# **Communication from Public**

Name: LABOR COALITION

Date Submitted: 09/11/2025 10:06 AM

Council File No: 25-0002-S85

Comments for Public Posting: Support for SB 34 (Richardson) - Ports of Los Angeles and Long

Beach













































September 11, 2025

The Honorable Members of the Los Angeles City Council 200 N. Spring Street Los Angeles, CA 90012

Re: Council File 25-0002-S85 / Support for SB 34 (Richardson) – Ports of Los Angeles and Long Beach

Dear Councilmembers,

On behalf of the above organizations, we write to strongly urge your support of SB 34 (Richardson) and the corresponding Resolution introduced by Councilmember McOsker (CF 25-0002-S85).

This important legislation provides essential certainty for Southern California's ports, protects middle-class union jobs, and ensures that environmental progress continues without undermining economic competitiveness or local governance.

For more than a century, California's ports and their resultant economic engines have been the backbone of our economy. The Ports of Los Angeles and Long Beach facilitate trade and support millions of direct, indirect, and induced jobs that provide working families with middle-class wages, health care, and retirement security.

Some opponents of SB 34 argue that the bill is "premature" considering the South Coast Air Quality Management District (SCAQMD) Governing Board's recent decision to pursue a Potential Cooperative Agreement with the Ports. While we all support good-faith negotiations and collaborative agreements, the facts are clear: on August 1, 2025, the SCAQMD Governing Board only paused the pursuit of Proposed Rule 2304 (Indirect Source Rule for Commercial Marine Ports, or ISR) until September 18, 2025, after which time SCAQMD could resume rulemaking for a binding ISR. Without SB 34, communities, workers, and businesses will be left with continued uncertainty and the constant threat of rigid, top-down regulations that could impose cargo caps, threaten thousands of jobs, and destabilize the economic prosperity of Californians statewide.

It is also worth noting that the Pacific Maritime Association and the Pacific Merchant Shipping Association oppose SB 34 because it prohibits public funds from being used for automation that would displace well-paying jobs. Since 2017, the Legislature has prohibited public funds from being used for automated cargo handling equipment and related infrastructure. Most recently, in June 2025, the Assembly passed AB 605 (Muratsuchi) with similar anti-automation protections.

The Legislature should not allow foreign billion-dollar companies to use public lands and public funds to eliminate jobs and hurt working families.

California can and must continue to improve air quality, but it should do so without destabilizing the economic foundation of our ports or jeopardizing tens of thousands of union jobs. SB 34 strikes that balance.

For these reasons, we respectfully urge your "AYE" vote on CF 25-0002-S85 in support of SB 34 (Richardson).

### Sincerely,

International Longshore & Warehouse Union, Local 13 - Longshore

International Longshore & Warehouse Union, Local 63 – Marine Clerks

International Longshore & Warehouse Union, Local 94 – Foremen

California Federation of Labor Unions, AFL-CIO

National Union of Healthcare Workers

Utility Workers of America, Local 483

Brotherhood of Locomotive Engineers and Trainmen

Pacific Harbor Line

California Professional Firefighters

Western States Regional Council of Carpenters

Los Angeles County Federation of Labor

International Longshore & Warehouse Union, IBU Marine Division

International Longshore & Warehouse Union, Southern California District Council

International Longshore & Warehouse Union, Local 20 – Chemical Processing & Packaging

International Longshore & Warehouse Union, Local 26 - Warehouse

International Longshore & Warehouse Union, Local 30 – Mineral Workers

International Longshore & Warehouse Union, Local 46 – Longshore

International Longshore & Warehouse Union, Local 56 – Ship Scalers

International Longshore & Warehouse Union, Local 63 – Office Clerical Unit

International Longshore & Warehouse Union, Local 65 – Port Police

International Longshore & Warehouse Union, Local 68 – Port Pilots

International Longshore & Warehouse Union, Southern California Pensioners

## **Communication from Public**

Name: Christopher Chavez **Date Submitted:** 09/11/2025 06:05 PM

**Council File No:** 25-0002-S85

**Comments for Public Posting:** PDF version of letter is attached. September 11, 2025 The Honorable Marqueece Harris-Dawson President, Los Angeles City Council Chair, Rules, Elections and Intergovernmental Relations Committee 200 N. Spring St., Room 450 Los Angeles, CA 90012 Dear Councilmember Harris-Dawson, We are writing to express our opposition to File Item 25-0002-S85, relating to Senate Bill 34 (Richardson). While the resolution presents SB 34 as encouraging collaboration, this is simply not the case. Instead, SB 34 would constrain the South Coast Air Quality Management District's (South Coast AQMD) efforts to reduce emissions from the region's single largest source of NOx emissions in the smoggiest air basin in the country: the ports and port-related activities. Such constraints are unacceptable considering Los Angeles's air quality challenges. The air in Southern California is so bad that we persistently fail to meet both national and state air quality standards. According to South Coast AQMD, over 1,500 Southern Californians die prematurely every year due to our inability to meet clean air standards. Yet, both SB 34 and File Item 25-0002-S85 advance the false narrative that health-protective rulemaking is the problem rather than pollution. SB 34 would also undermine decades of work by community, environmental, environmental justice and public health advocates. The current rulemaking process has been anything but "abrupt," as Councilmember McOsker's resolution states. The current rule process began in early 2022, after the previous negotiations for an agreement between the ports and South Coast AQMD collapsed. Community members and advocates have consistently engaged in the rulemaking process, having participated in countless public working groups, community listening sessions and meetings with staff and board members as well as submitting both written comments and verbal testimony at public hearings. SB 34 ignores all of this and would impose restrictions from Sacramento rather than addressing the lived experience of portside residents. It is also important to note that the proposed rule is not "overreaching," as the resolution states. The current rule concept, which has been on the table since November 2024, only requires the ports to develop an infrastructure plan for zero-emission vehicles and equipment. South Coast AQMD's proposed rule is explicitly incremental in its scope. While community members

