



March 17, 2026

Mayor Bass
200 N. Spring St.
Los Angeles, CA 90012

Mayor Richardson
411 W. Ocean Blvd.
Long Beach, CA 90802

Chair Cacciotti and Members of the Governing Board
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

RE: CAAP Plus Measures Recommendations for Ports Cooperative Agreement

Dear Mayor Bass, Mayor Richardson, and Chair Cacciotti and Members of the South Coast Air Quality Management Governing Board,

On behalf of the undersigned members of the Trade, Health, and Environment (THE) Impact Project coalition, we write to provide recommendations for additional Clean Air Action Plus measures to be adopted in the Ports' Cooperative Agreement with the South Coast Air Quality Management District. The following recommendations include community demands for short- to medium-term actions that will facilitate meaningful emission reductions at the San Pedro Bay Ports.

The Ports Cooperative Agreement approved in November 2025 directs the San Pedro Bay Ports to develop zero-emission infrastructure plans, but notably failed to include measures that would catalyze the transition to zero-emissions equipment at the Ports. As the Ports did not support a

regulatory pathway, we expect the Ports to now commit to meaningful actions that will result in significant emission reductions and relieve the pollution burdens of frontline communities.

We request that the Ports adopt the following recommendations, which fall into two categories: (1) actions that ensure transparency and accountability to the portside community; and (2) policies that will incentivize adoption of zero-emissions equipment at the Ports.

The San Pedro Bay Ports remain the largest fixed source of air pollution in the South Coast Air Basin, and progress to reduce emissions has slowed considerably in the past several years. Therefore, we request that the Ports take the following actions to provide transparency on the pollution attributable to port operations:

The Ports must commission and fund a health risk assessment, to be completed by December 31, 2028, and updated at least every five years thereafter.

- The health risk assessment must be conducted by a third party and assess all known health effects caused by toxic air contaminants and other pollutants emitted from port operations.
- The assessment must include the anticipated death rates associated with port pollution and an analysis of linkage of death events to specific pollutants and related medical diagnoses. In addition, the third party must analyze the economic impacts on these health impacts, including costs of premature deaths due to port pollution.
- The health risk assessment, and any data used to inform the analysis, must be made public and posted online to ensure easy access. The Ports shall provide a summary of the health risk assessment's findings in their subsequent State of the Port meetings.

The Ports must set emission reduction goals, by August 2026, to inform future actions to reduce pollution associated with port operations.

- The current Cooperative Agreement and the Ports' Clean Air Action Plan are insufficient to address the harmful emissions associated with port operations and do not reflect the region's nonattainment status. The Ports must set new reduction targets for the following pollutants: NO_x, PM_{2.5}, PM₁₀, NO₂, VOC, CO₂.
- These emission goals must be tied to attainment of national and state ambient air quality standards. Determining these emission reduction goals is an essential first step necessary to inform what actions the Ports must take and the timeline for these actions, including any infrastructure plans developed under the approved Cooperative Agreement.
- The Ports shall provide annual progress reports for each terminal to allow the public to track whether port operations are meeting emission reduction goals, and present on the progress to their respective Harbor Commissions and quarterly Clean Air Action Plan meetings.

For the next fiscal year, the Ports must allocate adequate funding for their community mitigation funds of at least \$25 million each. The Ports must create a mechanism to determine annual funding amounts in subsequent years, based on cargo volumes.

- The community mitigation fund must be dedicated to zero-emission projects that are a priority for port communities and other needs as determined by the public. This may include projects to deploy battery-electric trucks and switcher locomotives, installation of additional air quality monitors and purchases of air filters for residents affected by port pollution.
- The Ports must conduct public workshops and targeted outreach to community, including collaboration with designated community representatives and Wilmington/Carson/West Long Beach AB617 Community Steering Committee members, to inform selection of zero-emission projects. We recommend that a committee including community representatives be established to steward the mitigation fund, and that AB617 working group members be granted a decision-making role to determine how funds are spent.
- The Ports must issue quarterly reports on the status of the community mitigation fund, including types of projects seeking funding, total funds spent, and remaining funds available. This information must be presented to the committee established to steward the mitigation fund.

As noted above, there is an urgent need to clean up port equipment and transition to zero-emissions, particularly as both Ports continue to experience record-breaking cargo throughput and are forecasting further expansion to accommodate increases in throughput. Growth of port operations cannot occur without the Ports taking action to rectify the air pollution problems that portside communities already face. Therefore, we request that the Ports adopt the following policies, which build on programs that the Ports have previously implemented and will provide the incentives necessary to facilitate the deployment of zero-emission port equipment.

