



**Alameda County Health Care Services Agency  
Public Health Department**

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August 31, 2018

Ms. Khamly Chuop  
Port Associate Environmental Planner/Scientist  
Port of Oakland  
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Oakland, CA 94607  
E-mail: [kchuop@portoakland.com](mailto:kchuop@portoakland.com)

Subject: Draft Seaport Air Quality 2020 and Beyond Plan

Dear Ms. Chuop:

Thank you for the opportunity for the Alameda County Public Health Department (“ACPHD”) to comment on the Port of Oakland’s Draft Seaport Air Quality 2020 and Beyond Plan (“Draft Seaport Plan”). The vision of the Alameda County Public Health Department is that everyone in Alameda County no matter who you are, where you live, how much money you make, or the color of your skin, leads a healthy, fulfilling and productive life. ACPHD has a long-time commitment to partnering with community stakeholders, Regulatory Agencies, the City and the Port to achieve health equity in West Oakland. In that spirit, ACPHD is working to ensure that the goals, policies and actions in the Draft Seaport Plan provide long-term health and safety and economic benefits to all communities, particularly local community residents. Overall, the Draft Seaport Plan provides a commendable long-term goal of zero emissions by 2050. However, the Draft Seaport Plan should provide stronger commitments to Implementing Actions (IAs) and near-term goals and timelines to provide a clear path forward and help ensure the interim steps get implemented to achieve the ambitious goal.

### **Partnerships and Engagement**

For the Draft Seaport Plan to be successful towards the long-term goal, it is crucial for the Regulatory Agencies, Port, City, business and community stakeholders to strengthen partnerships and coordination throughout implementation. The Draft Seaport Plan mentions working with ACPHD at the bottom of page B-3, “While the Port will continue to take action to reduce DPM emissions associated with Seaport operations, the Port looks to CARB and the Alameda County Department of Public Health to assess health risk.” Beyond information sharing with health agencies, Strategy #4: Build and Strengthen Partnerships could include the role of the Port in partnering on outside efforts focused on reducing health risks. One such opportunity is better aligning the Draft Seaport Plan with the AB 617 West Oakland Plan. Specifically, the Draft Seaport Plan could address partnering with health agencies in the AB 617 process to develop specific strategies and actions to reduce cumulative health risks. Together, these Plans have the potential to provide meaningful health benefits to the West Oakland community and opens up the

possibility of leveraging additional local, state and federal funding to support some of the actions in the Draft Seaport Plan.

Another area that could be strengthened in the Draft Seaport Plan is providing more detail on the steps that will be taken to meaningfully engage the Maritime Air Quality Improvement Plan Steering Committee and Task Force, particularly in Strategy #5: Engage Stakeholders in the implementation phase. For example, include an IA to ensure the MAQIP Steering Committee can provide feedback on the feasibility criteria and participate in the decision-making process on the Implementing Actions (“IAs”). The Draft Seaport Plan should include an engagement plan that shows specific points where engagement informs decision-making in this process and in implementation, such as periodic convenings to discuss progress, challenges and course corrections before the sunset of the Draft Seaport Plan.

### **Need for strong commitments and clarity and consistency throughout the Plan**

Throughout the Draft Seaport Plan, the Port could consistently and explicitly name what actions the Port will commit to, particularly in the next five years. For example, in Strategy #2, the IAs are listed as things that the Port and its partners will do together, but in other places, the Draft Seaport Plan lists things the Port will “potentially” do. First, it is unclear what the roles and responsibilities are of the Port versus partners. It also does not include specific timelines for the IAs. This leaves uncertainty about what the near-term opportunities are, what specifically the Port will do and what the Port needs its partners to do to support success of the Draft Seaport Plan.

### **Need to leverage all tools available**

The Draft Seaport Plan emphasizes technological strategies to achieve the 2030 and 2050 targets; it could also address other tools and authority available to the Port of Oakland to support the targets.

- As a landowner, the Port could be using land use authority and contracting policies to establish minimum requirements for tenants and lessees to raise the bar of future development and set up clear expectations up-front from all Port tenants and lessees.
- The Port is jointly developing the Comprehensive Truck Management Plan with the City of Oakland to address the impacts of trucks in West Oakland neighborhoods, including truck services at the Port, truck parking and enforcement policies. These are not highlighted as part of the Draft Seaport Plan, but will be important for reducing health impacts on residents, supporting the needs of truckers and preventing backsliding on reductions.
- The Draft Seaport Plan does not include an enforcement plan to ensure that there is compliance with the measures.
- The Draft Seaport Plan emphasizes operations, but could include a commitment to clean construction, which are temporary but important impacts to prevent added pollution burden for West Oakland neighbors, particularly those with existing respiratory illness.