and advocates did not agree with South Coast AQMD's "infrastructure first" approach, we are willing to accept it as a first step towards long-term emission reductions. Finally, we would like to note that we do not support the new "cooperative" agreement" process initiated by the ports and South Coast AQMD in mid-July to early-August. Not only has this short circuited the years-long public rulemaking process over the last 55 days, but the current publicly available proposal from the ports goes even further than what SB 34 proposes in terms of restrictions on South Coast AQMD. We also wish to state that our objections to SB 34 and File Item 25-0002-S85 are not related to human-operated equipment. 2025 has proven to be a particularly challenging year for public health, environmental protection and environmental justice. We need strong state and local environmental and environmental justice leadership now more than ever. SB 34, however, would move Los Angeles in the wrong direction, at the expense of some of California's most vulnerable, environmentally burdened communities. Thank you for your consideration of our comments. Sincerely, Chris Chavez Deputy Policy Director Cc: The Honorable Nithya Raman, Los Angeles City Councilmember, 4th District The Honorable Katie Yaroslavsky, Los Angeles City Councilmember, 5th District The Honorable Hugo Soto-Martinez, Los Angeles City Councilmember, 13th District The Honorable John Lee, Los Angeles City Councilmember, 12th District The Honorable Tim McOsker, Los Angeles City Councilmember, 15th District The Honorable Karen Bass, Mayor of Los Angeles



September 11, 2025

## The Honorable Marqueece Harris-Dawson

President, Los Angeles City Council Chair, Rules, Elections and Intergovernmental Relations Committee 200 N. Spring St., Room 450 Los Angeles, CA 90012

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Such constraints are unacceptable considering Los Angeles's air quality challenges. The air in Southern California is so bad that we persistently fail to meet both national and state air quality standards. According to South Coast AQMD, over 1,500 Southern Californians die prematurely every year due to our inability to meet clean air standards. Yet, both SB 34 and File Item 25-0002-S85 advance the false narrative that health-protective rulemaking is the problem rather than pollution.

SB 34 would also undermine decades of work by community, environmental, environmental justice and public health advocates. The current rulemaking process has been anything but "abrupt," as Councilmember McOsker's resolution states. The current rule process began in early 2022, after the previous negotiations for an agreement between the ports and South Coast AQMD collapsed. Community members and advocates have consistently engaged in the rulemaking process, having participated in countless public working groups, community listening sessions and meetings with staff and board members as well as submitting both written comments and verbal testimony at public hearings. SB 34 ignores all of this and would impose restrictions from Sacramento rather than addressing the lived experience of portside residents.

It is also important to note that the proposed rule is not "overreaching," as the resolution states. The current rule concept, which has been on the table since November 2024, only requires the ports to develop an infrastructure plan for zero-emission vehicles and equipment. South Coast AQMD's proposed rule is explicitly incremental in its scope.

While community members and advocates did not agree with South Coast AQMD's "infrastructure first" approach, we are willing to accept it as a first step towards long-term emission reductions.

Finally, we would like to note that we do not support the new "cooperative agreement" process initiated by the ports and South Coast AQMD in mid-July to early-August. Not only has this short circuited the years-long public rulemaking process over the last 55 days, but the current publicly available proposal from the ports goes even further than what SB 34 proposes in terms of restrictions on South Coast AQMD. We also wish to state that our objections to SB 34 and File Item 25-0002-S85 are not related to human-operated equipment.

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Thank you for your consideration of our comments.

Sincerely,

Chris Chavez

**Deputy Policy Director** 

Christopher Change

#### Cc:

The Honorable Nithya Raman, Los Angeles City Councilmember, 4<sup>th</sup> District The Honorable Katie Yaroslavsky, Los Angeles City Councilmember, 5<sup>th</sup> District The Honorable Hugo Soto-Martinez, Los Angeles City Councilmember, 13<sup>th</sup> District The Honorable John Lee, Los Angeles City Councilmember, 12<sup>th</sup> District The Honorable Tim McOsker, Los Angeles City Councilmember, 15<sup>th</sup> District The Honorable Karen Bass, Mayor of Los Angeles