



SAN PEDRO & PENINSULA
HOMEOWNERS COALITION



EARTHJUSTICE



**PACIFIC
ENVIRONMENT**

June 5, 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: Comments on Draft Addendum to Cooperative Agreement

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

On behalf of the undersigned members of the Trade, Health, and Environment (THE) Impact Project, we submit the following comments on the Draft Addendum to the Cooperative Agreement. As noted in our previous comment letter, the additional CAAP Plus measures that the San Pedro Bay Ports and South Coast Air Quality Management District commit to in this Addendum must (1) prioritize the protection of public health; and (2) improve transparency and accountability to the public.

Unfortunately, the Draft Addendum is wholly insufficient in addressing the outsized pollution and health impacts attributable to port pollution. These comments emphasize the need for additional measures targeted at the remaining categories of port equipment. In addition, we offer feedback on the proposed Port Emission Reduction Programs and Regional Off-Port Truck Infrastructure Program.

I. Need for Emission Reduction Measures Covering All Port Sources

We want to point out that the Draft Addendum does not include any actions beyond what the Ports have previously stated that they intend to pursue, separate from this Cooperative Agreement process. Last August, the San Pedro Bay Ports announced in a Quarterly Clean Air

Action Plan Update that each Port would update their ESI Incentive Program due to changes expected from the ESI 2.0 baseline updates.¹ Similarly, through implementation of the Clean Truck Fund Rate, the Ports were already contemplating incentive programs, such as a per-trip incentive to lower operational costs for zero-emission trucks.² While we support these programs, these are the only two real commitments in the Draft Addendum, which were already underway at the Ports. Moreover, we want to point out that the Cooperative Agreement, approved last December, stated that the Ports and AQMD would negotiate additional CAAP Plus Measures for the following source categories: (1) oceangoing vessels; (2) drayage trucks; (3) cargo handling equipment; (4) harbor craft; (5) on-port locomotives; and (6) workforce development.

We are disappointed to see that the Ports are only proposing emission reduction programs for two source categories and offer no concrete actions for other key categories of port equipment, such as cargo handling equipment, locomotives, and harbor craft. While the Preamble states that each City will continue to develop and implement activities that support emission reductions, the listed actions do not address all port sources and fail to provide any tangible commitments or hard deadlines. For example, the Draft Addendum indicates that each City will “develop[] a projection for Zero-Emission Cargo Handling Equipment Deployments.” These vague statements and the two Port Emission Reduction Programs identified in this Draft Addendum do not adequately address the health impacts borne by our portside communities.

The Ports’ progress in cleaning up port operations has slowed in recent years, and emission trends at both Ports indicate that existing policies are inadequate in countering the ongoing growth and concomitant pollution poisoning our portside communities. In 2024, both Ports experienced record-breaking cargo throughput, and this growth was accompanied by an increase in emissions from all port sources – 23 percent increase in diesel pollution and 12 percent increase in nitrogen oxide pollution at the Port of Long Beach, and 8 percent increase in diesel pollution at the Port of Los Angeles, compared to the prior year.³ These emission trends, coupled with the Ports’ continued growth, make it clear that the proposed programs are not enough to safeguard public health and ameliorate the health risks borne by portside communities.

The Draft Addendum must include additional measures that will facilitate cleanup of all port sources and incorporate the recommendations from our previous letter, including the following proposals:

- Support electrification of the Alameda Corridor and provide at least \$25 million to support overhead catenary infrastructure
- Devise Alternative Clean Freight Fee program, expanding the Clean Truck Fund Rate to containers moved by all modes of port equipment, which could generate incentive funds

¹ San Pedro Bay Ports, Clean Air Action Plan – Ocean Going Vessel Update presentation (Aug. 5, 2025), slides 2-7.

² Port of Long Beach, Clean Truck Program Update & Year 5 Spending Plan Priorities (Mar. 23, 2026), slide 3, 5.

³ Port of Long Beach, Air Emissions Inventory – 2024, pg. ES-2 (Sep. 2025); Port of Los Angeles, Inventory of Air Emissions 2024, pg. ES-6 (Sep. 2025).

that can go towards cleanup of harbor craft, locomotives, cargo handling equipment, and ships, as well as supporting infrastructure.

- Set goal of achieving 100% zero-emission harbor craft fleet by 2035
- For each Port, commit at least \$10 million per year to fund deployments of battery-electric cargo handling equipment, harbor craft, switcher locomotives, and installation of supporting infrastructure

As this Draft Addendum does not provide the full scope of Additional CAAP Plus Measures envisioned in the Cooperative Agreement, the Ports and AQMD must include, at minimum, a clause requiring further negotiations of additional measures following the release of Draft ZE Plans for the three Phase source categories.

