



### VIA ELECTRONIC MAIL

June 23, 2025

Chair Vanessa Delgado and Members of the Mobile Source Committee  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765  
Email: [vdelgado@aqmd.gov](mailto:vdelgado@aqmd.gov)  
Clerk of the Board, [cob@aqmd.gov](mailto:cob@aqmd.gov)

**Re: Finalize PR 2304 and commit to a Ports Indirect Source Rule with clear emission reduction targets**

Dear Chair Delgado and Members of the Mobile Source Committee:

The undersigned organizations write to strongly urge the Board to stay the course and finalize PR 2304 this year. The South Coast Air Quality Management District (SCAQMD) must act decisively to avoid repeating the delays that undermined the adoption of zero-NOx standards for furnaces and water heaters under Rules 1111 and 1121. After years of rulemaking and significant resources expended by staff, those delays ultimately weakened the rules and allowed misinformation to take root—misinformation that distorted the intent and content of regulations.

We cannot afford a similar outcome for Proposed Rule 2304, the Port Indirect Source Rule. Timely adoption is critical, as the Ports remain among the largest fixed sources of NOx pollution in the region. We urge the Board to move forward with finalizing the rule in August.

June 23, 2025

Page 2 of 3

The current draft of PR 2304 focuses on zero-emissions infrastructure planning and deployment—an essential foundation for accelerating the transition to cleaner technologies. This approach can still align with the 2022 Air Quality Management Plan (AQMP), which recognizes that achieving attainment of state and federal air quality standards requires a full-scale shift to zero-emissions across both mobile and stationary sources.

While we expect the District to pursue a comprehensive Indirect Source Rule for the San Pedro Bay Port Complex to fulfill the 2022 AQMP's commitment to reduce emissions at commercial marine ports, we recognize that infrastructure planning will be an important first step that has broad support, including from Mayors of both Los Angeles and Long Beach as referenced in their press statement of November 15, 2024. Importantly, even industry-led groups who now oppose the rule previously acknowledged the need for infrastructure planning during the 2024 working group meetings.

Delaying this rule risks enabling disinformation to set in and postponing the emission reductions the AQMP promised for commercial marine ports. A strong start to zero-emissions infrastructure planning is essential to ensure that the region can realize the benefits of the investments being made.

While we are encouraged that the latest draft includes a more comprehensive framework for setting source-specific planning targets, as the rule moves towards adoption, we encourage the Board to support further strengthening by:

- Linking infrastructure planning to measurable emission reduction outcomes;
- Enhancing community engagement throughout the plan submission and evaluation process;
- Ensuring transparency and accountability in implementation.

We look forward to our continued collaboration with the Board and District Staff to ensure that PR 2304 delivers on the agency's promise to protect public health and advance environmental justice.

Sincerely,

Fernando Gaytan

Senior Attorney

**Earthjustice**

Christopher Chavez

Deputy Policy Director

**Coalition for Clean Air**

June 23, 2025

Page 3 of 3

Paola Vargas  
Long Beach Organizer  
**East Yard Communities for Environmental Justice**

Sylvia Betancourt  
Program Manager  
**Long Beach Alliance for Children with Asthma**

Alison Hahm  
Staff Attorney  
**Natural Resources Defense Council**

Cristhian Tapia-Delgado  
Climate Campaigner, Southern California  
**Pacific Environment**

Andrea Vidaurre  
Co-Founder/ Policy Analyst & Advocate  
**People's Collective for Environmental Justice**

Peter M. Warren  
Member  
**San Pedro & Peninsula Homeowners Coalition**

Jennifer Maria Cardenas  
Campaign Organizer  
**Sierra Club**

Theral Golden  
President  
**West Long Beach Association**

Cc: Wayne Nastri, Executive Officer - email: [wnastri@aqmd.gov](mailto:wnastri@aqmd.gov)

Ian MacMillan, Assistant Deputy Executive Officer - email: [imacmillan@aqmd.gov](mailto:imacmillan@aqmd.gov)

Elaine Shen, Manager, ISR Rules & Socioeconomic Analysis - email: [eshen@aqmd.gov](mailto:eshen@aqmd.gov)