PORT of SAN DIEGO
Waterfront of Opportunity

Draft Revised Maritime Clean Air Strategy Public Comment

Comments received during the public review period:

August 5, 2021 – September 3, 2021

San Diego County
Air Pollution Control District

September 1, 2021

Ms. Maggie Weber
Port of San Diego, Maritime Clean Air Strategy
3165 Pacific Highway
San Diego CA 92101
via email: MCAS@portofsandiego.org

Re: Draft Revised Maritime Clean Air Strategy

Dear Ms. Weber,

The San Diego Air Pollution Control District (APCD) would like to commend the Port of San Diego for the time and effort invested in the creation of the comprehensive Maritime Clean Air Strategy, and for the responsiveness of the Port District to public comments on the April draft. Further, APCD appreciates the Port's participation in the Community Air Protection Program (AB 617) and its collaboration with the Portside Community Steering Committee in the development of the Community Emissions Reduction Plan (CERP) and its mission to reduce pollution exposure in the Portside Communities.

The Port MCAS and the APCD CERP share many of the same goals and actions, all aimed at improving air quality and health in the Portside Communities. The APCD especially appreciates the inclusion of Appendix C in the MCAS articulating the many areas of coordination between the CERP and MCAS, including:

- Provision of opportunities for zero-emission equipment while protecting fair outcomes for small fleet owners and truck drivers.
- Actions to reduce diesel particulate emissions from portside equipment, harbor craft, and oceangoing vessels
- Creation and improvement of data about air quality
- Creation of opportunities for increasing tree canopy and park/greenspace

The APCD supports the actions of the Maritime Clean Air Strategy and is actively working in partnership with the Port District on several actions, including MOUs on the air filtration program (Health Objective 3) and zero-emission truck pilot program (Enabling Objective 1A) over the next several months. The APCD looks forward to working with the Port District to achieve the important air quality goals for Portside communities and the region as a whole.

Sincerely,

Domingo Vigil, Deputy Director

THE WORKING WATERFRONT ON SAN DIEGO BAY

September 3, 2021

TO: MCAS Committee via MCAS@portofsandiego.org

The San Diego Working Waterfront Group (WWG) would like to take this opportunity to voice our concerns regarding the draft Maritime Clean Air Strategy (MCAS). Consisting of maritime industrial tenants of the Port, we are concerned by how the District could consider some of the proposed recommendation under the Port Act as it relates back to the MCAS.

Paragraph 4 under the "Establishment of Port District; Purposes; Use of Powers" of the *Port Act* filed March 03, 2020, states:

(a) A port district for the acquisition, construction, maintenance, operation, development, and regulation of harbor works and improvements…***for the promotion of commerce, navigation, fisheries, and recreation*** thereon, maybe established or organized and governed as provided in this act and it may exercise the powers expressly granted herein.

The intent behind the establishment of the Port District clearly states that it's to foster business, navigation, the fishing industry, and recreation while using this power to also enhance access to the bay and preserve plant and animal life as well as water quality in the bay.

The MCAS not only contradicts the basic principles of the Port Act, but it lays out specific goals that reduces commerce within the region

All studies have concluded that there's a lack of alternative fuel and available technology specified in the MCAS. Of those that are available, they are unreliable and costly. These pose logistical and financial challenges of doing business at the Port and does everything to discourage commerce. Grants is not a viable or feasible strategy. By continuing to pursue and enforce policy under the MCAS, is a violation of the Port Act and will dissuade industrial tenants, cargo handling companies and commercial shipping companies from doing business at the Port of San Diego.
The WWG is committed to doing our individual parts in reaching the highest standards of air and water quality while in the business of serving the maritime industry. We remain concerned that the MCAS is in violation of the Port Act and the aggressive timeline and costs posing as existential threats to our businesses.

Sincerely,

Dennis DuBard
Chair, Working Waterfront Group

From: Dick Goldman
To: Maritime Clean Air Strategy
Subject: Comment
Date: Friday, August 13, 2021 4:38:47 PM

Would be interesting and helpful if the Port summarizes what was changed since the last draft as a result of the latest public consultation.

Dick

SD: 619-255-2892

San Diego Port Authority – MCAS (Maritime Clean Air Strategy)
3165 Pacific Hwy,
San Diego, CA 92101

September 3, 2021

C&A Transportation Services
9010 Paseo De La Fuente N
San Diego, CA 92154

To whom it may concern:

We learned that the San Diego Port Authority is developing a Maritime Clean Air Strategy.

