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October 21, 2025

Sent via Email to ports_comments@aqmd.gov

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

Re: ILWU Locals 13, 63, and 94 Feedback- Draft Cooperative Agreement Between the South Coast Air Quality Management District, the City of Long Beach Harbor Department, and the City of Los Angeles Harbor Department

Dear South Coast Air Quality Management District,

International Longshore and Warehouse Union (“ILWU”), Locals 13, 63, and 94 write to provide feedback on the recent Draft Cooperative Agreement between the South Coast Air Quality Management District, the City of Long Beach Harbor Department, and the City of Los Angeles Harbor Department (“Draft Cooperative Agreement”).

As you know, ILWU Locals 13, 63, and 94 represents over 15,000 longshore workers, marine clerks, and foremen at the Ports of Los Angeles and Long Beach (“Ports”) as well as the foremen at the Ports of San Diego and Hueneme. No other group stands to gain more from cleaner port operations than our members, as we are the workforce with “boots on the ground” at the Ports and are intertwined with the Ports’ surrounding communities with 53% of our members residing within 5 miles of the Ports, and 74% of our members residing within 10 miles of the Ports.

The tremendous economic impact of the Ports within the South Coast Air Basin and beyond cannot be overstated. Our members have middle-class sustaining jobs with healthcare and retirement benefits that allow them to support their approximately 60,000 family members, as well as the local communities within the South Coast Air Basin and beyond. In addition, the Ports are responsible for over one million jobs in the counties of Los Angeles, Orange, Riverside, San Bernardino, and Ventura, and nearly three million jobs nationwide. The Ports’ economic activity generated \$2.78 billion in state and local taxes, plus an additional \$4.73 billion in federal taxes, in 2022.

Based on this immense economic impact, the most glaring omission in the Draft Cooperative Agreement is its silence on the use of public funds to automate workers out of a job. For nearly a decade, legislation has prohibited the use of public funds or grants to require, incentivize, encourage, or otherwise promote the use of automated, remotely controlled, or remotely operated cargo handling equipment, or infrastructure to support such equipment.

This prohibition on misuse of public funds is not anti-innovation, rather, it is basic fiscal responsibility. As the ILWU has consistently argued: taxpayer money should not be used to put taxpayers out of work for the benefit of foreign-owned ocean carriers and their subsidiaries. If terminal operators seek to invest in expensive automation that eliminates California jobs, sound governance and responsible economic policy mandate that they do so with private capital, not public subsidies.

As such, we respectfully request that language be inserted into Section II(A)(1) of the Draft Cooperative Agreement reflecting the parties commitment to not “use public funds or grants, whether municipal, county, state, or federal funds or grants, to require, incentivize, encourage, or otherwise promote the use of automated, remotely controlled, or remotely operated equipment, or infrastructure to support automated, remotely controlled, or remotely operated equipment.”

Such a provision is a rational, balanced policy that protects middle-class union jobs, prevents taxpayer dollars from being used to automate those jobs away, and ensures continued environmental progress without destabilizing California's economic foundation.

Sincerely,



Gary Herrera
President
ILWU Local 13



Danny Vilicich
President
ILWU Local 63



Daniel G. Miranda
President
ILWU Local 94