

**Comment Letters Received
(as of June 19, 2017)**

Click on the link to be taken directly to the letter. Attachments referenced in the letters are available upon request.

[Clean Energy et al. \(November 16, 2016\)](#)

[Earthjustice et al. \(November 17, 2016\)](#)

[California Natural Gas Vehicle Coalition and The Coalition for Renewable Natural Gas \(November 18, 2016\)](#)

[Michael Mayor \(December 22, 2016\)](#)

[San Pedro Neighborhood Council \(January 6, 2017\)](#)

[Central San Pedro Neighborhood Council \(January 11, 2017\)](#)

[Coalition for Clean Air \(January 13, 2017\)](#)

[Earthjustice et al. \(January 24, 2017\)](#)

[M. Steven Moore \(January 27, 2017\)](#)

[Pacific Merchant Shipping Association \(January 30, 2017\)](#)

[California Natural Gas Vehicle Coalition \(February 1, 2017\)](#)

[Atlas Marine \(February 3, 2017\)](#)

[Gwendolyn Harry \(February 7, 2017\)](#)

[American Power Group \(February 7, 2017\)](#)

[Southern Counties Express \(February 8, 2017\)](#)

[Brian Yanity \(February 10, 2017\)](#)

[Total Transportation Services, Inc. \(February 13, 2017\)](#)

[Councilman Al Austin \(February 13, 2017\)](#)

[Los Angeles County Business Federation \(February 13, 2017\)](#)

[Sophia Song \(February 14, 2017\)](#)

[Cummins Westport \(February 15, 2017\)](#)

[Duarte Chamber of Commerce \(February 16, 2017\)](#)

[City of Ontario et al \(February 16, 2017\)](#)

[Greater Riverside Chambers of Commerce \(February 17, 2017\)](#)

[Ontario Chamber of Commerce \(February 17, 2017\)](#)

[University of California, Riverside \(February 17, 2017\)](#)

[Coalition for a Safe Environment \(February 17, 2017\)](#)

[UCLA Community Scholars Class \(February 20, 2017\)](#)

[Agility Fuel Solutions \(February 17, 2017\)](#)

[Clean Energy \(February 17, 2017\)](#)

[Shippers Transport Express \(February 17, 2017\)](#)

[Coalition for Renewable Natural Gas \(February 17, 2017\)](#)

[California Natural Gas Vehicle Coalition \(February 21, 2017\)](#)

[California Air Resources Board \(February 17, 2017\)](#)

[Northwest San Pedro Neighborhood Council \(February 15, 2017\)](#)

[Earthjustice et al. \(April 10, 2017\)](#)

[Ron Loveridge \(April 8, 2017\)](#)

[City of Rancho Cucamonga \(March 21, 2017\)](#)

[Earthjustice et al. \(March 13, 2017\)](#)

[South Coast Air Quality Management District \(February 17, 2017\)](#)

[Pacific Merchant Shipping Association \(March 3, 2017\)](#)

[Michael Mayor, Mayor Logistics \(March 31, 2017\)](#)

[Enrique Ponce \(April 21, 2017\)](#)

[Joan Levine \(May 14, 2017\)](#)

[Juan Alvarez \(May 16, 2017\)](#)

[Clean Energy \(May 24, 2017\)](#)

Clean Energy
Southern California Gas Company
Cummins Westport
Westport
Agility Fuel Solutions
Chart Industries

November 16, 2016

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Harbor Commissioners

Honorable Harbor Commissioners:

This letter is submitted with respect to planned updates to the Clean Air Action Plan (CAAP) that the Ports of Los Angeles and Long Beach (Ports) will initiate at a joint hearing scheduled for November 17, 2016. This letter is submitted by companies that support natural gas trucks as the solution for criteria air pollution and greenhouse gas emissions. These companies include Clean Energy, Southern California Gas Company, Cummins Westport, Westport, Agility Fuel Solutions, and Chart Industries. These companies have supported the Ports and the drayage community even prior to the original Clean Truck Program (CTP) initiated in 2008. Our members developed the cleanest engine technology available at that time, designed and deployed LNG and CNG fuel systems for trucks, and deployed a natural gas fueling network throughout the region and beyond.

The original CTP reduced emissions of diesel particulate matter from the drayage truck fleet. However, the need to drive down drayage emissions continues. Communities need NOx emission reductions to help achieve compliance with air quality standards. Combatting climate change requires substantial reductions of greenhouse gas emissions. Our industry is proud to report that there has been a game-changing breakthrough in advanced natural gas engine technology that is as clean as, and in some cases cleaner than, other zero-emission tailpipe technologies at a cost-effective price point.

Ultralow NOx natural gas engines powered by renewable natural gas:

- Reduce greenhouse gas emissions by up to 90%.
- Reduce NOx and particulate emissions by 90% below the current EPA standard, which has been determined by the California Air Resources Board to be as clean as an electric battery truck powered by today's electrical grid, and reduce NOx by over 98% from the EPA 2007 standard.
- Eliminate diesel particulate matter emissions.
- Displace 100% petroleum fuel, supporting the California State Implementation Plan target for a 50% reduction in petroleum fuel consumption.

The commercial availability of ultralow NOx technology combined with renewable fuel means we have, for the first time ever, a commercial pathway for rapidly cleaning the port truck fleet. This cleanup can begin in 2018 and be completed in a few short years. The technology is available, the fueling infrastructure has been built, and the service network is in place.

Clean Air Action Plan
Ultralow NOx Engines with Renewable Fuel
November 16, 2016

We encourage the Ports to structure the CAAP so that trucks entering port service will meet the CARB optional low NOx standard of 0.02 g/bhp-hr when the new truck program begins. Further, trucks should be required to use 100% renewable fuel. These two measures, ultralow NOx trucks powered by renewable fuel, are the only solution that will achieve immediate and meaningful reductions of NOx and greenhouse gas emissions and petroleum displacement.

We would be remiss if we did not emphasize how critical it is to implement an ultralow NOx standard when the new program begins. Noting that over 60% of the drayage truck fleet is older than 2010, early deployment of ultralow NOx technology is essential to maximizing reductions of NOx and greenhouse gas emissions.

Funding can and should be made available to help deploy ultralow NOx trucks. Each of our companies pledges to work with the Ports and other stakeholders to seek funding from regional, state and federal programs. The actual amount of funding required is modest compared to the benefits to our communities and the Ports' ability to grow and employ Southern Californians. Indeed, it is in the State's best interest to fund the initiative because the Ports will be the springboard for California's drive to sustainable freight.

Reduced air pollution. Reduced greenhouse gases. Reduced diesel particulate matter. Reduced foreign oil dependence. Ultralow NOx technology with renewable gas is the proven, cost-effective answer to our challenges with port truck emissions. As long standing allies of the Ports in the pursuit to reduce port truck emissions, we look forward to having a "seat at the table" in offering our ideas on how the ports can cost-effectively clean the fleet in a few short years and ensure a sustainable future. Please contact Todd Campbell at (949) 437-1400 or todd.campbell@cleanenergyfuels.com for arranging further discussions.

Thank you for your concern with this important issue and we stand with you to make the Ports the leaders in sustainable trucking.

Sincerely,

Clean Energy
Southern California Gas Company
Cummins Westport

Westport
Agility Fuel Solutions
Chart Industries

CC:
Gene Seroka, Executive Director, Port of Los Angeles
Duane Kenagy, Interim CEO, Port of Long Beach
Chris Cannon, Port of Los Angeles
Rick Cameron, Port of Long Beach



 **EARTHJUSTICE** & **West Long Beach Association**

November 17, 2016

President Guzmán &
Harbor Commissioners
Port of Long Beach
4801 Airport Plaza Dr.
Long Beach, CA 90815

Ambassador Martinez &
Harbor Commissioners
Port of Los Angeles
425 South Palos Verdes St.
San Pedro, CA 90731

Re: Agenda Item No. 10 (HD 16-662) – Clean Air Action Plan (CAAP)

Dear President Guzmán, Ambassador Martinez and Members of the Harbor Commissions:

On behalf of the undersigned organizations, we submit these comments on the Clean Air Action Plan (“CAAP”) 2017 Discussion Draft (“Discussion Draft”). Initially, we are pleased that port staff shared this discussion draft in advance of the public hearing. It helps inform our initial input on the plan. Overall, this next iteration of the CAAP needs significant improvements to

address the health imperative to clean up localized toxic pollution, address the port's significant contribution to regional pollution, and address greenhouse gas emissions from port operations. We are willing partners to help shape this historic document.

Our initial assessment has identified the following high level input on the Discussion Draft -

- **Emissions Targets** – We are deeply disappointed that the revised CAAP does not include revised emission targets from the ones developed in 2006 and targets beyond 2023. The South Coast Air Quality Management District has identified the twin ports as the largest fixed source of pollution in the region. The Ports appear to conflate meeting emission targets established in 2006 with achieving safe, healthy air. Even with reductions since 2005, the Ports still impose high risks to neighboring communities and contribute greatly to our region's failure to meet state and federal air quality standards. The Ports should establish revised goals given that there is a consensus from our state and local air quality agencies that more reductions are needed.
- **Improved Measure Descriptions** – The CAAP needs to better articulate its strategy for cleaning up each source category. We urge the Ports to provide more specifics to clearly articulate (1) the deadline(s) for achieving the strategy, including interim deadlines and a discussion of whether the deadlines could be sooner in time; (2) the enforcement method (i.e. will the measure be in leases, part of the concession agreement with LMCs, or part of a port tariff); (3) the cost of the strategy and the sustainable stream of funding that will support those costs; and (4) the strategy's emissions benefits. This will help create a coherent plan with the ability to track progress.
- **Zero Emission Trucks** – We are pleased to see a commitment for all zero emission drayage trucks by 2035. This is a significant and necessary goal that needs to be set. However, noticeably absent from the Discussion Draft is a real roadmap with interim goals and milestones. These interim steps must be included because the current approach provides little accountability and short-term actions. The Ports must lay out a cogent plan to actually achieve zero emission truck technologies, including targeting segments of the drayage market (i.e. those traveling shorter distances) that can achieve 100% zero emissions sooner than 2035.
- **Railyards Must Reduce Emissions** – Pollution from railyards must be addressed in a real and meaningful way. To date, this has been the source category with the least success. For more than a decade, communities adjacent to railyards have asked for relief from the high levels of toxic pollution. The Ports must do more to ensure their business partners – the Class 1 railroads – do their part of clean up the toxic levels of emissions in our communities.
- **Need for Robust Community Engagement** – We are surprised by the paltry community engagement to date. The initial Clean Air Action Plan included significant outreach and involvement with community and environmental groups. This stakeholder process provided necessary input on how to achieve success, measure success and ensure progress was actually made. We suggest that the Ports collaborate with our organizations to ensure it reaches and receives input from a broad set of community and environmental stakeholders.

We intend to provide additional, detailed comments at a later date. We look forward to a robust process that leads to a document that makes community, health, and environmental stakeholders proud.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is fluid and cursive, with a long horizontal stroke at the end.

Adriano L. Martinez
Earthjustice

Michele Hasson
Center for Community Action & Environmental Justice

Beto Lugo-Martinez
Comite Civico Del Valle, Inc.

Taylor Thomas
East Yard Communities for Environmental Justice

Giselle Fong
End Oil/Communities for Clean Ports

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

Melissa Lin Perrella
Morgan Wyenn
Natural Resources Defense Council

Joe Galliani
South Bay Los Angeles 350 Climate Action Group

Theral Golden
West Long Beach Association

CC: Mayor Garcetti
Mayor Garcia



Submitted via email

November 18, 2016

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners

RE: The Draft Clean Air Action Plan 2017 Discussion Document

Honorable Harbor Commissioners:

The purpose of this joint letter is to provide comments on the 2017 planned updates to the Clean Air Action Plan (CAAP) by the Ports of Los Angeles and Long Beach (Ports).

The California Natural Gas Vehicle Coalition (CNGVC) is the statewide advocacy association for natural gas vehicles. The Coalition for Renewable Natural Gas (RNG Coalition) is an international advocacy association for the renewable natural gas (RNG, biomethane or upgraded biogas) industry in North America. Together, the CNGVC and RNGC advocate for the increased utilization of RNG in natural gas vehicles to help California meet its ambitious climate change and greenhouse gas emissions reduction goals.

We believe that the most cost-effective way to reduce NOx emissions from the heavy-duty truck sector is to convert existing diesel fleets to natural gas, using 8.9L and 12L Low NOx Near Zero NG engines fueled by renewable natural gas, specifically in drayage trucks at the Ports. Used together this ultra-low carbon fuel and Near Zero engine technology can immediately and uniquely begin delivering 90 percent (or greater) reductions in NOx emissions for the large fleet of on-road HDVs. Simultaneously, the use of RNG significantly reduces Super Pollutants (methane) and GHG emissions (Carbon) by more than 80 percent. In some cases, where RNG production facilities actually sequester carbon, the carbon intensity value of the fuel is negative compared to diesel.

The Natural Gas Vehicle industry has invested millions of dollars and created thousands of jobs in California. While only a fraction of our renewable waste streams have been converted to RNG, such production facilities create as many as 173 direct and indirect jobs per project. We estimate CA will need to develop between 100-300 RNG projects to meet its clean air and renewable energy objectives. That notwithstanding, RNG production has tripled since 2013, and this year industry is expected to produce 126 million diesel gallon equivalents (DGE) of RNG. This is on pace to increase to 234 million DGE in 2017 and reach 342 million DGE by the end of 2018. There is ample RNG supply to fuel Near Zero engines now and in the foreseeable future, and to charge heavy-duty electric vehicles in decades to come at both the Port of Los Angeles and Long Beach.

We would like to encourage you to structure the CAAP so that trucks entering port service will meet the CARB optional low NOx standard of 0.02 g/bhp-hr when the new truck program begins. Further, trucks should be required to use 100% renewable fuel, such as RNG.

The natural gas vehicle and fuel industry are commercially ready today to provide the Ports a cleaner alternative to diesel to ensure that the new, updated CAAP is a success.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lawson', with a long horizontal stroke extending to the right.

Thomas Lawson
President,
California Natural Gas Vehicles Coalition

A handwritten signature in blue ink, appearing to read 'Johannes Escudero', with a long horizontal stroke extending to the right.

Johannes Escudero
CEO,
Coalition for Renewable Natural Gas

RE: CAAP meeting followup

Time: Fri, 23 Dec 2016 17:32:45 +0000
From: "Tomley, Heather" <heather.tomley@polb.com>
To: michael mayor <mmayor@mayorusa.com>
CC: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: RE: CAAP meeting followup

Attachments: msg-21972-1529.html (11k)
image001.png (20k)
DTR Equipment List-1.pdf 1.pdf (83k)



Hi Michael –

Thank you for your question. The Draft Clean Air Action Plan Discussion Document proposes that starting in 2018, any truck with an engine that is 10 years old or older would be subject to a fee. That means, if the fee is adopted by our Boards as currently proposed, starting in mid-2018, trucks with engine model year 2007 or 2008 will be subject to a fee. The following year, 2019, trucks that are 2009 and older will be subject to a fee, and so on for subsequent years.

This is currently a proposal and we are accepting comments through February 17th. The program will still need to be considered by our Boards before it would be implemented. The next steps would be for our Boards to consider adoption of the Clean Air Action Plan (anticipated in Spring 2017), and then approve the changes to tariff for the Clean Trucks Program (to be considered by our Board later in 2017).

I hope that helps. Let us know if you have any additional questions.

Thanks,

Heather

Heather Tomley

Director of Environmental Planning

Port of Long Beach

Heather.Tomley@polb.com

ph: 562.283.7100

www.polb.com



From: michael mayor [mailto:mmayor@mayorusa.com]

Sent: Thursday, December 22, 2016 1:15 PM

To: Tomley, Heather

Subject: CAAP meeting followup

Can i understand the guidelines. I am attaching our Dray truck Registry in order for you to understand my question.

12/27/2016

Runbox : RE: CAAP meeting followup

In 2018 will all trucks in my fleet have a fee associated to them?

I see I have 2007 - 2015 engines and I know that they are ok to enter Port, but trying to see which vehicles will not be allowed to enter and which will have no fee.

Michael Mayor

www.mayorusa.com



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Coluso, Amber

From: DeMoss, Tim
Sent: Friday, January 06, 2017 10:57 AM
To: Coluso, Amber
Subject: Fwd: Discussion Document Final 11 18.pptx

See email below. Also, we met with clean energy yesterday to discuss the cleaner action plan please add that to your meetings list.

Sent from my iPhone

Begin forwarded message:

From: "Bezmalinovich, Augie" <ABezmalinovich@portla.org>
Date: January 6, 2017 at 10:19:42 AM PST
To: "DeMoss, Tim" <TDeMoss@portla.org>
Cc: "Wunder, Lisa" <LWunder@portla.org>
Subject: RE: Discussion Document Final 11 18.pptx

Hi Tim,

I hope all is good and how did your conversation go yesterday – are you on the agenda for Monday? I do plan on attending!

Please see the below which is being contemplated by the Central SP NC and I figure that all the SP NCs are onboard with this letter. You most likely will get asked about items that appear in this letter and this should help you prepare for Monday's meeting. All the best!

Augie

Vilma Martinez, Board President
Dave Arian, Board Vice President
Patricia Castellanos, Commissioner
Anthony Pirozzi, Jr., Commissioner
Edward Renwick, Commissioner
Gene Seroka, Executive Director
Port of Los Angeles,
425 South Palos Verdes Street, San Pedro, California, USA 90731
Dear Executive Director Seroka and Harbor Commissioners:
The San Pedro Neighborhood Council represents stakeholders that are subject to some of the worst air quality in the nation. We deserve clean air. The Council supports several points that were addressed in the Ports' Clean Air Action Plan. At the same time, we believe the goals included are far too distant since the ports air pollution results in a real cost to the lives of many in this community and others surrounding the ports. Still, we are specifically in favor of the following goals that will begin to provide our

stakeholders with cleaner air, including:

- A transition to zero emission trucks. According to the South Coast AQMD, heavy-duty trucks are a major source of pollutants, so we urge you to reach zero emissions in ten years.

- Both ports working with local workforce development programs to assist with necessary

training programs to support implementation of new technologies and retraining programs for drivers. The community needs to know when this will happen.

- A transition to zero emission terminal equipment. We urge you to reach zero emissions in ten minutes.

- Conversion to electric-powered rail-mounted gantry cranes in five years or sooner.

- Conversion to electric yard tractors in regular operations in five years or sooner.

- By 2020, reduce residential cancer risk from port-related DPM emissions by 85 percent.

The San Pedro Neighborhood Council urges you to add the following goals to your plan:

- Mitigate ship emissions more by expanding the use of bioremediation, such as planting

trees, and Advanced Maritime Emission Control System (AMECS), or similar technologies.

- Collaboration with labor unions in planning to adapt current (and future) port workers to

automation and zero emission technologies, and corresponding maintenance, as such technologies are phased in.

- Achievement of zero emissions for trucks that travel shorter distances before 2035.

- More clearly specified deadlines to reach emission reduction targets for both trucks and

port equipment.

- Specification of enforcement methods for failure to meet goals.

- Transition all lighting technologies to use Light Emitting Diodes.

- Prioritize transitioning harbor ships over container ships from older engines to newer engines.

- Acknowledgment by the Ports of Los Angeles and Long Beach of the negative health impacts from the port's pollution.

- Active community engagement with harbor area residents at least annually. This could

be achieved by presenting at neighborhood council meetings.

- Improved communications and outreach to local communities when publicizing employment opportunities and job openings at the ports.

- Investment in local education programs for future port workers.

- Better maintenance of the ports' air quality monitoring systems, especially the accuracy of equipment.

- Incentives and rebates for independent truck drivers that will enable them to switch to zero emission trucks in a financially viable way. (In other words, truckers shouldn't go broke or get pushed out of the market.)

The San Pedro Neighborhood Council opposes new biofuel technologies to be developed for

utilization at the Ports of Los Angeles and Long Beach. Even if these fuels are renewable,

engines powered by biofuels still produce greenhouse gases and toxins. Also, as was made clear

by the Aliso Canyon gas leak, storing these fuels is dangerous and can result in pollution to the environment.

The San Pedro Neighborhood Council does support both ports using existing biofuel technologies, such as biodiesel, as a short term solution to help phase out more current technologies. But all biofuels should be phased out by 2035.

The San Pedro Neighborhood Council understands that the current costs of zero emission technologies may not be perceived as attractive relative to fossil fuel technologies. However

fossil fuel technologies have negative externalities, in the form of greenhouse and toxic emissions. Instead of fossil fuel industries paying these costs, governments, or the people,

subsidize them in the form of health care costs and environmental remediation.

The fossil fuel industry industries should be responsible for those costs.

The ports can take an active role in making fossil fuel technologies reflect their true costs. The

Clean Air Action Plan mentioned implementing a fee structure on polluting trucks; the highest

fees will be on the most polluting trucks and there will be no fees for zero emission trucks. The

majority of these fees need to be paid by the corporations and businesses that utilize these trucks

to move their goods, not truck drivers.

That proposed strategy will be especially effective at incentivising companies and individual

drivers if it becomes standard with other ports. We encourage you to negotiate with other ports at

the state, national, and international level to adopt similar policies.

Finally, we appreciate the ports' initiatives in addressing long-standing air quality issues impacting our communities, and we look forward to working with the Ports to make further

progress however they can. Please let us know what the Harbor Area neighborhood councils, and

its stakeholders, can do to help the Port of Los Angeles achieve these important goals.

Sincerely,

CC:

Los Angeles Mayor Eric Garcetti

200 N. Spring St. Room 303 Los Angeles, CA 90012

Los Angeles Councilman Joe Buscaino

200 N. Spring St. Room 410 Los Angeles, CA 90012

638 S. Beacon St., Room 552 San Pedro, CA 90731

310 222 1220

From: DeMoss, Tim

Sent: Thursday, January 05, 2017 3:54 PM

To: Bezmalinovich, Augie

Subject: Discussion Document Final 11 18.pptx

See attached



CENTRAL SAN PEDRO NEIGHBORHOOD COUNCIL

WWW.CENTRALSANPEDRO.ORG

January 11, 2017

Vilma Martinez, Board President
Dave Arian, Board Vice President
Patricia Castellanos, Commissioner
Anthony Pirozzi, Jr., Commissioner
Edward Renwick, Commissioner
Gene Seroka, Executive Director
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731

Mona Sutton
President

Donald Galaz
Vice President

John Stammreich
Secretary

Danielle Sandoval
Treasurer

Joanne Rallo
Communications/Outreach

Dear Executive Director Seroka and Harbor Commissioners:

The Central San Pedro Neighborhood Council (CeSPNC) appreciates Mayor Eric Garcetti, Port of Los Angeles Executive Director Gene Seroka, Long Beach Mayor Robert Garcia and interim Port of Long Beach Chief Executive Duane L. Kenagy for acting quickly and working diligently on plans to fulfill Governor Jerry Brown's Executive Order B-32-15, which outlines a statewide Sustainable Freight Action Plan.

The CeSPNC applauds all parties for forming the Sustainable Freight Advisory Committee and developing the Clean Air Action Plan.

The CeSPNC also recognizes that the Port of Los Angeles and Port of Long Beach are the two largest ports in the nation, first and second respectively, and combined are the ninth largest port complex in the world.

Due to the Ports' activities, the Central San Pedro Neighborhood Council stakeholders are subject to some of the worst air quality in the nation. We deserve clean air.

The council supports several points that were addressed in the Port's Clean Air Action Plan. At the same time, we believe the goals included are far too distant since the ports air pollution results in a real cost to the lives of many in this community and others surrounding the ports.

We are specifically in favor of the following goals that will begin to provide our stakeholders with cleaner air, including:

- A transition to zero emission trucks. According to the South Coast AQMD, heavy-duty trucks are a major source of pollutants, so we urge you to reach zero emissions in ten years.
- Both ports working with local workforce development programs to assist with necessary training programs to support implementation of new technologies and retraining programs for drivers. The community needs to know when this will happen.
- A transition to zero emission terminal equipment. We urge you to reach zero emissions in ten years or sooner.

- Conversion to electric-powered rail-mounted gantry cranes in five years or sooner.
- Conversion to electric yard tractors in regular operations in five years or sooner.
- By 2020, reduce residential cancer risk from port-related DPM emissions by 85 percent.

The Central San Pedro Neighborhood Council urges you to add the following goals to your plan:

- Mitigate ship emissions more by expanding the use of bioremediation, such as planting trees, and an Advanced Maritime Emission Control System (AMECS), or similar technologies.
- Collaboration with labor unions in planning to adapt current (and future) port workers to automation and zero emission technologies, and corresponding maintenance, as such technologies are phased in.
- Achievement of zero emissions for trucks that travel shorter distances before 2035.
- More clearly specified deadlines to reach emission reduction targets for both trucks and port equipment.
- Specification of enforcement methods for failure to meet goals.
- Transition all lighting technologies to use Light Emitting Diodes.
- Prioritize transitioning harbor ships over container ships from older engines to newer engines.
- Acknowledgment by the Ports of Los Angeles and Long Beach of the negative health impacts from the port's pollution.
- Active community engagement with harbor area residents at least annually. This could be achieved by presenting at neighborhood council meetings.
- Improved communications and outreach to local communities when publicizing employment opportunities and job openings at the ports.
- Investment in local education programs for future port workers.
- Better maintenance of the ports' air quality monitoring systems, especially the accuracy of equipment.
- Incentives and rebates for independent truck drivers that will enable them to switch to zero emission trucks in a financially viable way. (In other words, truckers shouldn't go broke or get pushed out of the market.)

The Central San Pedro Neighborhood Council opposes new biofuel technologies to be developed for utilization at the Ports of Los Angeles and Long Beach. Even if these fuels are renewable, engines powered by biofuels still produce greenhouse gases and toxins. Also, as was made clear by the Aliso Canyon gas leak, storing these fuels is dangerous and can result in pollution to the environment.

The Central San Pedro Neighborhood Council does support both ports using existing biofuel technologies, such as biodiesel, as a short term solution to help phase out more current technologies. But all biofuels should be phased out by 2035.

The Central San Pedro Neighborhood Council understands that the current costs of zero emission technologies may not be perceived as attractive relative to fossil fuel technologies. However fossil fuel technologies have negative externalities, in the form of greenhouse and toxic emissions. Instead of fossil fuel industries paying these costs, governments, or the people, subsidize them in the form of health care costs and environmental remediation.

The fossil fuel industry industries should be responsible for those costs.

Both the Port of Los Angeles and the Port of Long Beach should accept responsibility and take an active role in making fossil fuel technologies reflect their true costs. The Clean Air Action Plan mentioned implementing a fee structure on polluting trucks; the highest fees will be on the most polluting trucks and there will be no fees for zero emission trucks. The majority of these fees need to be paid by the corporations and businesses that utilize these trucks to move their goods, not truck drivers.

That proposed strategy will be especially effective at incentivizing companies and individual drivers if it becomes standard with other ports. We encourage you to negotiate with other ports at the state, national, and international level to adopt similar policies.

Finally, we appreciate the initiatives of the Port of Los Angeles and the Port of Long Beach in addressing long-standing air quality issues impacting our communities, and we look forward to working with the Ports to make further progress however they can. Please let us know what the Central San Pedro Neighborhood Council, and its stakeholders, can do to help the Port of Los Angeles achieve these important goals.

We look forward to your response to our concerns. We also look forward to cleaner air for all the residents of the Harbor Area.

Sincerely,

A handwritten signature in cursive script that reads "Mona Sutton".

Mona Sutton
President
On behalf of the Central San Pedro Neighborhood Council
CC:
Los Angeles Mayor Eric Garcetti
200 N. Spring St. Room 303 Los Angeles, CA 90012
Los Angeles Councilman Joe Buscaino
200 N. Spring St. Room 410 Los Angeles, CA 90012
Northwest San Pedro Neighborhood Council
Coastal San Pedro Neighborhood Council



January 13, 2017

President Lori Ann Guzmán &
Harbor Commissioners
Port of Long Beach
4801 Airport Plaza Dr.
Long Beach, CA 90815

Ambassador Vilma Martinez &
Harbor Commissioners
Port of Los Angeles
425 South Palos Verdes St.
San Pedro, CA 90731

Re: Clean Air Action Plan (CAAP)

Dear President Guzmán, Ambassador Martinez, and Members of the Harbor Commissions:

On behalf of the Coalition for Clean Air, we submit these comments on the Clean Air Action Plan (“CAAP”) 2017 Discussion Draft (“Discussion Draft”). Overall, this next iteration of the CAAP is moving in the right direction but still needs significant improvements to address the health imperative to clean up localized toxic pollution, address the port’s significant contribution to regional pollution, and reduce greenhouse gas emissions from port operations. We are willing partners to help shape this historic document.

Our initial assessment has identified the several issues with the Discussion Draft. Our recommendations are:

- **Public health** - The highest priority should be the protection and improvement of public health. The ports should make this explicit.
- **Criteria** – The ports need to specify the criteria that they will use to determine the feasibility of fulfilling CAAP commitments. Failing to identify these criteria undermines the credibility and meaningfulness of these commitments. Without explicit assessment criteria identified in advance, the ports leave stakeholders with the uncertainty of whether the emission reduction commitments will be met. This uncertainty makes business decisions more difficult, leaves clean technology developers and manufacturers without a market and unable to raise and sustain investment capital, and increases despair among community members who hope and count on the ports to reduce the environmental and quality of life impacts of port operations on them where they live, work, and play.
- **On Dock Rail Mode Shift** - To avoid simply transferring the environmental and public health burdens of port operations onto another community, the development of one or more inland ports



must include a firm commitment to using 100% zero emission locomotive, off-road, and short-haul heavy duty truck technologies.

- **Emissions Targets** – We are deeply disappointed that the revised CAAP does not include revised emission targets. The South Coast Air Quality Management District has identified the twin ports as the largest fixed source of pollution in the most polluted air basin in the country. The emission inventory projections submitted to the air district and incorporated in the 2016 Regional Transportation Plan include a projected 14% increase in the key smog precursor emissions, oxides of nitrogen (NOx), by 2023. This backsliding is unacceptable. The Ports appear to conflate meeting emission targets established in 2006 with achieving safe, healthy air. The ports continue to impose unacceptably high environmental health risks to neighboring communities and contribute greatly to our region’s failure to meet state and federal air quality standards. The ports should commit to new air pollutant emission reduction targets.
- **Improved Measure Descriptions** – The CAAP needs to better articulate its strategy for cleaning up each source category. We urge the ports to provide more specifics to clearly articulate (1) the deadline(s) for achieving the strategy, including interim deadlines and a discussion of whether the deadlines could be sooner in time; (2) the enforcement method (i.e., will the measure be in leases, part of the concession agreement with LMCs, part of a port tariff); (3) the cost of the strategy and the sustainable stream of funding that will support those costs; (4) the strategy’s emissions benefits; and (5) establish a framework for coordinating incentives and regulatory requirements. This will help create a coherent plan with the ability to track progress.
- **Zero Emission Trucks** – We are pleased to see a commitment for all zero emission drayage trucks by 2035. This is a significant and necessary goal that needs to be set. However, noticeably absent from the Discussion Draft is a real roadmap with interim goals and milestones. These interim steps must be included because the current approach provides little accountability and short-term actions. The ports must lay out a cogent plan to actually achieve zero emission truck technologies, including criteria for supporting new incentive funding and a strategy for securing it. Targeting segments of the drayage market (i.e. those traveling shorter distances) that can achieve 100% zero emissions sooner than 2035.
- **Technology and Fuels** - We support the California Air Resources Board’s position of using the cleanest technology available to meet the applicable duty cycle requirements. Current technological limitations prohibit the use of zero emission heavy duty trucks in delivery and use scenarios of more than approximately 100 miles per day. Near-zero emission natural gas heavy duty trucks that have at least 90% lower NOx emissions than trucks complying with the current federal emission standard can meet longer distance delivery needs. Natural gas fuel providers have demonstrated a willingness to supply renewable natural gas for these trucks. There should be a 100% renewable natural gas requirement for near-zero emission trucks operating at the port. Early deployment of near-zero heavy duty trucks fueled with renewable natural gas provides a viable path for transitioning away from the existing more highly polluting fleet in duty cycle operations that currently cannot be met by zero

COALITION FOR
CLEAN AIR

emission vehicles. The ports, however, must identify how they plan on balancing the short-term, more cost-effective deployment of near-zero emission heavy duty trucks with the long-term commitment to an all zero emission fleet. This will require some difficult decisions. We would like to know how the ports plan on executing this strategy.

- **Railyards Must Reduce Emissions** – Pollution from rail yards must be addressed in a real and meaningful way. To date, this has been the source category with the least success. For more than a decade, communities adjacent to rail yards have asked for relief from the high levels of toxic pollution. The Ports must do more to ensure their business partners – the Class 1 railroads – do their part to reduce significantly emissions from their operations. The technology for switcher locomotives, scrubbers and CHE needs to be a part of this commitment.
- **Need for Robust Community Engagement** –The first Clean Air Action Plan included significant outreach and involvement with community and environmental groups. This stakeholder process provided necessary input on how to achieve success, measure success and ensure progress was actually made. We request that the ports commit to an on-going active community engagement and empowerment process that includes meaningful opportunities for community members to learn about and influence decisions that impact port-related environmental and public health issues. The dialogue between the ports and community members needs to improve. The ports should consider their outreach and engagement efforts as underperforming until and unless community members agree that the ports have listened and acted to address public concerns.

CCA believes that everyone has the right to breath clean air. Established in 1971, CCA is California's only statewide organization exclusively advocating for improving air quality and preventing climate change. CCA helps policy makers, businesses, and individuals make good clean air choices that protect and improve public health in California. CCA's priorities include ensuring that climate investments and benefit disadvantaged communities and promoting zero and near-zero emission technologies.

Thank you for your consideration of our comments. If you have any questions or need any additional information, please contact me at nidia@ccair.org 231-223-6865.

Sincerely,

Nidia Erceg, Deputy Policy Director Coalition for Clean Air



CC: The Honorable Eric Garcetti , The Honorable Robert Garcia



800 Wilshire Boulevard, Suite 1010
Los Angeles, California 90017
(213) 223-6860

1107 Ninth Street, Suite 440
Sacramento, California 95814
(916) 527-8048

www.ccair.org



San Pedro and Peninsula Homeowners Coalition & San Pedro Homeowners United

January 24, 2017

Ambassador Martinez
Port of Los Angeles
425 South Palos Verdes St.
San Pedro, CA 900731

President Guzmán
Port of Long Beach
4801 Airport Plaza Dr.
Long Beach, CA 90815

Dear Ambassador Martinez and President Guzmán:

On behalf of the undersigned organizations, we write regarding the San Pedro Bay Ports Clean Air Action Plan 3.0. All of our organizations have worked on port issues for many years. In fact, most of our organizations participated in the development and implementation of the original Clean Air Action Plan. This most recent version comes at a critical time for the region. As we struggle to meet federal and state air quality standards, our regional planners are calling on all of us to do our part in reducing emissions. This includes the San Pedro Bay Ports, which have a tall task in changing their status as the largest fixed source of smog emissions in the region. Layered upon this regional air pollution crisis are the local threats from port pollution, which continue to impact families in the harbor region. Despite progress in emissions reductions

since 2006, recent trends are showing little to any reductions since 2011, and in fact there appears to be increases of emissions.

Given this sobering reality, we need to make sure that the third iteration of the Clean Air Action Plan is a resounding success. Too many lives are on the line if we don't get it right. Given that the comment period straddled the holidays, it has been hard for many community members to actively participate in the plan engagement. In addition, it is our understanding that there is only one public workshop planned prior to the comment period ending. As such, we recommend extending the public comment period by one month to allow for enhanced community engagement and outreach. We also recommend more engagement with community members, which will be vital to the success of this plan. This plan will be the roadmap guiding the San Pedro Bay Ports for the next five plus years, and an additional month of engagement will not derail the necessary progress.

We appreciate your consideration of this request. We believe the plan will be greatly improved if additional time is provided for input from stakeholders. Please do not hesitate to contact us at 310-434-2300 if you have any questions about this request.

Thanks,



Melissa Lin Perrella
Natural Resources Defense Council

Taylor Thomas
East Yard Communities for Environmental
Justice

Morgan Wyenn
Natural Resources Defense Council

Kathleen Woodfield,
San Pedro and Peninsula Homeowners
Coalition

Adrian Martinez
Earthjustice

Chuck Hart
San Pedro Homeowners United

Sylvia Betancourt
Long Beach Alliance for Children with
Asthma

CC: Mayor Garcetti
Mayor Garcia
Gene Seroka
Duane Kenagy
Chris Cannon
Heather Tomley

Andrea Hricko
Southern California Environmental Health
Sciences Center

Comments

Time: Fri, 27 Jan 2017 00:12:12 +0000
From: stevem@expopropane.com
To: caap@cleanairactionplan.org
Subject: Comments

Attachments: msg-12558-144.html (3k)



The following are comments to the Clean Air Action Plan from Expo Propane and the Western Propane Gas Association. Expo Propane provides propane, propane infrastructure, and propane vehicle technology to the Ports and Southern California. The Western Propane Gas Association is the propane industry trade association in California:

Clean air is good, which is something we can all agree upon. Electrification has its benefits. It is one option, not necessarily THE solution or end game. Options are good; more options are better. Technology is advancing rapidly in internal combustion engines and in fuels. Propane, for example, is the world's most widely used alternative fuel. It is the third fuel, behind gasoline and diesel, and has lower greenhouse gas and other emissions. Our industry is working with engine manufacturers, who are now meeting, and plan to meet the near-zero, low NOx, emission level on equipment (yard hostlers, for example) used in the terminals.