Oceangoing Vessels

- The Ports must update their respective Ship Incentive Programs by January 1, 2027, and invest sufficient funding to encourage shipping companies to adopt cleaner technologies. Specifically, we request that each Port devote at least \$10 million per year to their Ship Incentive Programs, and update the per call incentive offered to (1) vessels that meet the highest Environmental Ship Index (ESI) score; (2) vessels with Tier III engines or cleaner; or (3) vessels that use cleaner marine fuels.
- If a Port has not spent \$10 million per year on their Ship Incentive Program, the remaining amount will be deposited into the Technology Advancement Program for funding of zero-emission projects at that Port.
- The Ports must provide monthly reports to the public on recipients of these incentives. Moreover, the Ports shall review incentive amounts on a bi-annual basis to assess effectiveness of the Programs in attracting cleaner vessels.

- We also encourage the Ports to develop a public report on clean technologies and alternative fuels that are being used globally, to assess potential pathways for reducing ship pollution, including assessment of any ports with 100% electrification targets. The Ports must conduct community outreach and engagement throughout development of this report.

Drayage Trucks

- By January 1, 2027, the Ports shall develop a roadmap to achieving the CAAP goal of 100% zero-emission drayage truck fleet by 2035, including interim benchmarks for 2028, 2030, and 2033. To inform this roadmap, the Ports must conduct an analysis of charging infrastructure needs and ZE truck adoption rate needed to achieve 2035 CAAP goal to inform this roadmap, and prepare an updated economic impact analysis of an increased Clean Truck Fund Rate (e.g. impacts for previously proposed \$70/TEU rate).
- Develop a 3-year pilot feebate program by June 30, 2026 that provides a per-trip incentive for zero-emission trucks picking up or dropping off a container at the Ports. Each Ports shall spend a minimum of \$10 million per year on the feebate program. If a Port does not disburse \$10 million annually through the feebate program, the remaining amount will be deposited into the Technology Advancement Program for funding of zero-emission projects at that Port.

Locomotives

- By December 2026, each Port commits to publicly supporting electrification of the Alameda Corridor and agrees to provide at least \$25 million to support overhead catenary infrastructure for the Alameda Corridor. Additionally, the Ports must commit, by the end of the year, to apply for state and local funding opportunities to electrify Alameda Corridor rail operations using overhead catenary, in coordination with the Alameda Corridor Transportation Authority (ACTA) and Caltrans.
- By December 2026, the Ports commit to supporting the ACTA to commission a plan to electrify the Alameda Corridor.

Additional Incentives for Port Equipment (including Cargo Handling Equipment & Harbor Craft)

- We have previously proposed an Alternative Clean Freight Fee, which would expand the Clean Trucks Program (\$10/TEU fee for non-exempted trucks) to containers moved by all modes of port equipment. This would create a greater pool of incentive funding that can go towards cleanup of harbor craft, locomotives, cargo handling equipment, and oceangoing vessels and buildout of necessary zero-emission infrastructure, such as charging stations and shorepower. The Ports must establish this program by end of 2026, with a fee of at least \$70/TEU.

We want to remind you that portside communities and everyone living in the Los Angeles region continue to breathe filthy air in large part due to port emissions. You have a duty to the public to devise a plan to clean up the many polluting port sources, and the proposed CAAP Plus measures are a step in that direction. We appreciate your consideration of the recommendations and welcome the opportunity to discuss further with you.

Sincerely,

Regina Hsu
Earthjustice

Marven Norman
Center for Community Action & Environmental Justice

Paola Vargas
East Yard Communities for Environmental Justice

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

Alison Hahm
Natural Resources Defense Council

Cristhian Tapia-Delgado
Pacific Environment

Peter M. Warren
San Pedro & Peninsula Homeowners Coalition

Jennifer Maria Cardenas
Sierra Club

Theral Golden
West Long Beach Association

cc:

Los Angeles Board of Harbor Commissioners

Long Beach Board of Harbor Commissioners

Heather Tomley, Managing Director of Planning & Environmental Affairs, Port of Long Beach

Lisa Wunder, Director of Environmental Management, Port of Los Angeles

Ian MacMillan, Assistant Deputy Executive Officer, South Coast Air Quality Management District