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SAN PEDRO & PENINSULA HOMEOWNERS COALITION

May 1, 2024

Via Electronic Mail

Ian MacMillan
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Re: Proposed Rule 2304- Marine Port Indirect Source Rule- Recommendations for Developing a Strong Rule Following Technical Working Group Discussions

Dear Mr. MacMillan:

The undersigned organizations write to provide further comment on the development of Proposed Rule 2304- Marine Port Indirect Source Rule (“Port ISR”). We start by extending our appreciation to staff for facilitating three productive and well-organized discussions earlier this year with multiple interested parties to examine potential mechanisms to reduce further emissions from operations at the San Pedro Bay Ports. These meetings opened candid conversations about the state of zero-emissions technology and infrastructure needed to address regional air pollution needs.

While we see significant progress in rulemaking, we are concerned that some industry groups seek to further delay—citing the alleged need for lengthy discussions about technology. A key takeaway from three in-person meetings is that zero-emissions technology solutions are feasible and readily available to help meet aggressive emissions reduction targets needed at the ports and beyond. However, the more serious problem is the disparate business relationships and lack of coordination across port operations, creating inconsistencies and undermining (1) zero-emissions infrastructure, (2) technology deployment, and (3) emissions-reducing adjustments to operational procedures. This is precisely why the Port ISR must set clear emissions reduction targets with interim milestones that hold all parties accountable to cleaning the air and improving public health.

The Port ISR is already almost a decade overdue, and regional air quality attainment needs cannot be ignored. We urge SCAQMD staff to resist calls for a prolonged and unnecessary Technical Working Group process. The recently proposed disapproval by the EPA of the state's implementation plan heightens the urgency with which the District needs to act as the region stands to lose federal highway dollars, forfeit local control of air planning, and face other sanctions that would cause economic havoc. Notably, the South Coast's non-attainment woes continue to bring dire health consequences to heavily pollution-burdened communities. Because the District relied on black box measures for air planning, it must now account for 108 tons per day (tpd) of nitrogen oxide (NOx) reductions across the region. PR 2304 must be strong enough to meet the challenge.

As discussed in this letter, the Port ISR can offer a comprehensive strategy to reduce facility-wide emissions from indirect sources by calling for:

- Stronger and more aggressive emissions reduction targets based on projections for transitioning all categories of equipment, vehicles, and vessels to zero emissions where available;
- Stronger requirements for responsible parties (from terminal operators to the Ports) to coordinate and facilitate infrastructure building, switch to zero-emissions technologies, and deploy less-polluting operations to reduce emissions further;
- Stronger and more accurate monitoring and reporting requirements are needed to show accurately which mechanisms are reducing harmful emissions.

I. Port Activity Continues to Surge, Causing a Public Health Crisis

In 2021, the region saw a surge in air pollution generated at the Ports. In March 2021, cargo movement at the Ports increased an average of 50% compared to volumes two years prior.¹ The record levels of cargo throughput from 2021 to 2022 resulted in the highest emissions from port operations in over a decade. In the second half of 2021 alone, congestion at the Ports resulted in an additional 20 tons of nitrogen oxide emissions per day and 0.5 tpd of particulate matter emissions.²

This problem is not likely to go away as cargo activity at the San Pedro Bay Ports is expected to increase 57% from 2021 through 2032.³ A surge in traffic for all west coast ports, including the San Pedro Bay Ports, is predicted for 2024 as severe drought imperils routes through the Panama Canal and geopolitical tensions hamper traffic through the Suez Canal.⁴ Adding to shipping backlogs, the Francis Scott Key Bridge's recent tragic collapse in Baltimore will likely have far-reaching implications on shipping routes, including some potential impacts to West Coast Ports.⁵

¹ California Air Resources Board, Emission & Health Impacts from Vessels at Anchor (Jun. 2021), https://ww2.arb.ca.gov/sites/default/files/2021-06/ogvcongestion_ada.pdf.