Our industry is discussing the need for the introduction of Bio-Propane and/or Renewable Propane into the market place. If you join near-zero engine emissions with Bio-Propane and/or Renewable Propane, the result is a vehicle with essentially zero emissions. This would be equal to an electric vehicle.

If we look at the huge cost of disruptive electric infrastructure and vehicles and equipment, the cost must be passed on to the importer, exporter, terminal operator, and the consumer. The cost may not be worth the benefit. Current and future world market pressures could drastically affect the outcome of a proposal to electrify all the terminals. Also, keep in mind that all cost estimates have tendencies to have cost overruns, sometimes amounting to 50-100% of the original estimate.

As an example, terminal operators could use propane-powered yard hostlers. With a mobile fueling option, they don't need permanent infrastructure, and the total cost could be 85% to 1200% less than electric yard hostlers and electric infrastructure. Therefore, we could accomplish the same air quality goals for a fraction of the cost of electric infrastructure and equipment.

We would suggest a phase-in program which first implements near-zero vehicle and engine technology (making sure of the availability), then move to near-zero technology combined with renewable or bio-fuels. This would be a more practical, acceptable, and cost effective solution. We all do not want the Ports to be the cleanest EMPTY ones in the world!

M. Steven Moore
Expo Propane
9144 Rose St.
Bellflower, Ca. 90706
Mail: PO Box 579
Lakewood, Ca. 90714-0579

Phone: (562)804-3400
Fax : (562)804-2266
email: stevem@expopropane.com

January 30, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

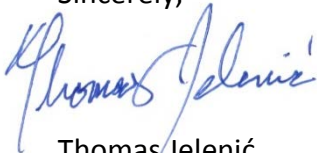
Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Subject: Request of Extension of Clean Air Action Plant Comment Deadline

Dear Mr. Cannon and Ms. Tomley:

As you know, PMSA has been meeting regularly with both ports to discuss the proposals in the draft 2017 CAAP Discussion Document. We appreciate that staff has taken the time to sit down with PMSA and its members. The need for this ongoing discussion is indicative of the complexity of the potential consequences of the plan. As PMSA is still working with its members to understand and respond to the draft document, we request that both ports extend the February 17, 2017 comment deadline for 45 days. This will allow further time for discussion with port staff and the continued development of alternative proposals.

Sincerely,



Thomas Jelenić
Vice President

cc: Gene Seroka, Port of Los Angeles
Mike DiBernardo, Port of Los Angeles
Duane Kenagy, P.E., Port of Long Beach
Rick Cameron, Port of Long Beach



California Natural
Gas Vehicle Coalition

February 1, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Subject: Request of Extension of Clean Air Action Plan Comment Deadline

Dear Mr. Cannon and Ms. Tomley:

As you know, the Natural Gas Vehicle industry has been very active in the discussion with both ports on the proposals in the draft 2017 CAAP Discussion Document.

Our industry has also taken the lead on reaching out to trucking companies and drivers, that operate in and around the ports, on the cost effective and environmental benefits of the Cummins Westport 11.9 liter Near Zero engine powered by Renewable Natural Gas. We believe that Near Zero technology should be a cornerstone to any plan to improve air quality in the port complex and throughout the South Coast Air Basin. We appreciate the efforts of port staff to engage the community and industries involved thus far, but knowing the game changing impact this plan will have over the next several decades, we believe more engagement is necessary.

We request that both ports extend the February 17, 2017 comment deadline for 45 days. This will allow further time for discussion and input with port staff from industry representatives and community stakeholders.

Who we are

The California Natural Gas Vehicle Coalition represents the state's natural gas vehicle industry and includes major automobile manufacturers, utilities, heavy-duty engine manufacturers, fueling station providers, equipment manufacturers, and fleet users of natural gas vehicles. We are working together to advance natural gas as an alternative transportation fuel.

If you have any questions, please don't hesitate to reach out to me at thomas@cngvc.org or at 916-448-0015. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lawson', with a horizontal line extending to the right.

Thomas Lawson
President, California Natural Gas Vehicle Coalition

cc:

Gene Seroka, Port of Los Angeles
Mike DiBernardo, Port of Los Angeles
Duane Kenagy, P.E., Port of Long Beach
Rick Cameron, Port of Long Beach



February 3, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

My trucking company has 10 of natural gas trucks in our operation providing port drayage service. These natural gas trucks are an important part of our business. Our customers appreciate having alternative fueled trucks that reduce emissions of greenhouse gasses and other pollutants in their supply chain as part of their sustainability efforts. Under the discussion document for the Clean Air Action Plan (CAAP), it appears that natural gas trucks will soon be subjected to fees and banned by 2020 because the trucks are older than 10 years. I believe that there are compelling reasons that support exempting the natural gas trucks from these proposed measures.

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, the natural gas trucks are using 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum fuel. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Finally, companies have invested in public and private fueling stations for natural gas trucks. Keeping this infrastructure operating is vital to enable future deployment of new near zero renewable natural gas trucks.

Companies and owner-operators stepped up and took a risk under the first Clean Truck Program to go with the natural gas trucks to support the Ports. While there were of course issues encountered as with any new technology, the trucks are still operating today delivering freight. The Ports can send a clear signal of support for clean technologies by providing special consideration under the revised CAAP. Specifically, the Ports should exempt the natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB optional low NO_x standard of 0.02 grams per brake horsepower hour. Thank you for your consideration of this important issue and we stand with you to make the San Pedro Bay Ports the leaders in sustainable trucking.

Sincerely,

Ed Mainus
President/Owner
(562) 437-3553
emainus@atlasmarine-inc.com



February 3, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

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Sincerely,

Alejandra Rosas
General Manager
(562) 437-3553
arosas@atlasmarine-inc.com



February 3, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

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Sincerely,

Alexander Diaz
Driver/Warehouse Manager
(562) 437-3553
hugo@atlasmarine-inc.com



February 3, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

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Sincerely,

Hugo Castellanos
Dispatch Manager
(562) 437-3553
hugo@atlasmarine-inc.com

Petition to Exempt In-Use Natural Gas Trucks from CAAP Fees and Bans

I operate a natural gas port truck. I request the Ports to exempt in-use natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB low NOx standard of 0.02 grams per brake horsepower hour for these reasons:

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

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Petición para Exonerar Camiones de Gas Natural en Uso de Tarifas y Prohibiciones de CAAP

Opero un camión de gas natural. Solicito a Los Puertos que eximan a los camiones de gas natural de las tarifas y prohibiciones hasta el momento en que Los Puertos requieran que todos los camiones cumplan con el estándar CARB bajo NOx de 0.02 gramos por hora de potencia de freno por estas razones:

En primer Lugar, los motores de camiones de gas natural están certificados según el estándar de emisiones de 2010 EPA, no el estándar de emisiones de la EPA de 2007. El objetivo del borrador de la CAAP es eliminar los camiones que no cumplen con el estándar de la EPA de 2010. Los camiones de gas natural ya alcanzan el estándar de 2010, y no deberían ser tratados como camiones estándar de la EPA de 2007.

En Segundo lugar, los camiones de gas natural pueden ser sustituidos con camiones diésel. Si es así, esto es un paso atrás. El primer Programa de Camiones Limpios busco fomentar la competencia en el mercado de camiones con combustibles alternativos y tecnologías limpias y camiones de gas natural en los puestos ahora operan con gas natural 100% renovable, eliminado nuestra dependencia de petróleo extranjero y reduciendo la huella de carbono. No es el momento de abandonar las tecnologías limpias que se necesitan para limpiar el aire, mejorar la independencia energética y fomentar el desarrollo económico regional y la competitividad del Puerto.

En tercer lugar, los camiones de gas natural utilizan gas natural 100% renovable que proporciona reducciones de gases de efecto invernadero del 40% al 70% y más, y 100% de desplazamiento de petróleo. Reduciendo las emisiones de gases de efecto invernadero y el consumo de petróleo mientras se incrementa el use de combustible renovable son políticas y prioridades importantes de California. El proyecto de discusión de CAAP está estableciendo objetivos para las reducciones de gases de efecto invernadero y el mantenimiento de estos camiones en funcionamiento debería ser una prioridad.

Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	Alexander Diaz	1570 Cota Ave Long Beach 90813	562 437-3553	Atlas Marine
	Javier Solis	1570 Cota Ave Long Beach 90813	(562) 437-3553	ATLAS MARINE
	Melvin Patajalu	2445 Cota Ave L B	259-7122	Atla Marine
	Daniel G.	1570 COTA AVE Long Beach 90812 La Puente ca	562) 437-3553	ATLAS M.
	Jose RIVERA	628 N. Penth AV.	626 780-174	ATLAS MARINE
	SERGIO MORA	1570 COTA LONG BEACH	562 234-5842	ATLAS MARINE
	Jose ADAMS	13950 COTA AV	562 034-5842	ATLAS MARINE
	manuel Chacon	1570 Cota AV Long Beach ca	562 234 5842	Atlas marine
	SERGIO A. Alvarez	1570 Cota Ave Long Beach, ca.	310 894-2854	Atlas Marine

Re: CAAP 2017 - General Inquiry - Deadline Extension for Public Feedback? (past February 17)?

Time: Tue, 07 Feb 2017 10:16:06 -0800 (PST)
From: "CAAP" <CAAP@cleanairactionplan.org>
To: "Gwendolyn Henry" <gwendolynhenry@hotmail.com>
CC: "tdemoss" <tdemoss@portla.org> , "renee.moilanen" <renee.moilanen@polb.com> , "acoluso" <acoluso@portla.org>
Subject: Re: CAAP 2017 - General Inquiry - Deadline Extension for Public Feedback? (past February 17)?
Attachments: msg-25716-305.html (2k)



Dear Ms. Henry,

The deadline for responses to the CAAP discussion document is still currently Friday, February 17, 2017. The Ports are currently considering extending the deadline, but have not finalized that decision at this time. We will still consider any comments to the Discussion Document after the February 17 deadline and will gladly meet with community stakeholders to discuss the CAAP 2017 Update.

Please feel free to send your comments or requests for a meeting to this email address.

Amber Coluso
Air Quality Specialist
Port of Los Angeles
acoluso@portla.org
(310) 732-3950

On Mon, 6 Feb 2017 21:46:51 +0000, Gwendolyn Henry wrote:

> Hello,
>
> My name is Gwendolyn Henry, and I am a stakeholder and member of the North West San Pedro Sustainability Committee.
> We are currently working on a letter with feedback regarding the Port's Clean Air Action Plan.
> There was some discussion of extending the deadline.
> Has that deadline been extended?
> Should it be extended, would there be additional time to organize an additional community meeting, to continue to spread the word, and provide as much valuable feedback as possible?
>
> The CAAP is a very impressive project, with far-reaching impact.
> Believe the Ports would benefit greatly from maximizing stakeholder feedback.
>
> Thank-you, Gwen Henry



2503 E. Poplar Street | Algona, IA 50511
ph 515.395.1360 | ff 866-994-7697 | fx 515.395.1369

February 7th, 2016

CAAP Administrator
Port of Los Angeles
425 S. Palos Verdes Street
P.O. Box 151
San Pedro, CA 90733-0151

CAAP Administrator
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, CA 90815

Dear Sir/Madam:

American Power Group (APG) is an innovative small business offering a unique dual-fuel conversion option for heavy-duty diesel engines. Our conversion system can be used on mobile emission sources (on- and off-road heavy-duty trucks) with displacements in excess of 13-liters as well as on medium- and large stationary engines (e.g. generators, motors, and pumps down to 65 kW). Our system reduces petroleum diesel usage by over 50% while also significantly reducing harmful criteria pollutants such as PM and NOx. Our system is extremely cost competitive – allowing the conversion of as many as six (6) on-road heavy-duty diesel engines to dual-fuel operations for the cost of one (1) new natural gas truck. We believe we offer the only commercially available cost-effective solutions to reduce fuel consumption and emissions of Class 8 heavy-duty trucks affecting air quality in California's disadvantaged communities and non-attainment regions near the LA-region ports.

APG fully supports the goals and concepts in the Draft Clean Air Action Plan Discussion Document. We believe that natural gas dual fuel technologies are an important component to consider for achieving the Port Region's goals. With over 15,000 heavy-duty diesel trucks entering the Port Region on an average day, there is a significant air quality challenge to overcome. A 2013 CALSTART Study of the region outlined the challenges faced by the drayage community in meeting the region's air quality goals without affecting commerce. CALSTART's study outlined several key performance parameters for drayage vehicle operators to be successful (and profitable): 400+ horsepower, 1,200-1,800 ft-lbs of torque, range in excess of 200 miles without refueling, and finally the flexibility to handle all routes (Southern California terrain and elevation changes make some routes difficult – e.g. I-5 North through the Tejon Pass ("The Grapevine").

APG believes that two key statements in the Discussion Document are critical: (1) The need to *transition* to zero-emission technologies; and (2) increase the State's competitiveness and drive future economic growth in the freight transportation industry. Even with the innovation represented by Cummins-Westport's 12-L Near-Zero Natural Gas engine on the horizon for 2018, there is nothing predicted for the heavy heavy-duty trucks operating with engines displacing more than 13-Liters and providing in excess of 400-HP. Drayage operators are often operating older trucks from the secondary market and work on extremely narrow margins. These operators provide a significant number of good jobs, both directly and indirectly, and are key drivers in our freight economy. However, it is in their best interest to buy the most flexible engine/truck combinations that they can afford in order to ensure that no payload or route is

beyond reach. They also want trucks that are easy to resale in order to (hopefully) recoup some of their capital investment.

We encourage the Ports, through the Clean Air Action Plan, to avoid foregoing emissions reductions TODAY by being too focused on tomorrow's zero-emission technology. Even in the most optimistic scenarios, the replacement of a few hundred vehicles (out of over 15,000) with expensive and untested zero-emission technologies (not to be confused with proven natural gas 'near-zero' technologies), makes only a very small dent in the region's air quality. A better choice – for the Ports and surrounding regions – is to invest WISELY in gateway technologies such as natural gas dual fuel that reduce emissions now while growing the CA freight economy AND preserving capital for investing in the zero-emission future. APG believes that you can do both – make a difference today and invest in an even better tomorrow.

For example, American Power Group has been working with experts in the industry to investigate pairing our innovative natural gas dual-fuel technology with advanced aftermarket selective catalytic reduction (SCR) systems to provide a pathway to achieve CARB's optional low NOx standard. This aftermarket conversion, if supported, could provide a pathway to reducing NOx emissions on existing engines to the new standard at a cost well below the purchase of a brand new vehicle. Supporting advanced technologies such as this will help to find solutions for the Class 8 heavy-duty vehicle sector, while not affecting commercial fleet operations with respect to payload or range, and at a cost that the commercial fleet owner/operator can accept. Funding for new technologies is sorely needed – but if those advanced technologies are not accessible and affordable to the fleet owners, they will not be adopted. A technology that isn't adopted in commercial volumes will not have the impact necessary to solve our challenging air quality issues.

In summary, APG is very aware of the numerous challenges faced by the Ports. With a wide variety of stakeholders with vastly different interests, APG does not envy the Ports' situation in choosing from among a variety of available options with limited funding. We do believe that there are ways to meet most, if not all, stakeholder requirements with a step-based approach and encourage the Ports to not neglect the better in pursuit of the perfect with respect to NOx and PM emissions in your region.

Sincerely,



Dan Goodwin
Vice President, Government Affairs
dgoodwin@americanpowergroupinc.com





February 8, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

Our trucking company, Southern Counties Express, has 38 of natural gas trucks in our operation providing port drayage service. These natural gas trucks are an important part of our business. Our customers appreciate having alternative fueled trucks that reduce emissions of greenhouse gasses and other pollutants in their supply chain as part of their sustainability efforts. Under the discussion document for the Clean Air Action Plan (CAAP), it appears that natural gas trucks will soon be subjected to fees and banned by 2020 because the trucks are older than 10 years. I believe that there are compelling reasons that support exempting the natural gas trucks from these proposed measures.

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, the natural gas trucks are using 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum fuel. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Finally, companies have invested in public and private fueling stations for natural gas trucks. Keeping this infrastructure operating is vital to enable future deployment of new near zero renewable natural gas trucks.

Companies and owner-operators stepped up and took a risk under the first Clean Truck Program to go with the natural gas trucks to support the Ports. While there were of course issues encountered as with any new technology, the trucks are still operating today delivering freight. The Ports can send a clear signal of support for clean technologies by providing special consideration under the revised CAAP. Specifically, the Ports should exempt the natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB optional low NOx standard of 0.02 grams per brake horsepower hour. Thank you for your consideration of this important issue and we stand with you to make the San Pedro Bay Ports the leaders in sustainable trucking.

Sincerely,
Gordy Reimer
President



Southern Counties Express, Inc.

18020 South Santa Fe Avenue
Rancho Dominguez, CA 90221-5515

Tel: (310) 900 - 2160

Fax: (310) 605 - 6755

<http://www.sceexpress.com>

Comments to Clean Air Action Plan: the need for electrified rail

Time: Fri, 10 Feb 2017 17:20:36 -0800
From: Brian Yanity <yanityak@gmail.com>
To: CAAP@cleanairactionplan.org
Subject: Comments to Clean Air Action Plan: the need for electrified rail

Attachments: msg-25641-733.html (3k)
BYanity SoCal freight rail electrification 10Feb2017.pdf (2M)



Dear Sir or Madam,

The Port of Long Beach and the Port of Los Angeles have long been leaders in reducing emissions from port operations, and should continue this legacy by leading the way in electrified freight rail. I am pleased to see that the 2017 San Pedro Bay Ports Clean Air Action Plan (CAAP) is poised to continue this innovation in electric trucks, cranes, lifting equipment, and electrical plug-ins for ships. Freight rail electrification would build upon, and add value to, the large infrastructure investments that the ports are making to shift more freight from truck to rail. Used successfully all over the world for over a century, electric freight railroads have many advantages. While the up-front capital costs may be substantial, all-electric freight rail with overhead catenary would pay for itself with significant reductions in emissions and transport energy costs.

The 2017 CAAP calls for expanding the use of on-dock rail by investing in improvements to the port-wide rail network, with the long-term goal of moving 50% of all cargo leaving the ports by rail. The CAAP also calls for the continued exploration of short-haul rail. The 2017 CAAP draft discussion document, released in fall 2016, did call for the planning of the electrification of transportation sector and freight movement equipment in general, particularly drayage trucks. However, the plan did not mention rail electrification specifically.

The Alameda Corridor and the Pacific Harbor Line system around the ports could serve as a pioneering example of freight rail electrification. The Alameda Corridor is owned by the public, and it is in the public's interest to reduce air pollution electrifying the trains running through populated areas. The Alameda Corridor was built with enough vertical clearance for an overhead catenary wire over a double-container stacked train, along with other features designed in anticipation of future electrification.

Electrification of the proposed short-haul rail service between the ports and the Inland Empire, currently under study, is an opportunity for using electric locomotives through the Alameda Corridor in the near- to medium-term. All-electric locomotives dedicated to the short-haul service could go back and forth along 80 miles or so of electrified track between San Pedro Bay and San Bernardino, while conventional non-electric line-haul freight trains could continue use the same tracks. For more information, please read my attached white paper titled "The Need for Freight Rail Electrification in Southern California".

Thank you for your time and consideration.

Best Regards,

Brian Yanity

Electrical Engineer

Fullerton, CA



STAYING A STEP AHEAD
& Leaving Small Footprints

February 13, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

Our company, Total Transportation Services, Inc. (TTSI) has eight (8) natural gas trucks in our operation providing port drayage service. These natural gas trucks are an important part of our business. Our customers appreciate having alternative fueled trucks that reduce emissions of greenhouse gasses and other pollutants in their supply chain as part of their sustainability efforts. Under the discussion document for the Clean Air Action Plan (CAAP), it appears that natural gas trucks will soon be subjected to fees and banned by 2020 because the trucks are older than 10 years. I believe that there are compelling reasons that support exempting the natural gas trucks from these proposed measures.

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, the natural gas trucks are using 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum fuel. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Finally, companies have invested in public and private fueling stations for natural gas trucks. Keeping this infrastructure operating is vital to enable future deployment of new near zero renewable natural gas trucks.



STAYING A STEP AHEAD
& Leaving Small Footprints

Companies and owner-operators stepped up and took a risk under the first Clean Truck Program to go with the natural gas trucks to support the Ports. While there were of course issues encountered as with any new technology, the trucks are still operating today delivering freight. The Ports can send a clear signal of support for clean technologies by providing special consideration under the revised CAAP. Specifically, the Ports should exempt the natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB optional low NOx standard of 0.02 grams per brake horsepower hour. Thank you for your consideration of this important issue and we stand with you to make the San Pedro Bay Ports the leaders in sustainable trucking.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Victor N. La Rosa', with a long horizontal flourish extending to the right.

Victor N. La Rosa

CEO/President – Total Transportation Services, Inc.

(310) 816-0260

vicla@tts-i.com

Petition to Exempt In-Use Natural Gas Trucks from CAAP Fees and Bans

I operate a natural gas port truck. I request the Ports to exempt in-use natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB low NOx standard of 0.02 grams per brake horsepower hour for these reasons:

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, natural gas trucks use 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

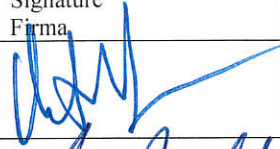
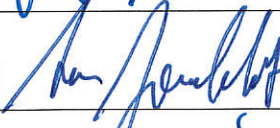


Petición para Exonerar Camiones de Gas Natural en Uso de Tarifas y Prohibiciones de CAAP

Opero un camión de gas natural. Solicito a Los Puertos que eximan a los camiones de gas natural de las tarifas y prohibiciones hasta el momento en que Los Puertos requieran que todos los camiones cumplan con el estándar CARB bajo NOx de 0.02 gramos por hora de potencia de freno por estas razones:

En primer Lugar, los motores de camiones de gas natural están certificados según el estándar de emisiones de 2010 EPA, no el estándar de emisiones de la EPA de 2007. El objetivo del borrador de la CAAP es eliminar los camiones que no cumplen con el estándar de la EPA de 2010. Los camiones de gas natural ya alcanzan el estándar de 2010, y no deberían ser tratados como camiones estándar de la EPA de 2007.

En Segundo lugar, los camiones de gas natural pueden ser sustituidos con camiones diésel. Si es así, esto es un paso atrás. El primer Programa de Camiones Limpios busco fomentar la competencia en el mercado de camiones con combustibles alternativos y tecnologías limpias y camiones de gas natural en los puestos ahora operan con gas natural 100% renovable, eliminado nuestra dependencia de petróleo extranjero y reduciendo la huella de carbono. No es el momento de abandonar las tecnologías limpias que se necesitan para limpiar el aire, mejorar la independencia energética y fomentar el desarrollo económico regional y la competitividad del Puerto.

En tercer lugar, los camiones de gas natural utilizan gas natural 100% renovable que proporciona reducciones de gases de efecto invernadero del 40% al 70% y más, y 100% de desplazamiento de petróleo. Reduciendo las emisiones de gases de efecto invernadero y el consumo de petróleo mientras se incrementa el use de combustible renovable son políticas y prioridades importantes de California. El proyecto de discusión de CAAP está estableciendo objetivos para las reducciones de gases de efecto invernadero y el mantenimiento de estos camiones en funcionamiento debería ser una prioridad.

Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	Victor N. La Rosa	18735 South Ferris Place, Rancho Dominguez, CA 90220	(310) 816-0260	Total Transportation Services, Inc.
	Sam Joumblat	18735 South Ferris Place, Rancho Dominguez, CA 90220	(310) 816-0260	Total Transportation Services, Inc.
	Tony A. Williamson	18735 South Ferris Place, Rancho Dominguez, CA 90220	(310) 816-0260	Total Transportation Services, Inc.
	Andy Rubio	18735 South Ferris Place, Rancho Dominguez, CA 90220	(310) 816-0260	Heavy Load Transfer, LLC



AL AUSTIN
COUNCILMEMBER, EIGHTH DISTRICT
CITY OF LONG BEACH

CITY HALL: (562) 570-6685
DISTRICT OFFICE: 570-1326
FAX: 570-5982
TDD: (562) 570-6629

February 13, 2017

Port of Long Beach Harbor Commission
Port of Los Angeles Harbor Commission

Dear Commissioners:

I am writing to express my support for proposed efforts to aggressively reduce emissions at the Ports of Long Beach and Los Angeles through the Ports' Clean Air Action Plan (CAAP). I support efforts to employ zero and near-zero emission technologies which provide viable pathways to green the trucking industry and improve air quality in communities that are impacted by the ports and freight corridors.

As the leading voices for two of the country's most dynamic and environmentally conscious ports, your collaboration with port stakeholders will determine whether our ports can achieve immediate and impactful results in our collective battle to reduce NOx emissions, combat climate change and reduce our dependency on fossil fuels. In particular, I support a goal in the Clean Air Action Plan to include a 100% transition to zero equivalent trucks fueled with 100% renewable fuel by the end of 2023.

As an elected leader serving communities that are impacted by good movement, I believe that we can and must be bolder in our continued efforts to reduce greenhouse gasses and diesel particulate matter. This includes, but is not limited to, immediately deploying proven, cost-efficient, commercially available technologies and low-carbon fuels that will move our ports closer to compliance with air quality standards while improving the health of communities that are disproportionately affected by chronic respiratory and cardiovascular diseases.

Thank you for your leadership and commitment to making our ports some of the greenest in the world. I look forward to working with you to identify, pursue and secure funding from regional, state and federal programs to make our collective vision of a sustainable, zero-emissions future a reality.

Sincerely,

AL AUSTIN II
Councilmember, Eighth District

City Hall: 333 West Ocean Boulevard, 14th Floor, Long Beach, CA 90802
District Office: 5641 Atlantic Avenue, Long Beach, CA 90805
district8@longbeach.gov





Strengthening the Voice of Business

- BizFed's Member Alliance
- AIA Los Angeles
- Alhambra Chamber
- American Beverage Association
- Antelope Valley Board of Trade
- Apartment Association, California Southern Cities
- Apartment Association of Greater Los Angeles
- Arcadia Association of Realtors
- Arcadia Chamber
- Asian American Business Women Association
- Asian American Economic Development Enterprise
- Asian Business Association
- Association of Independent Commercial Producers
- Assu Chamber
- Bell Gardens Chamber
- Beverly Hills Chamber
- Beverly Hills / Greater LA Association of Realtors
- Burbank Association of Realtors
- Burbank Chamber
- Building Industry Association, LA / Ventura Counties
- Building Owners & Managers Association, Greater LA
- CalAsian Chamber
- California Apartment Association, Los Angeles
- California Business Roundtable
- California Cannabis Industry Association
- California Construction Industry and Materials Association
- California Contract Cities Association
- California Consumer Finance Association
- California Fashion Association
- California Grocers Association
- California Hotel & Lodging Association
- California Independent Bankers
- California Independent Petroleum Association
- California Life Sciences Association
- California Metals Coalition
- California Restaurant Association
- California Small Business Association
- California Trucking Association
- CALInnovates
- Carson Dominguez Employers Alliance
- Central City Association
- Century City Chamber
- Citrus Valley Association of Realtors
- Coalition for a Prosperous America
- Community Associations Institute, Los Angeles
- Construction Industry Air and Water Quality Coalitions
- Consumer Healthcare Products Association
- Council on Trade and Investment for Filipino Americans
- Culver City Chamber
- Downey Association of Realtors
- Downtown Long Beach Associates
- El Monte/South El Monte Chamber
- Employers Group
- Engineering Contractor's Association
- Entrepreneurs Organization - Los Angeles
- F.A.S.T.-Fixing Angeles Stuck In Traffic
- Filipino American SEC
- FilmLA
- Foreign Trade Association
- FuturePorts
- FWD.us
- Gateway to LA
- Glendale Association of Realtors
- Glendale Chamber
- Glendora Chamber
- Greater Los Angeles Auto Show
- Greater Lakewood Chamber
- Greater Los Angeles African American Chamber
- Greater Los Angeles New Car Dealers Association
- Harbor Association of Industry and Commerce
- Harbor City / Harbor Gateway Chamber
- Harbor Trucking Association
- Hollywood Chamber
- Hospital Association of Southern California
- Hotel Association of Los Angeles
- Industry Manufacturers Council
- International Warehouse Logistics Association
- Inglewood Airport Area Chamber
- Irwindale Chamber
- Japan Business Association of Southern California
- La Canada Flintridge Chamber
- LAX Coastal Area Chamber
- Leadership for Urban Renewal Network
- League of California Cities
- Long Beach Area Chamber
- Los Angeles Area Chamber
- Los Angeles Black MBA Association
- Los Angeles Cleantech Incubator
- Los Angeles County Bicycle Coalition
- Los Angeles County Consumer Affairs
- Los Angeles County Waste Management Association
- Los Angeles Junior Chamber
- Los Angeles Latino Chamber
- Los Angeles Metropolitan Hispanic Chamber
- Malibu Chamber
- Los Angeles Parking Association
- Los Angeles Urban League
- Los Angeles World Affairs Council
- Pacific Palisades Chamber
- Pasadena Chamber
- Pomona Chamber
- Maple Business Council
- Motion Picture Association of America
- MoveLA
- Most Worshipful Hiram Tyre Grand Lodge
- NAIOP Southern California Chapter
- National Alliance for Jobs and Innovation
- National Association of Women Business Owners, LA
- Pacific Merchant Shipping Association
- Pasadena-Foothills Association of Realtors
- Recording Industry Association of America
- Redondo Beach Chamber
- Regional Black - San Fernando Valley Chamber
- Regional Hispanic Chamber
- Regional San Gabriel Valley Chamber
- Rosemead Chamber
- Rotary Club of Los Angeles
- San Gabriel Chamber
- San Gabriel Valley Civic Alliance
- San Gabriel Valley Economic Partnership
- Santa Clarita Valley Economic Development Corp.
- San Pedro Peninsula Chamber
- Santa Monica Chamber
- Santa Monica Junior Chamber
- Small Business Action Committee
- Society of Hispanic Professional Engineers - Los Angeles
- South Asian Business Alliance Network
- South Bay Association of Chambers
- South Bay Association of Realtors
- Southern California Golf Association
- Southern California Grantmakers
- Southern California Minority Supplier Development Council Inc.
- Southern California Water Committee
- Southland Regional Association of Realtors
- South Park Stakeholders Group
- Toluca Lake Chamber
- Torrance Area Chamber
- Town Hall Los Angeles
- Tri-Counties Association of Realtors
- United Chambers San Fernando Valley
- Universal City North Hollywood Chamber
- United States-Mexico Chamber
- U.S. Green Building Council-LA
- Valley Economic Alliance
- Valley Economic Development Center
- Valley Industry & Commerce Association
- Valley International Trade Association
- Vernon Chamber
- Vietnamese American Chamber
- Water Replenishment District
- We Care for Humanity
- West Hollywood Chamber
- West Los Angeles Chamber
- West San Gabriel Valley Association
- Western Manufactured Housing Association
- Westside Council of Chambers
- Western States Petroleum Association
- West Valley/Warner Center Chamber
- Westwood Village Improvement Association
- Wilmington Chamber
- Young Professionals in Energy - LA Chapter
- Youth Business Alliance
- Warner Center Association

February 13, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, CA 90815

Re: Request to extend Clean Air Action Plan comment deadline

Dear Mr. Cannon and Ms. Tomley,

On behalf of the Los Angeles County Business Federation (BizFed), a grassroots alliance of 164 business and trade associations that represents 325,000 employers with more than 3 million employees throughout our region, we are writing to request an extension (no less than 45 days) of the Clean Air Action Plan Update's (CAAP or Plan) public comment period.

We appreciate that the staffs from the Port of Long Beach and the Port of Los Angeles have taken the time to meet with members of the BizFed Energy and Environment Committee to discuss the CAAP. During our discussion, we learned about the collaborative work of the Ports to reduce emissions. We commend the Ports for their environmental leadership. In addition, we learned about the complexity and the potential economic impacts of the Plan. Our request to extend the CAAP period stems from our interest in studying the plan and providing meaningful comment; the extra time would allow us the opportunity to fully vet the CAAP with our members.

We are committed to working with the Ports to help develop a Plan that reduces emissions in a collaborative manner but that also does not overly burden commerce. An extension of the comment period will allow us the opportunity to provide you with constructive ideas and concerns from industry to make this the best plan possible. We are supportive of the Plan's goals. That said, we want to encourage the Ports to be very thorough in assessing the economic impacts of the CAAP update and to clearly demonstrate the costs and benefits associated with the Plan.

Thank you for considering our request. We look forward to working with you on this important effort.

Sincerely,

Mike Lewis
BizFed Chair
Senior VP,
Construction Industry/
Air Quality Coalition

David Fleming
BizFed Founding Chair

Tracy Hernandez
BizFed Founding CEO

cc:

- Gene Seroka, Port of Los Angeles
- Mike DiBernardo, Port of Los Angeles
- Duane Kenagy, P.E., Port of Long Beach
- Rick Cameron, Port of Long Beach

RE: clean air action plan

Time: Tue, 14 Feb 2017 17:06:24 +0000
From: "DeMoss, Tim" <TDeMoss@portla.org>
To: 'Sophia Song' <sophia@calko.com>
CC: 'Angie Han' <angie@calko.com> , 'renee.moilanen' <renee.moilanen@polb.com> ,
"CAAP@cleanairactionplan.org" <CAAP@cleanairactionplan.org>
Subject: RE: clean air action plan

Attachments: msg-6338-2.html (21k)
image002.jpg (2k)
image003.jpg (29k)



Hi Sophia,

There are others that have reached out to us and have expressed their displeasure with the proposed fee. We will take that into account as we draft the Clean Air Action Plan 2017 Update Document.

As currently written in the Discussion Document, the fee will only apply to trucks that are 10 years or older and that are attempting to gain access to Port of Los Angeles or the Port of Long Beach Marine Terminals only. The fee would not apply to other areas in California or nationwide.

You can call me if you have any other questions.

Thanks,

Tim DeMoss



Tim DeMoss

Air Quality Supervisor

Port of Los Angeles

Environmental Management Division

425 S. Palos Verdes St.

San Pedro, CA 90731

(310) 221-4782

(310) 547-4643 (fax)

tdemoss@portia.org

From: Sophia Song [mailto:sophia@calko.com]
Sent: Monday, February 13, 2017 5:39 PM
To: CAAP@cleanairactionplan.org
Cc: 'Angie Han'; DeMoss, Tim; 'renee.moilanen'
Subject: RE: clean air action plan

Dear CAAP

Thanks for your email. But we have further questions.

Can you comment if your current discussion on fee/ban is to enter the ports only? Or is it for trucks just to be on roads?

And is this for LA/Long beach area or CA only? Or does it apply to nationwide?

This is a sudden news though I know that the plan has not been confirmed yet.

And I think we will struggle a lot of if this becomes like an actual plan as you mentioned earlier as we still have a lot of trucks from year 2008 and 2009.

Also would it be possible for me to obtain a specific contact information (name, email address and phone no) so that I can periodically check on this issue?

Thank you.

Best,

Sophia Song



CALKO TRANSPORT COMPANY, INC.

720 E. Watson Center Rd.

Carson, CA 90745

Tel : 310-816-0602 ext 166

Fax : 310-847-7698

sophia@calko.com

From: CAAP [mailto:CAAP@cleanairactionplan.org]

Sent: Friday, February 10, 2017 14:45

To: Sophia Song

Cc: 'Angie Han'; 'tdemoss'; 'renee.moilanen'

Subject: Re: clean air action plan

Dear Ms. Song,

The Draft Clean Air Action Plan Discussion Document proposes that starting sometime in 2018, any truck (LNG or Diesel) with an engine that is 10 years old or older would be subject to a fee. That means, if the fee is adopted by our Boards as currently proposed, starting in mid-2018, trucks with engine model year 2007 or 2008 will be subject to a fee. The following year, 2019, trucks that are 2009 and older will be subject to a fee, and so on for subsequent years. Again as currently proposed, there is no distinction between LNG or diesel engines. The strategy is currently based on engine model year.

This is just a proposal at this time and as stated in the last email we are accepting comments through February 17th. This program would still need to be considered by our Boards before it would be implemented. The next steps would be for our Boards to consider adoption of the Clean Air Action Plan, and then approve the changes to tariff for the Clean Trucks Program.

Hopefully this is a more helpful explanation for you. Let us know if you have any additional questions.

Sincerely,

San Pedro Bay Ports

Clean Air Action Plan

On Fri, 10 Feb 2017 14:08:53 -0800, "Sophia Song" wrote:

> Hi CAPP

>

>

>

> Thanks for the reply. And the ending model year that may be affected are 2010 or older for both diesel and LNG? Any idea when would be the effective date/year?

>

> I know that the issue is still under discussion but please advise if you have the info. Thank you.

>

>

>

> Best,

>

> Sophia Song

>

>

>

> logo

>

> CALKO TRANSPORT COMPANY, INC.

>

> 720 E. Watson Center Rd.

>

> Carson, CA 90745

>

> Tel : 310-816-0602 ext 166

>

> Fax : 310-847-7698

>

> sophia@calko.com

>

>
 >
 > From: CAAP [mailto:CAAP@cleanairactionplan.org]
 > Sent: Friday, February 10, 2017 13:56
 > To: Sophia Song
 > Cc: 'Angie Han'; tdemoss; renee.moilanen
 > Subject: Re: clean air action plan

>
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 >
 >
 > Dear Ms. Song,

>
 > The Draft Discussion Document for the Clean Air Action Plan (CAAP) 2017 Update can be viewed at www.cleanairactionplan.org. In this document will you find the currently proposed Clean Truck Strategy. As currently proposed, there is no distinction between LNG or diesel engines. The strategy is based on engine model year.