II. Enhanced Clean Ship Incentive Program

Oceangoing vessels are the largest source of port emissions, and an overhaul of these programs is long overdue. As the Preamble notes, the San Pedro Bay Ports are conducting a Clean Marine Fuel Assessment, which must include a thorough analysis of the health and safety risks of each alternative marine fuel and technology that will help inform the development of the Enhanced Clean Ship Incentive Programs. Moreover, the Clean Marine Fuel Assessment cannot evaluate liquefied natural gas as an option, as LNG is not a clean fuel and should not be incentivized in the incentive programs.

We appreciate that the Draft Addendum identifies elements that will improve public transparency, such as publicly sharing information on ship types typically calling at each port and current participation levels in the existing programs. This transparency is critical to enabling community members to engage in the public process and provide feedback on the development of each Port's Enhanced Clean Ship Incentive Program. The Ports must maintain this transparency following adoption of the Enhanced Clean Ship Incentive Programs by continuing to report on participation levels and quantifying the emission benefits associated with the programs.

III. Zero-Emission Truck Utilization Incentive Program

We support the development of incentive programs that will encourage the use of zero-emission drayage trucks serving the Ports and the per-trip feebate proposal aligns with the previous recommendations several groups made in 2019 with the help of the UCLA Luskin Center. However, we want to emphasize that the Ports are already undertaking these efforts through their respective Clean Truck Programs. This proposal simply repackages existing efforts, while failing to appropriately chart a path towards the 2017 Clean Air Action Plan Update goal of achieving a 100% zero-emission drayage truck fleet by 2035.

With less than ten years left, it is imperative that the Ports develop a roadmap to achieving the 2035 goal, including exploring other policies that can further accelerate the adoption and deployment of zero-emission trucks. This request is consistent with the recommendation of the

Sustainable Supply Chain Advisory Committee, which was set up to advise the Mayors of Los Angeles and Long Beach. The Zero-Emission Truck Utilization Incentive Program is one of only two measures proposed in the Draft Addendum, yet the Ports can provide no assurances that this program is sufficient to get us on track to meet the 2035 goal. We ask that the Ports consider more effective policies, such as an increased Clean Truck Fund Rate of \$70/TEU.

IV. Regional Off-Port Truck Charging & Fueling Infrastructure

We are glad that the Draft Addendum includes a funding commitment from both Ports for this regional truck charging and fueling infrastructure initiative, but we urge the AQMD to prioritize battery-electric technologies in selecting projects. We want to make clear now that we do not support hydrogen fuel cell technologies in applications where battery-electric technology is proven and already in operation.

The technology for battery-electric trucks is far more mature and more economically viable. Moreover, over 95 percent of hydrogen production is currently derived from fossil fuels and presents significant emission risks.⁴ Fossil-based hydrogen production is also extremely water-intensive, requiring up to 40 liters of freshwater to produce a single kilogram of hydrogen.⁵ We cannot allow more water extraction from communities that are already water scarce. Aside from the relative inefficiencies of hydrogen, it is a highly flammable substance that presents significant safety risks. A reliance on hydrogen fuel cell trucks would require the buildout of infrastructure, including pipelines and refueling stations through densely populated neighborhoods. The transportation and storage of hydrogen also threaten the safety of workers and frontline communities. In the administration of this program, the AQMD must conduct public workshops to solicit feedback from freight-impacted communities and ensure that the deployments of zero-emission trucks and installation of supporting infrastructure meet community needs. Therefore, we ask that the AQMD focus on charging infrastructure for this funding. In addition to the February 28, 2027 deadline for approval of MOUs, the Addendum should set a timeline for the AQMD to announce the solicitation and review project applications.

In entering into the Cooperative Agreement, the Ports and AQMD committed to work together to reduce port emissions for the health of all residents in the South Coast Air Basin, including our overburdened portside communities. This Draft Addendum does not go far enough in addressing our port pollution crisis, and we ask that the Ports and AQMD increase their ambition and devise additional emission reduction measures. We appreciate your consideration of these comments and welcome the opportunity to discuss with you.

⁴ U.S. Department of Energy, Hydrogen Resources, <https://www.energy.gov/eere/fuelcells/hydrogen-resources>

⁵ RMI, *Hydrogen Reality Check: Distilling Green Hydrogen*, <https://rmi.org/hydrogen-reality-check-distilling-green-hydrogens-water-consumption> (2023).

Sincerely,

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