² California Air Resources Board, Emissions Impact of Ships Anchored at Ports of Los Angeles, and Long Beach (Nov. 2021), https://ww2.arb.ca.gov/sites/default/files/2021-11/SPBP_Congestion_Anchorage_Emissions_Final.pdf.

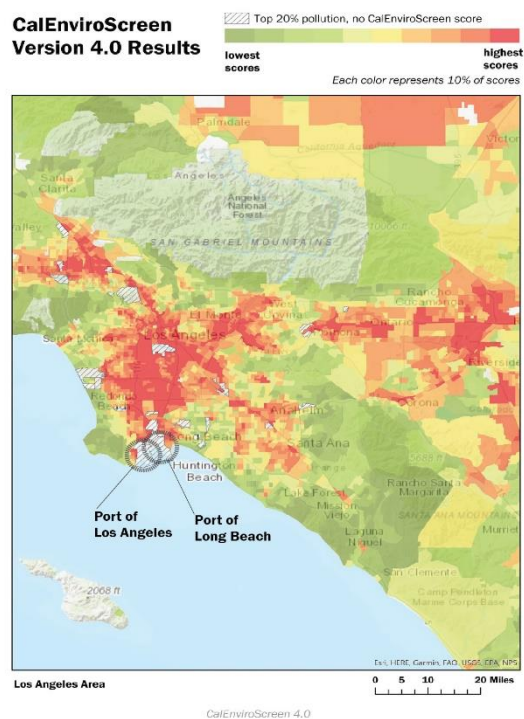
³ California Air Resources Board, Public Hearing to Consider the Proposed Control Measure for Ocean-Going Vessels At Berth, Initial Statement of Reasons, at ES-8, II-1, II-2 (Oct. 2019).

⁴ Ronald White, U.S. Strikes Yemen: Are L.A. Long Beach Ports Ready for Cargo Surge? Los Angeles Times, (Jan. 12, 2024), <https://www.latimes.com/business/story/2024-01-12/us-strikes-yemen-are-los-angeles-long-beach-ports-ready-for-cargo-surge>.

⁵ Summer Lin, How will the Baltimore bridge collapse affect prices and the West Coast? Los Angeles Times, (Mar. 29, 2024); <https://www.latimes.com/california/story/2024-03-29/what-does-the-baltimore-bridge-collapse-and-port-of-baltimore-closure-mean-for-southern-california-ports>; See also, Stas Margaronis, Beacon's O'Connell says U.S. West Coast port surge over rivals might be lengthy, American Journal of Transportation, (Jan. 31, 2024); <https://www.ajot.com/insights/full/beacons-oconnell-says-u.s-west-coast-port-surge-over-rivals-might-be-lengthy>

Even before this expected surge fully manifests, traffic to West Coast Ports is starting to see a significant uptick. While U.S. ports experienced an overall increase in volume year-over-year in February, the Port of Los Angeles (POLA) saw a 60% increase in container volume, marking the seventh consecutive month of year-over-year growth at the port.⁶ To date, POLA has increased the number of TEUs handled by 35% from a year ago. POLA even touts that “[f]or the past 24 years, the Port of Los Angeles has been the busiest container port in the Western Hemisphere.”⁷ At the same time, the Port of Long Beach (POLB) saw inbound loads up 29.4% from a year earlier.⁸ Total box trade movement for POLB rose 17.3% from pre-pandemic levels during the same months,⁹ and at POLA, inbound loads were up by 17.4% compared to pre-pandemic levels.¹⁰ Unfortunately, that record throughput has not come with additional community protections for the toxic air pollution it triggers.

Figure 1



[CalEnviroScreen 4.0 output with circles of the port sites overlaid to identify regions of concentrated pollution indicated by red/orange gradient.]

(concerning the rail companies expected to adjust their rail capacity to handle the import surge and minimize disruptions triggered earlier by the Suez and Panama Canals).

⁶ Connor Wolf, *U.S. Ports Post Year-Over-Year Increases for February: Los Angeles Reports 60% Increase to 781,343 TEUs*, Transport Topics, (Mar. 27, 2024), <https://www.ttnews.com/articles/ports-post-increases-0327>.

