

From: Mandel, Arthur - [REDACTED]
Sent: Thursday, July 31, 2025 5:29 PM
To: Mandel, Arthur - [REDACTED]
Cc: Granda, Adrian - [REDACTED]
Subject: [EXTERNAL] Op-Ed: A path forward to cleaner air at the ports

Dear SCAQMD Board Members and Consultants:

I wanted to share with you the attached Op-Ed from Gene Seroka and Mario Cordero that ran in the SoCal News Group of publications this evening.

Thank you,

Artie

Artie Mandel
Director of Government Affairs
Port of Los Angeles, Workforce & Government Affairs Division
[REDACTED]

Daily Breeze - Opinion

Gene Seroka and Mario Cordero: A path forward to cleaner air at the ports

Cargo ships offload in the Port of Los Angeles Tuesday Feb. 4, 2025. (Photo by Chuck Bennett, Contributing Photographer)

By [Gene Seroka](#) and [Mario Cordero](#)

UPDATED: July 31, 2025 at 5:00 PM PDT

For nearly two decades, the San Pedro Bay Ports of Los Angeles and Long Beach have been at the forefront of environmental stewardship in the goods movement industry. Our Clean Air Action Plan (CAAP), a voluntary, comprehensive strategy, has been a model for all ports and lauded nationwide and globally for its effectiveness. Since 2006, we've achieved remarkable emission reductions, including a 91% cut in diesel particulate matter (DPM), a 72% decrease in nitrogen oxides (NOx), and a 98% reduction in sulfur oxides (SOx) from port-related sources. This isn't just progress; it's a testament to the power of collaboration among stakeholders.

Tomorrow, we face a critical juncture in our ongoing commitment to clean air. The South Coast Air Quality Management District (SCAQMD) is considering Proposed Rule 2304, an indirect source rule focused on planning and constructing zero-emission infrastructure at our ports. We believe there is a better option. While we share the ultimate goal of a healthier air basin, we propose an enforceable Cooperative Agreement, built upon enhanced CAAP measures—which we've termed "CAAP Plus"—offers a more effective, expeditious, and collaborative pathway to achieving significant, quantifiable emission reductions.

Urgency to act is paramount. The CAAP Plus Measures are not aspirational; they are concrete, time-bound commitments to accelerate the transition to zero-emission technologies across all port-related sources, which goes far beyond the ZE infrastructure focus of PR 2304. We are proposing to enhance incentives for cleaner ocean-going vessels, the largest source of emissions at the ports, through programs like the Environmental Ship Index Incentive Programs, accelerating shore power, and opening our vessel speed reduction programs to possible revisions in order to maximize emission reductions. Our commitment extends to leveraging Green Shipping Corridors to pilot methanol marine fueling and demonstrate the world's first zero-lifecycle carbon emission container ship along the Shanghai Corridor by the end of 2030.

For drayage trucks, we are proposing to commit our Clean Truck Fund Rate revenues—a combined \$75 million annually—to subsidize the transition to zero-emission trucks and infrastructure, with a minimum of \$60 million allocated over the next three years specifically for zero-emission truck infrastructure throughout the region. We will also develop a zero-emission drayage truck utilization incentive program and consult annually with SCAQMD on spending priorities.

When it comes to terminal equipment and in-port locomotives, we have worked with multiple stakeholders – including the SCAQMD and community groups – in pursuing and managing hundreds of millions in state and federal grant funding to accelerate their transition to zero emissions, including over \$52 million specifically for zero-emission locomotives. Our proposed agreement integrates monitoring and reporting on these projects to increase transparency into our progress.

A cornerstone of our proposal is the development of comprehensive Zero-Emission Infrastructure Plans, phased for different port sources between 2027 and 2030, detailing everything from energy demand to cost estimates and workforce needs. Once the Cooperative Agreement is approved, we will work directly with our tenants to develop and implement these plans. Importantly, the Cooperative Agreement also includes our workforce development efforts, including a joint Goods Movement Workforce Training Facility, to ensure a skilled labor force is ready for this green transition across longshore, trucking and warehouse labor forces.

Unlike the infrastructure planning mandated by Proposed Rule 2304, which SCAQMD staff has publicly stated will not result in emission reductions and is not intended for State Implementation Plan (SIP) credit, our Cooperative Agreement outlines voluntary measures with quantifiable emission reduction benefits that SCAQMD can choose to credit towards SIP compliance. This means real, tangible air quality improvements for the South Coast Air Basin, and a vital step for avoiding a Federal Implementation Plan and potential loss of transportation funding.

Importantly, the measures in the proposed Cooperative Agreement have been meticulously developed through a working group process convened by SCAQMD itself beginning last summer and the ports' own public engagement efforts. The Cooperative Agreement represents strong alignment between the ports and cities and has the full support of both the mayors of Los Angeles and Long Beach, demonstrating a united front and a commitment to seeing this through. This alignment is the critical difference that will ensure the success of this collaborative approach.

We offer robust accountability and transparency provisions, with clear time milestones for implementing the CAAP Plus Measures. The public will be engaged through transparent processes, including CAAP Stakeholder Meetings and our respective Boards of Harbor Commissioners and City Councils' public meetings, with annual progress reports provided to SCAQMD and made public. We are committed to developing substitute measures if any component becomes infeasible, and, importantly, the agreement includes mechanisms for dispute resolution, with court enforcement as an option if necessary. Discussions with the District, should staff be directed to negotiate with us, will lead to development of additional enforcement and accountability measures.

We urge the SCAQMD Board to pause the rulemaking process for PR 2304 and direct staff to negotiate in good faith with the Ports and Cities on this Cooperative Agreement. Our Ports and the millions of jobs and hundreds of billions of dollars in economic activity they support are far too vital to risk on a speculative and unproven approach, especially in this time of trade uncertainty. Let's seize this opportunity for a collaborative path to cleaner air built upon the known and unparalleled success of the CAAP.

Gene Seroka is Executive Director of the Port of Los Angeles. Mario Cordero is Chief Executive Officer of the Port of Long Beach.

Originally Published: July 31, 2025 at 4:58 PM PDT