



October 13, 2025

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

RE: Support for Cooperative Agreement with Ports of Long Beach and Los Angeles

Dear South Coast AQMD Governing Board Members:

The Harbor Association of Industry & Commerce (HAIC) supports the draft Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles. We urge the District to complete this agreement and pause work on Proposed Rule 2304.

The cooperative agreement provides a better path forward than direct regulation. The ports have demonstrated results through voluntary clean air programs. Since 2005, port operations reduced diesel particulate matter by 91%, nitrogen oxides by 72%, and sulfur oxides by 98%. This track record shows the ports deliver emission reductions without regulatory mandates.

The agreement addresses legitimate air quality concerns while recognizing operational realities. Zero-emission infrastructure requires massive investment in electrical systems, charging stations, and fueling facilities. This work must proceed carefully to avoid disrupting cargo operations that support regional jobs and economic activity.

The updated draft agreement released September 16, 2025 includes meaningful enforcement provisions and transparency requirements. The ports commit to detailed infrastructure plans across three phases through 2029. Annual reports will track progress. Financial penalties apply if ports miss deadlines. These provisions ensure accountability.

A cooperative approach allows flexibility that rigid rules cannot provide. Technology markets for zero-emission port equipment remain immature. Equipment costs remain high. Infrastructure requirements vary across different terminal operations. The agreement framework can adapt as technology advances and operational experience grows.

Direct regulation would impose one-size-fits-all requirements on diverse operations. Container terminals differ fundamentally from bulk cargo facilities. Drayage truck operations differ from cargo-handling equipment needs. The cooperative agreement allows tailored solutions for different operations while maintaining clear emission reduction goals.

Harbor businesses support clean air objectives. Our member companies employ thousands of workers who live in communities surrounding the ports. We share the goal of reducing emissions that affect public health. The question is how best to achieve those reductions.

The cooperative agreement creates a framework for ports, tenants, and equipment operators to work together on infrastructure development. This collaborative approach will produce better results than adversarial compliance with prescriptive rules.

We request that South Coast AQMD:

Complete negotiations on the cooperative agreement Adopt the agreement at the earliest opportunity

Pause work on Proposed Rule 2304 for the five-year agreement term Report annually to the Governing Board on agreement implementation

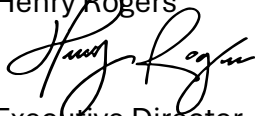
The August 1, 2025 Board motion established a standard for pausing rule development. The updated draft agreement meets that standard. Meaningful progress on enforcement and transparency provisions removes barriers to finalizing the agreement.

We appreciate the extensive work by District staff and port leadership to develop this framework. The cooperative agreement represents the best path forward for air quality improvement and economic vitality in the San Pedro Bay.

The HAIC will participate in the October 15, 2025 public meeting and welcomes continued dialogue on implementation. We stand ready to support our port partners and District staff in making this agreement successful.

Respectfully submitted,

Henry Rogers

A handwritten signature in black ink, appearing to read 'Henry Rogers', written over a horizontal line.

Executive Director

Harbor Association of Industry & Commerce

cc: Port of Long Beach, Board of Harbor Commissioners
Port of Los Angeles, Board of Harbor Commissioners
HAIC Board of Directors