

July 31, 2025

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

Dear Chair Delgado and Members of the Governing Board:

The Pacific Maritime Association (PMA) is proud to represent the world's leading shipping lines and terminal operators at West Coast ports, a leading global gateway and powerful engine for the regional and national economies. Our mission is to lead PMA members in negotiating, administering and protecting PMA/ILWU labor agreements.

PMA and our member companies share your steadfast commitment to achieving a zero-emission future at the ports of Los Angeles and Long Beach. Our members invest substantially in zero-emission equipment. Terminal operations at the San Pedro Bay Complex are the cleanest in the country.

Our organization has been following and participating in SCAQMD's process to develop a Marine Ports Facility-Based Mobile Source Measure. **We strongly believe that a cooperative enforceable agreement, rather than a Rule, is the best and most appropriate vehicle to achieve our shared zero-emission goals for the Ports of Los Angeles and Long Beach.**

An agreement, by nature, is better suited to address the complexity of operations at the ports and allows them to respond more nimbly to any changes in the regulatory or business environment. This is particularly important at a time when international structures, the federal and state regulatory environment, and the funding landscape are fluid. Given this rapidly changing global environment, an agreement will provide the necessary flexibility for all of us to adapt to changing conditions.

We believe that shifting to an agreement fosters collaboration and is likely to lead to more ambitious commitments because it is not bound by the rigid structure of a rule. Through an agreement, parties can collaborate to encourage more innovative solutions while including appropriate enforcement mechanisms.

PMA and our member companies fully appreciate the challenges SCAQMD faces in addressing emissions at the ports, and we want to work with you to forge the best path forward to address emissions in a meaningful way while also protecting the important economic role our ports play locally, regionally and throughout the State.

PMA Comment Letter to SCAQMD

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We urge the Board to recognize the collaborative strength of a cooperative enforceable agreement, which will deliver meaningful changes and create a more sustainable future in Southern California.

Sincerely,

A handwritten signature in black ink, appearing to be 'SH' or 'S.H.' with a large loop at the end.

Stephen Hennessey

President and CEO

Cc: PMA Board of Directors
Los Angeles Mayor Karen Bass
Long Beach Mayor Rex Richardson
Gene Seroka, Port of Los Angeles
Mario Cordero, Port of Long Beach
Maria Hoyer, Latham and Watkins