

Public Testimony Supporting Ports Indirect Source Rule

T.H.E. Impact Project

BACKGROUND:

Communities, environmental justice advocates and health professionals have fought for decades to have the South Coast Air Quality Management District (SCAQMD) do more to address deadly port pollution caused by the freight and shipping industries.

The **Ports ISR** has been delayed for nearly a decade due to the Air District's foot-dragging and industry interference; meanwhile, communities have continued to suffer. Failure to address port pollution at the San Pedro Bay Ports – comprised of the Port of Los Angeles and Port of Long Beach – has contributed to the Southern California region's failure to meet federal clean air standards, resulting in [1,500 premature deaths each year](#).

CALL TO ACTION: It's time for the Air District to take action and adopt a strong Port ISR without further delay. A strong Port ISR should:

- 1) **Sets bold emissions reduction targets** with accountability for missed goals.
- 2) **Invests in zero-emission infrastructure** free from fossil fuels.
- 3) **Delivers accurate public emissions monitoring** for transparency.

Below are a few suggested talking points you can modify and use during the three-minute comment period at the South Coast AQMD's Mobile Source and Governing Board meetings. The full calendar can be found at https://www.aqmd.gov/home/news-events/calendar_v2

Introduce yourself: Your Name and whether you reside in an impacted community (if relevant).

Problem:

- We have known for decades that pollution from the region's ports are gravely harming frontline communities.
- ***[If you live in an impacted community- describe your experience dealing with the impact of air pollution from ports]***
- The particulate matter and ozone that these emissions sources contribute to are known to lead to more emergency room visits, more hospitalizations due to heart attacks, aggravated asthma, decreased lung function, restricted airways, and even premature death.
- Setting emission reduction targets, requiring zero-emissions infrastructure, and zero-emission deployment are all great elements to include in these rules, but they must be strong enough to be effective.
- Each time the Air District decides to stall on the Port ISR, frontline communities continue to bear the brunt of the resulting health impacts.
- The Air District has the legal authority and moral obligation to adopt rules mandating that the region's biggest polluters curb their life-threatening emissions so that our air quality is finally safe enough to meet federal standards.

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Solution:

- **Encourage Strong Action to shift to zero-emissions:**
 - The Port ISR offers an opportunity to find additional emissions reductions that will help to bring our deadly air into compliance with federal, healthy standards.
 - The Port ISR has the potential to lay the foundation for a zero-emission infrastructure system that will power Southern California's freight sector.
 - South Coast needs to signal to port operators that the future is zero-emission technology by strongly mandating that they invest in zero-emission infrastructure.
 - We urge the AQMD to set targets in the rule, and ensure they're aggressive so that polluters are not simply doing what's already required of them.
 - When setting those targets, the *entire facility* should be considered, not just a subset of vehicles and equipment that pollute our air.

- **Transparency and accountability**
 - At the Ports, the ISR should require coordination between terminal operators, utilities and the ports to encourage the conversion of commercial harbor craft and other vessels to zero emissions.
 - The Port ISR should provide impacted communities with information gathered from mandated reporting to hold facility operators accountable for commitments made.
 - We urge you to include more robust reporting requirements with public disclosure of the operator's actions or inaction for stronger enforceability.

- **Enforcement**
 - A strong Port ISR rule should not have unnecessary exceptions that let some of the region's biggest polluters do little or nothing to curb pollution.
 - A strong regulation should have interim targets in the 2020s, 2030s with an ultimate zero-emission goal by no later than 2040 to stay within a 1.5 degree Celsius / 2.7 Fahrenheit Paris-Agreement aligned pathway to prevent climate breakdown.
 - The regulation should hold polluters accountable by establishing consequences for non-compliance so that corrective action is taken to protect communities from further harm.

We urge you to focus on passing the strongest possible Port ISR this year and start delivering on the promise of the 2022 AQMP to realize a zero-emissions future.