



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,

A handwritten signature in cursive script, appearing to read "Christopher Chavez".

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