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August 28, 2018

Ms. Khamly Chuop, Port Associate Environmental Planner/Scientist
Port of Oakland
530 Water Street
Oakland, CA 94607

VIA EMAIL

RE: Draft Seaport Air Quality 2020 and Beyond Plan

Dear Ms. Chuop:

Thank you for the opportunity to comment on the Port of Oakland's Draft Seaport Air Quality 2020 and Beyond Plan (the Plan), released on June 29, 2018.

Bay Planning Coalition (BPC) is a nonprofit, member organization that advocates for sustainable commerce, industry, infrastructure, recreation and the natural environment connected to the San Francisco Bay and its watershed. Together with our nearly 150 member organizations, we work diligently to ensure that land on the Bay is used wisely and developed in economically and environmentally sound ways. BPC has been proud to call the Port one of our key members and community partners since our founding in 1983, and has been privileged to serve on the Port's Maritime Air Quality Improvement Plan (MAQIP) Task Force both in 2008 and 2018.

We commend the Port for its strong efforts to cut back on greenhouse gas emissions meanwhile also reducing other emissions known to affect public local health. The Plan – "a pathway to zero emissions" – is ambitious and exemplifies the Port's active leadership in sustainable business operations in the Bay Area.

That being said, we do question some of the financial implications of the Plan in its current form. Specifically, we worry that the high cost of the Plan may put economic strain on the Port and result in a loss of jobs that would otherwise be preventable. In addition, we are concerned that compliance with the Plan may burden some of the Port's business partners, who may ultimately choose to take their business to other U.S. or foreign ports.

To prevent these potential setbacks, we encourage the Port to imbue the Plan with more flexibility by adding a clause that will allow for periodic adjustments. This would enable the Port to change its course of action in achieving the Plan goals should the Port and its partners face any unintended economic consequences. This would help ensure that the Port retains its position as a competitive international port and a significant driver of the regional economy.

Thank you for considering our comments. Please feel free to reach out to me with any questions or to discuss these recommendations further.

Sincerely,



John A. Coleman
Chief Executive Officer