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Los Angeles County Business Federation

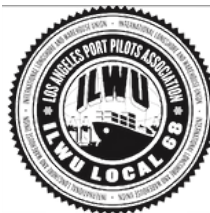
Strengthening the Voice of Business Since 2008



WEST HOLLYWOOD



SOUTH BAY ASSOCIATION OF CHAMBERS OF COMMERCE





J.G. Boswell Company





September 17, 2024

Hon. Karen Bass
Mayor
City of Los Angeles
200 North Spring Street
Los Angeles, California 90012

Hon. Rex Richardson
Mayor
City of Long Beach
411 West Ocean Boulevard
Long Beach, California 90802

Re: SCAQMD Port Indirect Source Rule (ISR)- OPPOSE

Dear Mayor Bass and Mayor Richardson:

The signatories of this letter respectfully request your opposition to the adoption of a Port Indirect Source Rule (ISR) by the South Coast Air Quality Management District (SCAQMD). A Port ISR would strangle the goods movement industry, damage the regional economy, and eliminate port jobs as well as jobs throughout Southern California and beyond, all without any assurance that it will result in significant or meaningful improvements in air quality. Instead of a Port ISR, we ask that you commit to the development of a comprehensive plan to permit and build the essential infrastructure necessary for the deployment of zero-emission equipment at the Ports of Los Angeles and Long Beach (Ports), and in the greater Southern California intermodal supply chain without impacting jobs and revenues.

Without first planning for and then developing the actual infrastructure necessary to make a transition to zero emissions equipment, a Port ISR would serve no other purpose than to punish the supply chain for doing business in Southern California, driving away cargo and decimating jobs and the regional economy in the process. Simply put, the planning, permitting, and development of new infrastructure needs to occur before regulators require the new infrastructure and equipment to be used.

Ironically, these investments in new infrastructure are only feasible if the industry remains healthy enough to help the Ports fund them. An ISR that diverts cargo to other, dirtier ports throughout the world would likewise remove the very means for businesses to generate the revenues necessary to afford new infrastructure and equipment. Adding insult to injury, a Port ISR would establish regulatory requirements that will render the Ports, their marine terminal operators, and truckers ineligible to participate in grant programs and compete for public funds and subsidies just when they need access the most.

There is broad agreement among stakeholders that it would be more effective and productive to forego a Port ISR and instead focus on an infrastructure and streamlined permitting program to support current and future needs related to zero-emission infrastructure and equipment. Additionally, such an approach would not impact port jobs and revenues. For example, the identified needs include more than \$500 million to upgrade electrical systems to support electricity demands for cargo handling equipment, heavy-duty vehicle charging, and at-berth shore power at the Port of Los Angeles. At the same time, the Port of Long Beach projects a 5.9-fold increase in electricity demand by 2030. Without the development of these critical infrastructure investments, no Port ISR-mandated reductions would be feasible, and, therefore, would not generate emissions benefits.

While failing to deliver substantial improvements to air quality, a Port ISR would eviscerate the region's economy and disrupt the nation's access to essential goods that rely on the Ports. Nearly 40% of the

nation's goods flow through the Ports of Los Angeles and Long Beach. The economic impact of these Port activities on local communities, regional, state, and national economies are enormous. These economic impacts include:

- **3.1 million jobs** are supported by the Ports
- In 2022, jobs related to Port activities generated **\$19.93 billion in labor income** (compensation including benefits)
- The Ports contributed more than **\$48.47 billion in total economic output** in 2022
- The Ports supported **\$2.7 billion in state and local tax revenue** in 2022
- Including related jobs, **one out of every 51 jobs nationwide** is supported by the Ports

For these reasons, the undersigned respectfully ask you to strongly and publicly oppose the Port ISR and instead support an infrastructure development approach. This infrastructure-based approach is a win-win scenario that preserves jobs, the regional economy, and state and local tax revenues while aiming to meet the state's climate goals and the goals in the Ports' Clean Air Action Plan (CAAP), while also assuring the development of the infrastructure and equipment necessary to achieve emission reductions.

Sincerely,

Abundant Harvest Organics
African American Farmers of California
Agricultural Council of California
Agriculture Transportation Coalition
Alliance for Chemical Distribution
Almond Alliance
American Frozen Food Institute
AmericanHort
American Waterways Operators
APM Terminals
Association of Food Industries
Auto Care Association
Baggie Farms
Baltimore Customs Brokers & Forwarders
Association
Bay Area Council
Belmont Nursery
Best Drayage
BNSF Railway
Boos & Associates
Brandt
Brotherhood of Locomotive Engineers &
Training
Building Owners & Managers Association of
California
Butte County Farm Bureau
California Aquaculture Association
California Automotive Wholesalers' Association

California Avocados
California Building Industry Association
California Business Properties Association
California Business Roundtable
California Chamber of Commerce
California Citrus Mutual
California Cleaners Association
California Cotton Ginners & Growers Association
California Farm Bureau
California Farmworker Foundation
California Food Producers
California Manufacturers & Technology
Association
California Retailers Association
California Short Line Railroad Association
California Trucking Association
Californians for Affordable & Reliable Energy
Central Valley Business Federation
Mayor Alvaro Preciado, City of Avenal
Columbia River Customs Brokers & Forwarders
Association of Northern California
Construction Industry Air Quality Coalition
Crinklaw Farm Services Inc.
Customs Brokers & Forwarders Association of
Northern California
Customs Brokers & International Freight
Forwarders Association of Washington State
Dairy Institute of California

