

July 31, 2025

The Honorable Vanessa Delgado  
Chair, South Coast AQMD Governing Board  
21865 Copley Drive  
Diamond Bar, CA 91765  
Email: [vdelgado@aqmd.gov](mailto:vdelgado@aqmd.gov)

**Re: Support the Ports' Cooperative Proposal Over Proposed Rule 2304**

Dear Chair Delgado:

On behalf of Hager Pacific Properties, I respectfully urge you to support the cooperative agreement proposal presented by the Ports of Los Angeles and Long Beach in lieu of adopting Proposed Rule 2304 (the "Ports ISR").

As a real estate investment firm with over 100 properties in Southern California and hundreds of tenants, we understand the positive impact this proposal would have. These tenants provide many jobs and have a massive economic impact on our communities. Our tenants operating in warehouses over 100,000 square feet are committed to environmental stewardship and comply with South Coast AQMD Rule 2305 (the "Warehouse ISR") and the WAIRE Program. We fully support reducing emissions regionally, and firmly believe the Ports' collaborative approach through its proposed cooperative agreement provides a stronger path forward compared to Proposed Rule 2304.

As stakeholders closely connected to the operations of the San Pedro Bay Ports, we recognize and value their unparalleled economic importance — supporting hundreds of thousands of jobs and empowering national supply chains. The Ports' proposed cooperative framework offers a practical and accountable solution that strengthens the Clean Air Action Plan, accelerates environmental progress, and avoids the unintended consequences that a rigid regulatory mandate may cause.

We respectfully request that you pause the rulemaking process and direct SCAQMD staff to negotiate a cooperative agreement with both Ports, and the Cities of Los Angeles and Long Beach. The final version of a cooperative agreement should be presented to the Harbor Commissions and the SCAQMD Governing Board by October 2025.

Sincerely,



**John Dobrott**  
**Vice President – Asset Management**  
**Hager Pacific Properties**

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