We are deeply concerned with the aggressive timeline in which the goals outlined are expected to be implemented by the tenants and their vendors. Requiring all cargo trucks to be electric 15 years ahead of state goals will demolish the commercial viability of the port and institute a competitive advantage for every other west coast port that San Diego is competing against. Trucking companies that deliver to hospitality tenants will also be financially impacted by the increase in rates to conduct business in the tidelands area.

The Port must conduct an economic study, which needs to be done prior to final adoption of the MCAS by the Port Commissioners. Economic impacts to the tenants directly impact the Port financially. Expansive outreach should also be done with those industries that serve the tidelands.

It is incomprehensible the Port is moving to finalize the MCAS without the critical data regarding the economic impacts and outreach to those tenants and industries that will have to deliver or stop doing business altogether.

We are extremely concerned requiring these measures have an existential threat to their businesses as well as to Port revenues without understanding economic impacts, technical availability, and commercial feasibilities of the demands you are proposing.

Respectfully,

Esteban Cebreros

Esteban Cebreros
Director of Sales
C&A Transportation Services

ENVIRONMENTAL HEALTH COALITION | 40 YEARS
2727 HOOVER AVE., SUITE 202 | NATIONAL CITY, CA. 91950 | (619)474-0220 | ENVIRONMENTALHEALTH.ORG

August 23, 2021

Larry Hofreiter
Port of San Diego
3165 Pacific Hwy
San Diego, CA 92101

Re: Environmental Health Coalition's (EHC) Initial Comments on the August Draft Maritime Clean Air Strategies ZEV Truck and Charging Infrastructure Policies in Preparation for the 9/1/2021 "ZEV Meeting" with Port Staff

Dear Mr. Hofreiter:

EHC has reviewed the Port's August 2021 Draft MCAS ZEV truck and charging infrastructure related policies. While there has been some progress, the MCAS' overall number and scope of ZEV related policies and strategies will not position the Port to be able to achieve the BPC's unanimous decision on 7/13/21 establishing the goal of transitioning 100 percent of port trucks to ZEV by 2030. The draft MCAS does not sufficiently provide the specificity needed to ensure transition of existing tenants and future discretionary actions and new tenants to achieve 100% ZEV by 2030.

EHC has previously recommended that the Port create separate groups of policies and strategies to advance ZEV with respect to the varying levels of the Port's regulatory authority (e.g., policies for: 1. existing tenants; 2. new discretionary actions, including new leases; 3. charging infrastructure). Breaking out additional ZEV related policies and strategies in this way will create a clearer roadmap to achieve the goal.

The Port has asked that EHC propose policies/strategies for each of these three groups in advance of the 9/1/21 "ZEV" meeting with EHC, Port staff and others. EHC has provided below an initial assessment of the draft MCAS ZEV related policies as well as a preliminary list of recommended ZEV policies and strategies. Please note that while our comments below are focused on ZEV heavy duty trucks, many of the same concepts can and should be applied to the MCAS cargo handling equipment related policies as well.

High-Level Recommendations/Comments:

- Prepare a ZEV heavy duty truck transition plan by January 2022 for inclusion in the MCAS that provides major benchmarks to achieve 100% ZEV trucks by 2030. The plan should reflect all tasks required for consideration and adoption by the BPC and their projected adoption dates necessary to achieve 100% ZEV trucks by 2030.
- Finalize a ZEV truck program by end of 2022 for short-haul trucks.

- The Port's focus should be on ZEV, not near-zero emission trucks.
- Prepare a ZEV fee/tariff proposal by January 2022 with policy options for consideration by the BPC.
- Creation of a ZEV charging infrastructure plan by March 2022.
- Establish a public facing truck registry by end of 2021 for all trucks.
- Ensure the clearinghouse process/database that tracks MCAS/CERP is public facing and transparent and includes six month on-going status updates along with stakeholder oversight. Establish policies that inform how the Port will demonstrate its progress in achieving MCAS and CERP goals.
- Incorporate EHC's recommended policies/strategies for existing tenants (e.g., fees, funds, incentives etc.).
- Incorporate EHC's recommended policies/strategies for new discretionary actions (e.g., requirements for ZEV, rent relief, expedited review and/or other incentives etc.).
- Incorporate policies/strategies to promote charging facilities similar to those for existing tenants and new discretionary actions.