⁷ Port of Los Angeles, *Annual Facts and Figures Card*, <https://www.portoflosangeles.org/business/statistics/facts-and-figures> (as of Apr. 10, 2024).

⁸ Pacific Merchant Shipping Association, *West Coast Trade Report* (Mar. 2024), <https://www.pmsaship.com/wp-content/uploads/2024/03/West-Coast-Trade-Report-March-2024-Final.pdf>.

⁹ *Id.*

¹⁰ *Id.*

However, increased port activity need not spike already high pollution levels. A strong ISR rule for the Ports could offer greater protection to port-side communities by aggressively transitioning to zero-emissions equipment, accelerating needed infrastructure, and developing new operational strategies that will help further reduce emissions from vessels not yet electrified.

II. Electric Charging Infrastructure is Critical

During the District’s recent Ports ISR Working Group meetings, numerous community, industry, and labor representatives emphasized that wide-scale transmission upgrade and expansion projects are necessary to comply with the planned Ports ISR. Updating outdated transmission plans and coordinating a clear timeline with local utilities, port authorities, and terminal operators is also necessary to ensure compliance with the District’s life-saving Rail and Warehouse ISRs. Improved coordination across the San Pedro Bay port complex is also vital to ensure compliance with state regulations, including the California Air Resources Board’s (CARB) Advanced Clean Cars II, Advanced Clean Fleets, and Advanced Clean Trucks standards that mandate all new vehicles sold by 2035-2042 be zero-emission vehicles. Additional CARB ZE regulations include the Ocean-Going Vessels at Berth, Zero-Emission Forklifts, Mobile Cargo Handling Equipment regulations, and the Clean Miles Standard. These rules require bringing more power to the ports on an ambitious timeline.

Local community members and the larger public cannot afford to rely on aspirational goals and promises—we urge SCAQMD to develop transparent and enforceable commitments in the Ports ISR. The SCAQMD must utilize the Ports ISR to better coordinate Local Utilities, Port Authorities, Terminal Operators, and Original Equipment Manufacturers and ensure these entities are prepared for the much-needed transition to zero-emission port operations. We recommend that SCAQMD develop incentives and require early compliance with transition plans by all port partners. It is our hope and expectation that Port Authorities and Terminal Operators will also work to attract ZE equipment and vehicles by providing ZE “priority access” to terminals through efficiency lanes with the goal to reduce vehicle emissions and curb port pollution. The need for SCAQMD to play a lead role here is critical. Since the adoption of the Clean Air Action Plan, the Ports failed to set interim targets for zero-emission transition, dropping the ball on their own ambitious plan to clean the air. Despite recent and even more CAAP updates in 2017, the Ports’ approach has failed because it lacks a clear roadmap. Today, over half a decade later, we are still dealing with the consequences of intensifying port pollution.

Regulation advancing transmission infrastructure development to support zero-emissions strategies is not unprecedented. We have seen infrastructure planning succeed in the warehouse context through the District’s Warehouse Indirect Source Rule, supporting custom plans that include developing off-site zero-emission vehicle charging stations ([WAIRE points](#)). This flexible points-based system ensures a continuous emission-reduction process while granting operators time to build the infrastructure necessary for this new regulation.

Furthermore, there is an unprecedented amount of federal funding now available, including EPA’s Clean Ports Program and the Climate Pollution Reduction Grant, that the ports and SCAQMD are well-positioned to receive to invest in community protections, electric infrastructure, and ZE equipment to fast-track the shift to zero-emission operations. In addition, the White House just announced the first-ever national goal to transition the U.S. to a zero-emissions freight sector, including trucks, rail, aviation, and marine transportation.¹¹ The Biden-Harris Administration also committed to collaborating with other countries to enable zero-emissions medium- and heavy-duty vehicles to reach 30% of new sales in 2030

¹¹ White House, [FACT SHEET: Biden-Harris Administration Sets First-Ever National Goal of Zero-Emissions Freight Sector, Announces Nearly \\$1.5 Billion to Support Transition to Zero-Emission Heavy-duty Vehicles | The White House](#) (Apr. 24, 2024).

and 100% by 2040. These historic investments of nearly \$1.5 billion to support the zero-emission transition is a significant step to reducing extreme levels of pollution harms faced by frontline communities—and makes clear that the time is now to invest in zero-emission infrastructure and equipment to take a system-wide approach to cleaning up the freight sector.