>
 > We anticipate on finalizing the CAAP later this year, but there is no definitive date at this time. The comment period for the Discussion Document ends on Friday, February 17. Comments submitted after February 17 will still be considered, but may not make it into the final document if submitted significantly later than that date.

>
 > If you would like additional information, please feel free to contact us.

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 >
 > Sincerely,

>
 >
 > San Pedro Bay Ports
 > Clean Air Action Plan

>
 > On Fri, 10 Feb 2017 12:52:36 -0800, "Sophia Song" wrote:

> > Dear CAAP
 > >
 > >
 > > Can you please reply?

> > Best,
 > > Sophia Song

> > logo
 > >
 > > CALKO TRANSPORT COMPANY, INC.
 > >
 > > 720 E. Watson Center Rd.
 > >
 > > Carson, CA 90745
 > >
 > > Tel : 310-816-0602 ext 166
 > >
 > > Fax : 310-847-7698
 > >
 > > sophia@calko.com

> > From: Sophia Song [mailto:sophia@calko.com]
 > > Sent: Wednesday, February 08, 2017 10:16
 > > To: 'caap@cleanairactionplan.org'
 > > Subject: clean air action plan

> > Hi
> >
> >
> >
> > We have a trucking company - all our trucks go in to LA/Long beach ports.
> >
> > We have both LNG and diesel trucks. And the oldest engine year is 2007.
> >
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> >
> > When we checked with AQMD, they advised that currently there is no ban for
> > LNG trucks regardless if engine year but all diesel trucks have to be 2010
> > or newer from 1/1/2023.
> >
> >
> >
> > Please advise if your current discussion/consideration on fee and ban
> > includes any restriction on LNG trucks and what year of engine for diesel or
> > LNG would be affected.
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> >
> > And when will you finalize your plan? (officially determine instead of
> > discussion)
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> >
> > Thank you.
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> >
> > Best,
> >
> > Sophia Song
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Cummins Westport
The Natural Choice



February 15, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Submitted through caap@cleanairactionplan.org

Dear Mr. Cannon and Ms. Tomley:

I am writing on behalf Cummins Westport Inc. to express support for proposed efforts to aggressively reduce port truck emissions at the Ports of Long Beach and Los Angeles through the Clean Air Action plan (CAAP).

Cummins Westport Inc. (CWI) is the leading provider of low emission natural gas engines for buses and trucks, having delivered over 70,000 natural gas engines since our inception in 2001. Today our engines power nearly all the natural gas buses and trucks currently operating in California. In 2016, CWI developed Near Zero NOx reduction technology and began production of the ISL G Near Zero engine. These engines are certified by the California Air Resources Board to a NOx emissions level of 0.02 g/bhp-hr, which is 90% below the current EPA standard of 0.2 g/bhp-hr. They offer an immediate 90% NOx reduction from 2010 compliant engines going into operation in new buses and trucks to customers in Los Angeles. CWI is proud to have partnered with the South Coast Air Quality Management District (SCAQMD) and the California Energy Commission (CEC) to develop the Near Zero technology and acknowledge the funding received from these agencies. We are currently expanding this Near Zero technology with the same 90% NOx reduction profile to our 12 liter ISX12 G Near Zero engine, currently undergoing testing in Port trucks and in other applications throughout the US for delivery in January 2018.

We strongly support efforts to employ proven, renewable fuel options that will clean up the trucking industry and improve air quality in our communities while keeping goods moving. Cummins Westport engines can operate on up to 100% renewable natural gas (RNG) without modifications, resulting in significant greenhouse gas reductions. In fact, the CEC and AQMD have determined that Near Zero natural gas engines operating on RNG have equivalent emissions as an electric vehicle.

Our organization has been involved in improving air quality standards and public health in port and freight corridor communities since 2010 when the first of 700 ISL G powered trucks entered service in the Ports. Trucks powered by the ISL G have been successfully reducing emissions in the Port since then. Of course there were lessons learned, and industry growth from the first deployment of the technology in heavy duty trucks. For example, the size of the 9 liter engine was challenged with heavier loads encountered in port drayage. In 2013, the ISX12 G heavy duty natural gas truck engine was introduced, which offers more power and a heavy duty design ideally suited to port truck operations. Over 8,000 of these 12 liter engines are in service with leading truck fleets in the United States. The next generation ISX12 G Near Zero will offer port operations heavy duty truck performance with the lowest possible emissions.

Service and support is another good example of how industry growth has occurred since the first deployment of natural gas trucks in the Ports. To support the operators of natural gas trucks, Cummins has expanded the dealer service network in the Los Angeles area by over 50%. Today over 98% of dealers have qualified natural gas service technicians on staff. Service and support is also available through the network of truck dealers and third party truck service providers. Local investment in natural gas engine parts stock has tripled since the first deployment of the technology, in addition to the parts stocked for the base engine components that are common to the Cummins diesel engines.



Cummins Westport natural gas engines are manufactured by Cummins at engine plants in North Carolina and New York. Cummins has no practical limit on the number of natural gas engines that can be manufactured. The engines are backed by a full Cummins factory warranty, and are supported locally in southern California by Cummins Pacific. Engines are shipped directly to truck and bus OEMs for factory installation, with ongoing support also available through the OEM dealer network. Every leading truck manufacturer produces trucks with CWI natural gas engines including Freightliner, Volvo, Kenworth, Peterbilt and Mack. These are the trucks that truckers are accustomed to buying.

In summary, Cummins Westport is fully committed to deploying and supporting Near Zero engines to help the Ports and California clean the air and meet air quality attainment requirements. Near Zero technology with 90% reductions in NOx emissions, powered by RNG, offers emissions and sustainability benefits today equivalent to electric battery trucks of the future. Near Zero technology is plug-and-play, leveraging off the existing network of fueling stations and service and support providers. Finally, Near Zero technology is delivered in trucks built by the same truck manufacturers that trucking companies use today.

We congratulate you on your efforts through the Clean Air Action Plan to achieve immediate and impactful results in our collective battle to reduce NOx emissions, combat climate change, and reduce our dependency on fossil fuels. We support the plan put forth by the California Natural Gas Vehicle Coalition to begin transitioning to Near Zero and Zero emissions technology in 2018 and complete the full transition by 2023.

We look forward to working with the Ports and other stakeholders to produce a Clean Air Action Plan that puts our communities first and creates a pathway to a sustainable future with clean air, jobs, and competitive ports.

Respectfully submitted,

Rob Neitzke

President – Cummins Westport Inc.

812-344-1323, rob.a.neitzke@cummins.com

Cummins Westport

The Natural Choice





February 16, 2017

Port of Long Beach

Port of Los Angeles

Attn: Heather Tomley

Attn: Chris Cannon

Email: caap@cleanairactionplan.org

We, as listed below, commend the San Pedro Bay ports for their efforts to greatly improve the air quality in the ports and along our region's highways through the Clean Air Action Plan (CAAP).

We strongly agree with goals of getting older, dirtier heavy-duty trucks off the road. At the same time, we believe the plan must do more in the near-term to accelerate turn-over to cleaner zero- and near-zero emissions trucks.

The urgency is very personal. As community leaders and business advocates in communities adjacent to the ports and along major transportation corridors emanating from the ports, we know only too well the health impacts that diesel trucks have on our constituents. Studies have clearly shown that residents in our communities have higher rates of asthma and face the region's highest cancer risk from air pollution.

Each year, asthma alone results in millions of missed school and work days, untold productivity losses, and healthcare costs in the hundreds of millions. And, all too often, disadvantaged communities, children and the elderly suffer most.

We simply cannot wait for 2035. Far too many lives are at stake.

Mayor Eric Garcetti established the Sustainable Freight Advisory Committee (SFAC) to review the CAAP and make recommendation. One of SFAC's strongest recommendations was to accelerate the transition to clean heavy-duty truck technologies that are available in the near-term. SFAC identifies several technologies that will be available in the next 1-3 years, some of which can be deployed now. We concur with this finding and believe that rapidly moving towards these technologies is imperative.

Incentives to facilitate the transition to cleaner technologies are pivotal to accelerated deployment. We urge the Ports to work with local, state and federal agencies to advocate for incentive funding to achieve a full transition to zero- and near-zero emissions trucks by 2023.

The Ports must take this opportunity to demonstrate leadership in supporting clean technologies that will allow the economic powerhouse that is the ports to thrive, while ensuring the health and well-being of our communities.

Thank you for your consideration.

Azusa Mayor Joe Rocha

Claremont Mayor Sam Pedroza

Pomona Mayor Tim Sandoval

Azusa USD School Board Member Yolanda
Rodriguez Pena

Duarte USD Board Member Ken Bell

San Gabriel Valley Economic Partnership
Director of Public Policy Brad Jensen

Duarte Chamber of Commerce Executive
Director Jim Kirchner

Greater Monterey Park Chamber of Commerce
Board Chairman David Barron

Greater Monterey Park Chamber of Commerce
Executive Director Dora Leung

David Barron, Publisher, West Valley Journal

Paul De La Cerda, External & Government
Relations & Corporate Partnerships,
Executive Director, East Los Angeles
College Foundation, Monterey Park



February 16, 2017

Port of Long Beach
Attn: Heather Tomley

Port of Los Angeles
Attn: Chris Cannon



caap@cleanairactionplan.org

Dear Heather,

I am writing this letter on behalf of the following:

City of Ontario, Mayor Paul Leon

City of Fontana, Mayor Acquanetta Warren

City of Colton, Richard DeLaRosa,

City of Upland, Mayor Pro Tem Gino Filippi

Inland Empire Chamber Legislative Alliance

Montclair Chamber of Commerce

Iddo Benzeevi, President Highland Fairview World Logistics Center

The Inland Empire's economy is closely tied to the Ports of Los Angeles and Long Beach. Proximity to major transportation routes and large tracts of affordable land have transformed San Bernardino and Riverside counties into an inland extension of the ports, serving as a warehousing and distribution hub for goods traveling by truck across California and the US.

In fact, approximately 40 percent of all goods from the ports flow through the Inland Empire. This number is expected to increase as the ports prepare for larger classes of container ships.

At the same time, freeways and major arterial streets that cross our communities expose our constituents to pollution from heavy-duty diesel trucks transporting goods from the ports inland. As a result, citizens of the Inland Empire are at greater risk of asthma, cancer and even premature death.

We need a solution to improve air quality and well-being for our constituents, while allowing for continued expansion of the logistics industry, which is vital to the Inland Empire's economy and to continued job growth.

Providing incentives to replace dirty diesel trucks with clean zero-and near-zero emissions trucks offers that solution. Clean truck technologies are available now that can improve air quality and public health. The ports don't have to wait. Rapidly deploying





8880 Benson Ave., Ste#110 Montclair, CA 91763

Phone: (909) 985-5104

Fax: (909) 985-8039

E-mail: info@montclairchamber.com

www.montclair-chamber.com

clean trucks will also allow the logistics industry to thrive by mitigating pollution that would otherwise exceed thresholds set by the South Coast Air Quality Management District, potentially crippling this key economic driver.

We, the undersigned, commend the San Pedro Bay Ports for recognizing in the Clean Air Action Plan the critical role incentives for clean truck purchases play in reducing harmful pollutants. We respectfully request, however, that the Ports consider accelerating the timeframe for deploying clean trucks to 2023, rather than 2035, so our communities can begin to realize the aforementioned health and economic benefits in the near-term.

City of Ontario, Mayor Paul Leon
City of Fontana, Mayor Acquanetta Warren
City of Colton, Richard DeLaRosa,
City of Upland, Mayor Pro Tem Gino Filippi
Inland Empire Chamber Legislative Alliance
Montclair Chamber of Commerce
Iddo Benzeevi, President Highland Fairview World Logistics Center

Sincerely,

City of Ontario, Mayor Paul Leon
City of Fontana, Mayor Acquanetta Warren
City of Colton, Richard DeLaRosa,
City of Upland, Mayor Pro Tem Gino Filippi
Inland Empire Chamber Legislative Alliance
Montclair Chamber of Commerce
Iddo Benzeevi, President Highland Fairview World Logistics Center
Myra Kirscht
President/CEO
Montclair Chamber of Commerce
8880 Benson Ave Suite #110
Montclair, CA 91763
(909) 985-5104



GREATER RIVERSIDE CHAMBERS OF COMMERCE

The Chamber...building a stronger local economy

February 17, 2017

Port of Long Beach
Attn: Heather Tomley

Port of Los Angeles
Attn: Chris Cannon

The Inland Southern California region maintains close economic ties with the Ports of Los Angeles and Long Beach. As a result, nearly 40 percent of the goods from these ports flow through the Inland Empire, which has become a transportation and logistics hub in recent years. While we understand the necessity to improve air quality across the region, it is equally important that the local transportation industry is given the appropriate time and guidance to comply with clean energy mandates.

Now, there is a significant opportunity for public-private entities to work together to meet timelines and reach clean energy goals while also ensuring that the transportation and energy providers are not subject to punitive fees and penalties. On behalf of the Greater Riverside Chambers of Commerce, I commend efforts to reduce harmful air pollutants for local residents by pursuing clean zero-and near-zero emissions trucks as well as efforts to protect transportation industries from arbitrary cost increases. Unnecessary or excessive mandates and fees will only compel industries to pass the costs for compliance on to the consumer.

Respectfully,

Cindy Roth
President/CEO

CR/as

cc: The Honorable Sabrina Cervantes, 60th Assembly District
The Honorable Jose Medina, 61st Assembly District



February 17, 2017

Port of Long Beach
Attn: Heather Tomley

Port of Los Angeles
Attn: Chris Cannon

caap@cleanairactionplan.org

The Inland Empire's economy is closely tied to the Ports of Los Angeles and Long Beach. Proximity to major transportation routes and large tracts of affordable land have transformed San Bernardino and Riverside counties into an inland extension of the ports, serving as a warehousing and distribution hub for goods traveling by truck across California and the US.

In fact, approximately 40 percent of all goods from the ports flow through the Inland Empire. This number is expected to increase as the ports prepare for larger classes of container ships.

At the same time, freeways and major arterial streets that cross our communities expose our constituents to pollution from heavy-duty diesel trucks transporting goods from the ports inland. As a result, citizens of the Inland Empire are at greater risk of asthma, cancer and even premature death.

We need a solution to improve air quality and well-being for our constituents, while allowing for continued expansion of the logistics industry, which is vital to the Inland Empire's economy and to continued job growth.

Providing incentives to replace dirty diesel trucks with clean zero-and near-zero emissions trucks offers that solution. Clean truck technologies are available now that can improve air quality and public health. The ports don't have to wait. Rapidly deploying clean trucks will also allow the logistics industry to thrive by mitigating pollution that would otherwise exceed thresholds set by the South Coast Air Quality Management District, potentially crippling this key economic driver.

We, the undersigned, commend the San Pedro Bay Ports for recognizing in the Clean Air Action Plan the critical role incentives for clean truck purchases play in reducing harmful pollutants. We respectfully request, however, that the Ports consider accelerating the timeframe for deploying clean trucks to 2023, rather than 2035, so our communities can begin to realize the aforementioned health and economic benefits in the near-term.

3200 Inland Empire Blvd. Suite 130
Ontario, CA 91764
909.984.2458
www.ontario.org

Sincerely,

Peggi Hazlett

CEO Ontario Chamber of Commerce

Inland Empire Chamber Legislative Alliance

Montclair Chamber, Ontario Chamber, Chino Chamber, Norco Chamber, Colton Chamber

City of Ontario, Mayor Paul Leon

City of Colton, Mayor Richard DeLaRosa

City of Fontana, Mayor Acquanetta Warren

City of Upland, Mayor Pro Tem Gino Filippi

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Ontario, CA 91764
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February 17, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Drive
Long Beach CA 90815

Subject: Comments on CAAP Discussion Draft

Dear Mr. Cannon and Ms. Tomley:

Thank you for the opportunity to provide input as you update the Clean Air Action Plan (CAAP). I had the opportunity to provide public comment at the February 16, 2017 Port of Los Angeles Board meeting. As I commented there, I have been involved for quite some time in evaluating emissions from port operations. My scientific interest is in quantifying real world emissions from sources. We have created a world class emissions testing capability at the University of California Riverside CE-CERT lab (see <http://www.cert.ucr.edu/research/efr/> for more information.)

CE-CERT has been studying the in-use emissions from heavy duty trucks to determine the actual emissions for a number of duty cycles that are commonly encountered in urban areas such as Southern California. These duty cycles complement the testing protocol that is used for emissions certification testing at EPA and California Resources Board (CARB). The objective is to quantify emissions in real world settings so that public policy decision makers can make informed decisions and engine manufacturers gain more information about the performance of their product.

CE-CERT has evaluated in-use heavy duty emissions from a broad range of diesel and natural gas engines ranging from pre-2010 emissions standard to the current optional low-NOx standards of CARB. The findings have been fascinating. I have enclosed a summary fact sheet and copies of reports that provide the details of the studies and findings. A key finding with diesel engines certified to the 2010 emission standard is that these engines emit higher NOx than certified levels in urban applications. These applications involve congested traffic and slower speed operations. The drayage application, which is of most interest to the Ports, exhibited emissions on average


that are 5 times greater than certified emissions. The enclosed report explains why the emissions control system is challenged in the drayage application. This is an important finding because emissions 5 times greater than the standard is approaching the emissions limit of a pre-2010 certified engine.

CE-CERT recently evaluated in-use emissions from a natural gas engine that is certified to the CARB optional low NOx standard of 0.02 g/bhp-hr. As I mentioned in my comments to the Board, this is the first technology tested where emissions actually decrease at lower speed duty cycles. In the port drayage application the emissions were found to be 0.002 g/bhp-hr, which is 90% below the optional low NOx standard. We had to develop specialized testing the accurately quantify emissions at this level. This is an example of the innovative work that we do at CE-CERT.

I applaud you for the work that you are doing to update the CAAP. I appreciate the difficult and complex task at hand, especially listening to public comment and the discussion by the commissioners. I hope that the emissions testing work that we do at CE-CERT helps you with the policy work that you do.

Thank you for this opportunity to provide comments and please feel free to contact me at (951) 781-5786 or kjohnson@cert.ucr.edu.

Sincerely,



Kent Johnson, Ph.D.
Bourns College of Engineering
UC Riverside CE-CERT

Enclosures:

In-Use Testing Fact Sheet
In-Use Testing of Diesel Engines Report
In-Use Testing of Near Zero Engine Report

**Coalition For A Safe Environment
California Kids IAQ
Community Dreams
Apostolic Faith Center
EMERGE
American Veterans (AMVETS)
Wilmington Improvement Network
San Pedro & Peninsula Homeowners Coalition
NAACP- San Pedro-Wilmington Branch # 1069
St. Philomena Social Justice Ministry**

February 17, 2017

Port of Los Angeles (POLA)
Los Angeles Harbor Department
Attn: Christopher Cannon
Director of Environmental Management
Environmental Management Division
425 S. Palos Verde St., San Pedro, CA 90733-0151
ccannon@portla.org
310-732-3675 Office
310-547-4643 Fax

Port of Long Beach
Attn: Heather Tomley
Director of Environmental Planning
4801 Airport Plaza Drive
Long Beach, CA 90815
heather.tomley@polb.com
562-283-7100

caap@cleanairactionplan.org

Re: CAAP 2017 Draft Discussion Document November 2016
Su: Submission of Public Comments

The Coalition For A Safe Environment et al co-signature organizations and individuals respectfully submit these Public Comments on behalf of our members, organization affiliations and the public regarding the CAAP 2017 Draft Discussion Document November 2016.

1. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include an Annual Implementation Plan, Measures, Emission Reductions Targets and a Timeline Schedule to comply with all mandatory state executive orders, legislation, rules, regulations, programs, goals, objectives and

measures applicable to the Ports and Goods Movement. At this time the Ports are in non-support of, non-advisement of or in non-compliance with all statutory requirements. To include but not limited to:

- a. CCR Section 93118.3 (12-2007) Airborne Toxic Control Measure for Auxiliary Diesel Engines Operated on Ocean-Going Vessels At-Berth in a California Port.
- b. Governor Executive Order S-3-05 (6-1-2005) that calls for a coordinated approach to address the detrimental air quality effects of GHGs.
- c. Governor Executive Order S-20-06 (10-17-2006) that requires State agencies to continue their cooperation to reduce GHG emissions and to have the Climate Action Team develop a plan to outline a number of actions to reduce GHG.
- d. Governor Executive Order S-13-08 (11-14-2008) that directs the Natural Resources Agency to develop the State's first Climate Adaptation Strategy (CAS) guide.
- e. Governor Executive Order B-16-12 (3-23-2012) sets a 2050 GHG emissions reduction goal for the transportation sector to achieve 80 percent less than 1990 levels.
- f. Governor Executive Order B-30-15 (4-29-2015) established a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050.
- g. Governor Executive Order B-32-15 (7-17-2015) works toward achieving GHG reduction targets with the California Sustainable Freight Action Plan, an integrated plan that establishes clear targets to improve freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system.
- h. AB 32 The California Global Warming Solutions Act of 2006: Air Pollution: Greenhouse Gases
 1. Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.
 2. Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry. It will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the state.

3. By exercising a global leadership role, California will also position its economy, technology centers, financial institutions, and businesses to benefit from national and international efforts to reduce emissions of greenhouse gases. More importantly, investing in the development of innovative and pioneering technologies will assist California in achieving the 2020 statewide limit on emissions of greenhouse gases established by this division and will provide an opportunity for the state to take a global economic and technological leadership role in reducing emissions of greenhouse gases.
4. It is the intent of the Legislature that the State Air Resources Board coordinate with state agencies, as well as consult with the environmental justice community, industry sectors, business groups, academic institutions, environmental organizations, and other stakeholders in implementing this division.

i. SB 32 The California Global Warming Solutions Act of 2006: Emissions Limit

1. The California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code) authorizes the State Air Resources Board to adopt regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions.
2. The California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code) requires the State Air Resources Board to reduce statewide emissions of greenhouse gases to at least the 1990 emissions level by 2020 and to maintain and continue reductions thereafter.
3. Continuing to reduce greenhouse gas emissions is critical for the protection of all areas of the state, but especially for the state's most disadvantaged communities, as those communities are affected first, and, most frequently, by the adverse impacts of climate change, including an increased frequency of extreme weather events, such as drought, heat, and flooding. The state's most disadvantaged communities also are disproportionately impacted by the deleterious effects of climate change on public health.
4. The State Air Resources Board shall achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature.

j. SB 375 The Sustainable Communities and Climate Protection Act of 2008

1. Each transportation planning agency designated under Section 29532 or 29532.1 shall prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall be action-oriented and pragmatic, considering both the short-term and long-term future, and shall present clear, concise policy guidance to local and state officials. The regional transportation plan shall consider factors

specified in Section 134 of Title 23 of the United States Code. Each transportation planning agency shall consider and incorporate, as appropriate, the transportation plans of cities, counties, districts, private organizations, and state and federal agencies.

2. A policy element that describes the transportation issues in the region, identifies and quantifies regional needs, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements. The objective and policy statements shall be consistent with the funding estimates of the financial element. The policy element of transportation planning agencies with populations that exceed 200,000 persons may quantify a set of indicators including, but not limited to, all of the following:

- Measures of mobility and traffic congestion, including, but not limited to, daily vehicle hours of delay per capita and vehicle miles traveled per capita.
- Measures of road and bridge maintenance and rehabilitation needs, including, but not limited to, roadway pavement and bridge conditions.
- Measures of means of travel, including, but not limited to, percentage share of all trips (work and nonwork).
- Measures of safety and security.
- A sustainable communities strategy prepared by each metropolitan planning organization.
- The greenhouse gas emission reduction targets may be expressed in gross tons, tons per capita, tons per household, or in any other metric deemed appropriate.

k. SB 350 Clean Energy and Pollution Reduction Act of 2015

1. To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources.
2. To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.
3. Widespread transportation electrification requires increased access for disadvantaged communities, low- and moderate-income communities, and other consumers of zero-emission and near-zero-emission vehicles.

l. AB 1482 Climate Adaptation (10-8-2015)

1. California's climate is changing, posing an escalated threat to public health, the environment, the economy, and public and private property in the state. The increasing frequency of extreme weather events, including floods and heat waves, fires, rising sea levels, and changes in hydrology, including diminishing snowpacks and more frequent droughts, among other climate change impacts, will affect every part of residents' lives in the next century and beyond. Planning appropriately for these impacts will help us be better prepared for the future.

2. The impacts of climate change, including longer droughts, extended floods, prolonged fire seasons with larger and more intense fires, heat waves, and sea level rise, are already creating challenges for public health and safety and causing destructive property damage.
3. Climate change poses a threat not just to the lives and health of residents but also to the state's economy and to the financial health of our local governments.
4. According to the Natural Resources Agency's report, "Safeguarding California: Reducing Climate Risk," state-of-the-art modeling shows that a single extreme winter storm in California could cost on the order of \$725,000,000,000, including total direct property losses of nearly \$400,000,000,000 and devastating impacts to residents, the economy, and natural resources.
5. Adapting to climate change, in addition to reducing the impacts of climate change on California's natural resources and infrastructure, is essential to protecting the state's environment and economy over time and will require coordination across all state departments and agencies.
6. Given the potential impacts and the long-term nature of effective planning, California needs to take action now.

m. SB 246 Climate Change Adaption (10-8-2015)

1. The state has been a leader in climate mitigation efforts to reduce greenhouse gas emissions. Now, and in the coming years, it is critical for California and the global community to continue and intensify those efforts in order to avoid the most severe impacts from a changing climate. However, because the global climate system changes slowly, impacts are ongoing and will inevitably worsen. In order to address the challenges posed by a changing climate, the state must invest in building resiliency and strengthening adaptation efforts at the state, regional, and local levels using the best-available science.
2. A principle of the state's adaptation strategy document, Safeguarding California, is to prioritize actions that not only reduce greenhouse gas emissions, but also help the state prepare for climate change impacts. Improved coordination, implementation, and integration of adaptation planning efforts and funding in the state's climate policies can directly protect the state's infrastructure, communities, environmental quality, public health, safety and security, natural resources, and economy from the unavoidable impacts of climate change for decades to come.
3. In order to have a cohesive and comprehensive response to climate change impacts, the state must have integrated planning with coordinated strategies across state, regional, and local governments and agencies.
4. The office is established as the comprehensive state planning agency that shall engage in the formulation, evaluation, and updating of long-range goals for factors that shape statewide development patterns and significantly influence the quality of the state's environment, in addition to assisting state, regional, and local agencies in a variety of research and planning efforts, pursuant to Section 65040 of the Government Code. Therefore, the office is well-positioned to work with regional and local entities across the state, coordinating with state climate adaptation strategies.
5. It is the intent of the Legislature, therefore, that adaptation strategies to build resiliency to the risks and impacts from climate change be integrated in state

policies, projects, and permitting processes, and that the office serve as a coordinating body for adaptation projects and goals across California.

n. SB 379 Land Use: General Plan: Safety Element (10-8-2015)

The safety element shall be reviewed and updated as necessary to address climate adaptation and resiliency strategies applicable to the city or county. Requires:

1. Requires local hazard mitigation plans to incorporate climate impacts by 2021; through coordination with an update to local jurisdictions' General Plan Safety Element (see OPR's 2016 edition of the General Plan Guidelines).
2. A vulnerability assessment that identifies the risks that climate change poses to the local jurisdiction and the geographic areas at risk from climate change impacts.
3. Information that may be available from federal, state, regional, and local agencies that will assist in developing the vulnerability assessment and the adaptation policies and strategies.
4. Information from local agencies on the types of assets, resources, and populations that will be sensitive to various climate change exposures.
5. Information from local agencies on their current ability to deal with the impacts of climate change.
6. Federal, state, regional, and local agencies with responsibility for the protection of public health and safety and the environment, including special districts and local offices of emergency services.
7. A set of adaptation and resilience goals, policies, and objectives.
8. A set of feasible implementation measures designed to carry out the goals, policies, and objectives
9. Feasible methods to avoid or minimize climate change impacts associated with new uses of land.

o. SB 115 Environmental Justice (October 6, 1999)

The California Environmental Protection Agency, in designing its mission for programs, policies, and standards, shall do all of the following:

1. Conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state.
2. Promote enforcement of all health and environmental statutes within its jurisdiction in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations in the state.
3. Ensure greater public participation in the agency's development, adoption, and implementation of environmental regulations and policies.
4. Improve research and data collection for programs within the agency relating to the health of, and environment of, people of all races, cultures, and income

levels, including minority populations and low-income populations of the state.

5. Identify differential patterns of consumption of natural resources among people of different socioeconomic classifications for programs within the agency.

p. SB 441 Transportation Planning. Promoting Health and Health Equity in MPO - RTPs (September 19, 2012)

1. Transportation planning has important implications for the maintenance and promotion of the health of all Californians.
2. California faces critical problems that will shape the future of our state and its population, including, but not limited to, an aging population, climate change, and increasing health inequities. California and the nation are experiencing unprecedented levels of chronic disease, that now accounts for over 75 percent of all deaths in California and 75 percent of health care expenditures in the United States. The health of California's population is largely determined by the social, physical, and economic environments where people live, work, and are active, as well as their opportunities and resources for health.

q. SB 391 California Transportation Plan (2009)

1. The bill requires the department to update the California Transportation Plan by December 31, 2015, and every 5 years thereafter. The bill would require the plan to address how the state will achieve maximum feasible emissions reductions in order to attain a statewide reduction of greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050. The bill would require the plan to identify the statewide integrated multimodal transportation system needed to achieve these results. The bill would require the department, by December 31, 2012, to submit to the California Transportation Commission and specified legislative committee chairs an interim report providing specified information regarding sustainable communities strategies and alternative planning strategies, including an assessment of how their implementation will influence the configuration of the statewide integrated multimodal transportation system. The bill would also specify certain subject areas to be considered in the plan for the movement of people and freight. The bill would require the department to consult with and coordinate its planning activities with specified entities and to provide an opportunity for public input.
2. The California Transportation Plan shall consider all of the following subject areas for the movement of people and freight:
 - Mobility and accessibility.
 - Integration and connectivity.
 - Efficient system management and operation.
 - Existing system preservation.
 - Safety and security.
 - Economic development, including productivity and efficiency.
 - Environmental protection and quality of life.

r. California Gov. Code § 11135 - Discrimination

No person in the State of California shall, on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, or sexual orientation, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state.

s. California Public Resources Code PRC 71110 - Environmental Justice

The California Environmental Protection Agency, in designing its mission for programs, policies, and standards, shall do all of the following:

1. Conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations of the state.
2. Promote enforcement of all health and environmental statutes within its jurisdiction in a manner that ensures the fair treatment of people of all races, cultures, and income levels, including minority populations and low-income populations in the state.
3. Ensure greater public participation in the agency's development, adoption, and implementation of environmental regulations and policies.
4. Improve research and data collection for programs within the agency relating to the health of, and environment of, people of all races, cultures, and income levels, including minority populations and low-income populations of the state.
5. Coordinate its efforts and share information with the United States Environmental Protection Agency.
6. Identify differential patterns of consumption of natural resources among people of different socioeconomic classifications for programs within the agency.
7. Consult with and review any information received from the Working Group on Environmental Justice established to assist the California Environmental Protection Agency in developing an agencywide strategy pursuant to Section 71113 that meets the requirements of this section.

t. California Gov. Code § 65040.12 - Planning and Land Use-Environmental Justice

Office of Planning and Research shall be the coordinating agency in state government for environmental justice programs. The General Plan Guidelines shall include guidelines for addressing environmental justice matters in city and county general plans. The guidelines developed by the office shall recommend provisions for general plans to do all of the following:

1. Propose methods for planning for the equitable distribution of new public facilities and services that increase and enhance community quality of life throughout the community, given the fiscal and legal constraints that restrict the siting of these facilities.
2. Propose methods for providing for the location, if any, of industrial facilities and uses that, even with the best available technology, will contain or produce material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety, in a manner that seeks to avoid over-concentrating these uses in proximity to schools or residential dwellings.

3. Propose methods for providing for the location of new schools and residential dwellings in a manner that seeks to avoid locating these uses in proximity to industrial facilities and uses that will contain or produce material that because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety.
 4. Propose methods for promoting more livable communities by expanding opportunities for transit-oriented development so that residents minimize traffic and pollution impacts from traveling for purposes of work, shopping, schools, and recreation.
 5. For the purposes of this section, “environmental justice” means the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.
- u. The South Coast Air Quality Management District is in Non-Attainment of Federal National Ambient Air Quality Standards (NAAQS). Note: Non-Attainment jeopardizes California eligibility for federal transportation funding.

- | | |
|-----------------------|------------------------------|
| 1. Criteria Pollutant | Ozone 1-Hours, Ozone 8-Hours |
| 2. Criteria Pollutant | PM 2.5 |

2. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include an Annual Implementation Plan, Measures, Emission Reductions Targets and a Timeline Schedule to comply with all mandatory federal executive orders, legislation, rules, regulations, programs, goals, objectives and measures applicable to the Ports and Goods Movement. At this time the Ports are in non-support of, non-advisement of or in non-compliance with all statutory requirements. To include but not limited to:

- a. Presidential Executive Order 12898 (February 11, 1994) Federal Actions to Address Environmental Justice In Minority Populations and Low-Income Populations

Requires that:

1. To the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.
2. Each federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under, such programs, policies, and activities, because of their race, color, or national origin.
3. It also requires federal executive agencies and the entities to which they extend financial support or project approval to “identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations.”

b. Title VI of the Civil Rights Act of 1964

Prohibition against exclusion from participation in, denial of benefits of, and discrimination under federally assisted programs on ground of race, color, or national origin

c. U.S. DOT Federal Transit Administration FTC EJ Circular 4703.1 - Environmental Justice Policy Guidance For Federal Transit Administration Recipients (August 15, 2012)

The purpose of this circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance in order to incorporate environmental justice principles into plans, projects, and activities that receive funding from FTA. There are three federally established guiding EJ principles:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.”

d. DOT Updated EJ Order 5610.2(a) (May 2, 2012)

Sets forth DOT policy to consider environmental justice principles in all DOT programs, policies and activities. It describes how the objectives of environmental justice will be integrated into planning and programming, rulemaking and policy formation. The Order sets forth steps to prevent disproportionately high and adverse effects to minority or low-income populations through Title VI analysis and environmental justice analysis conducted as part of Federal transportation planning and NEPA provisions. It also describes the specific measures to be taken to address instances of disproportionately high and adverse effects and sets forth relevant definitions.

e. Federal Disaster Mitigation Act of 2000 (Public Law 106-390)

The purpose of this title is to establish a national disaster hazard mitigation program to reduce the loss of life and property, human suffering, economic disruption, and disaster assistance costs resulting from natural disasters

3. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include Policies, Plan, Measures and a Timeline Schedule for supporting a No-Net Increase in emissions from any future new terminal project, existing terminal expansion project, port improvement project or terminal growth.
4. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include a revised new target to reduce GHGs from Port related sources to 80% below 1990 levels by 2050 to our proposed date of 2030. Zero Emission Electric Technologies, Near Zero Emission Technologies and Emission

Capture Technologies exit today for over 50% of all Port Greenhouse Gas Sources, can achieve 60% by the year 2020 and 75% by 2025.

5. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include a revised new target date of a phase-in of 100% Zero Emission Trucks by 2025 not 2035 as proposed.

There are currently three Zero Emission Class VIII On-Road Heavy Duty Drayage Truck manufacturers and three Port Off-Road Yard Truck Manufacturers currently commercially selling Zero Emission Trucks. There are three more Zero Emission Trucks Class VII Drayage Trucks currently in pilot project and demonstration projects which will be completed in 2017. There are currently three Near Zero Emission Class VIII and Class VII Drayage Truck Manufacturers currently selling trucks commercially.

Zero Emission and Near Zero Emission Drayage Trucks can be phased-in now for all short-haul runs of less than 50 miles.

As a point of information Drayage Trucks have a standard industry rated useful life of 10 years which easily allows a sooner turn-over than what is being discussed by the ports and disclosed to the Board of Harbor Commissioners.

Reference: CALSTART Report, "Key Performance Parameters for Drayage Trucks Operating at the Ports of Los Angeles and Long Beach." 11-15-2013

6. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include 100% Zero Emission Cargo Handling Equipment phase-in by 2025 not 2030 as proposed. There is currently Zero Emission and Near Zero Emission Cargo Handling Equipment commercially available in over 75% of all categories.
7. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include a Health Impact Assessment (HIA) with a Public Health Survey. The CAAP's 2010 San Pedro Bay-Wide Health Risk Assessment (HRA) has failed to provide any evidence of any significant reduction in public health impacts or public health improvement.
8. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include:
 - a. Detailed information such as an Annual Implementation Plan, Measures, Emission Reductions Targets and a Timeline Schedule on how the Ports will reduce residential cancer risk from Port-Related DPM emission by 85%.
 - b. Detailed information on port conducted or sponsored public health research and public health data on the types, categories and number of residents afflicted with cancer.

9. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include identification, quantification and mitigation of all off-port tidelands property negative air quality, public health, public safety and socio-economic impacts from the Port Harbor Line Train operations, Union Pacific Railroad and BNSF Railroad operations, intermodal, maintenance and repair facilities.
10. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include identification, quantification and mitigation of all off-port tidelands property negative air quality, public health, public safety and socio-economic impacts from Port supporting and auxiliary activities to Harbor EJ Communities to include but not limited to the following activities that were once located solely on port tidelands property:
 - a. Container Storage, Maintenance & Repair Yards
 - b. Chassis Storage, Maintenance & Repair Yards
 - c. TRU Storage, Maintenance & Repair Yards
 - d. Container Fumigation Facilities
 - e. Container Inspection Facilities
 - f. Truck, Container & Bulk Cargo Weigh Stations
11. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include identification, quantification and mitigation of all off-port tidelands property negative air quality, public health, public safety and socio-economic impacts from Port supporting and auxiliary activities to Harbor EJ Communities to include but not limited to the following activities:
 - a. Drayage Truck Sales, Storage, Maintenance & Repair Yards
 - b. Truck & Train Maintenance & Repair Facilities
 - c. Truck & Train Fueling Stations
 - d. Community Blight from Port Supporting & Auxiliary Facilities
 - e. Public Transportation Infrastructure Maintenance, Repair, Replacement & Expansion
 - f. Truck, Train & Facility Traffic Congestion & Wildlife Impacts
 - g. Truck, Train & Facility Noise & Vibration & Wildlife Impacts
 - h. Truck, Train & Facility Light Pollution & Wildlife Migration Impacts
 - i. Harbor Community & Transportation Corridor Community Heat Island Impacts
12. We request that the San Pedro Bay Clean Air Action Plan (CAAP) 2017 Draft Discussion Document and Final San Pedro Bay Clean Air Action Plan 2017 Update include a Container Tariff and Bulk Product Metric Ton Tariff sufficient to:
 - a. Fund the purchase of new Zero Emission, Near Zero Emission and Emission Capture & Treatment Technologies at the Ports to meet CAAP goals and to comply with all mandatory state and federal executive orders, legislation, rules, regulations, programs, goals, objectives and measures applicable to the Ports and Goods Movement.

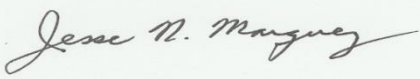
- b. Mitigate its annual and long term environmental, public health, public safety and socio-economic impacts.

CFASE et al organizations are non-profit community based public interest organizations actively involved in local, regional, state and federal legislation, rules, regulations, public policy, public programs, environmental, environmental justice, public health, public safety, family preservation, urban planning, community sustainability, public education, wildlife conservation, socio-economic justice, human rights and quality of life issues.

The Coalition For A Safe Environment is a non-profit Environmental Justice advocacy public policy organization involved in Ports, Goods Movement, Energy and Petroleum Industry issues.

The primary contact for these public comments and information is Jesse N. Marquez, Executive Director for the Coalition For A Safe Environment.

Respectfully Submitted,



Jesse N. Marquez
Executive Director

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February 20, 2017

Community Scholars Class, 2016
University of California, Los Angeles
Luskin School of Public Affairs
Department of Urban Planning
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2017 CAAP Update
caap@cleanairactionplan.org

RE: Public Comment on 2017 Clean Air Action Plan Discussion Document

On behalf of the UCLA Luskin Community Scholars Class of 2016, we respectfully submit the following comments on the 2017 Clean Air Action Plan Discussion Document. The 2016 Community Scholars Class was the capstone project for 14 graduate students in the Department of Urban Planning at UCLA and 6 staff of community and labor organizations in Los Angeles. The project won the national American Planning Association award for Best Applied Research Project.

The cohort collected and analyzed data on impacts of the San Pedro Bay Ports, focusing on workers in the supply chain, communities adjacent to logistics sites, and environmental impacts of transportation. Based on this research, our final report proposes a vision for an economy and a goods movement system that transitions away from extractive and exploitative consumption and towards social equity, sustainability, and community power. This comment letter applies our vision to the 2017 Clean Air Action Plan Discussion Document.

Overall, the Discussion Document is a step in the right direction, but should focus more on eliminating environmental impacts to workers and communities affected by Port operations and emissions. Communities in proximity to the Port have lower health outcomes than other communities in this region and the Port is the single largest source of pollution in the region. The Discussion Document needs to make the explicit distinction to reject environmental degradation to low-income neighborhoods and workplace exploitation to all, particularly the undocumented worker demographic.

- Improving public health and reducing both direct and indirect Port-related pollution in communities that face elevated levels of current emissions must be the primary goal. Public health must not be sacrificed for improved freight volume and efficiency.
- Under Strategy 1 (Clean Vehicles and Equipment Technology and Fuels) all Port-related pollution should be more immediately quelled. The Discussion Document confuses meeting 2006 emission targets with achieving safe and healthy air for everyone. Meeting old emission targets should not be the goal. We need to reduce pollution to ensure that our region's air is safe and healthy.

- Under Strategy 1, the development of the Clean Ships Program could provide numerous benefits. However, given past performance, a strong monitoring plan needs to be set in place to ensure compliance with the strictest environmental standards.
- Under Strategy 1, any update to the Clean Trucks Program needs to ensure that independent truck drivers are not unfairly burdened by any fees or requirements to purchase new trucks. Instead, the companies that unfairly classify truck drivers as independent owners and operators (IOOs) need to be held accountable for any raises in fees or requirements to purchase new trucks. The Ports should engage IOOs to develop an effective financial assistance program.
- Under Strategy 2 (Freight Infrastructure Planning and Investments), ensure that any expansion of on-dock rail does not lead to the creation of an 'inland port' where environmental burdens are shifted to other communities. Instead, any on-dock rail infrastructure at both the port side and inland side need to be 100% emissions free.
- Under Strategy 4 (Energy Resource Planning), as we transition to more electrification at the Ports, and of trucks that support the Ports, the source of the electricity is the next focus of our efforts to improve public health. As we see the potential unraveling of the federal Clean Power Plan, we need to ensure that our local plans take this into account. The Discussion Document correctly identifies the need to transition more electricity generation to local control to ensure that it is sustainable and emissions free.
 - The CAAP and other Port energy management plans should include a timeline of goals and metrics on how the ports will be powered solely on renewable energy.

Thank you for your consideration of our comments. If you have any questions or need any additional information, please feel free to contact us at sittigdylan@gmail.com.

Respectfully Submitted,

2016 UCLA Luskin Community Scholars Class



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February 17, 2017

Chris Cannon
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Heather Tomley
Port of Long Beach
4801 Airport Drive
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Subject: Comments on CAAP Discussion Draft

Dear Mr. Cannon and Ms. Tomley:

On behalf of Agility Fuel Solutions, I would like to commend the Ports of Los Angeles and Long Beach for your heavy-duty vehicle clean air initiative. Agility is a California-based manufacturer of natural gas fuel solutions for Class 5-8 trucks and we are excited to be part of the California Natural Gas Vehicle Coalition supporting the 2017 Clean Air Action Plan (CAAP).

The Ports of LA and Long Beach are pioneers in the transportation industry. The Clean Truck Program of 2006 resulted in the first factory-installed natural gas vehicles by Daimler Trucks North America. Since then, the medium and heavy-duty natural gas industry has evolved and grown. Engines are more powerful and reliable with significantly lower emission ratings. High-capacity fuel storage systems and expanded infrastructure have benefited long-haul routes with increased vehicle range. The increase in natural gas fleet vehicles has provided data that show a better total cost of ownership compared to diesel equivalents.

Agility is also a pioneer in the transportation industry. Customers trust our history, our technology, and our expertise. Our engineers take that trust seriously and have worked hard to develop safe, lightweight products that improve driver experience and reduce costs and downtime. Today's natural gas fuel solutions combined with near-zero engine technology and renewable natural gas will dramatically reduce dangerous nitrogen oxides, particulate matter, and greenhouse gases that damage the atmosphere in which we work and play.

California is a pioneer in the transportation industry. Its unique environmental conditions have driven research, product development, and infrastructure investment to create solutions that benefit the entire continent. Many

North American heavy-duty vehicle manufacturers now have factory installed or factory approved installation partners of natural gas engine options. North America will see capacity exceed 30,000 units per year by the end of 2017.

Agility believes the 2017 Clean Air Action Plan Update is a critical and vital next step to build on the legacy of the first Clean Truck plan. Our Low Emission Advanced Drayage (LEAD) truck plan can help with the achievement of these goals. We are committed to sustainability and support the coalition's three pillars: environment, economic investment and job creation, and port competitiveness. We look forward to our continued work with ports and the coalition for clean air and a healthy planet.



Kathleen Ligocki
CEO
Agility Fuel Solutions



William Nowicke
COO and President
Agility Fuel Solutions



Eric Bippus
SVP Sales and Marketing
Agility Fuel Solutions

Exemption for In Use Natural Gas Trucks

Time: Fri, 17 Feb 2017 20:45:34 +0000
From: Greg Roche <Greg.Roche@cleanenergyfuels.com>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org> , "Chris Cannon (cannon@portla.org)" <CCannon@portla.org> , "Heather Tomley (heather.tomley@polb.com)" <heather.tomley@polb.com>
CC: "Todd R. Campbell" <Todd.Campbell@cleanenergyfuels.com>
Subject: Exemption for In Use Natural Gas Trucks

Attachments: msg-11600-116.html (8k)
 TTSI - CAAP InUse NG Exemption Request.pdf (1M)
 Drivers - CAAP InUse NG Exemption Request.pdf (4M)
 AtlasMarine CAAP InUse NG Exemption Request.pdf (2M)
 CAAP_InUse_NG_Trucks_Letter-SCE.pdf (67k)
 Shippers Transport - CAAP InUse NG Exemption Request.pdf (54k)



Dear Heather and Chris,

At this week's meetings of your respective Commissioners, I commented on the situation with in-use natural gas trucks. Natural gas trucks are servicing the Ports because of the leadership of the original CAAP and resulting Clean Truck Plan. The Ports deserve credit, because of this leadership, the natural gas truck industry in this country was formed and has grown nationally since. Today there are heavy duty trucks running across the country with LNG and CNG. Trucks are operated by name brand fleets such as UPS, FEDEX, Kroger, and Frito Lay as well as by many other fleets that don't have this name recognition but are nevertheless successfully operating the technology. There are now coast-to-coast and border-to-border fueling stations so that natural gas trucks can service most parts of the country today on the infrastructure that has been built. Importantly, much of this market growth has been made possible by the release of the Cummins Westport 12 liter engine three years ago. The 12 liter engine resulted from the experience with the 9 liter engine at the ports and other locations where trucking companies liked the idea of running on natural gas but wanted a bigger block engine to provide the horsepower and torque needed for their applications. Today over 8,000 of the 12 liter engines are in operation. The 12 liter engine is available in trucks manufactured by Freightliner, Volvo, Kenworth, Peterbilt and Mack – the trucks that companies already buy. Nationwide service and support capabilities have grown as well since the beginnings at the port. Trained technicians and spare parts are now available through the Cummins service network, truck dealers, third party shops, Ryder and Penske. And of course, renewable fuel has entered the market, providing sustainability and GHG reduction benefits. This is tremendous progress in retrospect, and the Ports played a key role.

Now back to my comments. Under the discussion document for the Clean Air Action Plan (CAAP), it appears that natural gas trucks might be subjected to fees and banned by 2020 because the trucks are older than 10 years. I believe that this is an oversight and that there are compelling reasons that support exempting the natural gas trucks from these proposed measures.

First, most of the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, the natural gas trucks are using 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum fuel. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Finally, companies have invested in public and private fueling stations for natural gas trucks. Keeping this infrastructure operating is vital to enable future deployment of new near zero renewable natural gas trucks.

Companies and owner-operators stepped up and took a risk under the first Clean Truck Program to go with the natural gas trucks to support the Ports. While there were of course issues encountered as with any new technology, over 700 trucks are still operating today delivering freight. The Ports can send a clear signal of support for clean technologies by providing special consideration under the revised CAAP. Specifically, the Ports should exempt the natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB optional low NOx standard of 0.02 grams per brake horsepower hour. I have attached several support letters that agree with providing this exemption.

Thank you for your consideration of this important issue and we stand with you to make the San Pedro Bay Ports the leaders in sustainable trucking.

Greg Roche

VP Sustainable Trucking

Clean Energy

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Todd R. Campbell
Vice President Public Policy & Regulatory Affairs

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February 17, 2017



Ambassador Martinez &
Harbor Commissioners
Port of Los Angeles
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President Guzmán &
Harbor Commissioners
Port of Long Beach
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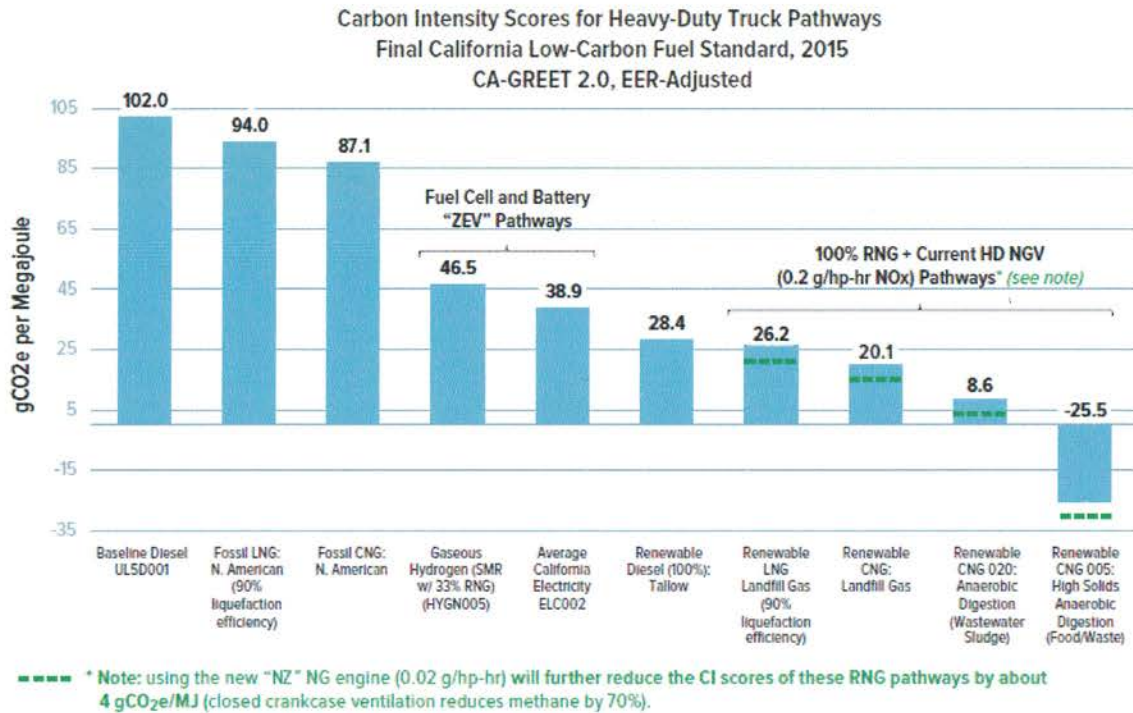
Re: The Clean Air Action Plan (CAAP) Discussion Draft

Dear Ambassador Martinez, President Guzmán, and Members of the San Pedro Bay Harbor Commissions:

Clean Energy would like to thank both Harbor Commissions and Ports of Los Angeles and Long Beach staff for investing in the communities for which the Ports collectively serve by producing a discussion draft of the Clean Air Action Plan 2017 (CAAP) released in November. Overall, this document attempts to create an open dialogue from which multiple stakeholders can provide comment, share ideas, and collectively arrive at consensus as to how the San Pedro Bay Port Complex can maintain its global competitiveness while, at the same time, measurably improve upon the region's air quality and climate to better the lives of impacted residential neighborhoods and workers alike.

Clean Energy, and our Industry for that matter, is very sensitive to the needs of the community, labor, private businesses, and the region. It is for this very reason that our industry strives to provide innovative solutions that are proven to work in near dock, local delivery and on-highway conditions while measurably protecting our impacted communities today with superior emissions performance. To get right to the point, we believe that the Cummins Westport "Near Zero" (NZE) engine line can deliver zero emissions equivalent, if not sub-zero emissions, performance for trucking fleets operating at the Ports and throughout the South Coast Air Basin upon a 2018 implementation of the final CAAP 3.0. When powered by organic waste-derived renewable natural gas (RNG), a NZE truck can reduce NOx more than 90% below 2010 diesels, eliminate 100% diesel particulate matter (PM), reduce regional PM emissions, and lower greenhouse (GHG) emissions by up to 80%. Furthermore, the NZE engine technology delivers zero emissions equivalent performance with a far more reasonable incremental cost over a

diesel tractor and RNG will provide tangible fuel savings and regulatory certainty for a truck driver or fleet.



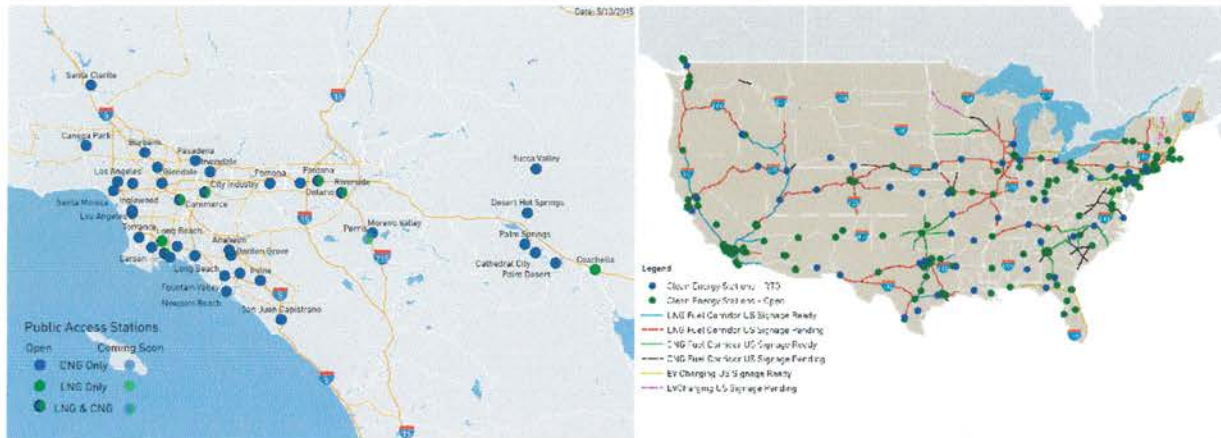
Source: California Air Resources Board, "LCFS Illustrative Fuel Pathway Carbon Intensity Determined using CA-GREET2.0," discussion presented by staff on 9/7/15 and/or CARB LCFS Final Regulation Order, Table 6; note that "H5AD" pathway is EER-adjusted by the CARB formula (-22.93 base CI divided by EER of .9), even though this improves its CI score.

Who Are We?

As the largest domestic distributor of natural gas fuel in North America with over 580 stations nationwide, Clean Energy is proudly fueling our partners' fleets, reducing our dependency on foreign oil, and providing solutions that make the American economy even stronger. Clean Energy has 19 stations in the southern California region that fuel CNG and LNG trucks, providing mobility and flexibility for port trucks and other trucking applications.

There are over 130,000 Natural Gas Vehicles (NGVs) on North America's roads today and more than 15.2 million worldwide. Clean, cost-efficient and abundant, natural gas is the smart choice for the transportation. And no one offers America's fleets more comprehensive natural gas fueling solutions than Clean Energy.

Finally, Clean Energy is also a leading producer of Redeem. Redeem is biomethane, a renewable natural gas, and America's first transportation fuel made entirely from organic waste. It is available for distribution as either compressed natural gas (CNG) or liquefied natural gas (LNG). Redeem is up to 80% cleaner than gasoline and diesel, cost-efficient, and domestically available, making it a smart choice for natural gas vehicle fleets including heavy-duty trucks. Port trucks have been fueling with 100% renewable fuel for the past three years.



Why More needs to be Done to reduce Air Pollution at the San Pedro Bay Ports

Our home, the South Coast Air Basin, is the most polluted region in the country. Not only do we collectively live in a designated non-attainment zone for ozone under the federal Clean Air Act, but our region is listed as an “extreme non-attainment” zone for smog-forming oxides of nitrogen (NOx): a designation only shared by the San Joaquin Valley. To emphasize the urgency of the situation, the Final Air Quality Management Plan (AQMP) that is expected to be formally adopted by the South Coast Air Quality Management District’s Governing Board next month states that approximately 522 tons per day (tpd) of total Basin NOx emissions must be reduced to approximately 141 tpd by 2023 and 96 tpd by 2031 to attain the 8-hour ozone standards. In other words, the region needs to reduce NOx emissions by 308 tpd or 112,420 tons per year within the next six years to avoid a Federal Implementation Plan that could restrict federal dollars, apply more stringent regulations, and slow construction permits throughout the region. It should also be noted that 88% of the NOx sources in the South Coast are originated from mobile sources.

To make matters worse, the most recent Multiple Air Toxics Exposure Study – IV (MATES IV) identifies diesel PM to make up 68.2% of the current air toxics risk throughout the South Coast Air Basin and the average population weighted cancer risk for the region is 367 per million. When the study begins to focus on air toxic hot spots, it finds the cancer risk in the port area to be 1,415 per million. Keep in mind that the US Environmental Protection Agency’s (EPA) standard for acceptable cancer risk is 1 per million. Finally, the actual measurements and modeling used for MATES IV spanned from July 1, 2012, to June 30, 2013, and for simplicity, the MATES IV modeling utilized the 2012 emissions inventory. In other words, this analysis should have captured many of the improvements made by the initial CAAP 1.0 and demonstrates, despite the tremendous gains that have been made to date, more needs to be done to reduce harmful air emissions from ships, locomotives, on- and off-road heavy-duty trucks that operate at our ports.

Figure ES-1 Map of MATES IV Monitoring Sites

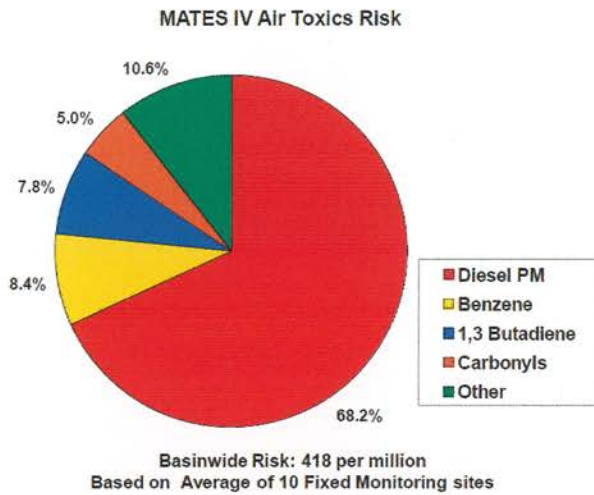


Figure ES-2 Average Risk from Monitoring Sites ES-6

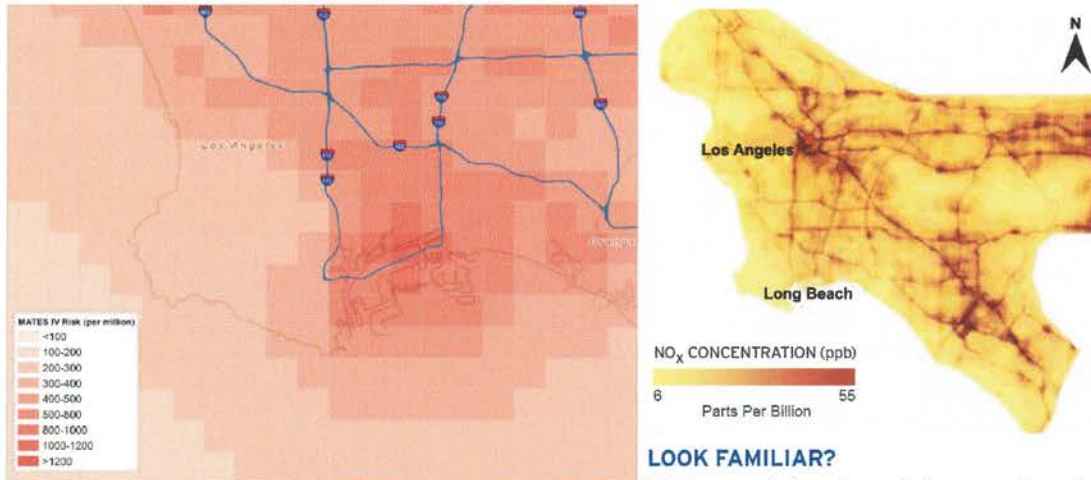
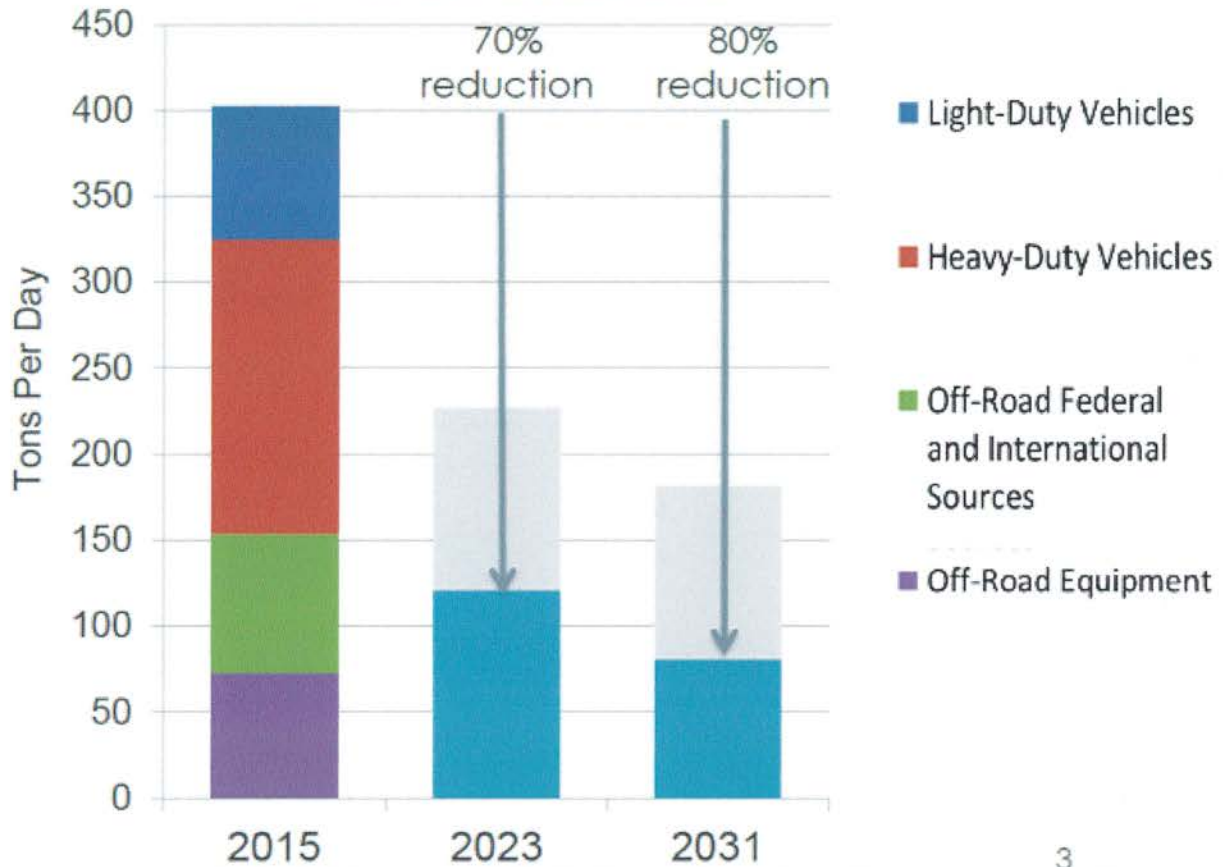


Figure 4-10
2012 Ports Area MATES IV Simulated Air Toxic Cancer Risk

LOOK FAMILIAR?
Pollution concentrations mirror major freeway corridors and disadvantaged communities nearby are suffering most from living with severe air pollution.

Finally, it should be noted that out of all the leading sources of NO_x throughout the South Coast Air Basin, heavy-duty diesel trucks are the number one source according to the South Coast Air Quality Management District (AQMD). In fact, if the South Coast Air Basin's is to achieve its 2023 federal ozone attainment goals it must put 272,000 near zero trucks meeting a 0.02 gram optional low-NO_x value or better on our roads over the next 6 years. While this could be challenging given the fact that the California Air Resources Board (ARB) does not have plans to officially adopt its proposed optional low NO_x standards as required NO_x standards for heavy-duty trucks until 2023, this does present an opportunity for the San Pedro Bay Ports to capitalize on numerous funding sources during this period of time to help buy down the costs of NZE and ZE trucks. Meanwhile, during the February 3rd AQMD Governing Board hearing, Supervisor Sheila Kuehl submitted a total of five amendments, two of which specifically address commercial marine ports and warehouse distribution centers, that would require indirect source rules to address the public's concern over heavy- and medium duty truck pollution in the South Coast. It is Clean Energy's belief that a strong CAAP that embraces NZE or cleaner trucks will be welcomed by the AQMD and would render these proposed amendments unnecessary.

South Coast Mobile Source NOx Emissions



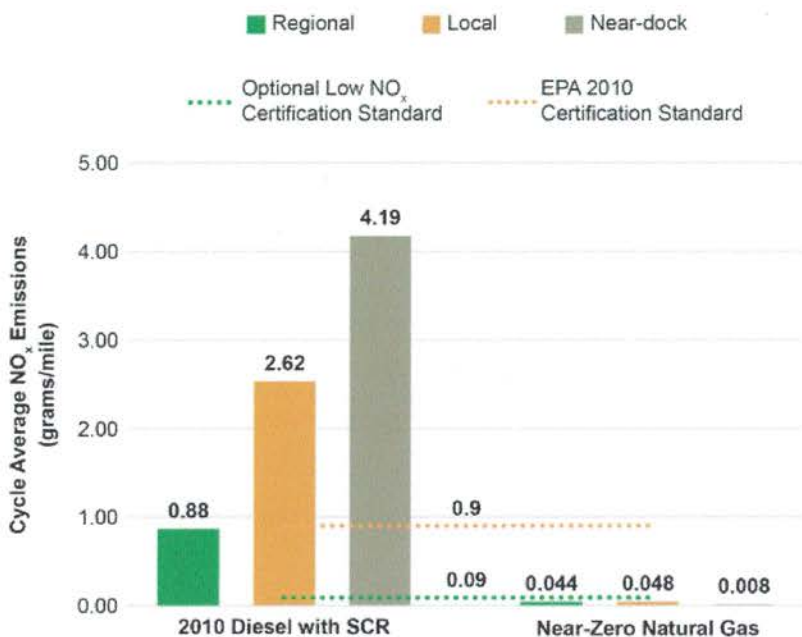
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Recent Studies demonstrate that Diesel is a failed technology for drayage and local delivery operations

Given our daunting regional air quality challenges, it is very clear that the Ports and the region's heavy-duty trucking fleets need to look beyond diesel technology and focus more on advanced technologies that can meet near zero, if not zero, emissions levels now. Indeed, several cities such as Paris, Madrid, and Mexico City have announced plans to eliminate diesel from their cities because of the air pollution and health impacts of diesel. This need to move beyond diesel becomes even clearer when one reviews the recent studies performed by UC Riverside and the ARB. According to UC Riverside, diesel in-use emissions are greatly impacted by the operational mode of the vehicle. Specifically, UC Riverside found that diesel emissions were five times higher than the 2010 certification standard set at 0.2 grams NOx when diesel engines operated in "near-dock" and "local delivery conditions. The ARB found these levels to be as high as nine times the certification standard.

Comparing NO_x Emissions in Port Truck Operations

EPA 2010 Diesel vs Near-Zero Natural Gas



- A recent study by UC Riverside suggests that 2010 or newer diesel trucks operating within 10 miles of the ports emit **five times more NO_x** than the US EPA and ARB 2010 certification standards allow.

- The same study shows that the emissions from the ISL G "zero emission equivalent" engine outperformed the 0.02g optional low NO_x standard for all test cycles.

It is interesting to note that when UC Riverside applied the same test to NZE engines powered by natural gas, these engines actually outperformed the optional-low NO_x standard at 0.02 grams by another 90+%. In other words, NZE engines were emitting NO_x emissions closer to 0.001 to 0.002 gram levels. Keep in mind that with the current electrical grid mix, the AQMD believes the NO_x equivalent of an electrical truck or bus would be around 0.024 grams NO_x. UC Riverside's in-use tests of NZE engines show that not only are 90% cleaner than their electric counterparts on a lifecycle emissions basis, but they are up to 99% cleaner than their diesel counterparts that are failing to meeting the 2010 certification. Given these results, either diesel technology needs to figure out how to significantly and comprehensively clean up its NO_x emissions yesterday or state and local officials managing our air quality must move away from these failed strategies and embrace clean advanced NZE and ZE technologies.

Port should focus on One Truck Transition: Near Zero or Cleaner by 2023

While we can appreciate the San Pedro Bay Ports' desire to focus on eliminating pre-2010 heavy-duty trucks over the next 3 years or by 2020, Clean Energy would encourage both Ports to prioritize their focus on eliminating all 2010 MY or older trucks by establishing a NZE or cleaner truck requirement at the San Pedro Bay Port facilities by 2023. The policy does not advocate for a single technology, but sets a standard for all cost-effective and commercially viable clean technologies to compete in the market. By doing so, the following advantages should occur:

- Truck drivers or fleet operators would not be forced to buy a cleaner truck to replace their pre-2010 MY truck for another six years nor would they be forced to purchase a 2010 MY diesel truck that would likely be targeted in future years for removal based on recent in-use testing showing that 2010 compliant diesel-powered trucks emit 5-9 times above their certification values;
- Multiple state and local funding programs will provide incentive dollars to help truck drivers and fleet operators purchase advanced clean trucks that meet a NZE or cleaner standard over the next six years;
- Regional stakeholders of the AQMD’s Air Quality Management Plan, Council of Governments, etc., could form a powerful coalition to support more funding of advanced clean trucks that meet a NZE or cleaner standard over the next six years (see Assembly Member Eduardo Garcia’s AB 1073 that just went into print on February 17, 2017: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB1073);
- Based on modeling runs performed by the California Natural Gas Vehicle Coalition, truck drivers and fleet owners would not have to make multiple purchases of trucks to meet the region’s increasing need for cleaner vehicles as a NZE or cleaner standard results in near zero emissions levels. This will result in greater health benefits at lower cost to all involved;
- The AQMD would no longer need to pursue an indirect source rule for commercial marine terminals or warehouse distribution centers as requiring that all trucks meet a NZE or cleaner standard by 2023 would essentially achieve what the spirit of such rules.
- Setting a strong standard now that will go into effect in six years will send a strong message to original equipment manufacturers that there is marked demand for advanced clean trucks that meet NZE or cleaner standards, thereby generating competition.

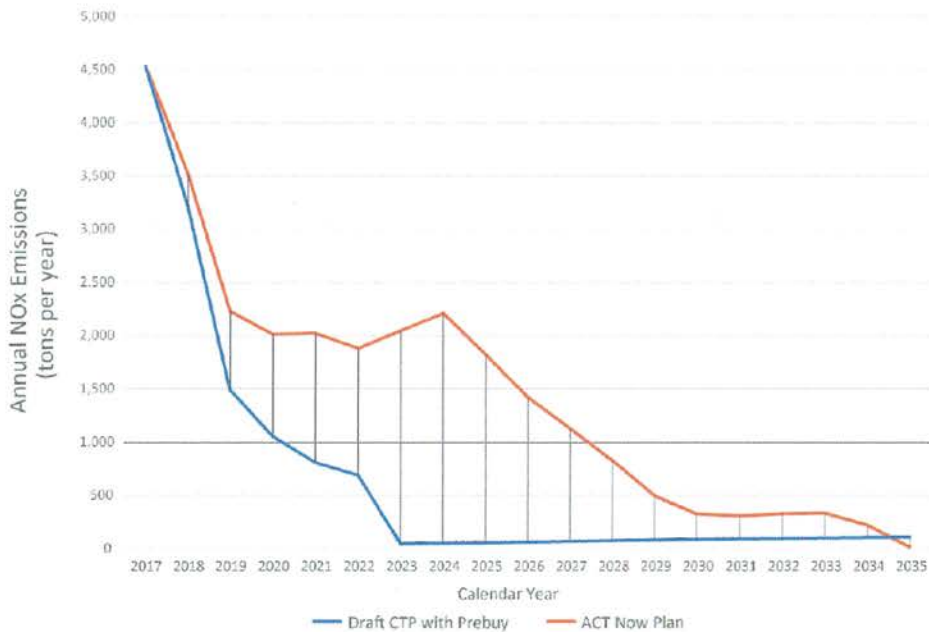


Figure 5: NOx Emissions Benefits under the ACT Now Plan

The Consideration of Truck Fees or Phase Out

Whatever the Ports' decide on the issue of truck fees or 10 year phase out of trucks, we would request that the Port consider a special exemption for those truck owners and fleet operators that purchased advanced clean trucks that met or exceeded the EPA and ARB 2010 Heavy Duty Standards under the CAAP 1.0. In many ways, these fleet owners and operators demonstrated much needed leadership to drive advanced clean truck technologies at the Ports and it is within both Ports' best interest to demonstrate a certain level of acknowledgment of this fact for these drivers and other fleets took the first step. Further, many of the natural gas trucks that met the 2010 EPA and ARB standards in 2007 now operate on RNG fuel, reducing their GHG emissions by up to 80% today. Further, these first generation advanced clean trucks also help support the RNG fueling infrastructure that will be needed to supply future NZE trucks under the CAAP 3.0. It is for all of these reasons that we would ask that these vehicles receive a special exemption from fees or a phase out until 2023. Showing these fleets that the Ports still values their leadership will go a long way for the next transition to NZE and ZE technologies.