### **Feasibility Criteria**

The Draft Seaport Plan Feasibility Criteria in Table 1 (page 15) could include a criterion around the health needs of the local residents and better reflect the makeup of the diverse stakeholder interests in the MAQIP process. Health benefits or reduction of toxic air contaminants and diesel particulate matter and the location of reductions could be explicitly added as a Criteria. The Cost-effectiveness Criteria should include the aspect of public health benefits in terms of potential reduced costs to the healthcare system and individuals that are directly impacted by air pollution; this is an area where the health agencies could consult to

develop some analysis on. Additionally, the Draft Seaport Plan uses Cost-effectiveness Criteria, but it is unclear where cost information about potential IAs and the overall cost of the Plan (Strategy #6) is coming from to prioritize IAs. The Cost and Resource Analysis in Appendix F is not included (see section below) and needs to be included to fully ascertain the implications of the proposed IAs. Last, the descriptions of some of the criteria need some clarification to make them more distinct, for example Affordability, Cost-Effectiveness and Acceptability.

### **More information needed to evaluate the implementing actions**

The Draft Seaport Plan is missing some information and it is unclear how the public will provide comments on these before the Final Seaport Plan is sent to the Board of Commissioners. For example, Appendix C, Table C-1 Potential Implementing Actions includes actions focused on equipment, fuel, operations and infrastructure, focused on Strategies 1-3, but there is no matrix for evaluating Strategies #4, 5 and 6. It is confusing because in the narrative, the leading sentence before listing the actions says that they are Potential Implementing Actions under Strategy #4 but there is no demonstration of the vetting of the IAs. Strategies #4, 5 and 6 are important for ensuring the Draft Seaport Plan is implemented in a way that promotes inclusion of impacted communities that could potentially benefit from the Draft Seaport Plan's Actions.

Additionally, Appendices E - Workforce Development and F - Cost and Resource Analysis are missing and it says it will be included in the Final Seaport Plan. This raises questions about the decision-making process and how the public will engage in a discussion about these before it is finalized by the Board of Commissioners. Without these analyses, is the Port committing to or holding off on the Potential IAs mentioned under Strategies #4, 5 and 6? The Draft Seaport Plan needs to clarify what IAs are being recommended for commitments from the Port and when and how will the public be able to provide feedback.

### **Need to consider sea level rise**

Given the emphasis on electrical infrastructure as a potential strategy for attaining a zero emissions Port, the Draft Seaport Plan should include a discussion on sea-level rise, including planning for potential impacts to the existing infrastructure and adaptation strategies for future development of electrical infrastructure. This will require assessment needs, cost analyses and development of adaptation strategies. These should be added as IAs to consider in the Draft Seaport Plan.

### **Technical Corrections**

The Draft Seaport Plan needs to include more recent studies to ensure accurate technical information. In Appendix B, West Oakland Community and Health Risk, bottom of page B-2, the Draft Seaport Plan cites the 2008 CARB Health Risk Assessment but should add that the Bay Area Air Quality Management District conducted a West Oakland Truck Study in 2009 that revised the Port's contribution to cancer risks in West Oakland from 16% to 29% with Port trucks contributing 61% of the risk. This is important to include in the Draft Seaport Plan because it informs the policy priorities and collaborations needed for future actions.<sup>1</sup>

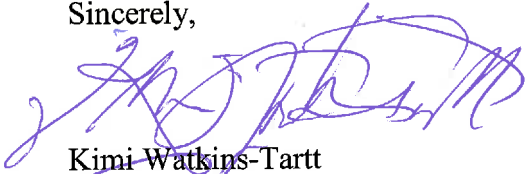
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<sup>1</sup> Available at: <http://www.baaqmd.gov/~media/files/planning-and-research/care-program/final-west-oakland-truck-survey-report-dec-2009.pdf>

Additionally, the Draft Seaport Plan may have incorrect information about the indicators within CalEnviroScreen 3.0. On page B-3, it says “In addition to air quality, the CES includes a wide range of factors, such as access to sidewalks and healthy food.” These are not included in the list of Pollution Burden or Population Characteristics Indicators.<sup>2</sup>

Thank you again for the opportunity to provide feedback on the Draft Seaport Plan. Please feel free to let me know if I can provide any additional information by contacting Anna Lee at [anna.lee@acgov.org](mailto:anna.lee@acgov.org).

Sincerely,



Kimi Watkins-Tartt  
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Alameda County

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<sup>2</sup> Available at: <https://oehha.ca.gov/calenviroscreen/indicators>