



May 28, 2026

Chair Michael Cacciotti and Members of the Governing Board  
South Coast Air Quality Management District (South Coast AQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765

Delivered electronically: [ports\\_comments@aqmd.gov](mailto:ports_comments@aqmd.gov)

**RE: Comments on Draft Proposed Addendum to Cooperative Agreement**

Dear South Coast Air Quality Management District Governing Board and Staff,

California Environmental Voters (EnviroVoters) appreciates the continued work to develop measures under the Clean Air Action Plan Plus (CAAP+) process addressing emissions associated with port activity. We recognize the significant public health stakes involved and share concerns raised by community partners across the South Coast Air Basin regarding the urgent need to reduce pollution impacting portside communities and Inland Empire residents who experience downstream effects of port pollution. Because these communities experience some of the greatest exposure to freight-related emissions, meaningful and intentional engagement is essential to ensuring policies reflect on the ground conditions and lead to effective solutions.

EnviroVoters appreciates that the proposed addendum to the Cooperative Agreement incorporates additional public process requirements, program reporting, and implementation provisions related to Ports Emissions Reduction Programs and Regional Off-Port Truck Charging and Fueling Infrastructure. The inclusion of draft program review periods, annual reporting requirements, and public meetings reflects movement toward greater transparency and accountability. However, we believe several areas within the proposed addendum require strengthening to ensure these measures deliver significant and lasting outcomes for impacted communities.

EnviroVoters supports the broader goals reflected in recent coalition communications calling for stronger action to address port-related emissions and rebuild public trust in this process. We submit this letter to highlight several core priorities we believe are essential to ensuring the CAAP+ measures move beyond procedural requirements and result in measurable air quality and public health improvements.

**First, strengthening community engagement must remain a central component of this process.**

We appreciate that the proposed addendum includes public review requirements under Attachment A2, including draft program review periods and a requirement for one public meeting during program development. However, we remain concerned that these provisions



establish minimum procedural requirements rather than ensuring meaningful and accessible engagement with impacted communities.

The proposed addendum states that Ports will conduct one public meeting during the review process and notes that this meeting may occur in conjunction with regularly scheduled CAAP Stakeholder Advisory Group meetings. While these meetings can provide useful updates, they may not sufficiently reach residents and communities most impacted by freight and port pollution. Community members have previously expressed difficulty tracking meetings, updates, and opportunities for participation when outreach relies primarily on existing agency communication channels and listservs.

We encourage South Coast AQMD to expand outreach strategies beyond minimum requirements and partner directly with trusted community structures, including Environmental Justice Advisory Groups, AB 617 Community Air Protection groups, and local organizations to co-host engagement opportunities. Inclusive outreach should also ensure Inland Empire communities, which experience downstream impacts associated with freight movement and warehouse activity, are meaningfully involved in engagement and decision-making, including through in-person engagement opportunities in the Inland Empire.

Stronger community engagement is critical not only for equity reasons, but also for effective implementation. When impacted residents participate early and consistently in the process, implementation challenges can be identified sooner, policies can become more durable, and public trust in agency decisions improves.

**Second, transparency and accountability must be more clearly embedded within implementation of the proposed measures.**

We appreciate that the addendum includes reporting and evaluation requirements, including annual program reporting and future Program Evaluation Reports. However, we remain concerned that several provisions focus heavily on completion of procedural steps rather than requiring demonstrated emissions outcomes.

Under the Enhanced Clean Ship Incentive Program and Zero Emission Truck Utilization Incentive Program, participation goals are described as being based on available information and acknowledge that participation levels are "beyond the control of the Ports." While we understand that market conditions and operational considerations create limitations, communities still need clarity regarding how success will ultimately be measured and what accountability mechanisms will exist if participation goals are not met.

We encourage South Coast AQMD to establish publicly accessible emissions reduction targets, progress reporting, and measurable performance indicators tied directly to implementation outcomes. Public-facing tracking mechanisms should allow communities, policymakers, and stakeholders to understand whether implementation is producing real air quality improvements rather than solely documenting completed actions.



Greater transparency will also help rebuild confidence in a process where many community members previously expressed concerns that decisions and negotiations occurred without sufficient public visibility.

**Third, program success should be grounded in measurable public health and emissions outcomes.**

Incentive programs and infrastructure investments can play an important role in reducing emissions when paired with clear targets, timelines, and accountability mechanisms. However, the proposed addendum primarily emphasizes program implementation and future evaluation processes without establishing clear quantifiable emissions reduction benchmarks.

The proposed addendum requires development of incentive programs intended to encourage participation and later evaluation reports assessing performance against identified metrics. However, there is limited discussion regarding specific emissions reduction expectations, utilization targets, or public health indicators that define successful implementation.

Strengthening clean air programs should focus not only on actions taken, but also on demonstrated outcomes, including increased zero-emission utilization, reductions in idling and vehicle miles traveled, and measurable reductions in pollution exposure in impacted communities.

EnviroVoters believes strong community partnership, clear transparency, and measurable emissions reductions are mutually reinforcing. When communities can participate meaningfully and see concrete progress, trust grows, implementation improves, and elected leaders are better positioned to support sustained clean air investments. Aligning community input with measurable outcomes will be critical to ensuring long-term regulatory success and delivering the public health benefits communities expect and deserve.

We look forward to continued collaboration with South Coast AQMD, community partners, and regional stakeholders to ensure CAAP+ measures deliver real and equitable air quality improvements for all communities impacted by port pollution.

Sincerely,

A handwritten signature in black ink that reads "Ashley Jackson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Ashley Jackson  
Inland Empire Regional Organizer