

September 18, 2025

The Honorable Vanessa Delgado
Chair, South Coast AQMD Governing Board
21865 Copley Drive
Diamond Bar, CA 91765
Email: vdelgado@aqmd.gov

**Re: Request that South Coast AQMD not release the 75-day package
for Proposed Rule 2304 - Commercial Marine Ports**

Dear Chair Delgado and South Coast AQMD Mobile Source Committee Members,

On behalf of NAIOP SoCal and our over 1,200 Members deeply involved in Southern California's commercial real estate industry and goods movement sector, I write to respectfully request that the South Coast Air Quality Management District (AQMD) refrain from releasing the 75-day package for Proposed Rule 2304 - Commercial Marine Ports, in order to allow the Ports of Los Angeles and Long Beach and South Coast AQMD to finalize a cooperative agreement.

The cities, Ports and South Coast AQMD have reached mutual consensus on all of the agreement terms related to zero-emission infrastructure planning, providing an alternative to Proposed Rule 2304. This agreement includes meaningful provisions on enforcement, transparency and strategies to reduce emissions. The Ports are committed to bringing the agreement to each respective governing body as soon as practicable. This meets the standard in the motion approved at the August 1, 2025 South Coast AQMD Governing Board meeting, and should serve as the basis to not release the rule package.

Spanning nearly 45 days, representatives from the cities and Ports convened over 15 meetings with South Coast AQMD staff, totaling more than 40 hours of joint discussion. The parties spent significant hours between meetings reviewing and responding to comments and preparing documents, demonstrating their shared commitment to reaching a meaningful and enforceable outcome.

NAIOP SoCal firmly believes that a Cooperative Agreement presents the most effective and collaborative path to reach our shared clean air goals. The Ports are public agencies, which serve to support millions of jobs across the nation – and especially in our Southern California communities – and have led the way towards achieving historic emissions reductions. They will continue to do so in collaboration with South Coast AQMD through a transparent public process, if given the chance to finalize this agreement.

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Thank you for your serious consideration of this request. Again, NAIOP SoCal respectfully urges you to direct South Coast AQMD staff to refrain from releasing the 75-day package for Proposed Rule 2304 - Commercial Marine Ports, and focus their work on the Cooperative Agreement as negotiated by the parties.

Sincerely,

Mihran Toumajan

Mihran Toumajan
Manager of Government Relations
NAIOP SoCal

CC: Hon. Holly J. Mitchell, South Coast AQMD Mobile Source Committee Vice Chair
Hon. Larry McCallon, South Coast AQMD Mobile Source Committee Member
Hon. V. Manuel Perez, South Coast AQMD Mobile Source Committee Member
Hon. Nithya Raman, South Coast AQMD Mobile Source Committee Member
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