Concluding Remarks

There is no question that the San Pedro Bay Ports have demonstrate regional leadership in air quality improvement with its adoption of the CAAP 1.0. However, it is abundantly clear that the Ports must do more to significantly reduce harmful emissions to protect both the community and its working populations on the docks. Looming federal ozone attainment deadlines and multiple studies exposing diesel engine strategies to be highly polluting reinforce this need to act now and not wait until 2035 to seek zero emission strategies. We have reviewed the ACT Now Plan submitted by the California Natural Gas Vehicle Coalition and we believe it outlines a comprehensive, well thought out, economically sensitive and thoughtful approach to reach our zero emission equivalent goals in a matter of six years. Establishing this goal six years out also allows for ample time for a Southern California coalition of stakeholders to seek the incentive dollars needed to make the transition to a NZE or cleaner fleet a reality. Further, avoiding an AQMD indirect source rule is in everyone's best interest. Clean Energy believes that with a strong CAAP that accelerates the adoption of the Ports' truck fleets to NZE levels by 2023, such considerations will become unnecessary.

Clean Energy would like to thank the Port of Los Angeles and Port of Long Beach Harbor Commissions and Staff for this opportunity to comment and share our views. As your long-standing partners in cleaning up the air throughout the San Pedro Bay and South Coast Air Basin, we look forward to the next draft of the CAAP 3.0.

Most sincerely,

A handwritten signature in black ink, appearing to read 'Todd R. Campbell', with a stylized, cursive script.

Todd R. Campbell

Petition to Exempt In-Use Natural Gas Trucks from CAAP Fees and Bans

I operate a natural gas port truck. I request the Ports to exempt in-use natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB low NOx standard of 0.02 grams per brake horsepower hour for these reasons:

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, natural gas trucks use 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Petición para Exonerar Camiones de Gas Natural en Uso de Tarifas y Prohibiciones de CAAP

Opero un camión de gas natural. Solicito a Los Puertos que eximan a los camiones de gas natural de las tarifas y prohibiciones hasta el momento en que Los Puertos requieran que todos los camiones cumplan con el estándar CARB bajo NOx de 0.02 gramos por hora de potencia de freno por estas razones:

En primer Lugar, los motores de camiones de gas natural están certificados según el estándar de emisiones de 2010 EPA, no el estándar de emisiones de la EPA de 2007. El objetivo del borrador de la CAAP es eliminar los camiones que no cumplen con el estándar de la EPA de 2010. Los camiones de gas natural ya alcanzan el estándar de 2010, y no deberían ser tratados como camiones estándar de la EPA de 2007.

En Segundo lugar, los camiones de gas natural pueden ser sustituidos con camiones diésel. Si es así, esto es un paso atrás. El primer Programa de Camiones Limpios busco fomentar la competencia en el mercado de camiones con combustibles alternativos y tecnologías limpias y camiones de gas natural en los puestos ahora operan con gas natural 100% renovable, eliminado nuestra dependencia de petróleo extranjero y reduciendo la huella de carbono. No es el momento de abandonar las tecnologías limpias que se necesitan para limpiar el aire, mejorar la independencia energética y fomentar el desarrollo económico regional y la competitividad del Puerto.

En tercer lugar, los camiones de gas natural utilizan gas natural 100% renovable que proporciona reducciones de gases de efecto invernadero del 40% al 70% y más, y 100% de desplazamiento de petróleo. Reduciendo las emisiones de gases de efecto invernadero y el consumo de petróleo mientras se incrementa el uso de combustible renovable son políticas y prioridades importantes de California. El proyecto de discusión de CAAP está estableciendo objetivos para las reducciones de gases de efecto invernadero y el mantenimiento de estos camiones en funcionamiento debería ser una prioridad.

Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
4/7/17 Muelin	Muelin	2249 ^{LB} California Ave	523-7122	Atlas Marin
Edith Gallegos	Edith Gallegos	6729 Curtis Ave Long Beach CA 90805	562-303-4004	GFS
Victor Garcia	Victor Garcia	Carson 2019 Dominguez	310 609-2002	Coach West.T.
Evelyn Garcia	Evelyn Garcia	Long Beach, CA		CALCO
Socorro	Socorro	4600 E 54th Pl Midwood	323 516 2030	CAIKO
William Diaz	William Diaz	720 E Watson Center Carson	323 816 0206	CAIKO
Juan Polanco	Juan Polanco	27905 Oberlin Dr. Whittier Valley Ct	951-212-3591	Southern Counties Express
Edgar Sandoval	Edgar Sandoval	5267 S DELONGPRE AVE LA CA 90027	323 218-5466	HARBOR EXP.
Hector Garcia	HECTOR GARCIA	RIVERSIDE, CA 92503		DDR

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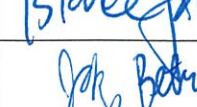
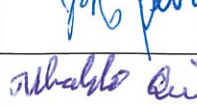
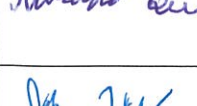
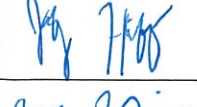
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Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	Anthony Diaz		(310) 548-1128	Atlas Marine
	FRANCISCO CABALLERO	6023 QUINN ST Bell GARDENS CA	(310) 7038823	Southern Counties Ex
	RYAN	2402 NO WALK AVE	310 330 5006	Lincoln
	ALBERT GOMEZ	LONG BEACH CA	310-873-4001	ATLAS MARINE
	BRUCE JACKSON	1331 Fynewoz wilmington	274-264-2460	OKinson Lg
	JAKE BELTRAN	Bell GARDENS, CA	(424) 882 4341	CSC
	UBALDO QUINTANA	1501 HARNESI	300 5188901	TTI
	JAKE HUFF	6725 W. 9th St.	310 628-8421	Rincon
	ANA MEJIA	wilmington, CA	(424) 514 6314	CalKO Trans.

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Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	Will DIAZ	CARSON, CA	(310) 481-5933	KPR
	Carmen Sanchez	412 S. Dstreet Wilmington, CA 90744	(310) 548-2122	ALKO,
	Alex Sancedo	8321 1st Ave LONG BEACH CA	424-512-8443	G.F.S DR.
MELVIN R.	MELVIN REYES	119 W ROSE ST		CSC
	EDDIE DIAZ	841 W Market Street CA	(424) 548-2214	CSC
	Rosie Sanchez		(310) 514-3378	G.F.S
	Amiguel Farciert	24 S. Claire St Whittier, CA,	(321) 738-0521	interstate
	JIMMY CABRAL		(424) 838-2225	Atlas Marine

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10 years for order

Petición para Exonerar Camiones de Gas Natural en Uso de Tarifas y Prohibiciones de CAAP

Opero un camión de gas natural. Solicito a Los Puertos que eximan a los camiones de gas natural de las tarifas y prohibiciones hasta el momento en que Los Puertos requieran que todos los camiones cumplan con el estándar CARB bajo NOx de 0.02 gramos por hora de potencia de freno por estas razones:

En primer Lugar, los motores de camiones de gas natural están certificados según el estándar de emisiones de 2010 EPA, no el estándar de emisiones de la EPA de 2007. El objetivo del borrador de la CAAP es eliminar los camiones que no cumplen con el estándar de la EPA de 2010. Los camiones de gas natural ya alcanzan el estándar de 2010, y no deberían ser tratados como camiones estándar de la EPA de 2007.

En Segundo lugar, los camiones de gas natural pueden ser sustituidos con camiones diésel. Si es así, esto es un paso atrás. El primer Programa de Camiones Limpios busco fomentar la competencia en el mercado de camiones con combustibles alternativos y tecnologías limpias y camiones de gas natural en los puestos ahora operan con gas natural 100% renovable, eliminado nuestra dependencia de petróleo extranjero y reduciendo la huella de carbono. No es el momento de abandonar las tecnologías limpias que se necesitan para limpiar el aire, mejorar la independencia energética y fomentar el desarrollo económico regional y la competitividad del Puerto.

En tercer lugar, los camiones de gas natural utilizan gas natural 100% renovable que proporciona reducciones de gases de efecto invernadero del 40% al 70% y más, y 100% de desplazamiento de petróleo. Reduciendo las emisiones de gases de efecto invernadero y el consumo de petróleo mientras se incrementa el uso de combustible renovable son políticas y prioridades importantes de California. El proyecto de discusión de CAAP está estableciendo objetivos para las reducciones de gases de efecto invernadero y el mantenimiento de estos camiones en funcionamiento debería ser una prioridad.

Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	Mary Garcia	2220 Chestnut Ave Long Beach CA 90806	424-7446650	WD.
	Eduardo Maldonado	210 E. 111th St Los Angeles CA	323) 590-6785	C-FRT
	Cecilia Diaz	641 W 82 St LA CA CA	323 331-4811	CAKHO
	PEDRO MELENDEZ	2754 E TYLER CARSON 90810	310.947-6837	KJR
	JOSE MENJIVAR	1013 SALT LAKE ST	562-219-4858	DDR TRASPOT
	Nelson Beltran	8942 Madison South Gate 90280		K & R Transp
	JOE M. GARCIA	6201 7th 62 Los Angeles	(323) 321-2345	CAKHO/Transport
	XADCO	1812 CANAL HILL L.A. 90810	(452) 2409366	le
	Milton Mojik	12585 Sunbird Ln Victorville	(818) 4646207	Rincon

Petition to Exempt In-Use Natural Gas Trucks from CAAP Fees and Bans

I operate a natural gas port truck. I request the Ports to exempt in-use natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB low NOx standard of 0.02 grams per brake horsepower hour for these reasons:

First, the natural gas truck engines are certified to the 2010 EPA emission standard, not the 2007 EPA emission standard. The CAAP discussion draft objective is to phase out trucks that do not comply with the 2010 EPA standard. Since the natural gas trucks already achieve the 2010 standard, they should not be treated as 2007 EPA standard trucks.

Second, natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

Third, natural gas trucks use 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more, and 100% displacement of petroleum. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

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Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
Juan B	Juan Barrera	Compton 12080 Santa Fe	310 901 2160	GET
Anibal M	ANIBAL MARROQUI	6 1/2 LOS ANGELES	213 915 1170	C-B-C-EXPR 163 PUESA
antonio S	ANTONIO S	KIP	323 987 6087	MONTEREY
Ryoda	Ronny ODOM	1327 W 228th ST	424 233 9707	CSC
Sergio Urzua	Sergio Urzua	972 calxico st		BVL
Sal Hernandez	Sal Hernandez	221 W. ROBERTS AVE 19 HABRA (A 9003)	(562) 489-9032	CAIKO
Jose Rivero	JOSE RIVERO	L2 puerto 628 PERLA RD	626 786 174	ATTAS MARIN
Pablo Aguirre	PABLO AGUIRRE	11894 HESPELS	562 316 3450	CAIKO TR
Ricardo A	Ricardo A	1959 GALE AVE		DR

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Signature Firma	Name Nombre	Address Dirección	Phone Teléfono	Drayage Company Compañía de Drayage
	THOMAS LEONARD	4067 HARDWICK ST HAWKWOOD, CA 90712	(310)901-3455	OKUSANO LOGISTICS INC.
	Tony L. Castillo	1352 Molino Ave Apt 201 L.B. CA 90804	(323)228-0353	Caliko
	Adam Gomez	4835 Warren St Riverside CA 92503	714 858 2055	DDR
	ERNESTO LIRA	11018 CLARE ST Whittier, CA 90601		INTERSTATE
	Jorge Gonzalez	6514 Purdy Ave Bell Garden CA	323 282 9962	SOUTHERN COUNTIES
	JESUS	14807 PARKWAY Pomona	727 437-33-04	CCX
	SERGIO ANELIANO	1520 Cota Ave Long Beach CA		Atlas Marine
	MIGUEL	SOUTH CENTE	562 7604125	FAS
	RAUL RODRIGUEZ	12301 AMBERHILL MORENO VALLEY CA	951 2518556	PACHECO ST



1150 E. Sepulveda Blvd. • Carson, CA 90745

TEL (562) 424-5525 FAX (562) 424-5934

February 17, 2017

Port of Los Angeles Board of Harbor Commissioners
Port of Long Beach Board of Harbor Commissioners
Submitted to: caap@cleanairactionplan.org

Subject: CAAP Exemption Request for In-Use Natural Gas Trucks

Dear Honorable Harbor Commissioners:

My trucking company has 11 of HPDI LNG trucks in our operation providing port drayage service. These natural gas trucks are an important part of our business. Our customers appreciate having alternative fueled trucks that reduce emissions of greenhouse gasses and other pollutants in their supply chain as part of their sustainability efforts. Under the discussion document for the Clean Air Action Plan (CAAP), it appears that these natural gas trucks will soon be subjected to fees and banned by 2020 because the trucks are older than 10 years. I believe that there are compelling reasons that support exempting the natural gas trucks from these proposed measures.

The natural gas trucks may be replaced with diesel trucks. If so, this is a step backward. The first Clean Truck Program sought to foster competition in the trucking market with alternative fuels and clean technologies and natural gas trucks at the Ports now operate on 100% renewable natural gas, eliminating our dependence on foreign oil while reducing the truck's carbon footprint. This is no time to abandon clean technologies that are needed to clean the air, improve energy independence, and foster regional economic development and port competitiveness.

The natural gas trucks are using 100% renewable natural gas that provides greenhouse gas reductions of 40% to 70% or more. Reducing greenhouse gas emissions and petroleum consumption while increasing use of renewable fuel are important California policies and priorities. The CAAP discussion draft is setting targets for greenhouse gas reductions and keeping these trucks operating should be a top priority.

Finally, companies have invested in public and private fueling stations for natural gas trucks. Keeping this infrastructure operating is vital to enable future deployment of new near zero renewable natural gas trucks.

Companies and owner-operators stepped up and took a risk under the first Clean Truck Program to go with the natural gas trucks to support the Ports. While there were of course issues encountered as with any new technology, the trucks are still operating today delivering freight. The Ports can send a clear signal of support for clean technologies by providing special consideration under the revised CAAP. Specifically, the Ports should exempt the natural gas trucks from fees and bans until such time as the Ports require all trucks to meet the CARB optional low NOx standard of 0.02 grams per brake horsepower hour. Thank you for your consideration of this important issue and we stand with you to make the San Pedro Bay Ports the leaders in sustainable trucking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Juan C. Alvarez', with a long horizontal stroke extending to the right.

Juan C. Alvarez
Safety Director
562-424-5525
Juan.alvarez@shiperstransport.com



February 17, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Dear Mr. Cannon and Ms. Tomley:

The Coalition for Renewable Natural Gas (RNG Coalition) thanks the Ports of Los Angeles and Long Beach for your efforts to update the Clean Air Action Plan (CAAP). We commend your ongoing leadership in pursuit of improving California's air quality by transitioning your fleets from diesel to cleaner burning domestic fuels.

Who We Are

The RNG Coalition shares your goal of cleaner air for all residents. We are a national non-profit industry association based in California that represents members from the entire value chain of renewable natural gas (RNG) production and distribution in North America. The RNG Coalition advocates for increased development, deployment, and utilization of RNG so that present and future generations will have access to this domestic, renewable, clean fuel and energy supply. Together, RNG Coalition member companies produce over 90% of the cellulosic biofuel generated annually under the Federal Renewable Fuel Standard (RFS), including 98% of the RNG transportation fuel registered under the program in 2015.

RNG Transportation Fuel Supply Is and Will Be Available

As the port authority considers how to best meet its fleet goals of powering vehicles with ultra-clean burning fuel in a cost effective manner, it has come to our attention that some stakeholders may believe that there will not be adequate supply of RNG transportation fuel available in the near future to fuel the port authority's fleets.

To the contrary, the RNG industry is ready and able to supply the port authority's needs. The RNG Coalition would like to take this opportunity to present primary source information on RNG production and the continued growth in domestic RNG supply that will occur. This information is derived from data communicated to RNG Coalition staff directly by Executives of the companies that produce our country's RNG supply. The data represent what these companies are planning to

produce in 2017 and in future years. Together, this data comprise the best information available on the upcoming production of RNG transportation fuel. RNG Coalition staff updates the data multiple times each year. This data is regularly communicated to the U.S. Environmental Protection Agency (EPA) and serves as a primary data source for its annual Renewable Volume Obligation (RVO) rule to the RFS.

Year	RNG Transportation Fuel Production (EGE / DGE)	Total RNG Transportation Fuel Production Facilities
2015 (actual)	140 million / 81.2 million	26
2016 (actual)	176 million / 102.1 million	37
2017 (planned)	374 million / 216.9 million	66
2018 (planned)	605 million / 350.9 million	76

Production of RNG has grown at impressive rates in recent years. The 30-million ethanol gallon equivalents (EGE) of D3 Renewable Identification Numbers (RINs) attached to RNG transportation fuel produced under the RFS in 2014 grew to 140 million EGE produced in 2015.¹ Over 98% of that volume was RNG fuel, and the volume exceeded EPA’s 2015 RFS volume obligation for D3 RINs by nearly 17 million gallons. In 2016, the volume of D3 RINs generated under the program grew to 176 million EGE, and again that volume was almost exclusively RNG fuel.² As of January 2017, industry growth has resulted in 56 operational facilities producing RNG, 48 of which inject into the U.S.’s network of natural gas pipeline infrastructure.³

In 2017, EPA’s annual volume standard – which by statute must be based on anticipated production – calls for 311 million D3 RINs.⁴ RNG producers have communicated their planned production volumes to the RNG Coalition, and RNG transportation fuel supply is set to exceed that volume this year. RNG producers plan to supply the market with more than 374 million EGE in 2017.⁵

This volume represents RNG currently flowing from 37 facilities that are already online, and another 29 RNG transportation fuel production facilities that companies are planning to have online before the end of 2017.⁶

In 2018, producers have reported planned production of 605 million EGE from a total of 76 facilities that are currently operational or under development.⁷ Early anticipated volumes from RNG

¹ Per U.S. EPA RFS program data

² *ibid.*

³ RNG Coalition data

⁴ Per U.S. EPA RFS program data

⁵ Most recent RNG Coalition data, compiled from volume data reported by Executives of companies producing RNG.

⁶ *ibid.*

⁷ *ibid.*

producers for 2019 and 2020 similarly show a continued increase in RNG transportation fuel supply in the years beyond.

In addition to those facilities currently flowing gas, RNG companies have committed investments in over three-dozen facilities in just the next two years. These RNG facilities are under development and due to add to the RNG transportation fuel available to supply your port fleets.

California Benefits from a Transition to Natural Gas Engines & RNG Transportation Fuel

The ports of the Los Angeles and Long Beach area are increasingly powering their vehicles with RNG. By 2023, area port employees and LA metro residents will be realizing the environmental and clean air benefits of 12,000 port trucks that run on clean burning natural gas engines and 120 million DGE of RNG fuel per year.

As shown in the Los Angeles County Metro Transit Authority's study conducted by Ramboll, fleets that make the transition to running RNG transportation fuel through near zero emission natural gas engines will drastically reduce carbon and NOx emissions. UC Riverside recently tested the Near Zero engine and found emissions for every duty cycle to be far less than the California Air Resources Board's optional low NOx standard. They found that trucks with the Near Zero engine operating in short-drive applications and in congested areas had emissions that even improved with more demanding duty cycles.

Fueling with RNG will Create California Jobs and Improve the State's Economy

RNG transportation fuel makes up over 50% of all the transportation fuel powering California's natural gas vehicles. Yet, in recent years, RNG project development in the state has occurred tepidly; RNG flowed into California from other states, mostly those in the south, Midwest, and East Coast. However, this fact is changing. California is on the cusp of an RNG project development boon that will result in further growth in RNG production not included in the supply volumes presented above.

Through working closely with California's natural gas pipeline utilities, RNG industry companies are reaching agreement to inject RNG into the state's pipeline network. The first project that will blend RNG into SoCalGas's network broke ground on the connecting pipeline in January. Considering California's wealth of organic agricultural waste, MSW, and wastewater resources, many other projects will follow, sustainably using the state's wastes to produce RNG in-state.

This activity will create hundreds, if not thousands of jobs in construction, engineering, operations, and maintenance in the next five years while injecting hundreds of millions of dollars into the California economy. Each new RNG project in California will create up to 173 direct and indirect jobs, while injecting investments of \$15 million or more into the local economy.⁸ These economic benefits are described further in a recent White Paper we are attaching to these comments – co-authored by the RNG Coalition and Energy Vision, a non-profit organization that has authored other papers with the U.S. Department of Energy, EPA, and Department of Agriculture.

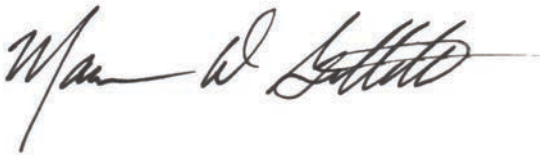
⁸ "Fueling Economic Growth with Renewable Natural Gas" (2016). *Energy Vision* and the *Coalition for Renewable Natural Gas*. Attached.

Conclusion

The RNG industry is positioned to continue ramping up production in the coming years. RNG projects being developed and under development are on track to increase the number of facilities producing RNG transportation fuel from 37 to 76 by 2019, and to more than double the domestic supply of RNG fuel between 2016 and the end of 2018. Increasingly fueling the port fleets with RNG and Near Zero emission engines provides GHG benefits on par or better than any other fueling method available. Additionally, a further commitment to fueling port fleets with RNG provides an opportunity to contribute to job creation in California and growth of the state's economy through new in-state RNG project development.

The RNG Coalition thanks you for your consideration of these comments. Our staff is more than willing to assist with any follow up questions on the information we have presented. You can reach us at 916-588-3033, or at the e-mail address provided below.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcus W. Gillette". The signature is fluid and cursive, with a horizontal line extending to the right from the end of the name.

Marcus Gillette
Director of Public & Government Affairs
Coalition for Renewable Natural Gas
Marcus@rngcoalition.com

Submittals:

Fueling Economic Growth with Renewable Natural Gas, *RNG Coalition & Energy Vision*
Ultra-Low NOx Natural Gas Vehicle Evaluation, *UC Riverside*
Zero Emission Bus Options: Analysis of 2015-2055 Fleet Costs and Emissions, *Romboll Environ US Corporation*

Advanced Clean Trucks (ACT) Now Plan-A Plan for Near-Term Clean Air, Economic Investment and Job Creation, and Increased Port Competitiveness

Time: Fri, 17 Feb 2017 21:39:18 +0000
From: Thomas Lawson <Thomas@cngvc.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
CC: Greg Roche <Greg.Roche@cleanenergyfuels.com> , allison <afsmith@semprautilities.com>
Subject: Advanced Clean Trucks (ACT) Now Plan-A Plan for Near-Term Clean Air, Economic Investment and Job Creation, and Increased Port Competitiveness

Attachments: msg-25845-16.html (9k)
image003.png (7k)
Game Changer_May 2016.pdf (3M)
UC Davis_RNG Feasibility Presentation to CARB_Dec 2016.pdf (721k)
UC Davis_RNG Feasibility_June 2016.pdf (4M)
MTA RAMBOLL ENVIRON REPORT SEPTEMBER 29 2016.pdf (1M)
2013_AQMD_in-use_retrofit_Miller.pdf (7M)
2016 CWI LowNOx NG_Finalv06.pdf (4M)
UCR - ISL G NZ Engine Report Fact Sheet Final.pdf (475k)
ACT Now Plan - FINAL_02 17 2017.pdf (1M)
CNGVC Introduction Letter to the ACT Now Plan.docx (241k)



Hi,

On behalf of the California Natural Gas Vehicle Coalition (CNGVC), I would like to submit the ACT Now Plan, that gives important recommendations to the 2017 CAAP update.

I have included the following attachments:

1. CNGVC Introduction Letter
2. Advanced Clean Trucks Now Plan (ACT Now Plan)
3. UC Riverside In-Use Testing Fact Sheet
4. UC Riverside In-Use Testing of Diesel Trucks Report
5. UC Riverside In-Use Testing of Near Zero Report
6. Zero Emission Bus Options Analysis of 2015-2055 Fleet Cost and Emissions
7. The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute
8. Game Changer - Next Generation Heavy-Duty Natural Gas Engines Fueled by Renewable Natural Gas

Thomas Lawson, *President*

California Natural Gas Vehicle Coalition

910 K St., Suite 340

Sacramento, CA 95814

916-448-0015 office

916-529-6035 cell





**California Natural
Gas Vehicle Coalition**

February 21, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Dear Mr. Cannon and Ms. Tomley:

The California Natural Gas Vehicle Coalition would like to commend the Ports of Los Angeles and Long Beach for their leadership in updating the Clean Air Action Plan (CAAP). Environmental leadership by the Ports has had a profound and positive impact across the world since the first CAAP. Consider how the first Clean Truck Program in 2008 has changed truck transportation in the United States. Before this landmark program, there was not a single heavy-duty truck manufacturer in this country that produced a natural gas truck on the factory assembly line as a true commercial product. The 2008 Clean Truck Program resulted in Daimler Trucks – the parent to Freightliner Trucks – building the very first factory-built LNG powered trucks. They put 132 units on the road. After that, other truck manufacturers followed. Today, natural gas trucks are available from every major truck manufacturer including Freightliner, Volvo, Kenworth, Peterbilt, Mack and Capacity. The choice of engines has also grown since the first Clean Truck Program. The industry started with the Cummins Westport ISLG 9 liter engine and has grown to include 12 liter engines for heavy duty drayage trucks and 6.7 liter engines suitable for yard tractors. The fuel has also evolved. Fossil natural gas was the alternative fuel for the first Clean Trucks Program. Today the fuel is Renewable Natural Gas (RNG) from landfills, sewage treatment plants, dairy farms, and other organic waste streams. In fact, low carbon RNG has been fueling natural gas port trucks for the past three years. Another significant difference over the years is that the market acceptance of natural gas trucks has grown with natural gas trucks being routinely deployed across this country by fleets like UPS, FEDEX, Kroger, Frito Lay, Ryder, Penske, and many others. The bottom line: the policies that the Ports adopt can continue to be the catalyst for clean and sustainable goods movement.

For the first time in our history, we now have the commercially available, cost-effective, and proven technology with a renewable fuel that can not only eliminate smog-forming emissions from a heavy-duty port truck, but also help our region to meet its near-term air quality attainment goals and our state to meet its mid-term climate mitigation goals. This “Near Zero” emissions technology can provide the same and even better environmental benefits as battery electric technology, but at a much lower cost and with immediate availability, dealer support and operational feasibility. Investments in Near Zero emission natural gas trucks fueled with RNG will drive huge investments in infrastructure and create associated jobs throughout the regional and state economy.

Diesel trucks have been polluting our ports and surrounding communities for too long. Recent testing performing by UC Riverside found that diesel trucks certified to the EPA 2010 emission standard actually pollute on average up to 5 times higher than the 2010 standard in a port drayage application. Submitted with this letter are the documents published by UC Riverside. The California Air Resources Board (CARB) has reported in-use emissions from diesel trucks of up to 9 times higher than certification. This is shocking news since diesel pollution mitigation has hinged on the 2010 emissions standard. Unfortunately, diesel is a failed strategy for improving air quality.

On the other hand, UC Riverside also tested the Near Zero engine and found emissions in every duty cycle to be less, in fact far less, than the CARB optional low NOx standard of 0.02 g/bhp-hr. In fact, Near Zero emissions improved with the shorter and more demanding duty cycles for trucks that operate in congested and short drive applications. Near Zero emissions in a port drayage cycle were found to be 0.002 g/bhp-hr, which is 90% below the CARB optional low NOx standard. This means that the Near Zero technology is 99.8% cleaner than a 2010 diesel truck in port drayage. This is an astounding accomplishment and why our industry is excited to bring this solution to solve such an urgent problem. We no longer need to wait for the future solution, the future is now.

Our industry believes that the 2017 CAAP Update is a critical and vital next step to build on the legacy of the first Clean Truck plan. We are committed to working as partners with the Ports and other stakeholders in developing the best plan to reach the goals already outlined, which is why we developed the Advanced Clean Trucks Now (ACT Now) Plan. This plan has recommendations that are cornerstones to cleaning the air. Importantly, the Ports do not exist in a vacuum. Yes, the air must be cleaned but prudence is essential to ensure that the Ports remain competitive. Cost-effectiveness is critical to ensure that limited resources are invested wisely, producing the needed results at costs affordable to the local goods movement industry. This thoughtful development of clean air strategies will ensure that the Ports maintain their leadership rather than having shippers divert freight elsewhere. In addition, the CAAP Update has the opportunity to be a catalyst for creating clean technology jobs in our region and our state. Transitioning to clean and sustainable goods movement will stimulate private investment in related infrastructure and create jobs to design, build, operate and maintain. As you will see in the attached document, our plan is based on three key pillars:

1. Environment,
2. Economic Investment & Job Creation, and
3. Port Competitiveness.

Given the feedback we have received from our ongoing stakeholder outreach and engagement on this plan, I am also including a couple of important reference documents that you may find useful and that support the vision of the ACT Now Plan.

1. “Zero Emission Bus Options” Analysis of 2015-2055 Fleet Cost and Emissions.” September 2016.

This is a study that was completed by Ramboll Environ for LACMTA. This study provides the technical analysis showing how 0.02g/bhp-hr NOx heavy-duty natural gas vehicles fueled with renewable natural gas will provide the greatest NOx, PM and GHG benefits of all technologies assessed, and provides the most cost-effective option to reduction smog forming pollutants and GHG emissions.

2. “The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute.” June 2016. (and accompanying slide presentation given to CARB, Dec. 2016)

This is a technical study prepared by the UC Davis STEPS (Sustainable Transportation Energy Pathways) Program, Institute of Transportation Studies on behalf of the California Air Resources Boards and California Environmental Protection Agency.

“This study examines the feasibility of producing large quantities of renewable natural gas fuels for use in transportation in California. The study’s results indicate that there are substantial sources of RNG in California that are commercially competitive with existing fossil fuel-based transportation fuels because carbon externalities are taken into consideration in the California market through existing programs such as the Low Carbon Fuel Standard (LCFS) and the U.S. Renewable Fuels Standard (RFS)... At current credit prices including California’s LCFS and the U.S. federal RIN credits, up to 82 billion cubic feet per year (bcf/y) of RNG supply could be attractive for private investment at competitive rate of return in developing RNG sources from landfill, dairy, municipal solid waste and waste-water sites combined.”

This study concludes that more than 21 percent of the existing California on-road diesel fuel market could be displaced by RNG based upon current market conditions in California. The study does not consider the potential under more favorable market conditions, and/or drawing upon RNG feedstocks beyond California’s borders. Clearly this study confirms that the supply of RNG is not a limiting factor in the ports, or the state’s more aggressive move to transportation options that rely on this ultra-low-carbon, domestic and renewable fuel source.

3. “Game Changer – Next Generation Heavy-Duty Natural Gas Engines Fueled by Renewable Natural Gas.” May 2016.

This is a technical white paper published by Gladstein, Neandross & Associates on behalf of a number of NGV industry organizations and the South Coast AQMD. The paper’s conclusions were similar to those reached by Ramboll Environ:

“With nearly the full range of HDVs covered, the combination of new near -zero -emission natural gas engine technology and RNG provides the single best opportunity for America to achieve immediate and substantial NOx and GHG emission reductions in the on -road heavy -duty transportation sectors. Equally important, major reductions of cancer -causing toxic air contaminants can immediately be realized in disadvantaged communities adjacent to freeways and areas of high diesel engine activity, where relief is most urgently needed.”

The *Game Changer* white paper also has a number of important references (particularly in Chapter 7) that provide further references to the potential supply of RNG to support a growing NGV market.

These reference materials should provide sufficient information and analysis to support the forward implementation of the proposed ACT Now Plan and answer the routine questions we have heard from environmental organizations and EJ advocates about these topics. We believe these represent some of the best data sources available on these topics; we have not been able to find any better analysis, including that prepared by those that may support other electric-drive technologies.

After reviewing the ACT Now Plan, we look forward to setting up subsequent meetings to address any questions that you may have.

Who we are

The California Natural Gas Vehicle Coalition represents the state's natural gas vehicle industry and includes major vehicle manufacturers, utilities, heavy-duty engine manufacturers, fueling station providers, equipment manufacturers, and fleet users of natural gas vehicles. We are working together to advance natural gas as an alternative transportation fuel.

Thank you for this opportunity to provide comments and please feel free to reach out to me at thomas@cngvc.org or at 916-448-0015.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lawson', with a horizontal line extending to the right.

Thomas Lawson
President, California Natural Gas Vehicle Coalition

Submittals

Advanced Clean Trucks Now Plan (ACT Now Plan)
UC Riverside In-Use Testing Fact Sheet
UC Riverside In-Use Testing of Diesel Trucks Report
UC Riverside In-Use Testing of Near Zero Report
Zero Emission Bus Options Analysis of 2015-2055 Fleet Cost and Emissions
The Feasibility of Renewable Natural Gas as a Large-Scale, Low Carbon Substitute
Game Changer – Next Generation Heavy-Duty Natural Gas Engines Fueled by Renewable Natural Gas

cc:

Gene Seroka, Port of Los Angeles
Mike DiBernardo, Port of Los Angeles
Duane Kenagy, P.E., Port of Long Beach
Rick Cameron, Port of Long Beach



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chair
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

February 17, 2017

Mr. Duane Kenagy, P.E.
Interim Chief Executive
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Mr. Gene Seroka
Executive Director
Port of Los Angeles
425 South Palos Verde Street
San Pedro, California 90731

Dear Mr. Kenagy and Mr. Seroka:

Thank you for providing the Air Resources Board (ARB) the opportunity to comment on the San Pedro Bay Ports Clean Air Action Plan 2017 Discussion Draft (CAAP) document. The CAAP outlines the Ports' efforts to achieve emissions reductions, including actions to transition to zero and near-zero emission technologies and improve system efficiency.

We applaud the work the Port of Long Beach and the Port of Los Angeles have already undertaken to reduce emissions and increase efficiency. We appreciate the Ports taking the next step to build on the statewide strategies and objectives outlined in the 2016 California Sustainable Freight Action Plan (Action Plan).¹ The Action Plan is an unprecedented, comprehensive planning effort to integrate investments, policies, and programs across several State agencies to help realize a singular vision for California's freight transport system. Cooperation among local, regional, State, national, and international stakeholders is critical towards achieving the Action Plan's multifaceted goals, and we are pleased to see the Ports taking a lead in moving this vision forward at the regional level.

¹ California Sustainable Freight Action Plan <<http://www.dot.ca.gov/casustainablefreight/>> accessed January 23, 2017.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

Mr. Duane Kenagy, P.E.
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In addition, we have recommendations for your consideration as you move from concepts to development of the full proposed CAAP:

- Climate Targets. The State of California has several ambitious climate change goals. Most recently, Governor Brown signed Senate Bill 32 (Pavley, Chapter 249, Statutes of 2016), setting a greenhouse gas (GHG) target of 40 percent below 1990 emissions levels by 2030. We strongly recommend that the CAAP incorporate this goal, as well as the State's 2050 target already proposed for inclusion. We also appreciate the link that the Discussion Draft makes between the individual GHG reduction targets set by the Cities of Los Angeles and Long Beach, advancing zero-emission and low carbon goods movement, and the strategies in the CAAP.
- Regional Air Quality. The State will also need reductions in criteria pollutant emissions to achieve ambient air quality standards. As you know, the South Coast Air Basin faces severe air quality challenges as one of only two regions in the country in extreme nonattainment with the ozone standard under the Federal Clean Air Act. The CAAP should clearly define how the Ports' actions will help achieve ARB's emission reduction commitments in the 2017 State Implementation Plan (SIP) for marine and port-related operations.
- Air Toxics. Reduction of diesel particulate matter (diesel PM), a toxic air contaminant that can cause cancer, cardiac and respiratory illness, and other health problems is also critical, and ARB remains committed to reducing diesel PM exposure in and around freight facilities. Together, we have made notable progress towards the initial ARB and San Pedro Bay Ports target to cut the health risk from diesel PM by 85 percent or more by 2020. But, the latest health science tells us that we must be even more vigilant to protect children, who experience higher doses of air pollution than previously understood due to their faster breathing rates and other factors. The Discussion Draft acknowledges this work, but the CAAP itself should explicitly recognize the need to go beyond 85 percent, and discuss how its strategies address this need.
- Zero Emissions. The San Pedro Bay Ports' continued financial and policy support for ever cleaner technologies and fuels is essential to cut the impacts of existing port operations, and to allow for cargo growth. Zero emissions must remain our long-term goal for all sectors to meet health and climate needs. We encourage the Ports to pursue an approach that allows for adoption of a wide range of

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zero-emission equipment and infrastructure technologies, including fuel cell-electric, battery-electric, and electric plug-in.

Some sectors (like cargo equipment, near-dock trucks, and locomotives) can begin transitioning to full or partial zero emission operation over the next decade as technology capable of meeting port duty cycles becomes available. Others will need to rely on the next generation of equipment with ultra-low emissions of nitrogen oxides (NOx) running on renewable fuels in this timeframe. This near-zero emission technology is important to accelerate emission reductions for attainment and to provide a bridge while new zero emission options are imagined, designed, developed, tested, and commercialized.

- Ocean Going Vessels. Vessel transit and maneuvering operations are a growing source of emissions and have the least effective pollution controls compared to all other port sources. The CAAP needs to emphasize what the Ports can do in collaboration with air agencies, ocean carriers, and marine terminals to achieve deep cuts in these emissions over time.

We support the Clean Ship Program described in the Discussion Draft, but understand that its effectiveness may be limited by the predicted slow production and introduction of new vessels meeting Tier 3 standards worldwide. We are also looking for CAAP endorsement of, and Port participation in, ARB's SIP strategy to advocate for new Tier 4 emission and efficiency standards from the International Maritime Organization. Given the expected delays on Tier 3 vessels, there may be an opportunity to essentially "leapfrog" Tier 3 and focus our incentives and policies on vessels meeting a Tier 4 standard with first-ever PM limits, tighter NOx limits, and improved fuel efficiency. ARB staff will also continue to work with Port staff on technology development and demonstration projects, especially much needed on-board control technologies that can be operated on existing vessels.

