

July 31, 2025

Vanessa Delgado  
Chair, South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765

**Subject: Support for Ports' Cooperative Agreement – Agenda Item 24 (PR 2304)**

Dear Chair Delgado,

On behalf of the Supply Chain Federation—which represents a broad coalition across ports, warehousing, transportation, labor, and other key links in the supply chain—we are writing to express our strong support for the Ports of Los Angeles and Long Beach's proposed cooperative agreement, submitted on July 18th, as an alternative to Proposed Rule 2304 (Port ISR), listed as Item 24 on this Friday's AQMD Governing Board agenda.

The Ports' proposal is a well-developed, pragmatic approach that builds on their proven track record of emissions reductions. Since 2005, the Ports have reduced NOx emissions by 72 percent, with a further 34 percent reduction since the 2017 Clean Air Action Plan (CAAP) update. This alternative agreement offers a credible, enforceable path to further emission reductions—potentially even more swiftly than the current PR 2304 proposal—while maintaining local control and operational flexibility.

Key elements of the Ports' proposed agreement include:

- **Six new “CAAP Plus” measures**, such as enhanced clean ship incentives, vessel speed reductions, and green shipping corridors, including the goal of launching the first Zero Lifecycle Carbon Emission container ship along the Shanghai Corridor by 2030.
- **Substantial financial commitments**, including \$60 million over the next three years for zero-emission (ZE) drayage truck infrastructure, and \$50 million for ZE switcher locomotives and related infrastructure.
- **Zero-emission equipment transition support**, including workforce development and technical assistance to prepare operators for ZE cargo handling, trucks, and locomotives.
- **Accountability and enforcement provisions**, including implementation milestones, annual public reporting, dispute resolution mechanisms, and binding commitments enforceable in court.

We respectfully urge the Board to pause the rulemaking process for PR 2304 and direct AQMD staff to formally engage with the Ports and Cities on this cooperative agreement. This collaborative path aligns with the region's environmental goals while preserving economic resilience and operational coordination at our nation's most critical goods movement hub.

Thank you for your leadership and consideration. Please don't hesitate to contact me with any questions.

Best regards,



**Sarah Wiltfong**  
Chief Advocacy and Public Policy Officer  
Supply Chain Federation

**CC:** South Coast AQMD Governing Board Members