Detailed Recommendations/Comments on August Draft MCAS ZEV:

1. MCAS Truck Goal #1 (Pg. ES-13) states: *Improve the air quality in the Portside Community by accelerating the implementation of zero emission/near zero emission trucks.*

EHC Recommendations/Comments:

a. **Remove "near zero".** In order to achieve the goal of 100 percent ZE by 2030 for trucks, per BPC direction, near zero emission trucks cannot be part of the goal.

2. MCAS Truck Objective 1A (Pg. ES-13) states: *20% of the Port's annual truck trips will be performed by zero emission trucks by June 30, 2026.*

EHC Recommendations/Comments:

a. **Annual ZEV benchmarks/milestones/tasks needed through 2030.** The target of 20 percent ZEV by 2026 is not aggressive enough to meet the goal of transitioning all trucks to ZEV by 2030. Establish annual zero emission truck interim milestones each year leading up to 2030 so that the Port and public can evaluate the Port's progress towards meeting its goals.

3. MCAS Truck Objective 1B (Pg. ES-14) states: *By the end of 2022, Port staff will develop and present a short haul, on-road, Zero Emission Truck Program for the Board's consideration that includes at least one collaborating trucking company and that targets having the necessary charging infrastructure in place by 2024, in order to displace approximately 65,000 diesel vehicle miles traveled.*

EHC Recommendations/Comments:

a. **Complete implementation of the short haul ZE Truck Program by 2022.**
b. **Electrify additional short-haul truck routes in the near-term.** Electrify additional short-haul routes identified as early targets for ZE trucks, and survey more routes considering near-term electrification of routes up to 200-miles per day. Work with the community to target specific routes for electrification that will result in localized emission and health risk reductions.

4. MCAS Truck Objective 1D states: *In collaboration with the California Air Resources Board, the Port will utilize a truck registry or other system to summarize annual truck trips to the Port's marine cargo terminals and measure progress to achieve Port goals.*

EHC Recommendations/Comments:

a. **Public facing registry completed by 2021 with annual updates.** By the end of 2021, the Port should have all trucks servicing the Port **registered** in a truck registry.
b. **VMT data needed.** Truck registry program should help to not only determine which trucks enter/leave the tidelands but also include truck VMT after they leave the Port to help inform charging infrastructure needs.
c. **Transparency and access to data.** The Port should make truck registry data easily digestible, available online, and updated in real time.

5. MCAS Truck Objective 1E states: *Provide status report to the Board of Port Commissioners with recommendations on zero emission truck technologies, as well as an evaluation of potential impacts to small fleets and/or independent truck drivers, as part of a Biennial Emissions Report to better understand the transition zero emission truck technology.*

EHC Recommendations/Comments:

a. **Prepare a ZEV transition plan by January 2022 for inclusion in the MCAS that provides major benchmarks to achieve 100% ZEV trucks by 2030.** The plan should reflect all tasks required for consideration and adoption by the BPC and their projected adoption dates necessary to achieve 100% ZEV trucks by 2030. The plan should also recognize truck driver misclassification and find ways to encourage companies operating at the Port to not misclassify drivers.

6. MCAS Truck Objective 2A states: *Within the fourth quarter of calendar year 2022, present a concept plan to the Board for its consideration that identifies four potential public facing medium-duty/heavy-duty charging locations within the San Diego Region to support deployment of zero emission trucks, which may include locations in close proximity to or on the Tenth Avenue Marine Terminal and/or the National City Marine Terminal.*

MCAS Truck Objective 2B states: *Collaborate and coordinate with community residents, stakeholders, and agencies to ensure that the medium-duty/heavy-duty zero emission truck charging facilities identified in Objective 2A are aligned with and connect to the region's larger zero emission vehicle charging infrastructure system.*

EHC Recommendations/Comments:

a. **Robust outreach scope and timeline needed.** Revise Objective 2A to ensure that a draft of the concept plan be presented to the Board by summer of 2022 after a robust public outreach. Then, deliver the final recommended plan to the Board for consideration by the end of 2022. Port staff should present a scope and timeline for this plan and the public outreach by the end of 2021.
b. **Avoid land use incompatibilities.** The sighting of potential/conceptual charging stations should be done through robust public engagement not just to align with the region's larger ZEV systems but to also ensure that they not worsen and/or create any land use incompatibilities in environmental justice communities.

c. **Initiate CEQA asap.** CEQA should be initiated by the end of 2021.