III. The Port ISR Can Offer a Multi-Faceted Approach to Eliminate Emissions

Reducing emissions from port operations will require innovative, multi-faceted approaches that include technology and other mechanisms to reduce overall emissions from the port complex. We learned from the working group sessions that technology is not the issue. The Port ISR can boost efforts to reduce emissions by emphasizing better coordination and the execution of comprehensive plans to get to zero-emissions tech across as many sectors as possible while also promoting mechanisms that will further improve activities like maneuvering, queues, and cold ironing. The bottom line is that the Ports ISR is a framework for incentivizing much-needed change, communication, and improved coordination between port parties to achieve necessary emission reductions.

To be clear, our organizations strongly believe that the ISR must catalyze the broad deployment of zero-emissions technologies across every sector of port operations if we are to eliminate the heavy health impacts the ports currently pose to surrounding communities. However, the ISR does not have to be limited to a handful of vehicle, vessel, or equipment categories. As we have seen from the Warehouse Indirect Source Rule, a more ambitious approach can spark investment in zero-emissions infrastructure and propel early deployments of necessary technology.

A common criticism of certain industry lobbyists is that the recent working group meetings were too focused on mechanisms rather than expected emissions reductions from a specific technology. However, this argument misses the point that the Indirect Source Rule can offer much more than a single pathway to reach emissions reduction targets. For our extreme nonattainment region to address its unique port air pollution challenges, zero-emissions technology and elimination of pollution-generating activities must be included as options to reduce emissions expeditiously. Should the ISR focus only on select equipment types, the rule will not live up to its full potential.

Staff rightly framed our most recent working group discussions around *mechanisms* and not just technology because ports and their tenants have many tools to further reduce emissions facility-wide. The ISR can facilitate better planning, coordination, and follow-through from port entities to ensure procedures and technologies are deployed to help maximize emission reductions and reach targets.

a. ISR Must be Centered Around Protecting Public Health

The debate over whether we need zero emissions solutions at California ports is over. It is well documented that health-harming emissions from port operations result in increased respiratory and heart illness, increased emergency room visits, and even premature death. Port-adjacent communities are repeatedly ranked in the 96th percentile for air toxics and cancer risks in the South Coast Air Basin and have higher rates of asthma.¹² Reducing emissions from this sector is vital to South Coast's attainment of federal and state air quality standards and reversing the harmful health burdens that port pollution places on vulnerable communities.

As we have stated in prior comments, given the health imperative for this rule, its success will come from reportable improvements in public health. Tracking the rule's success through robust monitoring and reporting will therefore be essential. Tracking local public health improvements in reduced asthma rates,

¹² See South Coast Air Quality Management District MATES V Study (Aug. 2021).

emergency room visits due to respiratory distress, and other medical emergencies over time will also serve to document success. We urge staff to include robust and enhanced monitoring and reporting of emissions and make those records publicly available. In addition, we recommend that the rule include a trigger to ramp up emission reduction targets if reduction strategies pursued are not rigorous enough to show results. The District should also explore targeting noncompliance fines for community-advised funds that can support zero-emissions deployments and help communities address acute health impacts.

b. ISR Must Complement CARB Rules While Accelerating Emissions Reductions Locally

A common issue raised by industry representatives concerning the Port ISR is whether the rule is necessary given CARB Advanced Clean Fleet, Commercial Harbor Craft, At-Berth, and other rules that will already require a switch to zero-emissions technology and operational measures. While it is true that these essential statewide rules will require the deployment of zero-emissions technology for specific port operations, our region's drastic air pollution problems require more than mere minimal compliance with statewide mandates. In addition, the District's Ports, Rail, and Warehouse ISRs must create a complementary three-prong approach to reduce collective harm flowing from the growing goods movement industry. The rules must work together to create clear timelines for ports, railyard, and warehouse representatives to work with utilities to get the necessary infrastructure in place, and timelines for manufacturers to have equipment and vehicles ready for purchase and deployment. These ISRs do not duplicate but build on CARB's approach to regulating individual pieces and types of equipment by setting facility-wide targets and clear timelines for emissions reductions while crediting the District and participating parties for these reductions.

