



March 26, 2025

Honorable Catherine Blakespear
California State Senate
Chair, Senate Environmental Quality Committee
1021 O Street, Suite 7720
Sacramento, CA 95814

Re: **OPPOSE SB 34 (Richardson) Air Pollution: South Coast Air Quality Management District: Mobile Sources: Public seaports**
As Amended March 24, 2025
Set for Hearing: April 2, 2025, Senate Environmental Quality Committee

Dear Chair Blakespear,

On behalf of the undersigned organizations, we write to express our strong opposition to SB 34 (Richardson)—a bill that threatens to undermine our ability to address one of the most significant contributors to air pollution in California—port activities and logistics. This legislation unnecessarily strips the South Coast Air Quality Management District (SCAQMD) of tools needed to address air pollution emanating from the Ports of Los Angeles and Long Beach (San Pedro Bay Ports), which are the largest fixed sources of air pollution in one of the most air polluted parts of the country.

We simply cannot afford to remove the ability of agencies to protect approximately half of the people of California living in the South Coast Air Basin. The San Pedro Bay Ports are a primary culprit in a region that consistently fails to meet air quality standards for ozone—a fundamental indicator of public health. Communities adjacent to the ports, such as Wilmington and West Long Beach, already suffer disparities in health outcomes, experiencing a life expectancy that lags behind the rest of Los Angeles County by as much as eight years. This bill only exacerbates these injustices, leaving our most vulnerable residents without the protections they desperately need as cargo levels surge by nearly 60% year-over-year.

SB 34 misrepresents the role of Indirect Source Reviews (ISRs), misleadingly suggesting that existing California Air Resources Board (CARB) regulations fully address air pollution from freight. They do not. While CARB has made strides with regulations for specific sources, many of these are under attack from the exact industries and their allies pushing this bill. In fact, the Western States Petroleum Association recently challenged CARB's life-saving at berth regulation, seeking to undermine a rule that will save thousands of lives across the state. As the federal government retreats on clean air, we need robust local rules now more than ever, not further limitations on our ability to protect public health.

This bill sets a dangerous precedent at a time when Californians are calling for leadership. Instead of empowering local agencies to enforce proven strategies to tackle pollution through ISRs, SB 34 encourages voluntary agreements that lack the accountability necessary for meaningful change. This is in stark contradiction to existing state law that mandates the SCAQMD to actively pursue ISRs, particularly in response to our severe air quality crisis in the South Coast. It undermines the very communities that the Legislature sought to empower with AB 617 (Garcia, C., Chapter 136, Statutes of 2017), dismissing their urgent calls for a Port Indirect Source Rule to reduce local impacts of diesel particulate matter.

Affected communities have been advocating for these regulations for over a decade, and the SCAQMD has included this measure in its Air Quality Management Plans since at least 2016. The Port ISR rulemaking process has spanned 37 months, during which there have been public workshops, working group meetings, technical advisory groups, community consultations, and extensive stakeholder engagement to review rule concepts.

The SCAQMD attempted to engage with the ports to negotiate a voluntary agreement, despite significant resistance from impacted communities. But these discussions did not lead to an agreement. In February 2022, after the ports were unable to reach a satisfactory agreement that would protect affected communities, the Board instructed the staff to shift to an ISR.

The facts are clear: ISRs are effective. They target pollution from facilities comprehensively, rather than piecemeal from individual sources, leading to significant reductions in emissions. This landmark approach has already resulted in investments in zero-emission fleets and essential charging infrastructure, showcasing the kind of transformative change that can only happen through strong regulatory frameworks.

We urge this committee to reject SB 34 and instead stand with the citizens of California who need and deserve cleaner air.

Sincerely,

Fernando Gaytan

Earthjustice

David Diaz

Active San Gabriel Valley

William Barrett

American Lung Association

Gracyna Mohabir

California Environmental Voters

Susan Jordan

California Coastal Protection Network

Barbara Sattler

California Nurses for Environmental Health and Justice

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