



Jodie Muller
President & CEO

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submitted via e-mail to: ports_comments@aqmd.gov

Dr. Elaine Shen
Planning & Rules Manager
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: WSPA Comments on Proposed Addendum to the Cooperative Agreement

Dear Dr. Shen,

Western States Petroleum Association (WSPA) appreciates this opportunity to provide comments on the South Coast Air Quality Management District's (SCAQMD's or District's) Proposed Addendum to the Cooperative Agreement.¹ WSPA has been an active participant in air quality planning issues for over 30 years. WSPA is a non-profit trade association that represents companies that safely explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Washington, Oregon, Nevada, and Arizona. WSPA-member companies operate tanker vessel and marine terminal facilities that could be impacted by the Cooperative Agreement.

Tanker operations and marine oil terminal operations differ materially from other vessel classes and cargo terminals. These differences include the nature of cargo transfer operations, associated safety systems, and equipment requirements essential to safe operation. Assumptions developed for other vessel types may not be directly applicable to tanker operations. The unique tanker operation challenges cannot be understated.

WSPA requests that tanker vessel activity and marine oil terminal operations be explicitly recognized as a distinct operational category as programs under this addendum are developed.

Enhanced Clean Ship Incentive Program

WSPA appreciates that the proposed Addendum would require each Port to enhance its Clean Ship Incentive Program to encourage calls by lower-emitting ocean-going vessels. As described in the Addendum, these enhancements would be aligned with the anticipated launch of Environmental Ship Index (ESI) 2.0, may include additional environmental "plus-ups," and would require the Ports to describe the vessel types that typically call at each Port, including annual visits by vessel type, engine tier level, and fuel type.

Because these elements will shape the design of the final program, WSPA urges the Ports and SCAQMD to ensure that the enhanced Clean Ship Incentive Program is developed in a manner that recognizes meaningful operational differences among vessel categories, including tankers. The Addendum appropriately requires the Ports to evaluate current participation and non-participation by vessel type, engine tier, and fuel type; to justify the proposed enhanced program based on relevant factors, including stakeholder outreach and operational and financial considerations; and to establish anticipated participation goals with the understanding that

¹ SCAQMD's Cooperative Agreement, Proposed Addendum. Available at: https://www.aqmd.gov/docs/default-source/ports-ca/0_draft-preamble-to-addendum_06-12-clean.pdf?sfvrsn=1ff4667e_2. Accessed on 29 June 2026.

participation levels are beyond the control of the Ports. These requirements should be applied in a way that ensures tanker operations are not evaluated against generalized assumptions that may be more applicable to other vessel classes.

In particular, WSPA recommends that the enhanced program design ensures that:

- program criteria do not assume equivalent applicability across vessel classes, fuel types, engine configurations, operating profiles, or terminal-interface requirements;
- participation expectations and any related program metrics reflect actual operational capability, technology availability, fuel availability, safety requirements, and commercial constraints for tanker vessels;
- incentive structures remain voluntary and do not create effective constraints on tanker vessel calls, terminal access, or marine terminal operators' ability to receive tanker vessels; and

In addition, the use of program metrics and participation targets should not result in tanker operations being evaluated against assumptions that do not reflect their operational constraints.

Low-Load and Fuel Considerations

WSPA appreciates that SCAQMD and the Ports recognize the importance of continued technical work related to vessel emissions and clean marine fuel pathways. The source documents identify several ongoing efforts outside the Cooperative Agreement that are directly relevant to future program design, including a Clean Marine Fuels Assessment, a Clean Marine Fuels Pilot Project, and a study of vessel emissions at low-speed operations. The June public meeting materials also note that coordination with CARB on low-load ship emissions research is ongoing and that these efforts are intended to inform program design.

These issues are especially important for tanker operations. Low-load emissions performance, clean marine fuel availability, fuel compatibility, bunkering readiness, and terminal-interface requirements remain evolving and unresolved considerations. Accordingly, WSPA urges SCAQMD and the Ports not to treat low-load emissions performance or clean-fuel availability as settled assumptions when developing the Enhanced Clean Ship Incentive Program or any related implementation measures.

For tanker vessels and marine oil terminals, program design should account for the practical realities of vessel operations, safety requirements, fuel availability, infrastructure readiness, energy reliability, and operational continuity. These considerations are consistent with the source documents' acknowledgement that program development may consider technical studies, stakeholder outreach, operational and financial considerations, and that implementation should account for energy cost, availability, reliability, workforce and infrastructure readiness, market demand, and safety.

Consistency with Ongoing Marine Regulatory Work

WSPA has provided input into maritime regulations at the state-level, including the California Air Resources Board's At Berth and Commercial Harbor Craft regulations, regarding feasibility, safety, and site-specific operational considerations; WSPA is also actively participating in the CARB's Ocean Going Vessel In-Transit regulations that are currently under development. Those considerations remain relevant here and should be reflected as program elements affecting tanker operations are developed.

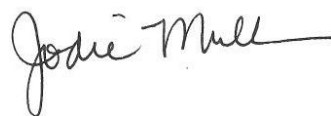
Coordination is especially important because these efforts are developing in parallel with state regulatory programs and other port-led initiatives. Without clear coordination among SCAQMD, the Ports, CARB, the United States Coast Guard, and other relevant agencies, there is a risk of overlapping, duplicative, or inconsistent expectations affecting tanker vessels, marine terminal operations, and fuel supply logistics across California. This could create uncertainty for vessel operators, charterers, marine terminal operators, and fuel supply logistics, particularly where program expectations differ from state regulatory timelines, technology feasibility determinations, safety requirements, or site-specific compliance pathways. These programs collectively influence vessel operations, marine terminal operations, and fuel movement throughout California. Program development should therefore account for cumulative system impacts rather than evaluating individual initiatives in isolation.

In summary, WSPA recommends the following:

- recognize tankers and marine oil terminal operations as a distinct operational category;
- avoid applying uniform assumptions across vessel classes;
- ensure incentive structures reflect feasibility and safety constraints;
- engage marine oil terminal operators and tanker stakeholders prior to finalizing program design elements affecting vessel operations; and,
- incorporate interagency coordination into program development for any elements affecting tanker operations.

WSPA appreciates the opportunity to provide these comments related to the Proposed Addendum for the Cooperative Agreement. We look forward to your consideration of our comments and further discussion. If you have any questions, please contact me or Ramine Ross at rross@wspa.org.

Sincerely,



cc: Wayne Natri, SCAQMD
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