

July 31, 2025

The Honorable Vanessa Delgado  
Chair, South Coast AQMD Governing Board  
21865 Copley Drive  
Diamond Bar, CA 91765  
Email: [vdelgado@aqmd.gov](mailto:vdelgado@aqmd.gov)

**Re: Support the Ports' Cooperative Proposal Over Proposed Rule 2304**

Dear Chair Delgado:

On behalf of *Newcastle Partners*, I respectfully urge you to support the cooperative agreement proposal presented by the Ports of Los Angeles and Long Beach in lieu of adopting Proposed Rule 2304 (the “Ports ISR”).

*Newcastle Partners is a privately held, vertically integrated real estate investment and development firm focused on delivering best-in-class industrial facilities across Southern California. With a portfolio spanning all four Southern California counties, Los Angeles, Orange, Riverside, and San Bernardino, we have developed and operated over 10 million square feet of logistics and distribution space. Our properties support more than 100 tenants regionally, ranging from global logistics providers to local businesses, and collectively help sustain an estimated 5,000 jobs tied to the goods movement economy.*

Our tenants operating in warehouses over 100,000 square feet are committed to environmental stewardship and comply with South Coast AQMD Rule 2305 (the “Warehouse ISR”) and the WAIRE Program. We fully support reducing emissions regionally, and firmly believe the Ports’ collaborative approach through its proposed cooperative agreement provides a stronger path forward compared to Proposed Rule 2304.

As stakeholders closely connected to the operations of the San Pedro Bay Ports, we recognize and value their unparalleled economic importance — supporting hundreds of thousands of jobs and empowering national supply chains. The Ports' proposed cooperative framework offers a practical and accountable solution that strengthens the Clean Air Action Plan, accelerates environmental progress, and avoids the unintended consequences that a rigid regulatory mandate may cause.

We respectfully request that you pause the rulemaking process and direct SCAQMD staff to negotiate a cooperative agreement with both Ports, and the Cities of Los Angeles and Long Beach. The final version of a cooperative agreement should be presented to the Harbor Commissions and the SCAQMD Governing Board by October 2025.

Thank you for your thoughtful leadership and continued commitment to clean air and economic vitality.

Sincerely,

***Lauren Smith***  
***Project Coordinator***  
***Newcastle Partners***

CC: Faye Thomas, Clerk of the Boards  
Michael A. Cacciotti, Governing Board Vice-Chair  
Curt Hagman, Governing Board Member  
Patricia Lock Dawson, Governing Board Member  
Larry McCallon, Governing Board Member  
Holly J. Mitchell, Governing Board Member  
Janet Nguyen, Governing Board Member  
Brenda Olmos, Governing Board Member  
Veronica Padilla-Campos, Governing Board Member  
V. Manuel Perez, Governing Board Member  
Nithya Raman, Governing Board Member  
Carlos Rodriguez, Governing Board Member  
Wayne Nastri, Executive Officer  
Sarah Rees, Ph.D., Deputy Executive Officer  
Ian MacMillan, Assistant Deputy Executive Officer  
Elaine Shen, Planning and Rules Manager  
Charlene Nguyen, Program Supervisor