For vessel operations at berth, we encourage the CAAP to set a goal to reduce emissions from every visit, by every vessel, to meet the air quality needs of the South Coast Air Basin. You are aware of our work on amendments to the Ocean Going Vessels At-Berth Regulation, which would bring more vessel types and vessel visits under the statewide emission control requirements.

While shore based electrical power at berth remains the "gold standard" for vessels that regularly visit the Ports, alternative emissions capture and control systems offer the potential to cut emissions from other vessels. The San Pedro Bay Ports' past

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financial and operational support for projects demonstrating alternative control systems was instrumental in getting two systems approved by ARB for container vessels. We look forward to technology manufacturers bringing us expanded options for more vessel types and sizes in the future. Technology that can safely control emissions from the boilers on tankers is a high priority because tanker operations account for a large share of at-berth emissions. The CAAP should utilize the full range of mechanisms available to the Ports (e.g., lease conditions, favorable dockage fees or other incentives) to achieve at-berth reductions ahead of, or beyond, the requirements of ARB regulation.

- Locomotives. To address the pollution and health impacts from the full range of freight equipment serving the Ports, the CAAP should describe the levers available to influence and significantly reduce current and future locomotive emissions. The 2010 CAAP Update included a goal that the railroads would transition to virtually all Tier 4 locomotives in their fleets serving the Ports. The 2017 CAAP should include an update on the fleet mix of line-haul locomotives serving the Ports and identify any actions needed to achieve the goal.

While a Tier 4 fleet is the next step, the ultimate goal is even lower-emitting, more fuel efficient locomotives that can operate with zero-emission track miles in impacted communities. To accomplish this, ARB is petitioning the U.S. Environmental Protection Agency to amend its national locomotive emission standards, effective in 2023 for remanufactured locomotives, and effective in 2025 for newly built locomotives. Requested amendments would result in critical NOx and diesel PM reductions, as well as require zero-emission-capable locomotives with GHG-reduction and fuel-savings potential. The CAAP is the vehicle for the Boards of Harbor Commissioners to express support for tighter national locomotive emission standards, consistent with the petition.

There is widespread interest in shifting more cargo from truck to rail to relieve road congestion and reduce greenhouse gases. But such a shift may lead to increases in certain criteria pollutant emissions unless locomotive engines are equipped with more advanced control technologies than current requirements. There is near-term potential for a demonstration project to go beyond Tier 4 controls and introduce on-board batteries to enable zero-emission rail miles. The 2017 CAAP should prioritize such projects for investment of Technology Advancement Program funding.


We appreciate the Ports' partnership and look forward to our continued collaboration on developing and implementing measures that reduce emissions, protect human health,

Mr. Duane Kenagy, P.E.
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cut climate change, and help realize our collective vision for a sustainable freight transport system.

If you have any questions, please call me at (916) 445-4383 or have your staff contact Heather Arias, Chief, Freight Transport Branch, at (916) 322-6054 or via email at heather.arias@arb.ca.gov.

Sincerely,


Richard W. Corey
Executive Officer

cc: Heather Arias, Chief
Freight Transport Branch
Transportation and Toxics Division



Northwest San Pedro Neighborhood Council

"Your Community Voice"

February 15, 2017

Vilma Martinez, Board President
Dave Arian, Board Vice President
Patricia Castellanos, Commissioner
Anthony Pirozzi, Jr., Commissioner
Edward Renwick, Commissioner
Gene Seroka, Executive Director
Port of Los Angeles,
425 South Palos Verdes Street, San Pedro, California, USA 90731



Ray Regalado
President

Lee Williams
Vice President

Melanie Labrecque
Treasurer

Cynthia Gonyea
Secretary

Dear Executive Director Seroka and Harbor Commissioners:

The **Northwest San Pedro Neighborhood Council (NWSPNC)** appreciates Mayor Eric Garcetti, Port of Los Angeles (POLA) Executive Director Gene Seroka, Long Beach Mayor Robert Garcia and interim Port of Long Beach Chief Executive Duane L. Kenagy for working diligently on plans that will help fulfill Governor Jerry Brown's Executive Order B-32-15, which outlines a statewide Sustainable Freight Action Plan.

Furthermore, **NWSPNC** applauds all parties of the Sustainable Freight Advisory Committee in acknowledging the negative health impacts from the port's pollution and developing the Clean Air Action Plan (CAAP).

Additionally, in light of the current political climate, and recent remarks by Governor Jerry Brown during his 2017 State of the State Speech, **NWSPNC** would like to encourage the ports of Los Angeles and Long Beach to strengthen the Harbor Area's role in advancing the conversation on global climate change.

The **Northwest San Pedro Neighborhood Council** represents stakeholders that are subject to some of the worst air quality in the nation. They deserve cleaner air.

The **Northwest San Pedro Neighborhood Council** supports many of the points addressed in the Ports' new Clean Air Action Plan that will help to provide our stakeholders with cleaner air and improved health.

That said, the **Northwest San Pedro Neighborhood Council** would advise the following:

1) Communication & Community Outreach

- a) Continued investment in local education programs for future port workers.
- b) Create a **CAAP Advisory Board** consisting of representatives from all partners and organizations working together to transform the ports. LADWP, SCAQMD, CalTrans, business and labor partners such as GE, Maersk and the ILWU, ITF, Teamsters, Machinists (IAM), Mechanics, Directors of Environmental Management from both ports, Mayor Eric Garcetti's office.

- i) CAAP Advisory Board would have quarterly meetings to devise and coordinate team solutions.
- ii) Include direct community engagement with harbor area residents, at least annually. This could be achieved with presentations at neighborhood council meetings.
- iii) Devise a social media workflow as an additional outreach tool to spread word to harbor residents, and/or business stakeholders. This could be especially beneficial if the CAAP Advisory Board desires stakeholder feedback to specific topics.
- iv) As technologies change, active outreach to harbor area residents of emerging technology job skill sets desired from future port workers, and CAAP business partners. The City of Los Angeles could also utilize this outreach forum to recruit talent from the harbor area. **NWSPNC** has a “Pathways to Employment” youth event that could be utilized for this purpose.
- v) Collaboration with labor unions in planning to adapt current (and future) port workers to automation and zero emission technologies, and corresponding maintenance, as such technologies are phased in.

2) Technology

- a) Achievement of zero emissions for trucks that travel shorter distances before 2035.
- b) Incentives and rebates for independent truck drivers that will enable them to switch to zero emission trucks in a financially viable way. (In other words, truckers shouldn't go broke or get pushed out of the market.)
- c) More clearly specified deadlines to reach emission reduction targets for both trucks and port equipment.
- d) Specification of enforcement methods for failure to meet goals.
- e) Transition all lighting technologies to use Light Emitting Diodes.
- f) Prioritize transitioning harbor ships over container ships from older engines to newer engines.

3) Air Quality Monitoring

- a) Provide more oversight of the Ports' real-time air-quality monitoring systems, better maintenance to ensure the accuracy of monitoring equipment.
- b) Urge both Ports to collaborate and conduct independent monitoring for the same pollutants for comparison purposes, which is presently not the case.
- c) Include emissions monitoring of train emissions on port lands and inland railyard facilities.
- d) Provide greater transparency to the public about compliance with measures designed to reduce air pollution.
 - i) Example: The ports of Los Angeles and Long Beach could collaborate on a unified webpage where environmental data for both ports can be accessed.
 - (1) Create a single map which pinpoints all monitor testing locations. Each monitoring stations' data can be selected individually from the map, but also provide a list view of data from all monitoring stations, with tools that allow interested parties to extract the data for their own metric analysis.
 - (2) Direct this idea to the suggested **CAAP Advisory Board (#1-b)**. Representatives from the SCAQMD, air-quality monitoring staff and website technology teams from the ports of Los Angeles and Long Beach could devise

solutions. The CAAP Advisory Board could also **request suggestions** from stakeholders as to how the data could be presented (#1-b-ii, 1-b-iii).

4) Health Risk Assessments

- a) Include an outline of scientific data collection methods and improved / more thorough health reporting for CAAP 2017.
 - i) Example: The CAAP's 2010 San Pedro Bay-wide Health Risk Assessment (HRA) failed to provide evidence of any significant reduction in public health impacts or public health improvement.
NWSPNC urges the Ports to provide a Public Health Baseline as a data control point so that all data collected from that point forward will prove or disprove CAAP public health improvements in Harbor Area residents.
 - ii) Example: The CAAP's current proposal to reduce residential cancer risk from Port-related DPM emission "by 85%." The HRA fails to disclose what types of cancers are seen in Harbor Area residents. The HRA also does not list the specific types of cancers that are related to DPM exposure. **NWSPNC** urges the Ports to disclose past cancer studies and documentation. This information should be included in the Public Health Baseline data by reference.

5) Mitigation

- a) Mitigate ship emissions more by using Advanced Maritime Emission Control System (AMECS), or similar technologies.
- b) Explore additional biological methods (phytoremediation) to mitigate environmental contaminants. There is growing evidence that plants and trees are successful in removing a wide variety of toxins (such as NOx, SO, arsenic, mercury, heavy metals) from air, water, soil. This form of mitigation could potentially assist in fulfilling or exceeding Port compliance of the California Coastal Act.
- c) Mandate a Container Tariff and Bulk Product Metric Ton Tariff sufficient to mitigate environmental and public health impacts.

6) Performance Measurements, and Auditing

- a) Create a methodology of audits and measurements, as well as an outline of what actions will be taken if goals aren't being met.

7) Fossil Fuels, Biofuels, Zero Emission & Emerging Technology

Fossil fuel technologies have negative externalities which significantly impact air quality throughout the L.A. Basin. Some identifiable impacts are in the form of measurable leaks from equipment failures, undetected smaller leaks in aging infrastructure, and routine flaring of excess gas from oil wells. Societal impacts are in the form of health care costs and environmental remediation that invariably are subsidized by governments, or directly by the residents of the L.A. Basin.

The ports can take an active role in making fossil fuel technologies reflect their true costs. The Clean Air Action Plan mentioned implementing a fee structure on polluting trucks; the highest fees will be on the most polluting trucks and there will be no fees for zero emission trucks.

- a) The **NWSPNC** suggests the majority of these fees should be paid by the corporations and businesses that utilize these trucks to move their goods, not truck drivers.
- b) The fee structure strategy will be especially effective at incentivizing companies and individual drivers if it becomes standard with other ports. We encourage you to work with other ports at the state, national, and international level to adopt similar policies.

Additionally, even if biofuels are renewable, engines powered by biofuels still produce greenhouse gases and toxins.

- c) The **NWSPNC** encourages the ports of Los Angeles and Long Beach to move away from biofuel technologies.
- d) The **NWSPNC** supports both ports using existing biofuel technologies, such as biodiesel, as a short term solution to help phase out more current technologies. But encourages the ports to phase out biofuels for zero emission technologies by 2035.

8) **Port Expansion and its Impact on Emission Reduction Quotas**

The **Northwest San Pedro Neighborhood Council** realizes the ports have expansion goals that include larger ships that carry more freight, additional freight transport infrastructure, which results in increased traffic. This poses a further challenge in meeting emission reduction goals. The **NWSPNC** urges the ports of Los Angeles and Long Beach to maintain or exceed emission reduction quotas as they strive to develop the Port for the next century.

The **Board of the Northwest San Pedro Neighborhood** requests a response by April 14, 2017 from the Port of Los Angeles regarding compliance by the Port of Los Angeles regarding its participation with the **NWSPNC** in cleaning up the air at the Port of Los Angeles. Also, **NWSPNC** requests the Port of Los Angeles keep the **NWSPNC** Board and the **NWSPNC** Port and Sustainability Committees informed of evaluations and proposed actions by the Port of Los Angeles in striving to maintain a cleaner LA Port.

We look forward to your response.

Sincerely,



Ray Regalado, NWSPNC President
On behalf of NW San Pedro Neighborhood

CC:

Chris Cannon, Chief Sustainability Officer, Director of Environmental Management
Port of Los Angeles, 425 S. Palos Verdes Street, San Pedro, CA 90731

Port of Long Beach Attn: Heather Tomley
4801 Airport Plaza Drive Long Beach, CA 90815

Los Angeles Mayor Eric Garcetti
200 N. Spring St. Room 303 Los Angeles, CA 90012

Los Angeles Councilman Joe Buscaino
200 N. Spring St. Room 410 Los Angeles, CA 90012

Governor Jerry Brown
State Capitol, Suite 1173 Sacramento, CA 95814

Janice Hahn, Supervisor, 4th District
LA County Board of Supervisors
505 S. Centre, San Pedro, CA 90731

Central San Pedro Neighborhood Council
1840 S. Gaffey Street, Box 212, San Pedro, CA 90731

Coastal San Pedro Neighborhood Council
1840 S. Gaffey Street, Box 34, San Pedro, CA 90731

Wilmington Neighborhood Council
544 N Avalon Blvd, Wilmington, CA 90744





**San Pedro and Peninsula Homeowners Coalition
West Long Beach Association**

April 10th, 2017

Port of Long Beach
Harbor Commissioners
4801 Airport Plaza Dr.
Long Beach, CA, 90815

Port of Los Angeles
Harbor Commissioners
425 South Palos Verdes St.,
San Pedro, CA 90731

Re: Comments on Clean Air Action Plan 2017 Draft Discussion Document

Dear Presidents Guzmán and Martínez, and Members of the Commissions:

Thank you for the opportunity to provide comments on the Clean Air Action Plan (CAAP) 2017 Draft Discussion Document. We understand that any comments received on the Draft Discussion Document will inform the forthcoming “Draft CAAP.”

The signatories to this letter represent organizations that have dedicated decades of work to reducing air pollution and other impacts from freight operations. We have a vision for clean air and healthy communities that began over two decades ago, when concerned citizens spoke out about diesel pollution from the San Pedro Bay Ports, railyards near West Long Beach and in Commerce, and Inland Valley warehouses. This vision, and those voices, catalyzed a sea of change—use of shore-side power by ships, health risk assessments for railyards, the Clean Trucks Program, and state and local regulations modernizing old diesel fleets. Despite these victories, however, our vision has yet to be realized. We still breathe the filthiest air in the

country. And we are still getting sick. The fight for our right to clean air and healthy communities continues from San Pedro to Wilmington to Long Beach to Commerce to Riverside and San Bernardino. This fight requires the Ports to boldly create a Clean Air Action Plan for the people.

At the recent California Air Resources Board (CARB) meeting, CARB recognized how freight operations contribute to regional air quality violations, and jeopardize public health. In response, CARB staff were directed to develop new regulatory requirements to further reduce emissions from ships and cargo handling equipment. Staff were also asked to develop concepts for an indirect source rule to control pollution from large freight facilities including ports, as well as alternatives capable of achieving similar levels of emission reductions. The Ports will undoubtedly play a large role in this work, and the CAAP should complement CARB's efforts. Moreover, the Ports are facing increasing pressure to develop a CAAP that clearly maps out a strategy that will help CARB achieve federal Clean Air Act requirements. It is within this context that we provide these comments and ask for your leadership.

I. PORT POLLUTION POSES A TRIPLE THREAT TO OUR HEALTH

Southern California is the “international gateway” for trade, where the San Pedro Bay Ports receive more than 40 percent of the nation's containerized goods. The pollution generated by this trade creates a triple threat for the health of local communities. First, diesel emissions from port operations are toxic and significantly harm communities closest to the source of pollution. Second, the combustion of fossil fuels by port serving vehicles and equipment emit large quantities of nitrogen oxides (NO_x) pollution, which contributes to regional air pollution problems like ozone and fine particulate matter. Finally, freight transportation generates greenhouse gas emissions, which are expected to increase as the ports grow.

This “triple threat” disproportionately impacts low-income communities and communities of color that often live in close proximity to freeways, ports, railyards, and other facilities that generate significant levels of localized diesel exhaust.¹ As a result, these same communities experience higher asthma rates and other illnesses. They are also harmed by other sources of industrial pollution present in their communities.

A. Localized Pollution Threats and Quality of Life Impacts

Diesel-powered trucks, ships, trains, and equipment used to move port cargo impose serious health impacts on individuals and entire communities. Diesel particulate matter (diesel PM) is diesel exhaust emitted by diesel engines. Exposure to significant amounts of diesel PM emissions can lead to premature death and other devastating health impacts including asthma and respiratory impacts,² pregnancy complications and adverse reproductive outcomes,³ cardiac and

¹ Arlene Rosenbaum et al., *Analysis of Diesel Particulate Matter Health Risk Disparities in Selected US Harbor Areas*, AM. J. PUB. HEALTH S217, S221 (2011).

² S.J. Brandt, L. Perez, N. Künzli et al., *Costs of Childhood Asthma Due to Traffic-Related Pollution in Two California Communities*, 40 EURO. RESPIRATORY J. 363–70 (2012), available at <http://doi.org/10.1183/09031936.00157811>.

³ Jun Wu et al., *Association Between Local Traffic-Generated Air Pollution and Preeclampsia and Preterm Delivery in the South Coast Air Basin*, 117 ENVTL. HEALTH PERSP. 1773, 1773-1779 (Nov. 2009); R. Basu, M. Harris, L. Sie

vascular impairments,⁴ and heightened cancer risk.⁵ Diesel PM from exhaust is responsible for over two-thirds of the total air toxics health risks in Southern California,⁶ and a South Coast Air Quality Management District study on air toxics exposure confirms that “diesel particulate continues to be the dominant toxic air pollutant based on cancer risk.”⁷

The largest mobile source emitters of diesel PM in California are diesel trucks.⁸ CARB estimates that diesel PM from trucks and buses contributed to roughly 4,500 premature deaths across California in 2008.⁹ Diesel PM is also emitted from locomotives, marine vessels, cargo handling equipment and a variety of other diesel equipment used in the freight system. The South Coast air basin and the San Joaquin Valley are the regions with the highest levels of diesel PM emissions in California.¹⁰ In the South Coast air basin, which is home to nearly 17 million people, diesel PM emissions averaged 7.40 tons per day in 2012.¹¹ In the San Joaquin Valley, average daily diesel PM emissions were 4.93 tons per day in 2012.¹² These two regions alone comprised nearly half of total daily diesel PM emissions in California in 2012.¹³

Communities near freight hubs and along freight corridors bear disproportionate health burdens and are largely comprised of low-income residents and people-of-color.¹⁴ In a study

et al., *Effects of Fine Particulate Matter and Its Constituents on Low Birth Weight Among Full-Term Infants in California*, 128 ENVTL. RESEARCH 42–51 (2014), available at <http://doi.org/10.1016/j.envres.2013.10.008>.

⁴ J.E. Hart, E. Garshick, T.J. Smith et al., *Ischaemic Heart Disease Mortality and Years of Work in Trucking Industry Workers*, 70 OCCUPATIONAL AND ENVTL. MEDICINE 523–528 (2013), available at <http://doi.org/10.1136/oemed-2011-100017>.

⁵ See AIR RES. BD., SUPPLEMENT TO THE JUNE 2010 STAFF REPORT ON PROPOSED ACTIONS TO FURTHER REDUCE DIESEL PARTICULATE MATTER AT HIGH-PRIORITY CALIFORNIA RAILYARDS (July 2010) [hereinafter “Railyard Commitments Report”], available at <http://www.arb.ca.gov/railyard/commitments/supcomceqa070511.pdf>; IARC: *Diesel Engine Exhaust Carcinogenic*, 20 CENT. EUR. J. PUBLIC HEALTH 120, 138 (June 2012), available at <https://www.ncbi.nlm.nih.gov/pubmed/22966735>; L. Benbrahim-Tallaa, R.A. Baan, Y. Grosse et al., *Carcinogenicity of Diesel-Engine and Gasoline-Engine Exhausts and Some Nitroarenes*, 13 THE LANCET ONCOLOGY 663–664 (2012), available at [http://doi.org/10.1016/S1470-2045\(12\)70280-2](http://doi.org/10.1016/S1470-2045(12)70280-2).

⁶ S. COAST AIR QUALITY MGMT. DIST., FINAL REPORT: MULTIPLE AIR TOXICS EXPOSURE STUDY IN THE SOUTH COAST AIR BASIN (MATES-IV) 6-1 (May 2015) [hereinafter “MATES-IV”].

⁷ *Id.* at 6-2.

⁸ AIR RES. BD., ALMANAC EMISSION PROJECTION DATA (2013), available at http://www.arb.ca.gov/app/emsinv/2013/emssumcat_query.php?F_YR=2012&F_DIV=-4&F_SEASON=A&SP=2013&F_AREA=CA#6; see also, AIR RES. BD., SUSTAINABLE FREIGHT: PATHWAY TO ZERO AND NEAR-ZERO EMISSIONS at 58 (April 2015) [hereinafter “Sustainable Freight Strategy”], available at <http://www.arb.ca.gov/gmp/sfti/sustainable-freight-pathways-to-zero-and-near-zero-emissions-discussion-document.pdf>.

⁹ AIR RES. BD., APPENDIX D: HEALTH IMPACTS OF ON-ROAD DIESEL VEHICLES D-4 (2008), available at <https://www.arb.ca.gov/regact/2008/truckbus08/appd.pdf>.

¹⁰ Sustainable Freight Strategy at 59.

¹¹ *Id.*; see also, *About South Coast AQMD*, S. COAST AIR QUALITY MGMT. DIST., <http://www.aqmd.gov/home/about> (last visited March 20, 2017).

¹² Sustainable Freight Strategy at 59.

¹³ *Id.*

¹⁴ Teagan K. Boehmer et al., *Residential Proximity to Major Highways — United States*, 62 MORBIDITY AND MORTALITY WKLY. REP. 46, 46-50 (Nov. 22, 2013), available at <https://www.cdc.gov/mmwr/preview/mmwrhtml/su6203a8.htm>; A. Hricko, G. Rowland, S. Eckel et al., *Global Trade, Local Impacts: Lessons from California on Health Impacts and Environmental Justice Concerns for Residents Living Near Freight Rail Yards*, 11 INTL. J. ENVTL. RESEARCH AND PUBLIC HEALTH 1914–1941 (2014), available at <http://doi.org/10.3390/ijerph110201914>.

examining communities near four railyards—BNSF San Bernardino, Union Pacific Commerce, BNSF Hobart, and Union Pacific Intermodal Container Terminal Facility/Dolores—researchers found maximum individual cancer risks ranging from 180 in one million to 650 in one million.¹⁵ Residential communities closest to the Ports of Los Angeles and Long Beach had increased cancer risks greater than 500 in one million.¹⁶ When the movement of goods slowed during the recent economic recession, studies showed there was a reduction in cancer risks.¹⁷

Moreover, recent evidence has demonstrated that diesel emissions are even more dangerous than we previously knew, particularly to children. In California’s Final Sustainable Freight Strategy, several agencies noted:

Despite substantial progress over the last decade, the diesel equipment operating in and around freight hubs continues to be a significant source of air toxics that can cause localized risks of cancer and other adverse health effects. New health science tells us that infants and children are 1.5 to 3 times more sensitive to the harmful effects of exposure to air toxics than we previously understood, which heightens the need for further risk reduction.¹⁸

In addition to generating air pollution, the freight system can also have a negative impact on quality of life. Industrial freight operations create a host of other health risks, such as increased noise, and what some consider “nuisances,” including increased traffic, light, and vibrations. The imposition of freight elements in a residential area can also create blight, leading to increased crime and lower property values that make it difficult for communities to thrive. It is not uncommon for families living near freight elements to reside next to tall stacks of rusted-out shipping containers, barbed-wire lined chain link fences, and long lines of idling heavy-duty trucks that pose safety and environmental threats to these communities. In short, freight operations often change a neighborhood for the worse.

B. Ozone and Fine Particulate Matter Pollution

The vehicles and equipment that move freight also emit NO_x, which is produced by the combustion of fuels.¹⁹ NO_x contributes to the formation of both ozone (*i.e.* smog) and particulate matter pollution. Port operations significantly contribute to ozone levels in the South Coast air basin, which has some of the worst ozone pollution levels in the U.S. Emissions from diesel trucks alone account for 28 percent of all NO_x emissions from mobile sources in the air basin,²⁰

¹⁵ Railyard Commitments Report at 3 (Table 1); *see also*, MATES-IV at 6-2.

¹⁶ Railyard Commitments Report at A-18.

¹⁷ *Id.* at 3.

¹⁸ *Final California Sustainable Freight Action Plan* at 6 (July 2016), *available at*

http://www.dot.ca.gov/casustainablefreight/documents/Main%20Document_FINAL_07272016.pdf.

¹⁹ *Nitrogen Dioxide*, U.S. ENVTL. PROTECTION AGENCY, <http://www.epa.gov/airquality/nitrogenoxides/> (retrieved October 27, 2015).

²⁰ AIR RES. BD., 2012 ESTIMATED ANNUAL AVERAGE EMISSIONS FOR THE SOUTH COAST AIR BASIN (2013), *available at*

http://www.arb.ca.gov/app/emsmv/2013/emssumcat_query.php?F_YR=2012&F_DIV=0&F_SEASON=A&SP=2013&F_AREA=AB&F_AB=SC.

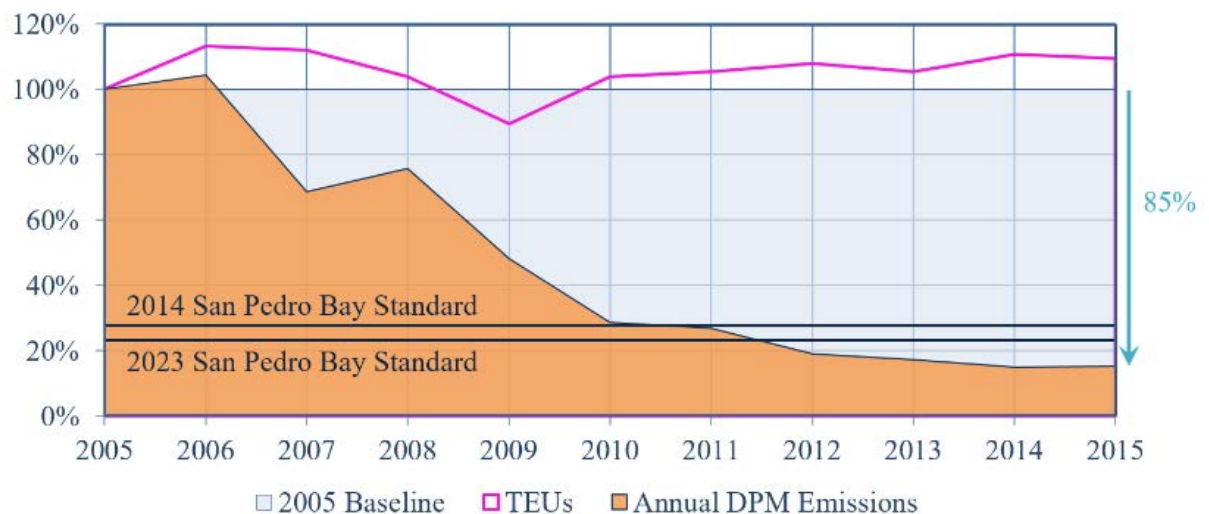
and air regulators have confirmed that the Ports of Los Angeles and Long Beach are the “single largest fixed source of air pollution in Southern California.”²¹

Reducing this pollution will yield significant benefits. In just two southern California communities impacted by goods movement activities (Riverside and Long Beach), researchers estimated an annual health cost of \$18 million for asthma and exacerbations of asthma due to freight-related air pollution.²² Meeting the federal ozone and particulate matter standards in the South Coast air basin would result in health benefits valued at over \$21 billion dollars.²³

C. An Unsustainable Path: Projections for Bigger Future Problems

Over the years, progress has been made to reduce emissions from port operations. Port environmental policies and state and federal regulations have reduced emissions from port-serving vehicles and equipment. See, e.g., the graph below, illustrating the estimated 85 percent reductions in levels of diesel PM emissions since 2005 at the Port of Los Angeles.

Figure ES.7: DPM Reductions to Date



Source: 2015 Emission Inventory Report, Port of Los Angeles.

As growth in demand for goods movement increases, however, the pace of emission reductions will slow and may potentially reverse this trend.²⁴ In fact, the graph pictured above

²¹ S. COAST AIR QUALITY MGMT. DIST., 2016 FINAL AIR QUALITY MANAGEMENT PLAN IV-A-126, available at <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-iv-a.pdf?sfvrsn=4>.

²² S.J. Brandt, L. Perez, N. Künzli et al., *Costs of Childhood Asthma Due to Traffic-Related Pollution in Two California Communities*, 40 EURO. RESPIRATORY J. 363–70 (2012), available at <http://doi.org/10.1183/09031936.00157811>.

²³ Victor Brajer, Jane V. Hall, and Frederick W. Lurmann, *Valuing Health Effects: The Case of Ozone and Fine Particles in Southern California*, CONTEMPORARY ECONOMIC POLICY 524-535 (2010).

²⁴ Sustainable Freight Strategy at 13.

shows that the pace of emission reductions between 2011 and 2015 is a fraction of what it was from 2005 to 2010.

The Southern California Association of Governments expects that in future years “[i]nfrastructure for freight traffic will be strained, current efforts to reduce air pollution from goods movement sources will not be sufficient to meet national air quality standards, capacity at international ports will be overburdened and warehouse space could fall short of demands.”²⁵ For example, the Port of Los Angeles experienced a 27 percent increase in shipping volume, with an all-time record 796,536 Twenty-Foot Equivalent Units (TEUs) being shipped through the Port in December 2016.²⁶ The Port also increased its levels of imports, exports, and empty containers.²⁷ The Port of Long Beach also expects to see higher shipping volumes in 2017 than in 2016.²⁸ And, these high levels are expected to grow. The chart below is from the 2016 Goods Movement Appendix to the 2016 Regional Transportation Plan, and shows that freight volumes at the San Pedro Bay Ports are predicted to grow by more than 100% in the next two decades.²⁹

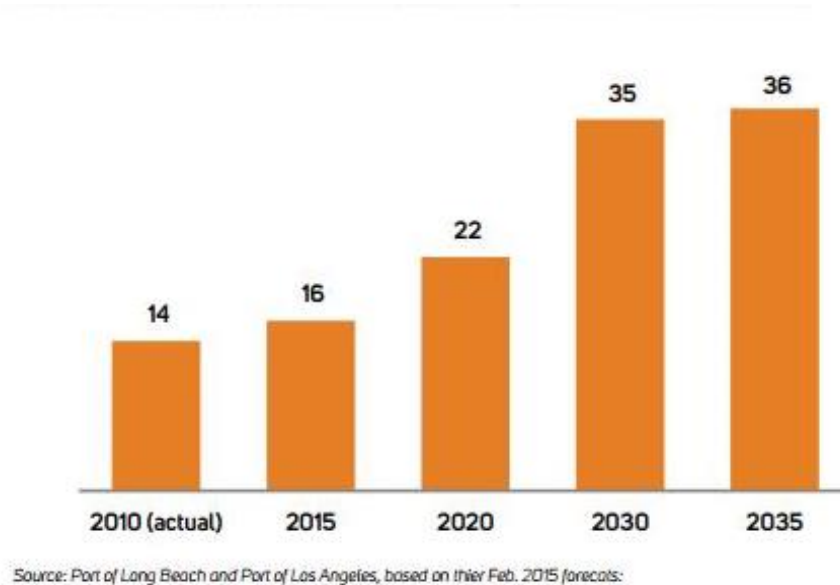


Figure 3. Projected container volume (millions of TEUs) in San Pedro Bay Ports.

Such increases will in turn increase operations at railyards and distribution centers throughout the region. In fact, the Southern California region expects a 228 million square foot

²⁵ S. CAL. ASS’N OF GOVERNMENTS, THE 2016-2040 REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITIES STRATEGY: A PLAN FOR MOBILITY, ACCESSIBILITY, SUSTAINABILITY, AND A HIGH QUALITY OF LIFE 3 (April 2016), available at <http://scagrtpscscs.net/Pages/FINAL2016RTPSCS.aspx>.

²⁶ Jeff Berman, *POLA and POLB See Strong 2016 Volumes Over All*, LOGISTICS MGMT (Jan. 16, 2017), http://www.logisticsmgmt.com/article/pola_and_polb_see_strong_2016_volumes_over_all.

²⁷ *Id.*

²⁸ *Cargo Container Trade Expected to Grow in 2017*, PORT OF LONG BEACH (March 29, 2017), <http://www.polb.com/news/displaynews.asp?NewsID=1623&TargetID=1>.

²⁹ S. CAL. ASS’N OF GOVERNMENTS, GOODS MOVEMENT APPENDIX 9 (April 2016), available at http://scagrtpscscs.net/Documents/2016/final/f2016RTPSCS_GoodsMovement.pdf.

shortfall in warehouse space in the next 20 years.³⁰ The development of warehouses and distribution centers will continue to occur in areas that are less developed (e.g., the Inland Valley) and that are already grappling with severely polluted air.

Such data underscores that zero-emission solutions are essential to protecting the health of the millions of residents that will be adversely affected by dramatic increases in freight volumes.

II. ADVANCING ZERO-EMISSION TECHNOLOGIES IS THE ONLY SOLUTION FOR ADDRESSING PORT POLLUTION’S TRIPLE THREAT

Governor Brown and air quality regulators have made clear that California will not meet national health-based air quality standards and state greenhouse gas reduction goals if the Ports proceed with a “business as usual” approach for moving freight. CARB has explained that “California must take effective, well-coordinated actions to transition to a zero emission transportation system for both passengers and freight.”³¹

A sustainable freight system requires a long-term wholesale transformation away from fossil-fueled technologies. Such transformation starts with widespread implementation of zero-emission technologies that are already viable in applications with the potential for significant expansion. Zero-emission technology, such as drivetrains powered by batteries or hydrogen fuel cells, are available for some truck types, as well as forklifts, gantry cranes, and other types of goods movement equipment. As with the early light duty vehicle electrification market, the market faces higher per vehicle costs, vehicle availability, limited manufacturers, and other early market entry barriers including limited fleet experience with the vehicles. These, however, are barriers that can be overcome with the right policies and investments to successfully move the freight system toward zero-emission technologies. Increased deployment of these technologies will help create economies of scale. As use of zero-emission technologies grows, prices will fall and the efficiency of those technologies will improve.³² Growing use of zero-emission technologies will also require greater investment in infrastructure that supports these technologies.

Where short-term adoption of zero-emission technologies is not yet possible, other interim strategies must be pursued to lower emissions from conventional technologies such as through programs mandating cleaner fossil fuels. But these must be viewed as short-term, interim strategies that should be designed to support the longer-term transformation away from fossil fuels altogether.

In order to land on a trajectory toward a zero-emission future, we ask that the Ports adhere to the following principles in developing the CAAP:

³⁰ S. CAL. ASS’N OF GOVERNMENTS, GOODS MOVEMENT REGIONAL TRANSPORTATION PLAN 2012-2035 12, *available at* http://rtpscs.scag.ca.gov/Documents/2012/draft/SR/2012dRTP_GoodsMovement.pdf.

³¹ Sustainable Freight Strategy at 1.

³² EELCO DEN BOER ET AL., ZERO EMISSIONS TRUCKS: AN OVERVIEW OF STATE-OF-THE-ART TECHNOLOGIES AND THEIR POTENTIAL 16-17 (July 2013) [hereinafter “CE Delft Report”], *available at* http://www.theicct.org/sites/default/files/publications/CE_Delft_4841_Zero_emissions_trucks_Def.pdf.

- **Work backwards from zero.** First envision a zero-emission port and then design a roadmap with the necessary steps to get there. This should include an analysis of the technologies needed, the barriers to overcome, near and long-term measures, and the timing for achieving all of these steps.
- **Send a clear market signal to manufacturers.** Incentives can be useful both in the development and early deployment phases of introducing new technologies, but incentives alone are insufficient to drive the scale of development and deployment that will be necessary to transform our freight system. The Ports must seize the opportunity to adopt policies that send market signals to manufacturers, which will support the industry-wide investment that will be necessary to spur innovation, create necessary supply chains, and enable economies of scale.
- **Set near-term measures for zero-emission technologies available now.** Requiring the deployment of zero-emission technologies for the vehicle types where such technologies are closest to commercialization will help demonstrate the viability of these technologies for those equipment types, as well as for others that are farther behind in the development process.

By following these principles, the Ports can seize the opportunity to build momentum, economies of scale, and transform supply chains, leading the goods-movement industry into a zero-emission future.

III. SETTING A VISION FOR A CLEAN AIR ACTION PLAN THAT PROTECTS PEOPLE’S HEALTH AND IS RESPONSIVE TO COMMUNITIES

The Ports must take bold action to address their contributions to degraded air quality and public health problems suffered by Southern California residents. The Draft Discussion Document currently lacks the ambitious measures, robust analysis, interim milestones, and public input necessary to meet this challenge. We urge that the Ports incorporate our recommendations below into the next iteration of the Draft CAAP.

Below, we offer our vision for the Ports’ Clean Air Action Plan.

A. TRUCKS

The Clean Trucks Program adopted by the Ports in 2007 demonstrates the speed and efficiency in which older trucks can be turned over when there is a political will to do so. The Ports estimate that “in just two years the trucking fleet . . . was transformed and truck-related DPM emissions were reduced 97% between 2005 and 2015.”³³ Notwithstanding this landmark program, however, more must be done to reduce emissions from the truck sector. The Ports now have an important opportunity to continue the legacy of the 2007 Clean Trucks Program by advancing cleaner trucks, particularly zero-emission trucks.

