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September 19, 2023

Chair Delgado and Members of the Governing Board  
South Coast Air Quality Management District (SCAQMD)  
[Cob@aqmd.gov](mailto:Cob@aqmd.gov)

**RE: Commercial Marine Ports Indirect Source Rule**

Dear Chair Delgado and Members of the Board,

Central San Pedro Neighborhood Council opposes the Proposed Rule 2304, a Commercial Marine Ports Indirect Source Rule (ISR).

The regional environmental benefits promised in ISR 2304 will be won at the expense of diverted cargo and the ensuing economic downturn in our communities. San Pedro Bay communities deserve policies that protect both the health of our environment and our economic opportunities.

Proposed Rule 2304 sets emissions caps for the San Pedro Bay with hard target dates for total emission reduction. The ISR is intended to prompt the shipping industries to replace existing cargo vessel fleets with new lower emissions ships. The unintended consequence is that shippers may opt to simply re-route cargo to East Coast and Gulf Coast ports. Ironically, the longer voyages will result in a net global increase in ship emissions.

With the economic activity in the San Pedro Bay port complex responsible for 1 in 9 jobs in the South Coast region, a diversion in cargo at this scale will be an economic disaster in our communities. Job losses, foreclosures, increased homelessness, business closures, population shifts, increased crime, etc. San Pedro and our South Coast neighbors are in need of relief from the health consequences of the global shipping industry. However, there is no environmental health without economic justice.

Rather than a regional regulatory framework, a Federal policy on ship emissions is a better approach for regulating ship emissions in San Pedro Bay and beyond. The Clean Air Shipping Act (H.R. 4024) aims to achieve similar reductions in shipping emissions without isolating the South Coast region. A Federal policy is more effective to advance the development of cleaner technologies and fuels. Federal regulation doesn't incentivize cargo diversion, and risk our ports becoming regional hubs instead of the global shipping gateways they are today.

As a community we need balance between course corrections on climate change and economic opportunities for the people living and working in the South Coast region. We want clean air and good jobs. The regional focus of Proposed Rule 2304 trades a strong economy for environmental progress. These trade offs make it bad policy for San Pedro Bay.

Sincerely,