



Los Angeles/Orange Counties Building and Construction Trades Council

Affiliated with the Building & Construction Trades Dept., AFL-CIO

September 18, 2025

To the esteemed Governing Board of the South Coast Air Quality Management District:

As Executive Secretary for the Los Angeles & Orange Counties Building & Construction Trades Council I write to respectfully request that South Coast Air Quality Management District (AQMD) not release 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 our respective governing bodies as soon as practicable. This meets the standard in the motion approved at the August 1, 2025, meeting, and should serve as the basis to not release the rule package.

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

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

Thank you for your consideration. We again, respectfully urge you to direct AQMD staff to not release the 75-day package for Proposed Rule 2304 Commercial Marine Ports and focus their work on the Cooperative Agreement as negotiated by the parties.

Faternally,

A handwritten signature in black ink, appearing to read "Ernesto Medrano".

Ernesto Medrano
Executive Secretary

EM: ag/OPEIU#537/afl-cio