



1131 SW Klickitat Way
Seattle Washington
98134
800/422-3505 tel
206/623-0179 fax

August 1, 2025

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

Dear Chair Delgado and Board Members:

SSA Marine respectfully requests that the South Coast Air Quality Management District Board pause the rulemaking for Proposed Rule 2304 and direct the staff to negotiate with the cities of Los Angeles and Long Beach and the Ports of Los Angeles and Long Beach on a cooperative agreement that will lead to emission reductions and improved air quality in the San Pedro Bay area.

SSA Marine is the largest marine terminal operator in the United States, and the largest container terminal operator in the Americas. SSA Marine, along with its subsidiaries, manages marine container terminals across the U.S. and employs over 13,000 union longshore workers for loading and unloading ships arriving at U.S. ports, including at Long Beach and Los Angeles. SSA's operations include container, break bulk, roll-on-roll-off (RORO), project cargo, and cruise terminals, handling approximately 28.5 million marine TEU's globally in 2024. The Ports of Long Beach and Los Angeles are critically strategic sites for SSA Marine and play an important role as a gateway in connecting the United States to the global economy, facilitating the flow of international trade, and supporting a robust supply chain.

We appreciate SCAQMD's long-standing partnership in advancing clean air and sustainable infrastructure. Our collaboration through the Carl Moyer Program and other funding opportunities has been instrumental in accelerating the deployment of cleaner technologies at the ports. These joint efforts have laid a strong foundation for continued progress toward our shared zero emissions goals.

SSA Marine has made significant strides in our sustainability program. Between 2021 and 2024, our Long Beach terminals reduced absolute emissions by 44%. We are exceeding our ambitious multi-year greenhouse gas emissions reduction target of 15% by the end of 2024 and have set new decarbonization goals of 35% reduction by 2030 and 50% reduction by 2035. To accomplish these goals, we have made significant strategic investments in port decarbonization that reduce our emissions and enhance the safety of our enterprise. SSA Marine deployed over 190 units of near-zero and zero emissions equipment across our global operations. We are also undergoing zero emissions engineering master planning at our international container terminals in Long Beach. At Outer Harbor (Berth 55) at the Port of Los Angeles, we completed the deployment of 44 battery electric-powered forklifts earlier this year and the terminal now operates with 100% zero emission cargo handling equipment, which we estimate will reduce tailpipe CO2 emissions by approximately 264 metric tons annually.



1131 SW Klickitat Way
Seattle Washington
98134

800/422-3505 tel
206/623-0179 fax

The Ports of Long Beach and Los Angeles support millions of jobs and billions of dollars of economic activity that is critical to region as well as the nation. The cities of Los Angeles and Long Beach and their harbor departments have proposed a voluntary, enforceable agreement that facilitates enhanced collaboration on air quality improvements and prevent disputes. We agree with the broad coalition of stakeholders who believe that consideration of the rule should be put on hold while the Ports and AQMD are given an opportunity to negotiate in good faith. This would allow the parties to find a reasonable way forward in support of our shared goal of reducing emissions on aggressive timelines through practical and realistic investment and infrastructure planning.

The proposal by the Ports of Long Beach and Los Angeles builds on the success of SCAQMD's cooperative agreements and with regional airports and the San Diego Pollution Control District's recent agreement with the Port of San Diego. The proposal shares broad support among numerous impacted stakeholders while also providing a public and transparent process. An enforceable agreement provides a more effective and collaborative mechanism than a rigid rule and allows flexibility to reflect operational realities while at the same time ensuring accountability and enforcement among all stakeholders, including utilities, terminal operators, and the ports themselves.

SSA Marine is fully committed to continuing to make progress that advances sustainability, and we have demonstrated our dedication to reduce emissions at our facilities through aggressive investments. We strongly support the proposed collaborative effort proposed by cities and ports of Los Angeles and Long Beach, and we hope that SCAQMD will work with industry, labor, the ports, and local government authorities to support this approach in developing a more streamlined, enforceable, and impactful approach to infrastructure planning and emissions reduction.

Sincerely,

Meghan Weinman
Vice President, Sustainability
SSA Marine, Inc.