



August 31, 2018

**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Mr. Chris Lytle
Executive Director
Port of Oakland
530 Water Street
Oakland, CA 94607

RE: Draft Seaport Air Quality "2020 and Beyond" Plan

Dear Mr. Lytle:

Thank you for the opportunity to provide comments on the draft update to the Port's Seaport Air Quality Plan. The Bay Area Air Quality Management staff compliments Port staff for the hard work put into the draft document and the productive process with the Task Force reconvened to provide input to the Plan's development. The broad participation in the Task Force by representatives of the local communities, labor unions and companies doing business at the Port reinforces the strong foundation set in implementing the prior air quality plan. We also acknowledge and applaud the significant effort over the past decade by the Port's tenants and customers to reduce emissions from their activities.

Air District staff supports the vision set forth in the draft Plan to transition Seaport operations to zero emissions, as well as meet the State of California's goals for reductions in Greenhouse Gas emissions. However, the draft Plan does not provide clear commitments to meet these goals, nor does it convey with regards to diesel emissions a sense of urgency to do so expeditiously. Based on the presentations and discussions at the Task Force meetings, we hoped that the draft Plan would describe a clear glide path towards zero emissions, with the establishment of specific commitments and timelines for transitioning to zero emission equipment and trucks, for increasing shore-power usage and for bringing into service cleaner tugs and trains. Setting clear commitments and specific timelines establishes priorities so that your tenants and customers can plan appropriately; and our Board can better prioritize funding and jointly lobby for additional resources.

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Air District staff urges that the following changes be made to the draft Plan prior to the September 26, 2018 meeting of the Task Force, and that a new draft be released for review prior to consideration by the Board of Commissioners:

- Release for public review the technical studies referenced in the draft Plan.
- Provide a timeline describing when each specific measure will be implemented by the Port and/or its tenants. Air District staff recommend that the most detail be given to the initial deployment of zero-emission trucks and cargo handling equipment between 2019 and 2023. For the years after 2023, the Plan should provide emission reduction milestones every five years.

Port staff spoke quite convincingly at the Task Force and Co-Chair meetings about the natural fit for electric trucks in moving containers within the Port boundaries, especially in the evenings. Disappointingly, this excellent application of zero emission equipment isn't mentioned even in passing in the draft Plan. We urge the Port to make this project a central feature of the Plan, with a goal of implementing it over the next five years.

There are also several projects that the Port is implementing within the GoPort initiative with the Alameda County Transportation Commission that will result in emission reductions. We urge the Port to incorporate this freight efficiency effort into the Seaport Air Quality Plan.

- Incorporate the specific projects being recommended in the comment letter being submitted by the California Air Resources Board, as well as the projects detailed in our letters to the Port's Board of Commissioners dated November 3, 2017 and November 28, 2017.
- Establish an independent review process for determining the pollution exposure reduction benefits from and the technical and economic feasibility of clean fuels, zero emission trucks and cargo handling equipment, and low-emission engines for harbor craft and locomotives. This review process should rely upon the Task Force to develop a shared consensus of which technologies are the best fit for the trucks, refrigeration units and various equipment used to move freight at the Port.
- Add measures to reduce emissions from line-haul locomotives.

- Include a commitment to study and adjust the Port's leases, fees, and tariffs to provide incentives for using zero emission trucks and cargo handling equipment, or other energy efficient methods, to move freight at the Port of Oakland.
- Add a discussion of how the Plan will integrate the Port's assessment of sea-level rise adaptations, as required by AB 691. This assessment will help ensure that infrastructure to support zero-emission trucks and equipment will be adequately protected from rising water levels.

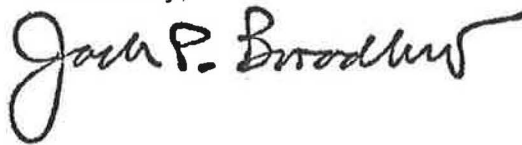
In addition to the above changes, there are two important clarifications needed to the draft Plan:

- The draft Plan states that the Air District has contracted with AEG for a barge based "bonnet" abatement system to control emissions from vessels in Oakland. The system that the Air District is co-funding will be used at the Port of Benicia. We welcome the opportunity to jointly develop a similar system for use in Oakland.
- The draft Plan cites a report prepared by the Air Resources Board in 2008, "Diesel Particulate Matter Health Risk Assessment for the West Oakland Community," which concluded that Port operations contribute 16 percent to the overall cancer risk in West Oakland. However, as explained most recently in our November 28, 2018 letter to the Port's Board of Commissioners, the Air District, the Port and the local community conducted a follow-up study in 2009 which found that a larger proportion of the truck traffic in West Oakland was attributable to Port operations and concluded the Port's contribution to the overall cancer risk in the West Oakland community is approximately 29 percent. We request the draft Plan rely on the conclusions of the 2009 study.

The Air District is currently assisting the Port through its regional role as a funding agency and expertise in the enforcement of air quality regulations. Our recent commitments include more than \$5 million towards conversion of rubber-tired gantry cranes to near-zero emissions, a grant for a small, but vital, zero emission truck test, repowering tugboats, and support for the purchase of a Tier 4 switcher locomotive. We are also co-hosting with the Port an application workshop in early September.

In closing, I would like to acknowledge that the path to zero-emissions at the Port will not be easy and will take time, but I am confident that working in concert with the local community and your workers, tenants and customers, we can achieve the goals set forth in the draft Plan.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO

cc: BAAQMD Director Nate Miley
BAAQMD Director Scott Haggerty
BAAQMD Director John J. Bauters
BAAQMD Director Pauline Russo Cutter
Mr. Cestra Butner, President, Port of Oakland Board of Commissioners
Mr. Andy Garcia, GSC Logistics, Inc.
Ms. Margaret Gordon, WOEIP
Mr. Brian Beveridge, WOEIP
Ms. Cynthia Marvin, California Air Resources Board
Ms. Anna Lee, Alameda County Health Department