



September 29, 2025

Councilmember, Tim McOsker
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

Re: Support for SB 34 (Richardson) – Ports of Los Angeles and Long Beach (Ports)

Dear Councilmember McOsker,

On behalf of the International Longshore and Warehouse Union (ILWU) Coast Longshore Division Locals, we strongly and respectfully urge you to support Senate Bill (SB) 34 (Richardson). This legislation simultaneously 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. Industry trends and environmental regulations that first appear in Southern California tend to spread to other ports within our combined jurisdictions. With this reality in mind, we hope to send a clear message that while we are all working to improve air quality, those advances cannot come at the cost of working people's livelihoods.

For nearly a century, ILWU members have been the backbone of not just California's ports but ports up and down the west coast of the United States, including all 29 ports in the combined states of California, Oregon and Washington, in addition to several locals in Alaska and Hawaii. In every community, our ports support additional resultant economic engines—facilitating trade, supporting millions of direct, indirect and induced jobs, and providing working families with middle-class wages, health care, and retirement security. The Ports of Los Angeles and Long Beach (Ports) are of particular importance to California, and the ILWU more broadly, as they represent the largest maritime gateway in the Western Hemisphere, through which nearly 40% of our nation's trade is conducted, in addition to being home to a large percentage of our overall union membership.

Many of our members not only work at our respective ports but live and raise families in the ports' surrounding local communities and are consequently the most directly impacted by decisions impacting the ports. Therefore, we are very concerned that the South Coast Air Quality Management District (SCAQMD), is considering the implementation of "cargo caps" as a means of reducing emissions through their Proposed Rule 2304, Indirect Source Rule for Commercial Marine Ports (Port ISR or ISR) at the Ports. Since SCAQMD has publicly testified that they have no intention of implementing cargo caps or using public funds to advance automation at the Ports, we contend that codifying those positions should not be of concern. However, we have good reason to doubt their verbal assurances. Our Southern California brothers and sisters have shared a recent opposition letter to SB 34 from SCAQMD Executive Director Wayne Nastri, dated August 22, 2025, which states,

"However, SB 34 would substantially restrict South Coast AQMD's ability to regulate port-related emissions. Until January 1, 2031, it would prohibit the agency from taking any action that:

- Imposes a cap on cargo throughput or cruise ship passengers at the ports;
- Uses public funds to require, incentivize, encourage or otherwise promote the use of automated equipment or related infrastructure."

With these positions clearly documented in correspondence to the legislature, we have no choice but to believe their veracity.

Furthermore, we recognize that the SCAQMD is currently in the process of attempting to negotiate a Collaborative Agreement with the Port of Los Angeles and the Port of Long Beach which could serve as an alternative to a Port ISR. While we applaud this development and believe that such an effort is a pathway to a superior result for all interested parties, there is a provision in the latest draft document that allows any of the parties to withdraw from the Collaborative Agreement, for any reason, by providing a 90-day written notice. Should the Collaborative Agreement be dissolved at some future point, the SCAQMD could pivot back to rulemaking and therefore, SB 34 is essential regardless of whether or not a Collaborative Agreement is reached in the near future. As previously stated, we are concerned that a precedent initiated in Southern California will likely present itself in our respective local jurisdictions as well.

Additionally, a second opponent of the bill, the Pacific Maritime Association (PMA) suggests that SB 34 Section 2(a)(2)(B), which would prohibit an SCAQMD action from using "public funds or grants, whether municipal, county, state, or federal funds or grants, to require, incentivize, encourage, or otherwise promote the use of automated, remotely controlled, or remotely operated equipment, or infrastructure to support automated, remotely controlled, or remotely operated equipment" and related Section 2(b) is an effort to circumvent the ILWU-PMA Collective Bargaining Agreement. This contention is irrelevant. The state is not required to use tax-payer dollars to put taxpayers out of work for the benefit of foreign owned ocean carriers and their subsidiaries.

Lastly, it is worth noting that through the collective efforts of the Ports and various supply chain stakeholders, under the Clean Air Action Plan (CAAP), the following reductions have been achieved when compared with a 2005 baseline: Diesel Particulate Matter (DPM) emissions have

been reduced by 92%, Nitrous Oxides (NOx) by 71%, Sulfur Oxides (SOx) by 98% and Green House Gases (GHG) by 20%. Meanwhile, Governor Abbot's Texas, Governor DeSantis' Florida and Governor Kemp's Georgia, not to mention ports in Mexico, are taking California's and other west coast ports' cargo due, in part, to their lax environmental regulations.

California and all our respective states can and must continue to improve air quality, but we 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 you to support SB 34.

Sincerely,

International Longshore and Warehouse Union, Coast Longshore Division Locals

Local 4, Vancouver, Washington
Local 7, Bellingham, Washington
Local 8, Portland, Oregon
Local 10, San Francisco, California
Local 12, North Bend, Oregon
Local 13, San Pedro, California
Local 14, Eureka, California
Local 18, West Sacramento, California
Local 19, Seattle, Washington
Local 21, Longview, Washington
Local 23, Fife, Washington
Local 24, Hoquiam, Washington
Local 25, Anacortes, Washington
Local 27, Port Angeles, Washington
Local 29, National City, California
Local 32, Everett, Washington
Local 34, San Francisco, California
Local 40, Portland, Oregon
Local 46, Port Hueneme, California
Local 47, Olympia, Washington
Local 50, Astoria, Oregon
Local 51, Port Gamble, Washington
Local 52, Seattle, Washington
Local 54, Stockton, California
Local 63, San Pedro, California
Local 91, Oakland, California
Local 92, Vancouver, Washington
Local 94, Long Beach, California
Local 98, Des Moines, Washington
Local 142, Hawaii

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