

1. What is LAX's annual GSE reporting requirement?

- i. **Equipment Inventory List (EIL) -** This is the operator's fleet inventory as it was on December 31st of the previous year (e.g., December 31, 2020 for reporting year 2020).
- ii. **LAX GSE Reporting Official Attestation Form** This form certifies the accuracy of the reported data to the best of the operator's knowledge.
- iii. **LAX GSE Sale and Relocation Form** This is data required under the LAX-SCAQMD MOU to account for GSEs movement within the South Coast Basin.

2. Who needs to submit data under the Vehicle Inventory List (VIL)?

LAWA's Certified Service Provider Program (CSPP) - Certified Service Provider License Agreement (CSPLA) requires the applicants to submit their vehicle inventory to show compliance with the LAX Alternative Fuel Vehicle Program. Only the operator under the CSPLA needs to submit the vehicle inventory list (fleet) using this portal.

Annual reporting under the LAX Alternative Fuel Vehicle Program should be completed via this website: <u>https://online.lawa.org/altfuel/login</u>

3. Is the new spreadsheet designed for multiple types of LAWA reports (such as CSPP), some of which may not apply to an airline?

Correct. The new EIL and VIL forms are designed for multiple types of LAWA reports. Airlines generally have a lease agreement and do not operate under the CSPP; therefore, airlines do not need to complete the VIL form. However, companies operating a vehicle at LAX with >8,500 lbs GVWR need to submit an annual report using the existing Alternative Fuel Vehicle Program portal <u>https://online.lawa.org/altfuel/login</u>.

For GSEs, LAWA is using the updated EIL form to collect 2021 data for the annual reporting under the LAX GSE Emissions Reduction Program. Airlines needs to report GSE data using this updated format.

4. Submission of the non-motorized GSEs are optional at this time but strongly encouraged. An inventory of the GSEs, regardless of whether it is motorized (required reporting under the LAX GSE Emissions Reduction Program) or non-motorized, is critical for LAWA for landuse/space planning and to manage its airfield traffic operations to ensure a safe environmentWill the Alt. Fuel Vehicle Program reporting only be required on the new platform using the 'Vehicle Inventory List' (VIL) and no longer through the old platform (https://online.lawa.org/altfuel/login)?

Alt Fuel Vehicle Program applies to vehicles with >8,500 pounds GVWR. Submit the annual report on applicable vehicle(s) to the existing platform <u>https://online.lawa.org/altfuel/login</u>. The operator will receive a final confirmation email after the annual report is successfully submitted to the portal. The operator includes this final confirmation email in the application package for the Certified Service Provider Program (CSPP) <u>https://www.lawa.org/groups-and-</u>



divisions/operations-and-emergency-management/airport-and-ground-transportationpermits/airfield-permits/certified-service-provider-license-agreement.

The Vehicle Inventory List (VIL) form is a list of all vehicles used by the operator for LAWA to manage airport operations. The form is and has been included in the application for the Certified Service Provider Program (CSPP). Beginning this year, the VIL data must now be uploaded via a portal <u>https://www.appsheet.com/start/d1221be8-2a5c-4787-bac4-5b0f5f24df0e</u> or <u>https://bit.ly/3geN9Z0</u>.

5. Can you confirm the VIL is only for vehicles subject to LAWA's Alternative Fuel Vehicle Program (i.e. vehicles < 8,500 lbs GVWR are not reportable)?

The VIL is data required to be submitted by operators under the CSPP regardless of the weight rating. Operators not under the CSPP does not need to complete the VIL.

6. The 'Read This First' and 'Equipment Inventory List' sheets mention reporting nonmotorized GSE. The LAWA GSE Emission Reduction Policy applies to GSE subject to CARB's Off-Road Diesel (ORD), Large Spark Ignition (LSI), and Portable Engine Airborne Toxic Control Measure (ATCM) regulations. Can you explain why non-motorized equipment needs to be reported? How is reportable non-motorized equipment defined?

Non-motorized GSEs are Ground Support Equipment without an engine. Non-motorized GSE data is used under the LAX Ground Equipment Inspection Program (GEIP) in Section 11 of the LAX Rules and Regulations <u>https://www.lawa.org/rules-and-regulations/lax-rules-and-regulations</u> to increase safety awareness on the airfield, and to reduce equipment/property damage caused by defective GSE and untrained staff. Most citations issued under the GEIP are for non-motorized GSEs. For example, in 2021, close to 80% of the GSE tagged out (~1,500 total) in the GEIP were non-motorized. The LAX GSE Emissions Reduction Program does not use data on non-motorized GSEs.

The CSPP already required operators under the agreement to submit a list of GSEs. The intent of the EIL is to simply data collection and create a centralized database for all LAWA GSE programs.

7. Operators are willing to provide data to support LAWA's programs, has there been any outreach or discussion on this request?

LAWA participates at the monthly *LAWA and TBITEC Terminal Operations Subcommittee Monthly Meeting,* which has membership of over 80 airlines and service providers, and the quarterly safety meetings. Program updates are communicated to members at those meetings. LAWA staff has also been conducting one-on-one outreach via virtual and phone meetings with airlines and service providers. There are more than 350 companies reporting under the LAX Alternative Fuel Vehicle Program and around 35 companies reporting under the LAX GSE Emissions Reporting Program. Staff is always available to help and to provide clarification on the program at (424) 646-6483; gsereporting@lawa.org; acanonizado@lawa.org.



8. Is the new Excel spreadsheet adding some on-road vehicles/equipment that should not be included for calculating the emissions fleet average (the average composite emissions factor for the fleet or the goal for the program)?

Some off-road GSEs have engines that were certified to on-road standards. The EIL form is for GSEs regardless of whether the engine is certified on-road or off-road. The average composite emissions factor for the fleet calculator includes both on-road and off-road GSEs and is designed to use CARB's on-road or off-road emission factor tables to calculate emission factors. On-road vehicles are not included in the EIL. See link to the 2015 program design model https://www.lawa.org/-/media/lawa-web/environment/files/gse-emissions-reduction-program/lax-gse-reporting-forms-and-emission-factor-model-user-guide.ashx.

This methodology has been discussed and confirmed to be valid for the measure under the 2019 Memorandum of Understanding between the South Coast Air Quality Management District and The City of Los Angeles Department of Airports <u>https://www.aqmd.gov/home/air-guality/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/commercial-airports-mous</u>.