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July 31, 2025

The Honorable Nithya Raman  
Governing Board  
South Coast Air Quality Management District  
21865 Copley Dr  
Diamond Bar, CA 91765

RE: Request for Pause in Rulemaking & Direction to Negotiate Cooperative Agreement

Dear Councilmember Raman:

On behalf of the California Association of Port Authorities (CAPA), I am writing to respectfully urge the South Coast Air Quality Management District (SCAQMD) Governing Board to pause its current rulemaking and direct staff to engage in good-faith negotiations with the Cities of Los Angeles and Long Beach and the respective ports on a cooperative agreement. We believe such an agreement could be developed and presented to both the Harbor Commissions and the SCAQMD Board by October.

California's ports handle 38% of all U.S. containerized imports and 28% of exports, accounting for 35% of the nation's containerized waterborne trade. More than 3.1 million American jobs depend on the cargo that flows through California ports, including over 800,000 export-related jobs and nearly 2.3 million tied to imports. Across our state, our seaports have consistently advanced environmentally friendly port operations and innovative emission reductions strategies that go above and beyond regulatory requirements.

The Cities of Los Angeles and Long Beach, along with their Harbor Departments, have proposed a voluntary, enforceable agreement between SCAQMD, the Port of Long Beach, and the Port of Los Angeles. This proposal goes beyond planning for zero-emissions infrastructure by calling for the accelerated voluntary implementation of six new Clean Air Action Plan (CAAP) Plus Measures. These measures would allow SCAQMD to quantify anticipated emissions reductions, potentially qualifying for State Implementation Plan (SIP) credits.

The last time this Board directed staff to negotiate an Indirect Source Rule (ISR), the inclusion of a six-month timetable had a significantly negative impact on negotiations. This time, we urge the Board to give the proposed Cooperative Agreement a serious and unencumbered opportunity to succeed.

California Ports are committed to meeting quickly over the next 30 days to finalize this approach. If no viable path forward emerges, SCAQMD staff will still retain the option to pursue alternative strategies at that time.

We appreciate your consideration and remain committed to a collaborative process that delivers meaningful air quality benefits while supporting the continued vitality of California's ports.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martha Miller". The signature is fluid and cursive, with a small mark at the end.

Martha Miller  
Executive Director  
California Association of Port Authorities