7. MCAS Enabling Objective 1B states: *Work with the California Department of Transportation and other west coast ports to implement domestic shipping services to reduce emissions by facilitating the movement of goods by waterborne routes that are currently served by trucks or rail.*

EHC Recommendations/Comments:

a. **Air quality in Portside communities is the priority.** Ensure that this mode shift would have a net reduction of diesel emissions in Portside communities. Portside residents need to know how this mode shift would impact air quality in their communities. Will additional ships be coming to San Diego's cargo terminals? Will these ships be shore-powered?

8. MCAS Enabling Objective 2A states: *Create a clearinghouse process to track progress towards achieving MCAS and relevant AB 617 CERP goals and objectives, including technology and emission improvements associated with development, within 30-days of final approval of both documents.*

EHC Recommendations/Comments:

a. **Transparency of data and database.** This should be a public facing database that is updated quarterly and presented in such a way that can be easily understood by the local community and other stakeholders. This information should be summarized and presented to the Board every 6 months. Establish policies that inform how the Port will demonstrate its progress in achieving MCAS and CERP goals.

9. MCAS Enabling Objective 2B states: *Establish an Emissions Reduction Incentive Program.*

EHC Recommendations/Comments:

a. **Develop the program by 2021 with regular updates.** This program should be established by the end of 2021, include the funding strategies that support an incentive based approach to reducing diesel emissions, and be part of the regular 6 month updates to the Board.

10. MCAS Enabling Objective 2C states: *Prepare a market study/feasibility analysis for the Board of Port Commissioners that explores a range of potential fees that can support zero emission/near zero emission reduction projects, as well as identify any implications the fee may have on the Port's revenue and maritime business opportunities.*

EHC Recommendations/Comments:

a. **Complete by January 2022 and remove "near zero".** This should be completed no later than January 2022 per the BPC's direction. A scope, public outreach/oversight components, and timeline of this feasibility analysis should be transparent and inclusive.

11. MCAS Enabling Objective 2E states: *Promote adoption of zero emission technologies by Port tenants, truckers, and other users of equipment.*

EHC Recommendations/Comments:

a. **Need specificity.** This objective is not a requirement.

EHC's Recommended ZEV Policies/Strategies for Existing Tenants:

1. **Increase existing rates/tariffs.** Increase the rates/tariffs charged to vessel operators, terminal operators, cargo handlers, and tenants and dedicate a portion of this increased funding to ZE trucks. For instance, the Port could consider increasing the amount of funding for the existing Environmental and Maritime Industrial Impact Funds. These funds may then be used to subsidize the cost of ZE trucks. Alternatively, the Port could consider creating an entirely separate fund or line item in the budget specifically for ZE trucks.

2. **Establish a dirty truck and/or cargo fees.** Establish a fee for non-ZEV trucks that enter Port tidelands by first quarter 2021 and utilize funds collected from the fee to subsidize purchase of zero emission trucks and infrastructure. Ensure that equity and a priority on small, locally owned companies is incorporated into a truck fund, and that fees do not fall on the backs of misclassified truck drivers. Also, ensure that dray-off activities are not occurring to avoid the fees. Alternatively or in addition, establish a fee on cargo entering the Port and use funds collected by the fee to subsidize zero emission trucks, zero emission cargo handling equipment, electric infrastructure etc.

3. **Establish additional incentives for zero emission trucks, such as registration fees and/or a priority access system.** Establish annual registration fees for the truck registry that are waived for ZE trucks. The Port could consider implementing a priority access system to provide ZE trucks preferential access to its terminals. For instance, the Port could consider giving owners and operators of ZE trucks their first-choice appointment slots at terminals. This measure would allow ZE trucks to access terminals more quickly than other trucks, enabling them to carry more cargo and earn more revenue in the same amount of time.

EHC's Recommended ZEV Policies/Strategies for Future Discretionary Actions:

1. **Proactively renegotiate existing tenant leases.** Start reaching out to tenants to put them on notice of the types of terms/conditions that could be required in order to extend the existing lease. Identify ways in which the Port can offer incentives (e.g., rent relief etc) and associated terms (e.g., 100% ZEV by 2030 and interim targets leading up to that date, no misclassification of truck drivers etc).

2. **New lease requirements.** Develop requirements for new leases that support 100% ZEV by 2030. New leases should require tenants to use a baseline percentage of ZEV trucks and cargo handling equipment at the start of the lease ramping up to 100% by 2030. Similarly, mitigation measures for new CEQA projects should be aligned with these ZE goals.

