



September 24, 2021

Secretary Pete Buttigieg
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Support for Port of Oakland's Port Infrastructure Development Project Proposal

Dear Secretary Buttigieg:

I write in support of the Port of Oakland's grant request to the U.S. Maritime Administration's Port Infrastructure Development Program (PIDP). PIDP creates an enhanced sustainable utility infrastructure network that could support a growing base of zero-emissions freight equipment throughout the seaport. The Port's project proposal will therefore advance local sustainable transportation initiatives in the freight sector that are critical to the federal government's vision for a clean energy future. The total cost of this infrastructure project is \$20 million. The Port is seeking \$11 million in funding.

This project will replace an aging substation with a multi-functional, modern 12-megawatt (MW) substation. The new substation will integrate renewable power generation to support much-needed expansion of the electric heavy-duty truck fleet, electric cargo handling equipment, and ship power availability at the Port of Oakland. The new substation will also provide demand management and resiliency by adding a 2 MW fuel cell, 4 MW of solar generation and storage, and connectivity to a nearby wastewater treatment plant biomass-powered generator. By improving the resiliency of the Port's utility operations, this funding request will ensure the continued development and integration of zero-emissions vehicles and equipment throughout the Port of Oakland's maritime operations.

In addition, the new substation will be connected to existing Port substations to improve reliability of the power supply to the entire seaport area. During power supply emergencies caused by increasingly common wildfires and extreme heat events, the substation could also provide power to the local community, enhancing local grid resilience in the face of climate change. Importantly, this new capacity should ensure that ships—a major source of emissions associated with Port activities—stay plugged-in during the state and region's ongoing power-related emergencies.

In order to meaningfully reduce emissions from freight equipment and accelerate the Port's transition to 100% zero-emissions operations, however, the infrastructure supported by this grant should be designed with an eye toward the future. The additional power capacity must accommodate future projects needed to fully electrify operations at the Port, including charging stations for all truck and cargo-handling equipment, enhanced on-site renewable generation, and energy storage. The 2 MW fuel cell supported by this project should be powered by "green hydrogen" produced using renewable electricity—the only established way to produce hydrogen



without emitting climate or air pollution that surrounding communities cannot afford. And any investment in “near-zero” technologies at the Port is counterproductive at this point. Near-zero only further invests in natural gas infrastructure that will perpetuate harm in frontline communities and keep us locked in the past. The Port must prioritize zero-emissions investments as the only solution that will effectively address the air quality and health impacts caused by the freight industry.

The surrounding community of West Oakland has disproportionately shouldered the public health and environmental impacts of the significant diesel emissions associated with freight activity in the region. The deployment of heavy-duty electric charging infrastructure serving seaport trucking and maritime terminal users is among the highest priorities identified by West Oakland community stakeholders, including community leaders that have worked closely with the Port on its air quality planning efforts. Heavy-duty electric charging has also been identified as a top near-term priority item in the West Oakland Community Air Action Plan (“*Owning Our Air*”), which was developed by the Bay Area Air Quality Management District and the West Oakland Environmental Indicators Project in collaboration with the Port. This grant offers a critical opportunity to reduce the Port’s emissions impact, achieve the state’s ambitious greenhouse gas goals, and fully transition a major freight and shipping hub to a zero-emissions, clean energy future.

We appreciate your continued commitment to an efficient and sustainable transportation network that will help our region finally achieve clean air. Thank you in advance for your consideration of this request.

Sincerely,

Michelle Ghafar
Senior Attorney
Earthjustice
mghafar@earthjustice.org
415-217-2186