



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

January 24, 2019

Mr. Danny Wan
Interim Executive Director
Port of Oakland
530 Water Street
Oakland, CA 94607

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

Dear Mr. Wan:

Thank you for the opportunity to provide comments on the revised draft to the Port's "2020 and Beyond" Seaport Air Quality Plan. The Bay Area Air Quality Management strongly supports the Plan's vision to transition the Seaport operations to zero emissions "...through changes in equipment, operations, fuels, and infrastructure. We appreciate that Port staff have incorporated into the Revised Draft Plan some of the comments that were submitted during the first review period calling for a clearer set of specific commitments and timelines for the purchase of zero emission trucks and equipment, however the Revised Draft Plan still falls short of showing a clear glide path towards zero emissions.

Air District staff recommend that the following changes be made to the Revised Draft Plan prior to consideration by the Board of Commissioners:

- Add health costs and benefits to the Port's feasibility criterion. The Air District, the California Air Resources Board and the Alameda County Health Department can all be useful partners in this effort. The Air District can specifically help by sharing the data and health metrics being developed as part of the technical studies in support of the West Oakland Community Action Plan. A clearer understanding of the specific waterfront sources most impacting local health can help inform the timing of the Port's transition to zero emissions.

Commit to providing financial support and to expedite the electrical upgrades that are needed to realize the Port's transition's to zero emissions. The Revised Plan relies too heavily on non-Port sources of funding and others' efforts for the implementation of new clean technology, equipment, fuels, and infrastructure. The Air District has invested well over \$100 million in grant funding for clean vehicle and equipment Port-related projects over the past decade, and while the Air District anticipates that another \$100 million in funding may be available over the next five to ten years for the purchase of zero emission equipment and trucks, these funds are subject to periodic review and

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renewal, are not guaranteed, and will be insufficient to meet the demand to achieve the Port's vision. As such, the Port's Plan should evaluate and commit to strategies that are within the Port's authority, such as the implementation of container fees to generate revenue for Clean Air projects, the inclusion of conditions on tenants on future lease agreements to require clean and zero emissions technology, and a plan to expedite a coordinated effort to upgrade electrical capacity for all tenants. We urge the Port to develop an alternative plan to achieve zero emissions that relies on funding and efforts from both Port and non-Port sources.

- 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 and equipment used to move freight at the Port.

The specific role of the Task Force needs to be more clearly describe in the final Plan. There were, in the comments to the initial Draft Plan, many suggested actions from the Port's local community, industry and public partners, which pre-date the development of the "2020 and Beyond" Plan. The placing of these ideas in an Appendix, unexamined by Port staff, unfortunately, and we believe, erroneously suggests that actions recommended by Task Force members are not being fully considered. We urge the Port, at a minimum, to screen these suggestions using the feasibility criterion listed on Page 15 of the Revised Draft Plan.

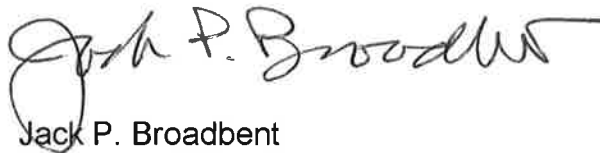
- The conceptual yard truck replacement scheme discussed in Appendix F is very useful in understanding many of the economic and technical issues in moving to zero emissions. We encourage the Port to extend this analysis to other types of cargo handling equipment. The extended analysis should utilize the fleet data from the *2017 Seaport Emissions Inventory* to determine the replacement rate. We also encourage the Port to consider the costs involved with an accelerated turnover rate, in addition to assuming equipment will only be replaced at the end of its useful life.

In summary, most of the thirty-two actions listed in the Revised Draft Plan have the Port tracking or studying actions undertaken by Port tenants and the Ports of Los Angeles and Long Beach; observing the retrofit of a small number of existing equipment; supporting the purchase of 21 electric trucks and augmenting the Port's fleet with an electric vehicle. These are all good

beginnings. We recognize the path to zero-emissions at the Port will not be easy and will take time. But restricting the initial efforts to already funded equipment replacements and some studies, while pragmatic, is too small a beginning.

Now is the time to be ambitious and bold. I would like to again express my confidence that, working in concert with the local community and your workers, tenants and customers, the Port of Oakland can reach zero emissions operations.

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