³³ SAN PEDRO BAY PORTS, CLEAN AIR ACTION PLAN 2017, DRAFT DISCUSSION DOCUMENT at 9 (Nov. 2016) [hereinafter “Draft Discussion Document”], *available at* <http://www.cleanairactionplan.org/wp-content/uploads/2016/11/CAAP-2017-Draft-Discussion-Documents-FINAL.pdf>.

According to the 2015 emissions inventories, trucks are the second largest source of NO_x emissions at the Ports (contributing more than 20 percent of the Ports' total NO_x emissions).³⁴ Additionally, 60 percent of trucks currently serving the Ports are nearly *10 years old*.³⁵ And in 2015, these older trucks conducted nearly 60 percent of port truck trips.³⁶

Based on these and other statistics, the Draft Discussion Document proposes a new phase of older truck bans that will eventually require all trucks registered in the Ports Drayage Truck Registry to be zero-emissions by 2035. We support this long-term 2035 goal. But, the plan needs to commit to interim benchmarks to ensure that progress towards this goal is achieved.³⁷

1. Target Segments of the Drayage Market that Can Achieve 100% Zero-Emissions Before 2035, and Set an Interim Zero-Emission Truck Mandate for Those Trucks

Trucks (electric and hybrid) are currently available that can perform 100% zero-emission short haul trips *today*. The Ports must create a robust plan to fully promote these technologies. As a start, the Ports should target trucks that travel shorter distances (e.g., between the ports and nearby railyards, peel off yards, and other freight facilities), and require such trucks to achieve 100% zero-emission miles in advance of 2035. Such a requirement could be phased-in and should be embodied in the Ports' Clean Trucks Program update. Targeting short haul drayage for a pre-2035 "all ZE" requirement would provide a significant step forward in creating a market for zero-emissions trucks and signal the Ports' commitment to their zero-emissions goal. Further, even if the number of trucks that travel short distances to and from the Ports is small relative to the rest of the trucking fleet, these trucks greatly contribute to local emissions given that they are constantly traveling a short loop through and near communities.

To help advance an "all ZE" requirement, the Ports could require, whenever legally possible, nearby freight facilities to restrict the kinds of trucks that can operate at the facility in order to promote zero-emission vehicles. For example, if the Ports create more "peel off" yards, they should issue a request for proposals (RFP) for those facilities that contain a zero-emission truck requirement.

The Ports can also do more to incentivize zero-emission miles by ensuring that any "Green Truck Priority" program provides greater incentives for use of zero-emission trucks (over near-zero emission vehicles).

2. Focus Investments on Zero-Emission Trucks

We support using "dirty truck fees" to encourage use of cleaner trucks, and to fund zero-emission trucks. We also support ensuring that such fees are assessed to the owner of the cargo that is being transported.

³⁴ *Id.* at 10.

³⁵ *Id.*

³⁶ *Id.*

³⁷ *Id.* at 12.

Any grants, subsidies, or incentives provided by the Ports to defray the cost of complying with the revised Clean Trucks Program should be exclusively allocated towards the purchase of trucks that will result in zero-emission miles such as battery-electrics, fuel-cells, or hybrids. Limited public tax dollars should be allocated to the cleanest, most health-protective technologies.

We oppose use of grants and subsidies that promote continued investments in internal combustion engines (e.g., diesel and natural gas trucks) and accompanying infrastructure. Such investments will delay the Ports, industry, and necessary markets from expeditiously shifting towards all zero-emissions, especially when one considers the long-useful life of port-serving trucks and fossil fuel infrastructure.

3. Consider Externalized Costs of the Trucking Industry

When considering the financial impact of a revised Clean Trucks Program on the Ports, trucking industry, and beneficial cargo owners, we ask that the Ports equally consider the costs of inaction for the community as well as the costs of less ambitious action. It is no secret that the trucking industry imposes costs on all those who breathe tailpipe emissions. Those costs surface in the form of illness, healthcare costs, lost work days, lost school days, and even premature death.

The question of costs—those borne by the trucking industry, the Ports, and the public—were the subject of robust discussion during the Ports’ first Clean Trucks Program. At that time, there was broad recognition by the Ports and many of the signatories to this letter that companies performing port drayage must be able to shoulder the financial costs of meeting the Ports’ safety, security, and environmental standards. Indeed, the Ports publicly acknowledged they cannot subsidize smaller trucking companies in perpetuity as the Ports environmental, safety, and security standards improve over time. This necessarily means that some companies may not be able to financially sustain obligations attached to hauling port cargo, while others will. While we are sympathetic to the concerns raised by smaller companies, given the costs borne by the public from polluting operations, we favor promoting public health and the companies that can meet the Ports’ environmental goals. The Ports came to the same conclusion when they adopted the original Clean Trucks Program.

4. Ensure “Feasibility Assessments” Are Fairly Conducted

The CAAP’s 2035 zero-emission truck goal is contingent on the outcome of the Ports’ feasibility assessments. While we do not oppose the Ports’ intention to assess technologies, the Draft Discussion Document provides few details on how the feasibility assessments will be performed, leaving the reader to wonder if the assessments will be fairly conducted. The Ports should disclose details such as who will conduct the feasibility assessments, what process will be used, what input will be sought, and what standards and criteria will be applied to judge “feasibility.”

B. SHIPS

1. Maximize Use of Emission Reduction Technologies and Promote Calls by Cleaner Ships

Ships are the largest source of maritime goods-movement related NO_x emissions, comprising 53 percent of the Ports' NO_x emissions, according to the 2015 emissions inventory.³⁸ Shore-side power is one technology that can provide significant emission reductions that benefit overburdened communities adjacent to ports. While docked, ships can use shore-side electricity to power support equipment on board, such as lighting, cooling, and ventilation.³⁹ The Ports should maximize the use of shore-side power, as it is commercially available from various manufacturers, the Ports have experience using this technology, and CARB has already adopted regulations requiring its use in some settings.⁴⁰

The Advanced Maritime Emissions Control System (AMECS) is an alternative to shore-side power for ocean-going vessels. AMECS attaches to the exhaust port of a vessel and scrubs the exhaust of 90-99 percent of PM₁₀, PM_{2.5}, NO_x, and SO₂ emitted.⁴¹ AMECS is an alternative for vessels that are not retrofitted to be able to access shore-side power. AMECS can be housed on the shore or on a barge and can move from vessel to vessel, even reaching vessels docked off-shore.⁴² A sustainable freight system should utilize AMECS in addition to shore-side power, and should actively seek out other new technologies to address emissions from ocean-going vessels.

Accordingly, we support the Ports' proposal to develop programs to control at-berth emissions from non-regulated vessels in advance of state regulation and at utilization rates higher than those proposed by CARB. It appears (from the title of Section 1.4) that the Ports intend to achieve this by providing incentives and putting requirements in some of the terminal leases. We support both these approaches, but strongly urge the Ports to make this a priority requirement in terminal leases. While incentives can indeed lead to adoption of some life-saving technologies such as AMECS and METS-1, the need for widespread deployment calls for making such technologies a lease requirement.

We also support the other ship-related efforts described in the Draft Discussion Document, such as efforts to incentivize energy efficiency upgrades, use of emission reduction technologies such as scrubbers, and efforts to accelerate the transition to Tier 3 ships by imposing higher rates on Tier 0 and Tier 1 ships. We are also aware, however, of the challenges involved in deploying Tier 3 ships, and that outreach campaigns to raise the shipping industry's awareness of incentive programs may or may not result in meaningful emission reductions.⁴³ To the extent that such challenges preclude the Ports from securing meaningful emission reductions

³⁸ Draft Discussion Document at 16.

³⁹ AIR RES. BD., HEAVY-DUTY FUELS AND TECHNOLOGY ASSESSMENT 15 (Draft April 2015), *available at* http://www.arb.ca.gov/msprog/tech/techreport/ta_overview_v_4_3_2015_final_pdf.pdf.

⁴⁰ *Id.*

⁴¹ AMECS, ADVANCED CLEANUP TECHNOLOGIES, <http://www.advancedcleanup.com/index.php?article=31> (last visited March 20, 2017).

⁴² Danielle Hesse, *Port of Long Beach to Test Promising Technology to Reduce Ship Emissions*, NATURAL RES. DEF. COUNCIL (March 20, 2014), http://switchboard.nrdc.org/blogs/mwyenn/port_of_long_beach_to_test_pro.html.

⁴³ See Draft Discussion Document at 17-19.

from the ship sector, the Ports must find the needed reductions elsewhere, such as through increased use of AMECS, or alternatively, additional emission reductions from other sectors that can offset otherwise modest reductions from ships.

2. Petition CARB for a Statewide Vessel Speed Reduction Program, and Support CARB's Efforts to Secure a New Tier 4 Standard from the International Maritime Organization

We support the Ports' Vessel Speed Reduction (VSR) programs and applaud the concrete benefits of this program to date. We recommend that to build upon this success, the Ports petition CARB to adopt a statewide VSR rule. First, the Ports have already proven VSR's success, and can provide ample evidence to support CARB in adopting a statewide rule. Second, there is no doubt that expanding the program statewide would result in important benefits for air quality and marine mammal conservation. Third, if CARB takes this on, then the Ports would no longer need to provide the financial incentives for the voluntary program; the Ports could use this freed-up funding on other critical emission reduction efforts.

Additionally, CARB, as part of its state implementation plan strategy, intends to advocate for new Tier 4 emissions and efficiency standards from the International Maritime Organization. The Ports should join CARB in these efforts.

3. Support Development of Zero-Emission Technologies for Ships

Companies are exploring zero-emission technologies for ocean-going vessels, and the Ports should encourage the development of these technologies through funding for demonstration projects. The first zero-emission ferry was constructed and operated earlier this year, and experts predict that new technology developments such as conversion to liquefied natural gas and hybrid technologies will reduce emissions for other types of ocean-going vessels, with an ultimate goal of developing zero-emission engines for ocean-going vessels.⁴⁴ Just as other technologies, such as forklifts and medium-duty trucks, have benefitted from dedicated funding for research and development, funding demonstration projects for ocean-going vessels would accelerate progress toward the development and commercialization of zero-emission technologies.

C. CARGO HANDLING EQUIPMENT

Cargo handling equipment is a prime place to advance zero-emission technologies. We are pleased to see the commitment to achieve all zero-emission cargo handling equipment by 2030.⁴⁵ Overall, we suggest that the Ports engage in a terminal by terminal assessment that catalogues all the cargo handling equipment, identifies opportunities for replacement with zero-

⁴⁴ Press release, *First Electrical Car Ferry in the World in Operation in Norway Now*, SIEMENS (May 19, 2015), <http://www.siemens.com/press/en/pressrelease/?press=/en/pressrelease/2015/processindustries-drives/pr2015050200pden.htm>; Wallenius Wilhelmsen Logistics, *Zero Emission Future* (last accessed March 31, 2017), <https://www.2wglobal.com/about-us/wwl/sustainability/responsible-logistics/environmental-frontrunner/zero-emission-future/>.

⁴⁵ Draft Discussion Document at 13.

emission technologies, and creates a terminal by terminal plan to achieve this zero-emission goal.

Similar to our comments on the Ports' long-term zero-emission goals for trucks, the 2030 zero-emission cargo handling equipment goal should include interim benchmarks. The CAAP should also include additional details on how the feasibility assessments for cargo handling equipment will be conducted.

In addition, achieving a zero-emission cargo handling requirement will require coordination with relevant utilities, and provide opportunities to integrate renewable energy and other clean resources to power this equipment. Integration of these resources will have an added benefit of making the Ports more resilient.

D. RAIL

Aggressive action is needed to reduce emissions from rail operations, which are a significant contributor to localized health risk. We were disappointed to see minimal consideration of rail measures in the Draft Discussion Document, and urge the Ports to add measures that can be applied to this source category, with the following considerations in mind.

First, we support the efforts to maximize on-dock rail, including investments in associated port-wide infrastructure improvements. We also support the Port's goal of handling 50 percent of all cargo leaving the Port complex by rail,⁴⁶ but urge the Ports to set interim deadlines and lay out a clear road map for how this goal will be achieved.

Second, we acknowledge and appreciate Pacific Harbor Line's (PHL) partnership with the Ports over the years, and urge the Ports to continue working with PHL to determine what additional emission reductions can be achieved from its fleet. The Draft Discussion Document omits both the opportunities the Ports have seized over the years to modernize PHL's fleet and to demonstrate innovative technologies, as well as new measures that allow this partnership to continue on a successful trajectory. We would like to see a commitment to electrify PHL's operations as an initial step in the necessary electrification of freight rail in the South Coast air basin.

Third, should CARB proceed with its plans to petition EPA for stronger national regulations of locomotives, including changes to federal regulations to allow broader state authority to set standards for non-new locomotive engines, we urge the Ports to support CARB's petition.

Fourth, the Ports should explore opportunities to advance emission reduction technologies for locomotives. While zero-emission technology developments for locomotives lag behind trucks and support equipment, there are technologies in development, including on-board batteries, that can enable zero-emission miles. LNG has also emerged as a promising alternative fuel that produces fewer NO_x and PM emissions than diesel fuel. There are also technologies available that can reduce emissions from existing engines. One example is the Advanced Locomotive Emission Control System ("ALECS"). ALECS captures and treats exhaust from

⁴⁶ *Id.* at 22.

locomotives while they idle at the railyard, using scrubbers that remove particulate matter and SO_x along with selective catalytic reduction technology to remove NO_x.⁴⁷ Locomotives do not need any modification to be able to use the ALECS system, so it could be installed in railyards in heavily polluted areas now.

Fifth, the Ports must continue to pursue their 2010 CAAP commitment to work with agency partners to accelerate the turnover of the line-haul locomotive fleet so that by 2020, the state-wide fleet is comprised of at least 95 percent Tier 4 line-haul locomotive engines.⁴⁸ Specifically, the 2010 CAAP included the following goals:

By 2020, goal for 95% of Class 1 line-haul locomotives entering the ports to meet Tier 4 standards. For a minimum performance requirement, by 2023, Class 1 line-haul locomotives entering the ports will meet an emissions equivalent of 40% USEPA Tier 3 line haul locomotive standards and 50% Tier 4 line haul locomotive standards, which may be implemented as mitigation for an identified impact through the CEQA environmental process or as a contractual lease requirement above what would be required strictly based upon identified impacts in the environmental analysis.⁴⁹

Emissions from Tier 4 line haul locomotives are over 70 percent lower than Tier 2 line-haul locomotives. Therefore, a transition to a Tier 4 fleet will provide significant emission reduction benefits.⁵⁰ The Ports should not abandon these critical measures. Instead, the Ports should commit to using their landlord authority and the CEQA process to achieve targeted emission reductions from locomotives and railyards. In addition, when negotiating contracts with PHL, the Ports should require PHL to use Tier 4 or better emission controls for its fleet.

E. HARBOR CRAFT

Commercial harbor craft includes a wide range of vessels, but tugboats are the equipment type most relevant for the freight system. Because tugboats stay within the confines of the harbor, they are good candidates for battery electric power. Further, there is a great need to continue to reduce emissions from harbor craft despite progress over the last decade. Indeed, as noted in the Draft Discussion Document, “the relative contribution of emissions from harbor craft compared to emissions from all port-related sources has increased and is projected to remain at this higher level in the future because the engines will continue to deteriorate absent new mandates for turnover. Today, harbor craft are our second largest source of particulate matter [after ocean-going vessels] comprising 18% of the port-related PM emissions.”⁵¹

Diesel electric hybrid tugboats already have been demonstrated at the Ports of Los Angeles and Long Beach. The first hybrid tugboat was demonstrated at the Ports in 2009, and a

⁴⁷ *Emissions Control System*, ADVANCED CLEANUP TECHNOLOGIES, <http://www.advancedcleanup.com/index.php?article=2> (last visited March 20, 2017).

⁴⁸ SAN PEDRO BAY PORTS, FINAL CLEAN AIR ACTION PLAN 2010 UPDATE 153 (Oct. 2010), *available at* <http://www.cleanairactionplan.org/documents/2010-final-clean-air-action-plan-update.pdf>.

⁴⁹ *Id.* at 156.

⁵⁰ *Id.* at 154.

⁵¹ Draft Discussion Document at 20.

second began operating in 2012.⁵² Diesel electric tugboats are also operating in Europe.⁵³ Hybrid diesel electric tugboats have seen 50 percent reductions in NO_x emissions and 70 percent reductions in diesel PM.⁵⁴ More widespread use of hybrid tugboats will provide near-term emission reductions, and serve as a necessary stepping stone to the development of full electric, zero-emission vessels. Accordingly, we request that any incentives for harbor craft operators promote the use of hybrid systems. As noted above, incentives, especially in the form of grants and subsidies, should be provided to the cleanest technologies available.

F. ELECTRICAL INFRASTRUCTURE

SB 350 directs agencies, including the Ports of Los Angeles and Long Beach, to prioritize widespread “transportation electrification” as a necessary step toward complying with state law and attaining ambient air quality standards.⁵⁵ Additionally, the Governor’s recent executive order on freight recognizes the need to coordinate actions to not only promote advanced technologies but also ensure the development of the new infrastructure necessary to support those technologies. To comply with SB 350 and the Governor’s order, and make zero-emission technologies a reality, the Ports must coordinate with relevant utilities.

Zero-emission technologies require networks of fueling stations or other recharging opportunities along their routes. A number of analyses have examined not only the technological steps required for the widespread commercialization of zero-emitting technologies, but also how infrastructure will need to be changed.⁵⁶ Achieving long-term infrastructure transformation will require close coordination between the Ports, air and transportation agencies, and utilities. Thus, as part of the CAAP, the Ports should develop an Electrical Infrastructure Action Plan in coordination with the relevant utility for each port to be used as a blueprint for future efforts to implement the electric vision set forth by California law.

G. EMISSION GOALS AND BASELINE

The 2010 CAAP included emission reduction targets for 2014 and 2023, and a health risk reduction goal for 2023. It is time for the Ports to update these goals.

Specifically, the CAAP must include emission reduction goals that are commensurate with achieving the deep cuts in NO_x pollution necessary to meet ozone standards in 2022, 2024, and 2032. These goals must reflect the Ports’ commitment to reducing their fair share of NO_x so that the air basin can finally meet the 1997 8-hour ozone standard by 2023. In addition, the Ports

⁵² David A. Tyler, *Foss’s Second Hybrid Tugboat Employs New, More-Powerful Lithium Polymer Batteries*, THE PROFESSIONAL MARINER (August 22, 2012 1:39 P.M.), <http://www.professionalmariner.com/September-2012/Fosss-second-hybrid-tugboat-employs-new-more-powerful-lithium-polymer-batteries/>.

⁵³ *Europe’s First Hybrid-Electric Tugboat Goes Into Service*, EV WORLD (June 15, 2012), <http://evworld.com/news.cfm?newsid=28150>.

⁵⁴ AIR RES. BD., VISION FOR CLEAN AIR: A FRAMEWORK FOR AIR QUALITY AND CLIMATE PLANNING Appendix A, 31 (DRAFT June 27, 2012), *available at* <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/vision-for-clean-air-2012/appendix-for-vision-for-clean-air.pdf?sfvrsn=2>.

⁵⁵ Pub. Util. Code § 740.12(a)(2).

⁵⁶ *See, e.g.*, GOVERNOR’S INTERAGENCY WORKING GROUP ON ZERO-EMISSION VEHICLES, 2013 ZEV ACTION PLAN 8-13 (Feb. 2013), *available at* [http://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_\(02-13\).pdf](http://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_(02-13).pdf).

must commit to additional NO_x reductions to do their fair share to achieve the emission reductions necessary to meet the 2008 8-hour ozone standard by 2032. The Ports should also consider the 2015 8-hour ozone standard, which aligns with California's ambient air quality standard. Keeping focus on these emission goals will help prioritize investments in technologies.

Second, the ports should engage in this same approach for Sulfur Oxides (SO_x) to meet relevant fine particulate matter standards.

Third, in addition to criteria pollutants, the CAAP should include additional risk reduction goals. Since the initial CAAP, the Ports have routinely used statements of overriding considerations to allow projects to proceed even when they exceed a health risk of 1 in a million. If healthy air is to be achieved, the Ports should not be approving projects that leave the air unsafe to breathe.

Fourth, the ports should set robust greenhouse gas emission reduction goals commensurate with achieving all relevant California climate pollution goals.

Finally, we are concerned that the Ports continue to use a 2005 baseline to measure emission reduction progress. This masks the stagnation that has resulted year to year since 2011. We urge the Ports to adopt a new baseline of 2011 against which to measure future programs rather than continuing to create a false impression that the Ports have recently made significant progress in emission reductions. The Ports need to measure progress against that new baseline moving forward so that the benefits of a new CAAP can be measured. At a minimum, the Ports should be transparent and candid about *both* the significant emission reductions achieved since 2005, as well as the lack of progress over the last 6 years.

H. IMPROVED MEASURE DESCRIPTIONS

The CAAP will serve as the Ports' roadmap for reducing emissions and greenhouse gases. To be meaningful, the actions proposed within the plan must be well-articulated. The Draft Discussion Document contains few details—making it difficult to gauge how various proposed measures will be implemented. Previous versions of the CAAP included details such as:

- Initiation year
- Key milestone dates
- Amount of criteria pollutants reduced
- Greenhouse gas impact
- Implementation method (e.g., lease requirement tariff, incentives, voluntary)
- Financial costs
- Elements to be tracked
- Measure descriptions⁵⁷

⁵⁷ SAN PEDRO BAY PORTS, FINAL CLEAN AIR ACTION PLAN 2010 UPDATE 153 (Oct. 2010), available at <http://www.cleanairactionplan.org/documents/2010-final-clean-air-action-plan-update.pdf>.

The Ports should include these details for *each measure* so that the public can gauge the effectiveness of the revised CAAP. Absent such information, it is impossible to evaluate, let alone meaningfully comment on the plan's effectiveness. Providing such details also promotes transparency and accountability.

I. CAAP PROCESS AND COMMUNITY ENGAGEMENT

In developing the CAAP, the Ports must not lose sight of the communities that are suffering the most under the current *unsustainable* system. Communities near freight hubs have in-depth knowledge of the risks those facilities pose, and their voices should be heard. Indeed, many of these impacted communities will include residents who work in freight-related industries. The Ports will benefit from the insight of these impacted communities that can speak to the on-the-ground effects of various “solutions” and can offer critical perspective on alternatives that should be considered. For example, solutions that merely target efficiency of the system may leave communities worse off if emissions are not reduced and traffic/throughput levels increase.

In seeking this input, however, agencies must take special efforts to enable participation by residents who are not paid and trained professionals on these issues. Education and other capacity building must be part of the effort to ensure that community members are allowed to participate in a meaningful way. Further, effective engagement should involve not just more meetings, but better facilitated discussions where community members' input is sought and used to improve outcomes. Public participation, input, and support of the CAAP is essential to the success of the plan.

Relatedly, effective engagement demands clarity and certainty as to the process for developing and adopting the CAAP. However, as of the date of this comment letter, the schedule for finalizing the CAAP is still unclear. The CAAP website does not announce when the Draft CAAP will be released, how long the public will be afforded to provide comments, or if additional public workshops and hearings will be held. This uncertainty impedes community engagement. Accordingly, we request that both Ports expeditiously confirm and publicly announce the schedule for the CAAP process and how the community will be meaningfully engaged.

CONCLUSION

Many of the signatories of this letter have advocated for cleaner port operations for decades, and are proud of the success we have made. This work has spanned multiple city administrations—and required the vision and courage of various mayors, port executive directors, and boards of harbor commissioners working with local advocates.

Further, many of the questions before the Ports' current leadership today are the same questions posed to previous leaders: “Who should shoulder the costs of cleaning drayage trucks given the economics of the drayage industry?”; “How and when should significant investments in zero-emission technologies be made?”; and “How must the Ports contribute to reducing their fair share of regional emission reductions in the face of regional violations of federal air quality standards?” We urge you to answer these questions in a manner that boldly protects public health, as some of your predecessors have done. The environmental and health harms caused by

port operations are not new, and will persist without bold intervention. Your leadership is needed now more than ever.

Sincerely,



Melissa Lin Perrella
Natural Resources Defense Council

Adrian Martinez
Earthjustice

Andrea Hricko
Southern California Center for Environmental Health Sciences, USC

Taylor Thomas
East Yard Communities for Environmental Justice

Gisele Fong
End Oil/Communities for Clean Ports

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

Peter Warren
San Pedro and Peninsula Homeowners Coalition

Theral Golden
West Long Beach Association

CC:

Mayor Garcetti
Mayor Garcia
Matt Petersen
Mark W. Taylor

Clean Air Action Plan

Time: Sat, 8 Apr 2017 22:37:23 -0700
From: Ron Loveridge <rol820@yahoo.com>
To: caap@cleanairactionplan.org
Subject: Clean Air Action Plan
Attachments: msg-19867-20.html (9k)



February 20, 2017

Port of Long Beach
Attn: Heather Tomley

Port of Los Angeles
Attn: Chris Cannon

Many leaders in the two counties of Riverside and San Bernardino have endorsed the comments below. Let me join them. At the center of logistics in Southern California, this region has a high stake in reducing the pollution from trucks, sooner rather than later. Ronald O. Loveridge, Director of UCR's Center for Suburban Development and past SCAQMD Board member (1994-2012)

The Inland Empire's economy is closely tied to the Ports of Los Angeles and Long Beach. Proximity to major transportation routes and large tracts of affordable land have transformed San Bernardino and Riverside counties into an inland extension of the ports, serving as a warehousing and distribution hub for goods traveling by truck across California and the US.

In fact, approximately 40 percent of all goods from the ports flow through the Inland Empire. This number is expected to increase as the ports prepare for larger classes of container ships.

At the same time, freeways and major arterial streets that cross our communities expose our constituents to pollution from heavy-duty diesel trucks transporting goods from the ports inland. As a result, citizens of the Inland Empire are at greater risk of asthma, cancer and even premature death.

We need a solution to improve air quality and well-being for our constituents, while allowing for continued expansion of the logistics industry, which is vital to the Inland Empire's economy and to continued job growth.

Providing incentives to replace dirty diesel trucks with clean zero-and near-zero emissions trucks offers that solution. Clean truck technologies are available now that can improve air quality and public health. The ports don't have to wait. Rapidly deploying clean trucks will also allow the logistics industry to thrive by mitigating pollution that would otherwise exceed thresholds set by the South Coast Air Quality Management District, potentially crippling this key economic driver.

We, the undersigned, commend the San Pedro Bay Ports for recognizing in the Clean Air Action Plan the critical role incentives for clean truck purchases play in reducing harmful pollutants. We respectfully request, however, that the Ports consider accelerating the timeframe for deploying clean trucks to 2023, rather than 2035, so our communities can begin to realize the aforementioned health and economic benefits in the near-term.



CITY OF RANCHO CUCAMONGA

10500 Civic Center Drive | P.O. Box 807 | Rancho Cucamonga, CA 91729-0807 | 909.477.2700 | www.CityofRC.us

March 21, 2017

Port of Long Beach
Attn: Heather Tomley

Port of Los Angeles
Attn: Chris Cannon

caap@cleanairactionplan.org

The Inland Empire's economy is closely tied to the Ports of Los Angeles and Long Beach. Proximity to major transportation routes and large tracts of affordable land have transformed San Bernardino and Riverside counties into an inland extension of the ports, serving as a warehousing and distribution hub for goods traveling by truck across California and the US. In fact, approximately 40 percent of all goods from the ports flow through the Inland Empire. This number is expected to increase as the ports prepare for larger classes of container ships.

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The City of Rancho Cucamonga commends the San Pedro Bay Ports for recognizing in the Clean Air Action Plan the critical role incentives for clean truck purchases play in reducing harmful pollutants. We respectfully request, however, that the Ports consider accelerating the timeframe for deploying clean trucks to 2023, rather than 2035, so our communities can begin to realize the aforementioned health and economic benefits in the near-term.

Sincerely,

L. Dennis Michael
Mayor

cc: Kristine Scott, SoCal Gas



& San Pedro and Peninsula Homeowners Coalition

March 13, 2017

Port of Long Beach
Harbor Commissioners
4801 Airport Plaza Dr.
Long Beach, CA, 90815

Port of Los Angeles
Harbor Commissioners
425 South Palos Verdes St.,
Sam Pedro, CA 90731

Dear Members of the Harbor Commissions,

We write with respect to the schedule for completing the San Pedro Bay Ports Clean Air Action Plan (CAAP).

Several of us attended the Port of Long Beach Board of Harbor Commissioner's meeting on February 13, 2017. At that meeting, Port of Long Beach staff outlined a schedule for completing the CAAP process, which included the Ports' release of a Draft CAAP in mid-May, followed by a 60-day comment period, and then consideration of a final CAAP at a joint Board of Harbor Commissioners meeting in late summer or early Fall. We publicly supported this schedule because it allows time for the Ports to conduct supplemental analysis (such as cost, job, and health analyses), and would allow for additional community engagement.

It is our understanding that the Port of Los Angeles is seeking to accelerate this schedule so that the entire process is concluded 2-3 months in advance. We find this troubling. As environmental justice and environmental advocates in the Los Angeles and Long Beach region, we are deeply invested in the CAAP to ensure that it meaningfully advances clean air. We also support expeditious emissions reductions from port operations. However, we know that a good clean air plan takes time to prepare. It requires analysis. And it requires sufficient time for public comment and community engagement. We are concerned that accelerating the CAAP's completion will result in a document that is not supported by the facts, nor the community.

We urge the Boards of both Ports to:

- (1) Adhere to the schedule originally articulated by Port of Long Beach staff; and
- (2) Post on their respective port websites the confirmed schedule for the CAAP process, including when the Draft CAAP will be released, when comments are due, when the Boards will meet to consider the CAAP, and when additional public meetings or workshops will be held. The public needs proper and advanced notice of these events in order to meaningfully engage.

Sincerely,



Melissa Lin Perrella,
Natural Resources Defense Council

Adrian Martinez,
Earthjustice

Andrea Hricko,
Southern California Center for
Environmental Health Sciences, USC

Gisele Fong,
End Oil/ Communities for Clean Ports

Joe Galliani,
South Bay L.A. 350 Climate Action Group

Bonnie Holmes-Gen,
American Lung Association in California

Sylvia Betancourt,
Long Beach Alliance for Children with
Asthma

Peter Warren,
San Pedro and Peninsula Homeowners
Coalition

Nidia Garcia-Erceg,
Coalition for Clean Air

Taylor Thomas,
East Yard Communities for Environmental
Justice

CC: Mayor Garcetti
Mayor Garcia
Matt Petersen
Mark W. Taylor



South Coast Air Quality Management District



21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Office of the Executive Officer
Wayne Nastri
909.396.2100, fax 909.396.3340

February 17, 2017

Mr. Gene Seroka
Executive Director
Port of Los Angeles
425 S. Palos Verdes Street
San Pedro, California 90731

Mr. Duane Kenagy, P.E.
Interim Executive Director
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, CA 90815

Dear Mr. Seroka and Mr. Kenagy:

SCAQMD Staff Comments on the
Draft San Pedro Bay Ports Clean Air Action Plan Update Discussion Document

The South Coast Air Quality Management District (SCAQMD) staff is pleased to submit comments on the Draft San Pedro Bay Ports Clean Air Action Plan (CAAP) Update Discussion Document. SCAQMD staff has been participating in discussions along with the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA) with your respective staffs on potential strategies that the Port of Los Angeles and the Port of Long Beach (Ports) can effectively implement to help the region meet federal air quality standards while continuing to provide long-term sustainable operations at the Ports. The region needs a strong and aggressive CAAP Update if we are to meet our common goals of providing health protection to not only the communities surrounding the port complex, but also a significant number of communities in the Basin impacted by the movement of goods that emanate from the Ports or goods destined for export out of the region.

Thank you for your contribution to the region's air quality.

I want to commend the Ports on your overall successful implementation of the 2006 CAAP and the 2010 CAAP Update strategies. While the strategies implemented to-date have been very successful, more will be needed over the next seven to 15 years to help the region meet federal air quality standards as provided in the 2016 Air Quality Management Plan (AQMP). SCAQMD staff strongly support the long-term goal of zero emission technologies. However, the technological and policy pathways to achieve this objective need to be described in detail to provide certainty not only to your tenants, but also to affected stakeholders and the surrounding communities. As such, SCAQMD staff strongly urges the Ports to set **new** specific emission reduction targets over the next five to 20 years to provide this certainty. The 2010 CAAP Update contains such targets taken from prior AQMPs. SCAQMD staff believe that the regional targets in the 2016 AQMP should be at least the starting point to set such targets. The regional targets in the 2016 AQMP are based on a “fair share” or “equal share” approach (i.e., all emission sources would equally reduce their emissions). However, given that certain port-related sources will be more or less challenged to find cost-effective emission reduction opportunities relative to other sources, achieving the AQMP regional targets will require assessments on the Ports ability to effectively replace older equipment and vehicles operating at the Ports. The following comments on the specific port-related sources provide the SCAQMD staff’s perspective of how the Ports can achieve the overall AQMP near-term and long-term targets while establishing a glide path for the eventual transition to zero emission technologies.

CAAP Goals

The discussions beginning on Page 5 of the Discussion Draft should contain a discussion of the 2016 AQMP and the emission reductions needed to meet federal ozone and fine particulate matter air quality standards in the 2019 to 2031 timeframe. The 45% reduction in NOx emissions by 2023 and an additional 10% (for a total of 55%) by 2031 are essential for the region to meet federal ozone air quality standards. The reductions are also reflected in the State SIP (State Implementation Plan) Strategy. The State SIP Strategy goods movement related measures are also provided in the California Sustainable Freight Action Plan.

I urge the Ports to revise the NOx, SOx, and PM emission reduction targets for 2023. The targets in the Discussion Draft were established in the 2010 CAAP Update and reflect overall regional emission reduction targets from the 2007 AQMP, which will be replaced with the 2016 AQMP targets. Technological advances since 2010 justify and compel the setting of new targets.

Strategies

SCAQMD staff is supportive of the proposed strategies to further reduce emissions from port-related sources. However, there is a need for specificity for each of the proposed strategies to the level provided in the original CAAP and subsequent updates and for certain strategies to accelerate implementation of near-zero and zero emission technologies. Specifically, there is a need to specify interim milestones and actions to be taken to meet each milestone so that progress can be properly gauged. SCAQMD staff urges the Ports to provide such specificity prior to any consideration of a final CAAP Update by your respective Boards.

Drayage Trucks

Relative to drayage trucks operating in and out of port facilities, simply requiring pre-2010 trucks to meet 2010 emission standards will not be sufficiently beneficial given that these trucks will meet 2010 emission standards by 2023 in order to comply with the State Truck and Bus Regulation. The Ports indicated that the proposal to phase out older trucks and replacing them with trucks that meet the 2010 NO_x emission standard of 0.2 g/bhp-hr will accelerate NO_x reductions from most port truck trips. However, the proposed concepts may not lead to overall emission reductions if “switching” of trucks occur outside of the ports (i.e., containers may be picked up or dropped off within the port complex with a 2010 truck, a pre-2010 truck could then be used to move the container a location outside of the port complex). This has occurred in the past to bypass the Clean Truck Program and the Drayage Truck Regulation before the regulation was amended to address this issue.

In addition, while the proposed strategy encourages the use of near-zero and zero emission trucks through an exemption from a proposed fee on trucks that are ten years or older, the strategy does not lead to added deployment of near-zero and zero emission trucks since owners of ten year old trucks can simply acquire a newer truck that meets the same 2010 NO_x emission standard. SCAQMD staff urges the Ports to consider a different implementation approach that will provide a true incentive for the acquisition of near-zero and zero emission trucks by 2023. The Ports should consider a more stringent ban on all trucks not meeting a near-zero or cleaner emission level by 2023 with a gradual phase-in period beginning in 2018. The phase-in does not necessarily need to be linear and can be more gradual in the early years, building up to full implementation in the later years. SCAQMD staff recommends that the Ports consider, during the phase-in period, fleets with 2010 or newer model year trucks have the ability to sell their truck to another entity who has a pre-2010 truck, and the pre-2010 truck would be scrapped if funding assistance is available. Such a concept has worked well with the SCAQMD’s

Lower Emission School Bus Program. If the Ports implement such a program, this will result in the permanent removal of the pre-2010 trucks not only from port operations but also from operations in the South Coast Region.

The phase-in period would continue after 2023 with a gradual phase-in of zero emission trucks where feasible. At that point, near-zero trucks could be sold to fleets with 2010 trucks if funding is available for the zero emission trucks. The ultimate goal of zero emission truck operations can be reached through the phase-in approach and provide additional emission reduction benefits during the transition period. Staff recognizes that as the phase-in is implemented, there may be special circumstances where “off-ramps” may be necessary. Staff looks forward to the opportunity to work with the Ports on the proposed concepts for on-road trucks.

Cargo Handling Equipment

SCAQMD staff is supportive of the concept to transition to zero emission cargo handling equipment. However, similar to drayage trucks, there is a need to provide specific timelines and milestones for the proposed transition and potential deployment of near-zero technologies if zero emission technologies do not perform adequately in certain operations. In addition, the strategy could also recognize repowering or converting existing equipment to zero emissions given the long useful life of this equipment and the cost of new equipment.

Ocean-Going Vessels

SCAQMD staff is supportive of the proposed strategies. Given the change in the business model of the shipping industry to form alliances and consolidate goods onto a larger vessel resulting in lower numbers of ship calls (resulting in lower emissions), SCAQMD staff believes that there may be opportunities to further reduce emissions either through permanent installation of after-treatment technologies or portable after-treatment technologies that would be carried on board the vessel. Staff looks forward to the opportunity to explore such concepts with the Ports through its Technology Advancement Program and with the shipping industry.

