



November 3, 2023

SCAQMD Board Members
South Coast Air Quality District
21865 Copley Drive
Diamond Bar, California 91765

Dear Chair Delgado and SCAQMD Board Members:

As you know, the Pacific Merchant Shipping Association (PMSA) has been actively engaged with South Coast Air Quality Management District (SCAQMD) staff and Board Members on development of the proposed Port Indirect Source Rule (ISR). Today, the Board will consider support for federal legislation that takes a holistic approach to addressing vessel emissions at the federal and international levels. PMSA appreciates the effort to seek uniform and comprehensive national and international approaches to the regulation of vessel emissions and we encourage SCAQMD's federal focus on achieving those goals.

To that end, PMSA requests two actions at this time. First, SCAQMD should set aside development of the proposed ISR and re-engage with the ports of Los Angeles and Long Beach, maritime industry stakeholders, and labor representatives on a collaborative approach to reducing emissions. Since the adoption of the Clean Air Action Plan (CAAP), diesel toxics have been reduced by an amazing 90%. Nitrogen oxides have been reduced by 63%, with sulfur oxides reduced by 97%. This has been an incredible accomplishment. With the CAAP's updated goals of achieving zero emissions on terminals and for on-road trucks, a collaborative approach has the greatest chance of success without the risk of loss to incentive funds that a regulation would pose.

Second, through a collaborative approach, PMSA requests that SCAQMD lead a coalition to seek a comprehensive national approach to address federal sources. A federal solution would create significant emissions reductions and be safe from legal challenges while creating a level regulatory field across the nation. Uniform national rules are critical to preserving California ports' competitiveness and assisting SCAQMD achieve air quality standards. Failing to do so continues to risk lost market share and cargo throughput that results in 1 in 9 jobs throughout the region and fails to address the limits of SCAQMD's current approach.

PMSA looks forward to working with the Board on this issue.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Jelenić". The signature is fluid and cursive, written in a professional style.

Thomas Jelenić
Vice President