Transitioning to electric-powered (battery and direct electrification) cranes, forklifts, hostlers, locomotives, switchers, and other operational equipment would dramatically reduce emissions. In addition, this rule can help advance local compliance with CARB Advanced Clean Fleet rules for zero-emissions drayage by requiring ports and terminal operators to plan for charging opportunities and ZE priority lanes. Other examples discussed during break-out sessions included increasing opportunities for shore power options for ships and commercial harbor craft such as tugboats.

South Coast Air District has the legal authority to regulate indirect sources of emissions stemming from facilities like ports. As previously discussed, the District is tasked with improving air quality in the South Coast and must develop air quality management plans that serve as the federally mandated state implementation plan for the region.¹³ Local air districts in California are required to “adopt and enforce rules and regulations to achieve and maintain the state and federal ambient air quality standards in all areas affected by emission sources under their jurisdiction.”¹⁴ Air districts with extreme nonattainment areas, such as the South Coast Air District, are required to adopt all feasible measures to reduce emissions.¹⁵ In addition to this general regulatory mandate, state law directs the South Coast Air District to “provide for indirect source controls in those areas ... in which there are high-level, localized concentrations of pollutants or concerning any new source that will have a significant effect on air quality in the South Coast Air Basin.”¹⁶ This directive requires the District to adopt and enforce pollution control measures for facilities like the port of Los Angeles and Long Beach—the single largest fixed source of air pollution in Southern California.¹⁷

¹³ Cal. Health & Safety Code §§ 40460, 40462.

¹⁴ *Id.* § 40001.

¹⁵ *Id.* § 40920.5.

¹⁶ *Id.* § 40440(b)(3).

¹⁷ Overview of SCAQMD's Clean Port Initiative, Clean Port, [Clean Port \(aqmd.gov\)](https://www.aqmd.gov/clean-port), (as of May 1, 2024).

With broad authority to regulate air quality under the federal Clean Air Act and state law, the Air District can push for the most innovative measures to tackle the region’s unique air pollution and public health crisis while encouraging early compliance with CARB rules. The state is further empowered to target and regulate mobile sources, including diesel-fueled vehicles and equipment. The District’s indirect source rules would remain consistent with CARB rules by including reduction targets based on other mobile sources and coordination on planning for transmission and charging infrastructure required to support early compliance.

The District’s ISRs offer a way to address the freight’s “pollution hubs” by offering tailored strategies on emissions at different types of facilities. Developing strong facility-based measures with clear targets to reduce emissions will advance a system-wide approach to emission reductions. By contrast, relying on an ad hoc approach will not achieve attainment in time, and focusing on individual pieces of equipment will not adequately address the current health harms of freight.

c. ISR Must Set Aggressive Emission Reduction Targets

We urge the District to set aggressive targets for facility-wide emissions reductions based on the broadscale deployment of zero-emission technology. Although much of the discussion thus far has centered around NOx, targets should encompass aggressive reductions for NOx, PM 2.5, and VOC. We already know the emissions at stake relative to the key technology categories operating at the ports.