Dalena / Benik & Associates
Del Rey Packing Company
Dependable Supply Chain Services
Detroit Customs Brokers & Forwarders
Association
Devine Intermodal
DP Enterprises
Dreisbach
El Dorado
Evergreen Shipping
Everport Terminal Services
Fab 5 Trucking, LLC
Family Business Association of California
Fashion Accessories Shippers Association
Fashion Jewelry & Accessories Trade Association
Fenix Marine Services
Foreign Trade Association
Fresno County Farm Bureau
FuturePorts
Garden Grove Chamber of Commerce
Gemini Shippers
Gensteam
Global Cold Chain Alliance
Golden State Logistics
Greater Ontario Business Council
Greater San Fernando Valley Chamber of
Commerce
GSC Enterprises
GUSS
Hager Pacific Properties
Harbor Association of Industry and Commerce
Harbor Trucking Association
Hardwood Federation
Hollywood Chamber of Commerce
IBU Marine Division
Inland Empire Chamber Alliance
ILWU Local 13
ILWU Local 20 Chemical Processing & Packaging
ILWU Local 26 Warehouse, Processing &
Distribution Workers
ILWU Local 30 Mining, Mineral Processing
Workers
ILWU Local 56 Ship Scalers & Painters
ILWU Local 63
ILWU Local 65 Port Police
ILWU Local 68 Port Pilots
ILWU Local 94

IMC Logistics
Impact Transportation, LLC.
Ingomar Packing Company
Inland Empire Economic Partnership
International Association of Movers
International Dairy Foods Association
International Transportation Service
International Warehouse Logistics Association
International Wood Products Association
J.G. Boswell Company
Kirby Offshore Marine, LLC
Latino Consumer Federation
LiUna Local 1309
Long Beach Area Chamber of Commerce
Los Angeles Area Chamber of Commerce
Los Angeles County Business Federation
Los Angeles Customs Brokers & Freight
Forwarders Association
Madera County Farm Bureau
Maersk
Marine Firemen's Union
Maryland Retailers Alliance
Matson
Meat Import Council of America
Merced County Farm Bureau
Metro Ports
Milk Producers Council
Milt & Edie's Dry Cleaners
Minnesota Soybean Growers Association
Minturn Nut Company Inc.
Monterey Farm Bureau
Moonlight
NAIOP - Inland Empire
NAIOP - SoCal
NAIOP California
National Aquaculture Association
National Association of Egg Farmers
National Association of Waterfront Employees
National Association of Wholesaler-Distributors
National Cotton Council
National Customs Brokers & Forwarders
Association of America, Inc.
National Federation of Independent Business
National Industrial Transportation League
National Retail Federation
National Union of Healthcare Workers
Nebraska Retail Federation

Nevada Trucking Association	Specialty Equipment Market Association
New York New Jersey Foreign Freight Forwarders & Brokers Association, Inc.	Sports & Industry Fitness Association
Nisei Farmers League	SSA Marine, Inc.
North American Association of Food Equipment Manufacturers	Stanislaus County Farm Bureau
Northern Border Customs Brokers Association	Supply Chain Council
Nursery Co.	Talon Logistics
Ocean Network Express	Teamsters Joint Council 42
Orange County Business Council	TGS Logistics
Pacific Coast Council of Customs Brokers & Freight Forwarders Association	The Pasha Group
Pacific Maritime Association	The Toy Association
Pacific Merchant Shipping Association	Tulare County Farm Bureau
Pasadena Chamber of Commerce	U.S. Aquaculture Suppliers Association
Pet Food Institute	U.S. Meat Export Federation
Peters Fruit Farms	United Contractors
Propeller Club of Los Angeles & Long Beach	United States Chamber of Commerce
Quik Pick Express	United States Trout Farmers Association
Ramirez Ag	Valley Industry & Commerce Association
Rebuild SoCal Partnership	Valliwide Marketing
Redondo Beach Chamber of Commerce	Valliwide Organic Farms
Retail Industry Leaders Association	Vane Line Bunkering
River Oak Orchards	Washington State Potato Commission
San Diego Customs Brokers Association	Washington Trucking Association
San Gabriel Valley Economic Partnership	Watson Land Company
San Joaquin Farm Bureau Federation	West Coast Marine Terminal Operators Agreement
San Pedro Chamber of Commerce	West Hollywood Chamber of Commerce
Santa Barbara County Farm Bureau	Western Agricultural Processors Association
Sheet Metal Workers Local 105	Western Growers
South Bay Chambers of Commerce	Western Propane Gas Association
Southern California Contractors Association	Western States Carpenters
Southern California Leadership Council	Western States Petroleum Association
Southern California Logistics Council	WIEBE Farms Inc.
	Wilmington Chamber of Commerce
	Yusen Terminals

cc: Carolyn Webb de Macias, Los Angeles Mayor Bass, Chief of Staff
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Nancy Sutley, Los Angeles Deputy Mayor Energy & Sustainability
Port of Los Angeles Harbor Commissioners
Gene Seroka, Port of Los Angeles, Executive Director
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Lucius Martin, Long Beach Deputy Mayor Economic Development
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Port of Long Beach Harbor Commissioners
Mario Cordero, Port of Long Beach, Chief Executive Officer