



SAN PEDRO &
PENINSULA
HOMEOWNERS
COALITION



WEST LONG
BEACH
ASSOCIATION



February 23, 2022

VIA ELECTRONIC MAIL

Ian MacMillan

Deputy Executive Officer, Planning, Rule Development and Area Sources

South Coast Air Quality Management District

21865 Copley Dr.

Diamond Bar, CA 91765

E: imacmillan@aqmd.gov

Re: SCAQMD Proposed Rule 2304, Indirect Source Rule for Marine Ports

Dear Mr. McMillan:

On behalf of the undersigned community, environmental justice, health, and environmental organizations, we write to ask for an expedited timeline for developing South Coast Air Quality Management District's Proposed Rule 2304 to regulate emissions from Commercial Marine Ports.

First, we want to thank the staff for swiftly setting up the first rulemaking working group meeting for this vital rule. We were pleased to receive the announcement immediately following the expiration of the six months spent exclusively negotiating voluntary measures. Now that the delay tactics requested by the San Pedro Bay Ports have run their course and the Board has reaffirmed a commitment to ISR rulemaking, the District must act quickly to make up for the lost time.

Unfortunately, the current rule forecast predicts that staff will not complete the rule **until December 2022**. This is entirely too long given that communities are now suffering from the harms of port-related pollution and the “new normal” of freight volumes never seen before in this region.

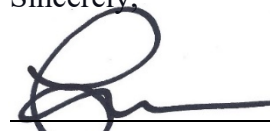
The region is still far from meeting state and federal standards, and the District must set a deadline to bring this rule to the Board for approval more quickly. We recommend that the District expedite the rulemaking timeline so that Rule 2304 is completed within the next seven months or **by September 2022**. This timeline is reasonable, considering that the District has contemplated the ISR for the Ports for nearly a decade. As far back as August 2016, staff already had preliminary concepts for developing the rule.

The community remains very willing to engage quickly in this rulemaking process. The District can have robust community outreach, and an expeditious process given the health crisis this industry is currently imposing on communities. We are ready to start now.

The Ports must do their part to reduce overall contributions to emissions in the region. We look forward to working with you to provide residents with the strongest possible Indirect Source Rule to curb emissions from the Ports in a much quicker timeframe.

Thank you.

Sincerely,



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Executive Director
California Kids IAQ

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