Based on staff’s overview of the current emissions inventory, the following categories of equipment would offer substantial opportunities to reduce NOx and Diesel Particulate Matter:

Category	NOx tpd eliminated assuming 100% ZE*	Diesel Particulate Matter tpd eliminated assuming 100% ZE*
Cargo Handling Equipment	1.8	0.03
Heavy-Duty Trucks	5.76**	0.04
Locomotives	3.6	0.14
Commercial Harbor Craft	3.24	0.09
Ocean Going Vessels	21.24	0.29
	35.64	0.59

*Based on staff analysis of 2018-2022 POLA/POLB Emissions Inventories, except for Heavy-Duty Trucks, and assumes OGV will have ZE options. ** Based on CARB SIP Strategy Estimates for ACF implementation in South Coast¹⁸

Based on these assumptions, the ISR should require zero-emissions planning to demonstrate aggressive measures to convert to zero-emissions equipment— prioritizing the categories where zero-emissions technology and emissions reduction opportunities are most available. Detailed plans should be required of both terminal operators and the ports—with interim milestones and metrics for zero-emissions equipment

¹⁸ California Air Resources Board, 2022 State SIP Strategy (Sep. 22, 2022), p. 59, https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

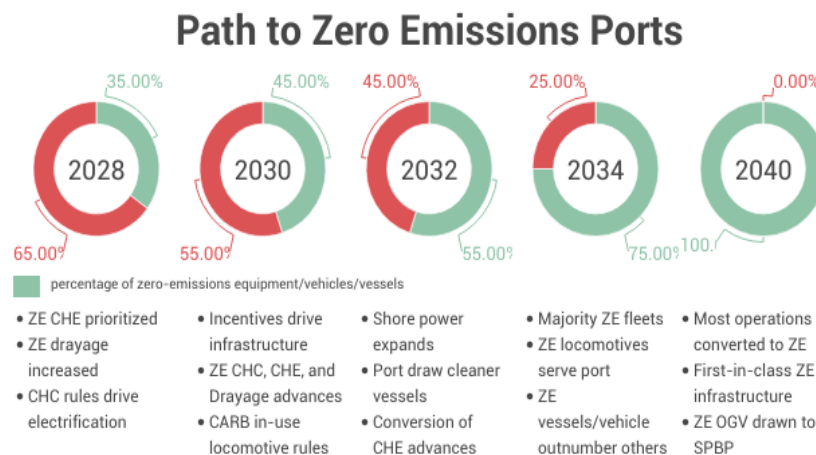
and vehicle turnover and infrastructure installation on an actionable schedule that shows the timing of service requests and work plans submitted to the two major utilities.

In setting the initial target, we urge staff to think boldly and set an ambitious target to meet the region's air pollution challenges. The mayors of Los Angeles and Long Beach announced nearly seven years ago that the two ports would target zero-emissions cargo-handling equipment by 2030 and zero-emission trucks by 2035. The 2022 Air Quality Management Plan (AQMP) rightly recognizes that the only way to achieve the required NOx reductions is through “extensive use of zero-emission technologies across all stationary and mobile sources.” This is aligned with the 2022 State SIP Strategy, which calls for state and local measures to reduce NOx emissions from mobile sources state-wide by “at least 64 percent” by 2037¹⁹ and anticipates that a large portion will occur in and around freight facilities like ports.²⁰ Finally, the Governor’s Executive Order N-79-20 requires the adoption of regulations to transition to zero-emissions vehicles, with a target of transitioning all off-road equipment to zero-emissions by 2035.²¹ Despite these mandates, the South Coast is not on a path toward achieving these goals without better local coordination on zero-emissions infrastructure and technology deployment.

We urge staff to set the ultimate target of zero emissions operations and work backward from there—setting milestone years that set the port on a trajectory towards success. An appropriately aggressive target can be set to get close to full zero-emissions operations by 2040 with milestone years of 2028, 2030, 2032, and 2034 to incrementally reduce overall emissions on a trajectory to meet a 2040 target. During interim milestone years, if a port or terminal operator’s actual conversion is not on pace to meet these zero-emissions targets, appropriate adjustments should be required to convert other elements of port operations sooner and more aggressively.

The following illustration shows a potential pathway towards a full zero-emissions target at the ports based on forthcoming mandates and additional commitments to zero-emissions required under PR 2304 to meet South Coast emissions attainment and public health needs.

Figure 2



¹⁹ *Id.* at p.9.

²⁰ *Id.*

²¹ California Executive order N-79-20 (Sep. 23, 2020), <https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf>.

