



October 13, 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

Dear South Coast AQMD Governing Board Members:

The South Bay Association of Chambers of Commerce (SBACC) supports the draft Cooperative Agreement between South Coast AQMD and the Ports of Long Beach and Los Angeles. We urge the District to complete this agreement and pause work on Proposed Rule 2304.

SBACC represents the 15 chambers of commerce across the South Bay region whose member businesses depend on efficient port operations for their economic vitality. Our chambers serve diverse business sectors—from manufacturing and logistics to retail, hospitality, and professional services. The ports are not just harbor facilities. They are economic engines that support regional supply chains, employment networks, and business growth across our entire community.

Proven Track Record of Results

The cooperative agreement provides a better path forward than direct regulation. The ports have demonstrated extraordinary 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 meaningful emission reductions without regulatory mandates.

Our member businesses recognize and appreciate this progress. Many of our members operate in communities near the ports. They understand firsthand how air quality improvements benefit workers, residents, and families throughout the South Bay. The voluntary programs have worked. The cooperative agreement builds on that success.

Balancing Environmental Goals with Economic Realities

The agreement addresses legitimate air quality concerns while recognizing operational realities that affect the broader regional economy. Zero-emission infrastructure requires massive investment in electrical systems, charging stations, and fueling facilities. This transition must

proceed carefully to avoid disrupting cargo operations that support thousands of regional jobs and billions of dollars in economic activity.

South Bay businesses depend on reliable port operations. Importers need predictable cargo flow. Exporters need efficient shipping access. Logistics companies need functional infrastructure. Retailers need steady inventory movement. Service providers need stable commercial activity. The cooperative agreement protects these interests while advancing environmental goals.

Accountability Without Rigidity

The updated draft agreement released September 16, 2025 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 without the inflexibility of prescriptive regulation.

A cooperative approach allows adaptation 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. This flexibility protects both environmental progress and economic stability.

Direct regulation would impose one-size-fits-all requirements on diverse operations. Container terminals differ fundamentally 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.

Regional Economic Impact

The South Bay's economic vitality depends on port efficiency. Our region hosts businesses across every sector of the supply chain. Manufacturers source materials through the ports. Distributors move goods through port-adjacent warehouses. Transportation companies serve port-related logistics. Professional service firms support port commerce. Small businesses throughout the region benefit from the economic activity ports generate.

Disruption to port operations creates ripple effects throughout our regional economy. Delayed cargo affects inventory management. Infrastructure problems affect delivery schedules. Regulatory uncertainty affects business planning. The cooperative agreement provides the stability and predictability our diverse business community needs while ensuring continued progress on air quality.

Our member chambers represent employers who provide thousands of jobs to South Bay residents. Many of these jobs connect directly or indirectly to port operations. The cooperative agreement protects this employment base while advancing environmental objectives that benefit the same workers and their families.

Collaborative Problem-Solving

The cooperative agreement creates a framework for ports, tenants, equipment operators, and regulators to work together on infrastructure development. This collaborative approach will produce better results than adversarial compliance with prescriptive rules. Our business community values this partnership model.

South Bay businesses support clean air objectives. We recognize the importance of environmental stewardship to public health and quality of life in our communities. The question is not whether to reduce emissions, but how best to achieve those reductions. The cooperative agreement answers that question with a practical, accountable, and flexible approach.

Our Request

We request that South Coast AQMD:

- Complete negotiations on the cooperative agreement
- Adopt the agreement at the earliest opportunity
- 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.

Moving Forward Together

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 South Bay region.

SBACC will participate in the October 15, 2025 public meeting and welcomes continued dialogue on implementation. We stand ready to support our port partners and District staff in making this agreement successful. Our member chambers are committed to clean air, economic prosperity, and collaborative solutions that serve the entire South Bay community.

Respectfully submitted,



Kimberly Caceres
SBACC Board Chair