



November 5, 2025

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

RE: Support for Cooperative Agreement with Ports of Long Beach and Los Angeles (Agenda Item 30 – November 7, 2025)

Dear South Coast AQMD Governing Board Members:

The South Bay Association of Chambers of Commerce (SBACC), representing chambers and businesses across the South Bay region, supports the draft Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles. We urge the District to approve Agenda Item 30 at your November 7, 2025 meeting and pause work on Proposed Rule 2304.

The Cooperative Agreement Delivers Results Without Regulatory Disruption

The cooperative agreement provides a better path forward than direct regulation. The ports have demonstrated results through voluntary clean air programs. Since 2005, port operations reduced diesel particulate matter by 91%, nitrogen oxides by 72%, and sulfur oxides by 98%. This track record shows the ports deliver emission reductions without regulatory mandates that could disrupt the supply chain our regional economy depends on.

The agreement addresses legitimate air quality concerns while recognizing operational and economic realities. Zero-emission infrastructure requires massive investment in electrical systems, charging stations, and fueling facilities. This work must proceed carefully to avoid disrupting cargo operations that support thousands of jobs across our member chambers' business communities.

Accountability and Transparency Are Built In

The updated draft agreement includes meaningful enforcement provisions and transparency requirements. The ports commit to detailed infrastructure plans across three phases through 2029. Annual reports will track progress. Financial penalties apply if ports miss deadlines. These provisions ensure accountability while preserving the operational flexibility needed for successful implementation.

A cooperative approach allows flexibility that rigid rules cannot provide. Technology markets for zero-emission port equipment remain immature. Equipment costs remain high. Infrastructure requirements

vary across different terminal operations. The agreement framework can adapt as technology advances and operational experience grows—protecting both air quality goals and economic competitiveness.

One-Size-Fits-All Regulation Would Harm Diverse Operations

Direct regulation would impose uniform requirements on fundamentally different operations. Container terminals differ from bulk cargo facilities. Drayage truck operations differ from cargo-handling equipment needs. The cooperative agreement allows tailored solutions for different operations while maintaining clear emission reduction goals.

Our member chambers represent businesses throughout the South Bay—from Carson to San Pedro, Torrance to Wilmington, and Long Beach to the Palos Verdes Peninsula. These businesses employ thousands of workers who live in communities surrounding the ports. We share the goal of reducing emissions that affect public health. The question is how best to achieve those reductions without undermining the economic foundation of our region.

Regional Economic Impact Matters

The San Pedro Bay port complex generates more than 1 million jobs across Southern California and \$300 billion in annual economic activity. Supply chain disruptions ripple through every sector our chambers serve—manufacturing, logistics, retail, professional services, and small businesses that depend on reliable goods movement.

The cooperative agreement creates a framework for ports, tenants, and equipment operators to work together on infrastructure development. This collaborative approach will produce better air quality results while protecting the economic vitality that supports our communities.

Our Request

We request that South Coast AQMD:

- Approve Agenda Item 30 and execute the Cooperative Agreement
- Pause work on Proposed Rule 2304 for the five-year agreement term
- Report annually to the Governing Board on agreement implementation

The August 1, 2025 Board motion established a standard for pausing rule development. The updated draft agreement meets that standard. Meaningful progress on enforcement and transparency provisions removes barriers to finalizing the agreement.

We appreciate the extensive work by District staff and port leadership to develop this framework. The cooperative agreement represents the best path forward for air quality improvement and economic vitality in the San Pedro Bay region.

SBACC and our member chambers stand ready to support our port partners and District staff in making this agreement successful.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kimberly Cacares". The signature is fluid and cursive, with the first name "Kimberly" and last name "Cacares" clearly distinguishable.

Kimberly Cacares, Board Chair
South Bay Association of Chambers of Commerce

cc: Port of Long Beach, Board of Harbor Commissioners

Port of Los Angeles, Board of Harbor Commissioners

SBACC Member Chambers

SBACC Board of Directors