The Figure 2 timeline aligns with the District’s projection concerning NOx emissions that predicts decreases from all major sources of on-road mobile sources, dropping 76% from 2018 to 2037.²² With a strong ISR, that timeline can be advanced at the Ports, charting a path to zero-emissions port operations by 2040.

We acknowledge that some components of port operations will not be ready to go to 100% zero during the early phases of this transition. This should not, however, preclude those responsible for port operations from instituting other provisions, including adjustments to operations that can result in significant emissions reductions to help meet interim targets. The following section describes some mechanisms that may help ensure target compliance.

d. ISR Can Improve Port Operational Efficiency to Reduce Port Pollution

The Ports ISR provides an opportunity to build on procedures that proved effective during the COVID-19 pandemic to reduce idle time and operational improvements to reduce emissions across both ports. These procedures include advanced scheduling and logistics that optimize routes for ships, trucks, trains, tugs, and ferries. This more holistic approach to port operations will decrease fuel consumption and reduce the pollution burden in surrounding communities.

e. ISR Can Leverage Existing Contractual Relationships to Promote Greater Emissions Reductions

During small group discussions, it became abundantly clear that multiple contractual relationships rule port operations. The Port Authorities and Terminal Operators are central to many of those contracts. While shippers may contract directly with freight forwarders, terminal operators have leasing agreements with the Ports that hold specific terms related to land use, docking, warehousing, and other storage activities.

These contractual arrangements, especially between the Port Authorities and terminal operators, can improve operations and facilitate, rather than frustrate, a faster move towards zero-emissions technology. There is precedent for this, as the District’s current draft for PR 2306 for Freight Railyards currently includes provisions requiring State and local governments to include rule compliance requirements in contracts. A similar provision can require compliance with PR 2304 emission reduction targets, planning, reporting, notification, and recordkeeping.

IV. Regulatory Compliance Must be Clarified

The authority vested in this agency to protect public health offers ample authority to design programs that will drastically reduce air pollution and address the impact that port pollution has on public health throughout the region. Public health must be at the core of this rule design and overall objectives. To accomplish these objectives, PR 2304 must result in a comprehensive strategy that builds upon the five facility-based mobile source strategies announced in the 2016 AQMP, to which the District recommitted itself in 2022.

We have already heard industry lobbyists complain that the rule might be duplicative and make it challenging to comply. These unfounded complaints come before the rule has even been drafted. Staff have an opportunity to craft the regulation so that each component builds upon other facility-based mobile

²² South Coast Air Quality Management District, Appendix iii, Summary of Emissions, p.II-2-67; <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/appendix-iii.pdf?sfvrsn=6>.

source measures, such as the Rail and Warehouse ISRs, to form the comprehensive strategy needed to address the network of harm that freight traffic and shipping currently impose on the South Coast.

Our coalition recommended keeping rules concerning rail under the Railyard ISR. Now that staff have determined to separate on-dock rail operations at the ports to fit with the Port ISR, we strongly encourage clarifying the rule to set clear targets for rail operations within the port boundaries, including switcher operations and on-dock loading. Given the ports' unique scope of rail operations, this further bolsters setting robust emission reduction targets to ensure that rail operations within the Port switch to zero emissions even sooner than their non-port counterparts.

Conclusion

We appreciate the opportunity to comment on the rule concept thus far. We realize that the staff continues to receive stakeholder feedback and likely plans to refine the concept further before publishing a draft rule. This rule will also be the focus of the upcoming board retreat. The goal now must be to bring this rule to the finish line by focusing on setting a strong emissions reduction target and exploring all mechanisms that will help port entities reach those targets. We look forward to continuing to dialogue with staff and interested parties to ensure this rule remains on track for adoption this year.

Thank you,

Fernando Gaytan, Earthjustice

Paola Vargas, East Yard Communities for Environmental Justice

Marven Norman, Center for Community Action and Environmental Justice

Jesse N. Marquez, Coalition For A Safe Environment

Sylvia Betancourt, Long Beach Alliance for Children with Asthma

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Bobbi Jo Chavarria, Sierra Club