Rail Operations

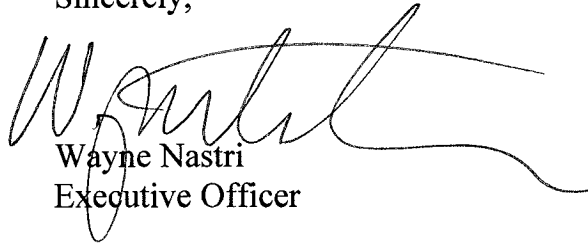
SCAQMD staff strongly supports expansion of on-dock rail operations and the current technology demonstration being conducted with Pacific Harbor Lines. We believe that over time, there will be a steady increase in Tier 4 locomotives operating in the South Coast Air Basin. However, there is a strong desire to see more Tier 4 or cleaner locomotives operating in the South Coast Air Basin as early as possible. SCAQMD staff looks forward to working with the Ports to explore additional opportunities to further reduce emissions from this sector.

Harbor Craft

SCAQMD staff believes the proposed strategy is feasible. Staff urges the Ports to continue to develop innovative strategies to further reduce emissions from this sector as the Ports evaluate operational efficiencies. The Ports action to allow harbor craft to berth at near-by locations rather than travel back to their home berth is one example of the innovative thinking that resulted in less emissions.

Again, I want to express SCAQMD staff's appreciation for this opportunity to comment on the Discussion Draft. I look forward to a more comprehensive and detailed CAAP Update that sends a strong message of the Ports' commitment to help the region meet federal air quality standards. As always, I look forward to continuing the close collaboration on technology development and funding opportunities. Please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Source Division, at (909) 396-3184 if you have questions or wish to further discuss our comments.

Sincerely,



Wayne Natri
Executive Officer

JW:MMM:HH

cc: Mr. Rick Cameron, Port of Long Beach
Mr. Chris Cannon, Port of Los Angeles
Ms. Heather Tomley, Port of Long Beach
Ms. Lisa Wunder, Port of Los Angeles

March 3, 2017

Chris Cannon
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, California 90731

Heather Tomley
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, California 90815

Subject: Draft 2017 CAAP Update Discussion Document Comments

Dear Mr. Cannon and Ms. Tomley:

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), including ocean carriers and marine terminal operators serving the ports of Long Beach and Los Angeles, PMSA submits the following comments on the draft 2017 Clean Air Action Plan (CAAP) Update Discussion Document.

The turmoil of the last year has been a capstone to a difficult decade in the shipping industry. It is estimated that this industry has lost \$10 billion in each of the last two years. Despite the losses this industry has successfully reduced emissions faster and in a greater amount than any other industrial sector. Marine terminal operators and ocean carriers did so in part because the path laid out in the original CAAP was based on known, commercially available technology that was supported by national or state emissions standards coupled with clearly defined mechanisms. The draft update to the CAAP abandons those principles and relies on speculative technology and arbitrary dates. In order to lay out a successful path with its marine terminal operator and ocean carrier partners, the ports need to substantially revise the concepts contained in the Clean Air Action Plan and rely on known technologies to achieve greater emission reductions.

Competitiveness

Over the past ten years, the environmental accomplishments have been incredible. Through a concerted effort by PMSA's members, the region has received the rewards of cleaner air. Unfortunately, over that same timeframe, we have not seen continued growth. In fact from 2006, when the CAAP was adopted to 2016, total throughput for the San Pedro Bay complex is still down. Looking at the decade preceding the adoption of the CAAP, there was the tremendous growth that made these two ports so successful. From 1996 to 2006, volumes through the San Pedro Bay Complex increased 174%. Unfortunately, since 2006 there has been no growth. Total throughput for San Pedro Bay is actually down nearly 1% over the past 11 years.

This phenomenon is not just a function of the Great Recession. In 2015 (the latest year the AAPA has complete data for), the San Pedro Bay Complex's share of the U.S./Canada market has dropped to 28.5%. That represents a nearly 4% drop in market share. This is a significant drop in market share, and this port complex would now be moving two million more TEUs through San Pedro Bay if the 2006 market

share had been maintained. That lost market share represents lost jobs, lost revenue, and lost taxes. If this industry has any hope in paying for these improvements, it is through growth. Only through growth and re-capturing market share will there be the resources necessary to make the investments envisioned by the CAAP. For this reason alone, the ports must increase their competitiveness.

Finally, the updated CAAP points to California's Sustainable Freight Action Plan as a source for setting its goals. The state Sustainable Freight Action Plan identifies increased competitiveness as one its goals and recognizes that it is a crucial component to achieving sustainability. Unfortunately, the CAAP does not do likewise. Therefore, PMSA requests that before this update to the CAAP is finalized, staff analyze the draft for its impact on competitiveness, develop a competitiveness goal, and integrate the goal within the CAAP to boost the competitiveness of this gateway.

Goals of the Clean Air Action Plan

The goals of the original CAAP were clear and that plan was successful because it aligned the ports' business goals of expediting project delivery and new infrastructure development with their environmental goals of significantly reducing emissions from port operations. The connection of the revised goals of the Clean Air Action Plan and the proposed new measures identified to achieve those goals is unclear. The CAAP update also fails to enunciate a new or updated connection to any business rationale for the measures proposed.

While the discussion document does identify the need to achieve emission reductions in order to achieve attainment with federal air quality standards and to meet California's greenhouse gas (GHG) reduction goals, these are broad measurements of state and regional air quality, not measurements of the ports' success at reducing emissions alone. Moreover, a severe mismatch exists between the stated goals of the CAAP update and the supporting measures.

For example, California has enacted SB32 which seeks to reduce GHG emissions to 40% below 1990 levels by 2030, yet the draft discussion document is seeking a 100% reduction in GHG emissions from cargo handling equipment (CHE) over the same period. No rationale has been provided as to why marine terminal operators must comply with a more aggressive schedule than that required for every other industry in California with respect to GHGs.

Similarly, the draft discussion document focuses on industry's "fair share" contribution to meeting federal air quality standards. To meet these standards, the SCAQMD's 2016 Air Quality Management Plan (AQMP) identifies ultra-low NO_x technologies as being sufficient to meet air quality standards. As you know, the AQMP has been the product of years of work involving many stakeholders to identify needed strategies to achieve attainment. Again, the CAAP requirements well exceed the baseline requirements, and no rationale has been provided why our industry should bear an additional burden beyond the reductions necessary needed to achieve attainment with federal standards.

Rather than focusing on strategies needed to accomplish stated goals, the CAAP seems focused on driving a single technology option: electrification. This is a technology mandate that is not necessary to

achieve the ports', regions', or State's goals. Accordingly, PMSA requests that in the revised CAAP document, port staff clearly align the measures in the CAAP with their stated goals and not place undue and unnecessary burdens on this industry that will only delay and significantly increase the costs of the needed emission reductions.

Cargo Handling Equipment

The draft discussion document lays out a proposal to move all CHE in San Pedro Bay to zero-emission equipment by 2030. In addition to not explaining why such drastic cuts over such an aggressive schedule need to occur and the mismatch with state and federal goals, there are several issues that the discussion document does not adequately address in recommending this proposal.

Cost

Neither the ports nor industry can adequately plan without a comprehensive understanding of the costs. To date, the only substantive estimate of the cost of moving to zero-emission technologies across San Pedro Bay is the Moffat & Nichol study commissioned by PMSA in response to the State's development of the Sustainable Freight Action Plan. That analysis put the additional capital costs of moving to automated zero-emission technologies (the only zero-emission technology available today) at \$18 billion over 30 years plus billions in added operating costs. Considering the losses this industry is facing, the constraints facing even the current capital programs the ports are engaged in, and the lack of volumetric and market-share container growth, the resources do not exist from either private or port revenue sources to achieve the ports' goals within the proposed timeframe. There are also exceptionally limited state and federal public funding sources for assisting in this type of equipment purchase, and there is even an effort to restrict the use of public funds dealing with improvements to port efficiency. PMSA requests that the upcoming CAAP document outline the costs of this measure and most likely sources of funding.

Planning & Permitting

The goal of moving to electrification by 2030 is less than 13 years from now. Yet, the discussion document does not describe how planning and permitting will happen. The only discussion of planning is suggestion that marine terminal operators submit procurement plans in 2020, the same year that the ports will conduct feasibility analyses. On its face, this proposal is unworkable. Procurement planning must follow, not be concurrent with any feasibility analysis. Second, asking marine terminal operators in 2020 to submit procurement plans for 2030 will be an illusory process for most terminals, given the plans will be for a time period beyond the end of their current lease terms.

Furthermore, even if there are no lease interruptions for a facility between 2020 and 2030, terminals cannot begin procurement planning without understanding the quantity and type of infrastructure that the ports will be constructing at marine terminals. As part of the next CAAP document, we request the ports to lay out their infrastructure plans across the port, which must include the necessary timeframe for California Environmental Quality Act (CEQA) review and

permitting in addition to an allowance for infrastructure development. Projects of this scale typically require years to successfully move through the planning and permitting process. The ports goals must reflect the tremendous planning, permitting, infrastructure construction, and technology deployment effort which will be necessary across all the marine terminals in San Pedro Bay, mindful of current and future lease obligations, within the next 13 years.

Technology

As previously stated, electrification is not necessary to achieve the criteria and GHG emission reduction needed to meet State and federal goals. Both California and U.S. EPA have committed to consider standards for the next generation of emission control technologies. These ultra-low emission technologies are 99% cleaner than equipment deployed prior to the original Clean Air Action Plan. Unfortunately, a focus on technology like electrification will mean that the final 1% of emission reductions will cost tens of billions of additional dollars. PMSA requests that in the next CAAP document, port staff evaluate both ultra-low emission technologies and electrification options for achieving significant emissions reductions.

Stranded Assets & Lease Terms

The draft discussion document recognizes the issue of stranded assets. The problem of stranded assets continues to grow as we move toward proposed deadlines. While the discussion document proposes a procurement plan as a means of mitigating stranded asset impacts, the useful life of most terminal equipment, which is currently in service, will be longer than the time until the CAAP's proposed deadline. The proposed timelines will also likely strand newer CHE purchased between now in 2030, which is required to be replaced under the California Air Resources Board's CHE rule, thus penalizing these purchases. Marine terminal operators need to be able to comply with existing rules and have the ability to plan and make economic use of their investment. If they are unable to do so, the CAAP will measurably harm the competitiveness of the San Pedro Bay port complex.

The need to make economic use of capital investment also raises the fact that the remaining term of existing leases may preclude the ability to invest billions in existing facilities. Leases will need to be extended for longer terms, in order to have sufficient time to recoup the costs of new, expensive investment.

Incentives

Much of the equipment on terminals today and planned for the near future has been and will be purchased as a result of previous CAAP measures or regulatory requirements. These requirements have already forced marine terminal operators to sacrifice years of useful life and their capital investment in the equipment. The ports have either directed this or are already the beneficiaries and fully aware of State's requirements. Facing a new round of forced obsolescence, the ports need to work with their partner tenants to find and provide incentive funding for new equipment. Terminal operators' business models are based on making economic use of their capital investments. If that equation changes, it directly impacts terminals' financial viability. Terminal operators are unable to charge their customers for

unanticipated regulatory requirements or loss of capital investment. As a result, incentives are critical to make the transition to a new round of capital equipment investment successfully.

Feasibility Analysis & Other Analyses

The draft discussion document proposes feasibility analyses to examine the availability of technology to replace existing terminal equipment. PMSA agrees that this is a necessary step. The next draft document should reflect the current status of what technology is feasible to accomplish the stated goal. Ultimately, no one understands better what is feasible, whether from an operational perspective, financial perspective, durability perspective, or other aspect, than a marine terminal operator. As a result, PMSA requests that the ports establish feasibility processes in consensus with PMSA's members with respect to both the technological and financial constraints regarding CHE introduction. In addition, PMSA requests that all supporting studies, whether economic or technical, be subject to industry review and comment. PMSA would be happy to continue to serve as the liaison to marine terminal operators and ocean carriers.

Terminal Operations

One of the major departures of the draft discussion document from prior versions of the CAAP is its dive into terminal operations with the goal to boost efficiency. However, some of the measures would actually decrease terminal efficiency, likely increasing congestion and increasing emissions. While efficiency measures will typically reduce emissions, it can only be successful by looking at system-wide efficiencies throughout the entire supply chain. As we have all learned from recent experiences with the accommodation of larger vessels, improving efficiency in a single element often comes at a cost of congestion in other parts of the system. For these reasons, PMSA applauds the desire for greater efficiency but also very strongly recommends that most efficiency measures be removed from the CAAP and that the CAAP affirmatively recommend that these measures be further addressed under the Supply Chain Optimization forum. The Supply Chain Optimization forum includes all the necessary operational and technical experts needed to make decisions on improving efficiency throughout the port and supply chain.

Green Truck Priority

The CAAP proposes to have marine terminal operators change their operations to provide a "Green Truck Priority" service in order to create an incentive for truck owners to invest in cleaner trucks. PMSA has several concerns regarding this measure. First, it is unclear why marine terminal operators, who have their own proposed obligations under the CAAP, should bear the burden of incentivizing other companies' cost of compliance. Second, while the discussion document places a significant amount of focus on efficiency, this measure would actually reduce terminal efficiency. Any measure that would require terminals to reserve gate lanes, labor, appointment slots, or other aspects of terminal operations to a select group will only reduce efficiency. Efficiency is achieved by streamlining operations and reducing multiple workflows throughout a facility. If the ports are serious about such a program, the ports need to provide incentive funding to marine terminal operators to provide the necessary benefits to

truck owners. Any program proposed by the ports should not only improve service to truck operators, it should also improve terminal efficiency. For example, a peel off operation where the truck operator takes the next available container would improve both terminal and truck efficiency. Without offering such an incentive, the ports should not expect terminal operators to help fund emission reductions from another logistics sector.

Expand On-dock Rail

PMSA supports efforts to increase on-dock rail use. On-dock rail will be an important tool to increase efficiency and provide a competitive advantage to the San Pedro Bay ports. PMSA looks forward to working with both ports to increase on-dock percentages.

Electric CHE Charging standards

PMSA recognizes the value in developing universal charging standards for electric CHE. When such an effort begins, the ports should include PMSA's members to ensure that the technology adopted is consistent with terminal operational needs.

Green Terminal Recognition Program

PMSA supports efforts to develop a green terminal recognition program that recognizes the ongoing efforts of marine terminal operators to increase efficiency and reduce emissions. The success of a green terminal program may hinge on the incentives that the ports will offer. In an environment of terminal overcapacity, terminal customers seek the lowest possible cost. Existing recognition programs do not carry the appeal they previously did due to the industry's structural overcapacity. Additionally, any such recognition program will not succeed if it pits one logistics provider against another; for example, attempting to optimize truck operations at the cost of vessel operations efficiency.

Equipment Idling

PMSA supports the goal of reducing idling. Idling reductions will not only reduce emissions, it will also reduce fuel consumption and operating costs. Before the ports embark on a specific program to reduce idling, however, more work needs to be done to determine the baseline. The idling emissions presented in both ports' annual emissions inventories are only modeled assumptions and do not reflect the real-world amount of idling occurring. Since those assumptions were determined, most equipment has been fitted with idle-limiting devices. Such devices may have already substantially cut idling and associated emissions.

PMSA also recommends that the ports engage with the Pacific Maritime Association (PMA), which deals with labor-related matters on the waterfront. The ports should work with PMA to determine if training is required and the requirements and confines of the current labor agreement.

Finally, once the magnitude and extent of idling emissions become known, the ports must incorporate this into the inventories, and then evaluate whether further expenditures to reduce

idling are justified, or if the money is better spent on replacing equipment with newer technology. Ultimately, there are limited resources to be spent on reducing emissions.

Ocean-going Vessels

Vessels are one of the most challenging emissions sources in the ports. As we have seen in the past decade, vessels rotate into and out of different services depending on economic conditions and trade flows. As a result, strategies that depend on fixed installation of technologies on California-bound vessels (as opposed to relying on technologies of international use) are subject to disruption when vessel redeployment is needed. As an example, shore power remains a California-only strategy, and is inflexible, costly and has a long lead time for vessel retrofits. Changing trade flows have meant that investment on specific vessels has been rendered useless when economic conditions dictate that a retrofitted vessel is redeployed. As the ports look to future controls, PMSA cannot over-emphasize the need for the ports to find strategies that provide more operational flexibility and can be harmonized with international efforts.

Vessel Speed Reduction

The Vessel Speed Reduction program (VSR) has been one of the most successful voluntary emission reduction programs in the maritime industry. With compliance at approximately 90%, thousands of tons of pollutants have been cost-effectively eliminated. The draft discussion document proposes to eliminate the financial incentive associated with slowing down within 20 nautical miles (nm) of the ports and focusing on incentivizing speed reduction for the full 40nm. PMSA is concerned that eliminating the 20nm incentive will not increase compliance for the 40nm distance, and would instead recommend maintaining both sets of VSR incentives.

Given the discrepancies in participation, PMSA would suggest that the ports assess why some vessels are unable to participate at 40nm, but do meet the speed targets within 20nm. This should be done prior to making any significant changes to the program to ensure the changes do not lead to unintended consequences or be counter-productive. To the degree that constraints like vessel schedules, labor shifts, and tides limit a vessel master's ability to slow down from 40nm, the elimination of the 20nm incentive may only eliminate the incentive to slow for the 20nm leg of the voyage. If this were the case, total emissions could increase. Another aspect of the program to consider is the all or nothing approach of assessing fleet-wide compliance to determine eligibility for the financial incentive. For example, if one service of an ocean carrier requires it to not comply with the VSR due to other constraints (e.g., the need to make a tide window or start of shift at Oakland, or a Panama Canal appointment), that may result in the entire fleet losing out on the financial incentive. Without the fleet-wide financial incentive there would be no incentive for other services of the same ocean carrier to reduce speed. This effect may be amplified by eliminating the 20nm incentive and focusing on the harder to achieve 40nm incentive. A vessel-by-vessel approach may help maximize participation in the future. Connection of VSR to higher dollar value programs such as POLB's Vessel Dockage Waiver Program or PANYNJ's CVI program could also increase participation.

Dirty Ship Fee

A proposal to collect a fee on Tier 0 and Tier 1 vessels calling San Pedro Bay would only create a negative impression the ports are developing a revenue scheme. Vessels are deployed to trade routes due to the ability to fill a ship. Fees, fines and penalties that attempt to alter this risk are ineffective due to the significant costs incurred by vessels operators when they are unable to fill a ship.

As the port knows, there is a glut of ship capacity. A recent Wall Street Journal article on shipbuilding states that shipbuilders “are all suffering from a global slump that may not end until 2019”. With the industry facing multi-year losses in the many billions of dollars, the ports’ fees will only impose costs that will serve to have shippers and carriers consider other gateways to move their goods and will not improve efficiency or increase the level of service at ports.

Ultimately, a proposal that diverts cargo is self-defeating. It is only through continued growth that the ports, marine terminal operators, and ocean carriers will be able to pay for the environmental improvements we are all seeking to make in San Pedro Bay. In order to find ways to encourage specific vessel types to call on the ports, and bring more cargo, PMSA suggests that the ports investigate whether specific, significant incentives may be developed.

From a GHG perspective, for non-liner vessel types incentivizing use of a limited vessel group (Tier II or III) could result in delays for California cargos, and increase costs and GHG emissions if vessels must travel longer distances to pick up these cargos. Both GHG and criteria pollutants should be considered.

Expanded Shore power

The draft discussion document proposes to expand the use of shore power beyond those vessel types already covered by CARB’s At-Berth Regulation. PMSA is concerned that this measure may needlessly divert cargo from Southern California. Previous reviews by the ports and CARB have revealed that it is not cost-effective to place at-berth controls on vessel types like break bulk, auto carrier, and dry bulk. This is primarily because the emissions from these sources are so small, such vessels make few if any repeat visits, and the cost to control is very expensive. Further, these vessel types typically do not provide regularly scheduled service like container vessels or cruise ships do. As a result, it would not be difficult to divert such ships to terminals outside San Pedro Bay. As these vessels often deal in price-sensitive commodities, increased cost to use San Pedro Bay port facilities will be taken into count.

Finally, CARB has committed to explore this under a state-wide regulation. If CARB finds that there are vessels that are cost-effective to control, San Pedro Bay ports would at least be on a level-playing field with other California ports. In order to expand shore power beyond those vessel types that are not found to be cost-effective by the ports or CARB, PMSA agrees that incentives may be the best way to achieve expanded use of at-berth controls without risking cargo diversion.

Energy Efficiency Incentives

PMSA supports the idea of developing incentives to encourage the installation of emission control technologies and operational efficiencies that reduce both criteria pollutants and GHG emissions. The idea of multiple ports participating in such an incentive program is particularly worth exploring. Many incentive programs have been unsuccessful due to the inability to deliver sufficiently compelling incentives. With multiple ports participating, it may be worthwhile for such a program to deliver more compelling incentives. However, there are hurdles to such programs. First, the programs must be simple to participate in. If the recordkeeping costs consume much of the incentive, the program will lose its impact. New vessel data collection and communications systems could enable such a program, and the program could be structured to incentivize installation of such systems. However clear requirements and low administrative burden are critical to success in these days of reduced vessel company staffs. Second, such programs must take into account early action. Any program that fails to do so would penalize those who have already taken steps to reduce emissions or improve efficiency while rewarding later actors.

Finally, the ports and industry must work with the State of California to harmonize rules with international standards. The draft discussion document gives an example of the use of seawater scrubbers as an advanced technology that could significantly reduce emissions, but a technology that is not formally permitted under California's Ocean-going Vessel Fuel Rule. Since operating a scrubber and using distillate fuels both cost money, ocean carriers cannot be reasonably expected to do both, even though scrubber technology may provide greater emissions benefit. This represents an opportunity to harmonize rules and obtain greater emission reductions at lower costs. PMSA hopes that the ports will partner in this effort.

CAAP and Indirect Source Rules

The ports need to address what happens with the CAAP with regard to the possible adoption of indirect source rules (ISRs) by local or state regulatory agencies. While the ports and PMSA are in agreement that ISRs would harm any collaborative approach, it is unclear how the ports intend to handle CAAP implementation in the event that an ISR is adopted. Marine terminal operators and ocean carriers cannot reasonably be engaged in a collaborative approach to reducing emissions when faced with a regulatory scheme that may require other measures that will likely limit growth. Even if ISRs are not adopted in the near term, the current draft 2016 Air Quality Management Plan proposes to consider them at the end of a one year stakeholder process. The ports' partners deserve a clear statement of what the ports' expectations are in the event of a competing regulatory scheme.

CAAP and California's Cap-and-Trade Program

One of PMSA's major concerns with the CAAP is the aggressive schedule for reducing GHG emissions from CHE. The proposal appears to be far more aggressive than the State's program. More importantly, as long as fuels are a component of the State's Cap and Trade Program, total state-wide GHG emissions will be determined by the number of allowances auctioned by CARB. In essence, were all port GHG

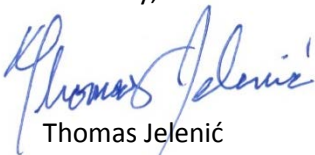
emissions eliminated, the allowances for those averted emissions would be available to other GHG sources (possibly at lower cost) and California's total GHG emissions would remain unaffected following the glide path established by the State for the reduction in GHG allowances.

In addition, it is counter-productive to our collective efforts and the economic success of the ports, and environmentally unnecessary, for the ports to force GHG emissions reductions at its operations if the costs of achieving reductions exceed the cost of reducing those emissions from other sources. In other words, when GHG emissions can be reduced at the cheapest cost per ton then everyone in the economy, and at the ports, are better off in the long-term.

Given these two maxims of the existing state GHG regulatory program, that fuels are already paying into the state program and that other cost-effective emissions reductions may be available to achieve additional emissions reductions, Port staff needs to evaluate how their proposals will work within the context of Cap and Trade. To the degree that the maritime industry accelerates GHG emission reductions, it may be that the maritime industry unnecessarily expends billions to "beat" the State mandated goals while having no measurable effect on total State-wide emissions, much less global levels. In all likelihood, the most effective approach would be for the port's strategy to match the glide path established by CARB to achieve 40% below 1990 levels by 2030, and to allow for flexibility in the CAAP when the costs of GHG emissions reductions at the Ports exceed the cost-per-ton of making equivalent reductions via the Cap and Trade market.

PMSA looks forward to continuing its work with the ports on the update to the Clean Air Action Plan.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Jelenić". The signature is fluid and cursive, with the first name being more prominent.

Thomas Jelenić
Vice President

cc: Gene Seroka, Port of Los Angeles
Mike DiBernardo, Port of Los Angeles
Duane Kenagy, P.E., Port of Long Beach
Rick Cameron, Port of Long Beach

FW: CAAP 2017 Discussion Document

Time: Fri, 31 Mar 2017 19:13:54 +0000
From: "Tomley, Heather" <heather.tomley@polb.com>
To: "'caap@cleanairactionplan.org'" <caap@cleanairactionplan.org> , "Cannon, Chris (CCannon@portla.org)" <CCannon@portla.org> , "Tim DeMoss (tdemoss@portla.org)" <tdemoss@portla.org> , "Wunder, Lisa" <lwunder@portla.org>
CC: "Mollanen, Renee" <renee.mollanen@polb.com>
Subject: FW: CAAP 2017 Discussion Document
Attachments: msg-30233-368.html (15k)



From: Guy Fayette [mailto:mlileasing@mayorusa.com]
Sent: Friday, March 31, 2017 11:56 AM
To: Tomley, Heather
Cc: Michael Mayor; Mollanen, Renee; Mascaro, Brett; aj.naddell@byd.com
Subject: CAAP 2017 Discussion Document

Heather Tomley

Director of Environmental Planning

Port of Long Beach

Dear Ms. Tomley,

This email is on behalf of Michael Mayor, President, Mayor Logistics.

Mayor Logistics (www.mayorusa.com) is a SoCal drayage transport company, based in Gardena. Company operations involve the extensive daily dispatch of our truck fleet to and from the Ports of Los Angeles (POLA) and Long Beach (POLB) to transport container traffic bound for SoCal logistics, warehouse, trans-load and inter-modal destinations. Mayor Logistics is an active compliant participant in the CARB Drayage Truck Registry and fully supports low NOx (CNG/LNG) and ZEV (electric) OEM vehicle technology.

In regard to the CAAP 2017 Discussion Document we understand that the new plan update will identify next steps and new strategies to guide progress into the future. One major initiative is to continue to advance the clean trucks program with the goal of a zero emissions fleet by 2035 paired with priority access to the port for zero and near-zero emissions trucks. This priority access increases the value of zero-emissions trucks and offsets the cost of transitioning to new technology.

Consequently, Mayor Logistics has received a proposal from BYD Motors to purchase 10 Zero Emission Drayage Trucks. We are also in discussion with SoCalEdison (SCE) regarding the necessary electric grid infrastructure.

Mayor Logistics has been awarded \$100,000 via SCAQMD Proposition 1B Heavy Duty Diesel Truck Replacement for Low NOx (.02) (CNG/LNG) engine technology. In addition, Mayor, is on reservation status for \$250,000 of NGVIP via UC Irvine, Institute of Transportation Studies; and has filed a Letter of Commitment for SCAQMD application to the CA Energy Commission GFO 16-604 Sustainable Freight Transportation Projects.

In regard to Zero Emission Trucks – Absent from the Discussion Document is a real road map with interim goals and milestones. These interim steps must be included because the current approach provides little accountability and short-term actions. Mayor Logistics encourages the Port of Long Beach to lay out a cogent plan to achieve zero emission truck technologies, including targeting segments of the drayage market that can achieve 100% zero emissions sooner than 2035. Perhaps upcoming funding disbursement via the \$800 million VW Settlement will be significant.

Specifically:

- Interim targets for implementation ~ TBD, will be based upon application funding via CARB/SCAQMD disbursement.
- Infrastructure build for ZEV ~ Mayor Logistics intends to purchase and install 10 BYD electric charger stations.
- To align with CAAP, Mayor Logistics plans to convert at least 10% of our truck fleet to ZEV.

Mayor Logistics looks forward to your reply.

Sincerely,

--

Guy Faighte

Sales Finance Consultant

mlileasing@mayorusa.com

MLI Leasing, LLC.

17212 S. Figueroa Street

Gardena, CA 90248

(424) 295-0262

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Re: Truck regulations for ports

Time: Fri, 21 Apr 2017 14:10:35 -0700
From: enrique ponce <yorbik17@gmail.com>
To: CAAP@cleanairactionplan.org
Subject: Re: Truck regulations for ports
Attachments: msg-6151-62.html (4k)



Ok thank you for your time.

I asked because right now I own a 2012 and the DEF system is killing me economically. To fix it will cost me over 7k, and right now as you know it's the slow season thanks to our dependence on china. So I'm letting it go for those reasons.

This system is hurting us owner operators big time.

Well thanks again.

On Apr 21, 2017 10:35 AM, "CAAP" <CAAP@cleanairactionplan.org> wrote:

Dear Luis,

The Draft Clean Air Action Plan (CAAP) Discussion Document proposes that starting sometime in 2018, any truck (LNG or Diesel) with an engine that is 10 years old or older would be subject to a fee. That means, if the fee is adopted by our Boards as currently proposed, starting in mid-2018, trucks with engine model year 2007 or 2008 will be subject to a fee. The following year, 2019, trucks that are 2009 and older will be subject to a fee, and so on for subsequent years. Again as currently proposed, there is no distinction between LNG or diesel engines. The strategy is currently based on engine model year. So if this proposal does not change, your 2010 truck would be subject to fees starting in 2020. Your truck would be banned from the Port in 2035 as the current proposal will only allow zero emission trucks in the Ports Drayage Truck Registry in 2035.

This is just a proposal at this time and the two Ports are currently working on a Draft CAAP document where some of the things discussed in the Discussion Document may change. We have received many comments on the proposed revisions to the Clean Truck Program. If you have any comments or concerns on the CAAP's changes to the Clean Truck Program please feel free to send them to this email. The Draft CAAP is currently estimated to be released summer 2017. The public will be given time to comment on the Draft and a workshop will be held to discuss the proposals.

Please make sure to sign up for the CAAP email mailing list for more updates on the CAAP and for the next public workshop. You can sign up to be on the mailing list at the link below.

<http://www.cleanairactionplan.org/subscribe/>

When purchasing a truck, you may be able to make use of the South Coast Air Quality Management District (SCAQMD) Voucher Incentive Program. If you own a truck or a small fleet of trucks (less than 10), you can turn in your old truck for a voucher to pay for a newer truck. More money is generally given to cleaner emission trucks (i.e. low Nox engines, zero emissions). Please see SCAQMD's website that has been linked below for more details and requirements about their program.

<http://www.aqmd.gov/home/programs/business/business-detail?title=voucher-incentive-program&parent=vehicle-engine-upgrades>

You can also look into the State's incentive program in purchasing a truck as well.

<https://www.californiahvip.org/default.aspx>

I hope this email has answered your question and that the incentive programs I referred you to will help you in purchasing a vehicle.

Amber Coluso

Port of Los Angeles

Air Quality Specialist

On Thu, 20 Apr 2017 09:31:37 -0700, enrique ponce wrote:

> Hi my name is Luis and I work for the long beach LA ports. At the end of
> the year I plan on buying a 2010 truck to put to work in these ports. Will
> this older model truck affect me going in to these ports?

5/18/2017

Runbox : Re: Truck regulations for ports

- > How old can the trucks be in the near future?
- > Thank you for your time.

CAAP Discussion Draft

Time: Sun, 14 May 2017 21:32:58 -0700
From: Joan Levine <jnlevine1@gmail.com>
To: caap@cleanairactionplan.org
Subject: CAAP Discussion Draft
Attachments: msg-3666-1906.html (1k)



Dear Sir or Madam,

Did I hear correctly that the Ports are seriously considering putting off until 2023 and 2035 any meaningful requirements that trucks clean up their emissions? Are you kidding me?

In case you don't know (and not all of you can be so ignorant), there are technologies available right now that are extremely clean, and can make a REAL DIFFERENCE for our lungs and our air. These are next-to-zero emission natural-gas trucks. They are like 99% cleaner than the dirty diesels on our roads.

Why on EARTH would you not mandate these cleaner trucks immediately, to clean up our EARTH? I know electrification is trendy, but please face reality. This generation can't wait.

Please don't stop clean air now, for the promise of electric trucks in the future. That would go down in history as a tremendous mistake.

Re: extension of 2007 engines to enter the ports until 2022.

Time: Tue, 16 May 2017 09:36:08 -0700 (PDT)
From: "CAAP" <CAAP@cleanairactionplan.org>
To: "Juan Alvarez" <Juan.Alvarez@ShippersTransport.com>
CC: "tdemoss" <tdemoss@portla.org> , "renee.moilanen" <renee.moilanen@polb.com>
Subject: Re: extension of 2007 engines to enter the ports until 2022.

Attachments: msg-9554-2191.html (3k)



Dear Mr. Alvarez,

The current California Air Resources Board Truck and Bus regulation allows for drayage trucks 2007 or newer engines to be compliant until December 31, 2022. So at the moment, truck with engines that are rated to 2007 EPA emissions standards are compliant with the Port of Los Angeles and Port of Long Beach Clean Truck Program.

However, the San Pedro Bay Ports Draft Discussion Document for the Clean Air Action Plan (CAAP) Update 2017 as currently written proposes that starting sometime in 2018, any truck (LNG or Diesel) with an engine that is 10 years old or older would be subject to a fee. That means, if the fee is adopted by our Boards as currently proposed, starting in mid-2018, trucks with engine model year 2007 or 2008 will be subject to a fee. The following year, 2019, trucks that are 2009 and older will be subject to a fee, and so on for subsequent years. Again as currently proposed, there is no distinction between LNG or diesel engines. The strategy is currently based on engine model year.

This is just a proposal at this time and the two Ports are currently working on a Draft CAAP document where some of these things discussed in the Discussion Document may change. We have received many comments on the proposed revisions to the Clean Truck Program. If you have any comments or concerns on the CAAP's changes to the Clean Truck Program please feel free to send them to this email. The Draft CAAP is currently estimated to be released summer 2017. The public will be given time to comment on the Draft and a workshop will be held to discuss the proposals.

Please make sure to sign up for the CAAP email mailing list for more updates on the CAAP and for the next public workshop. You can sign up to be on the mailing list at the link below.

<http://www.cleanairactionplan.org/subscribe/>

If you have any further questions, please feel free to contact us through this email.

Thank You,

San Pedro Bay Ports

On Mon, 15 May 2017 22:37:46 +0000, Juan Alvarez wrote:

> Good afternoon,
>
> I just want to confirm if that all engines 2007 emission compliance are extended to enter the ports until 2022 as stated on the web-site.
>
>
> [cid:image001.png@01D2CD91.304F6FB0]
>
> Regards,
>
> Juan C. Alvarez. (JC.)
> Safety Director.
> Office-562-424-5525
> Fax-310.847.7346
> juan.alvarez@shipperstransport.com
>
> [Description: Shippers Transport Express]
> PSave a tree. Don't print this email if not necessary

New Study Shows Renewable Natural Gas in Transportation Can Create Up to 130,000 Jobs and Generate Nearly \$14 Billion in Economic Benefits for California

Time: Wed, 24 May 2017 19:33:20 +0000
From: Greg Roche <Greg.Roche@cleanenergyfuels.com>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: New Study Shows Renewable Natural Gas in Transportation Can Create Up to 130,000 Jobs and Generate Nearly \$14 Billion in Economic Benefits for California

Attachments: msg-27766-393.html (6k)
ICF_RNG+Jobs+Study_FINAL+with+infographic.pdf (845k)
ICF_Jobs_Study_Infographic.pdf (197k)



New Study Shows Renewable Natural Gas in Transportation Can Create Up to 130,000 Jobs and Generate Nearly \$14 Billion in Economic Benefits for California

<http://www.rngcoalition.com/press-release-may-1-2017>

Dear Ports of Los Angeles and Long Beach:

Sustainable freight transportation requires low carbon fuel to fight climate change. Renewable Natural Gas (RNG), the lowest carbon fuel available, is already being used today to fuel the natural gas trucks operating at the Ports of Los Angeles and Long Beach. RNG is produced from a growing number of sources including food waste, landfills, water treatment, and dairy farms. California stands to benefit with jobs and economic development from this low carbon fuel.

Economic consulting firm ICF completed a study that examines the economic potential of fueling heavy-duty trucks with RNG produced in California, instead of being powered by petroleum-based diesel. ICF found that RNG in transportation can create up to 130,000 jobs and generate nearly \$14 Billion in economic benefits for California. Switching to natural gas trucks fueled by RNG at the two San Pedro Bay Ports would add more than 23,000 jobs and \$2 billion in economic benefits!

For every job created through direct investment, two more jobs will be created. The study estimates that these are high-paying jobs, with estimated labor income more than double California's current median income. The jobs and economic activity from investments in natural gas trucks powered by in-state RNG support California's diverse workforce with jobs in construction, fabrication, vehicle manufacturing, engineering services, waste management, and service industries.

RNG is ready to contribute to the Ports' objectives under the CAAP and help meet goals set by California and local communities to combat climate change, divert waste from landfills, reduce air pollution, and reduce petroleum consumption while at the same time grow our sustainable economy. The jobs study and an infographic summary are attached. Members of the Coalition for Renewable Natural Gas and the California Natural Gas Vehicle Coalition welcome an opportunity to meet with the Ports and discuss the exciting opportunity with RNG.

Greg Roche

VP Sustainable Trucking

Clean Energy

4675 MacArthur Court, Suite 800, Newport Beach, CA 92660

office 949-437-1359 | mobile 949-377-8119

greg.roche@cleanenergyfuels.com

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