport operations.

The CAC supports the staff proposal to pursue individual Memoranda of Understanding (MOU) with airports in the Basin rather than endorsing an Indirect Source Rule (ISR). After months of concerted meetings and workshops, airports have been able to provide information on their extensive environmental programs and share critical concerns about pursuing an ISR. Airports are heavily regulated by the Federal Aviation Administration (FAA) creating constraints that limit airport control over certain emissions, however, our facilities continue to develop and implement voluntarily-initiated projects and programs to reduce emissions. As examples:

- **Los Angeles International Airport** already has a GSE Emissions Reductions Program, which is the first of its kind in the country and has helped reduce emissions by 45% since 2013. The airport also has a Clean Fleet Program resulting in 60% of the LAX fleet being powered by alternative fuels.
- **John Wayne Airport** provides electric preconditioned air units for use by commercial aircraft and ground-based electrical power in place of jet-fueled on-board Auxiliary Power Units (APUs). The ground-based units burn about 10 times less fuel than APUs, resulting in lower carbon emissions.
- In 2005, **Hollywood Burbank Airport** implemented a Clean Air program, under which it installed battery chargers for electric ground service equipment at all 14 aircraft parking positions at the terminal. In 2012, the airport completed its aircraft

parking ramp rehabilitation project including the installation of electric ground power for aircraft at each of the 14 gates.

- **Long Beach Airport** built a new consolidated parking structure reducing emissions from shuttles to remote lots. This resulted in a reduction of 8,760 shuttle bus trips per year, also equivalent to reducing air emissions by 30,000lbs per year.
- **Ontario International Airport Authority** has 100% electrification of aircraft gates allowing planes to plug-in to the electrical grid while at the terminal.

With each new program created, airports undergo their own unique community engagement process to ensure that the appropriate stakeholders can be at the table during development. Precedent has been set at each airport to engage stakeholders and an MOU process would be approached in a similar manner. Airports will ensure that interested parties have an opportunity to evaluate and provide feedback throughout the course of development.

In addition, to lessen confusion for both airports and the public, we would request that any MOU agreed upon by airports and SCAQMD cover the entire facility. SCAQMD and CARB will soon have the decision to pursue ISRs for warehouses and distribution centers, which could impact certain airports with distribution sites within their boundaries. Airports would like to handle the entirety of their land in a uniform matter, and strategically develop measures and policies that will support the whole area through the MOU.

We thank you for considering our comments and continue to urge your support for staff's recommendation to MOB-04. With aircraft accounting for over two-thirds of untouchable aviation-related emissions, a voluntary MOU approach is the best option forward due to the limited emissions reductions remaining on the table from non-aircraft sources. The proposed pathway will provide an effective and efficient roadmap to supporting AQMDs emission reduction needs and not restrict airports ability to complete projects nor obtain federal grant funding. We stand ready as willing partners to continue working with SCAQMD staff towards an achievable plan.

Sincerely,



Jim Lites
Executive Director