



July 31, 2025

Honorable Vanessa Delgado, Chair
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Subject: Pause PR 2304 Rulemaking and Direct Staff to Negotiate with the City and Port of
 Los Angeles & the City and Port of Long Beach's Proposed Cooperative
 Agreement

Dear Chair Delgado:

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), representing ocean carriers, marine terminals, and other maritime industry interests operating on the US West Coast, PMSA is requesting your support to pause rulemaking on Proposed Rule 2304 and direct staff to negotiate with the ports of Los Angeles and Long Beach to conclude a cooperative agreement by October 2025.

On July 18th, the cities of Los Angeles and Long Beach, with their respective ports, submitted a detailed proposal for a cooperative agreement with the South Coast Air Quality Management District (SCAQMD). The proposal contains all the elements that SCAQMD Governing Board Members have requested. It addresses all port-related source categories. It provides for increased reporting and transparency, zero-emission infrastructure planning, zero-emission infrastructure investment in and beyond the two Harbor Districts, and zero-emission trucks, locomotives, and cargo-handling equipment. In these elements, the proposed cooperative agreement delivers faster infrastructure than Proposed Rule 2304, quantifiable emissions reductions compared to no emissions reductions from Proposed Rule 2304, clear accountability, and transparent reporting.

Importantly, the ports' proposal builds on a successful foundation. As you know, emissions in San Pedro Bay have been reduced by

91% for diesel particulate matter,
72% for nitrogen oxides, and
98% for sulfur oxides

Pause PR 2304 Rulemaking and Direct Staff to
Negotiate the City and Port of Los Angeles & City and
Port of Long Beach's Proposed Cooperative Agreement

July 31, 2025

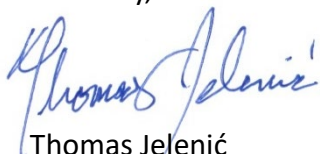
Page 2

Since 2005, through the implementation of the Clean Air Action Plan. In addition, the Clean Air Action Plan has been the template for ports across the nation to reduce emissions. The proposed cooperative agreement also builds on the strategy adopted by the San Diego Air Pollution Control District and Port of San Diego to improve cooperation and reduce emissions through an agreement, a strategy supported by the Environmental Health Coalition, and SCAQMD's own agreement with Los Angeles World Airports. The proposed cooperative agreement preserves the two-decade success of the Clean Air Action Plan, contains collaborative elements that could never be achieved through a rule, and avoids the uncertainty of a multi-phase rulemaking that will kill investment in the world's cleanest port complex.

Finally, the ports have committed put forth efforts to conclude negotiations by October 2025 . The SCAQMD Governing Board will be able to take an up or down vote on the proposal. A fully developed proposal now exists that promises more in terms of emissions reductions and investment in zero emission infrastructure than Proposed Rule 2304.

It is clear that the Governing Board should direct staff to pause rulemaking, negotiate the finalization of the proposal and bring the proposal to the Board for its consideration.

Sincerely,



Thomas Jelenić
Vice President