



October 22nd, 2025
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Delivered electronically: ports_comments@aqmd.gov

RE: Comments on Potential Cooperative Agreement with the Ports of Long Beach and Los Angeles; Protecting the Health of Inland Empire Communities

Dear SCAQMD staff,

We, the undersigned organizations serving and representing Inland Empire communities, stand in firm opposition to the proposed Cooperative Agreement in its current form. While collaboration toward clean air goals is essential, this agreement, as written, fails to protect the health of millions of Southern California residents and undermines urgently needed accountability measures. We urge the South Coast Air Quality Management District (SCAQMD) staff to adopt changes that address concerns about the deliverability and lack of accountability that this measure presents.

For decades, communities across the Inland Empire have lived with the consequences of unchecked port pollution. Nearly 40% of the nation's imported goods move through the Ports of Los Angeles and Long Beach¹, traveling east along the I-10, 60, and 215 corridors into our neighborhoods. The result of this high volume goods movement is some of the worst air quality in the country, with children in Riverside and San Bernardino counties suffering some of the highest asthma rates in California², and frontline communities experiencing increasing risk of heart and lung disease, cancer, and premature death.

Our region bears the brunt of the state's goods movement economy, yet we are often left out of decisions made at the ports that shape our air, our health, and our climate future.

¹ https://www.portoflosangeles.org/references/news_091721_speedcargo

² <https://www.lung.org/research/sota/city-rankings/states/california>

The proposed Cooperative Agreement and Board resolution would halt new clean air rulemaking for five years without any binding guarantees that meaningful progress will occur during that time. This pause would come at the expense of the most overburdened communities in Southern California, including those of us in the Inland Empire who live with daily freight traffic and diesel exhaust from the port's supply chain.

We cannot afford five more years of delay.

We urge the Ports and SCAQMD to adopt the following amendments before approving this MOU:

1. Include a failsafe accountability clause: If either the agreement is nullified before its intended termination date or the Ports consistently fail to meet agreed-upon actions, SCAQMD should automatically restart the PR 2304 rulemaking paused by the Resolution to ensure emission reductions are achieved.
2. Establish mandatory milestones and progress reporting: The agreement should require transparent, public benchmarks for achieving the Clean Air Action Plan (CAAP) 1-5 goals, including regular quantification of emission reductions, technology adoption rates, and community engagement updates. This measure is necessary for SCAQMD, stakeholders, and community to gauge if and how progress is being made compared to agreed-upon actions from the Ports.
3. Set clear emissions targets and independent monitoring: Define measurable air quality outcomes with independent verification to ensure the Ports are truly reducing pollution and not simply shifting emissions elsewhere. Emissions data is also integral to gauging potential health benefits to residents of the air basin.

Without these amendments, this Cooperative Agreement risks becoming a shield for inaction, allowing continued harm to the Inland Empire and the broader Southern California region.

Our communities deserve a living agreement, one that drives measurable progress, centers environmental justice, and prioritizes health over convenience. We urge the Ports and the SCAQMD Board to strengthen this MOU before adoption and ensure it reflects real accountability to the residents most affected by port pollution.

As SCAQMD considers this and future agreements, a fair, transparent, and inclusive public process must be foundational to ensure that communities most impacted by port-related pollution have a meaningful voice in shaping the decisions and implementation plans that affect their health and quality of life.

Clean air cannot wait another five years.

Sincerely,

Ashley Jackson

Inland Empire Regional Organizer
California Environmental Voters

Jen Larratt-Smith
Chair
Riverside Neighbors Opposing Warehouses (R-NOW)

Ana Gonzalez
Executive Director
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Jenna LeComte-Hinely
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Jocelyn Joz Sida
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