3. **Expedited review.** Create an expedited discretionary review process for projects that are implemented equitably, in-line with public health priorities of the Portside communities, and consistent with the MCAS. Working with the Portside communities through a community outreach, determine what type of review processes would be accelerated and what protections there would be if there is an MCAS provision that the community is not supportive of.

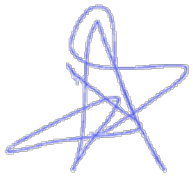
EHC's Recommended ZEV Policies/Strategies for Charging Infrastructure

1. **Develop a ZEV charging infrastructure plan by March 2022.** Create a plan to build out charging infrastructure on a timeline that will support 2030 ZEV goals.

2. Establish similar fees, tariffs, incentives, lease provisions etc (as described above for existing tenants and new discretionary actions) to support electric charging infrastructure.

Thank you for your time and consideration. Please contact Danny Serrano at dannys@environmentalhealth.org for any additional information.

Sincerely,



Danny Serrano, AICP
Campaign Director

From: Carla Pekin
To: Maritime Clean Air Strategy
Date: Wednesday, August 25, 2021 3:00:01 PM

How ridiculous of a plan to assume that you're going to have zero emission trucks and port machinery. Is it all going to be electric? And if so where does this electricity come from when California cannot even keep the lights on and we're having Flex alerts? How preposterous!
In regard to clean, air non pollution in low socio-economic areas, I have a problem living in Point Loma with planes the blasting over my home in the LaPlaya area where I'm not supposed to be in the flight path. The black caustic chemicals from those aircraft cover my outside patios, plants window sills etc. We are breathing in this poisonous particulate. How about the port and the FAA vectoring planes over the flood control control channel and less populous areas?
This plan is severely flawed

Dole Fresh Fruit North America
200 South Tryon Street, Suite 600· Charlotte, NC 28202 · Phone (980) 771-2335 · Dole.com

September 2, 2021

Thank you for the opportunity to share our thoughts and concerns regarding the revised draft of the Maritime Clean Air Strategy ("MCAS") developed by the Port of San Diego.

Dole Fresh Fruit Company has been an anchor tenant at Tenth Avenue Marine Terminal for more than 20 years. As a company, we believe we cannot be successful without ensuring that our people, resources, environment, and communities are treated as our most precious assets and are committed to being honest and transparent about our environmental efforts and impacts. As a member of the community and the San Diego Port Tenants Association, we are dedicated to "advancing trade, commerce, and tourism while protecting the environment" and strive to reach the highest standards of clean air and clean water in the conduct of our business. We are strong believers that environmental stewardship and economic sustainability are not mutually exclusive when approached in a thoughtful and reasoned manner.

We do, however, have significant concerns with the MCAS as currently drafted, primarily surrounding the economic feasibility, evolving and available technology and logistical challenges of implementing the requirements of the MCAS within the shortened deadlines proposed. In all candor, we are concerned that the implementation of these accelerated timelines, applicable only to the Port of San Diego, will have a disastrous effect on the region's economic vitality. The statewide objectives of Executive Order N-79-20, on which the MCAS is based, are ambitious and – by design – require sweeping changes from businesses. We support these goals, but believe the timing set out by Governor Newsom in the Executive Order is a critical element of that plan. The deadlines in the Executive Order offer a demanding but realistic schedule for compliance, in recognition of its ambitious goals. The aggressive timeline set forth on the MCAS requiring tenants and service providers at the Port of San Diego to reach targets a full 15 years ahead of state deadlines is simply shortsighted and fails to consider the unintended but severe impacts to Port tenants of being compelled to meet deadlines that fail to align with the rest of the State.

It is critical that all businesses operating in the State of California are provided a path towards compliance that is economically feasible and allows adequate time for the business-wide infrastructure changes, capital expenditures and long-term planning that such goals require. It is equally critical that tenants at the Port of San Diego and their service providers have the same opportunity for economic success as our competitors at other maritime facilities within the State. Forcing the tenants of the Port of San Diego to reach compliance on an expedited basis will put us at a direct and significant disadvantage to our competitors calling on other maritime facilities who are afforded the full timeline of the Executive Order. Requiring your tenants to meet tighter deadlines will have real – and substantial- dollars and cents impacts. At Dole alone, we estimate that the investment will be in the tens of millions to meet only those goals outlined in the MCAS relating only to cargo handling equipment.

These regulations will impose very significant economic challenges that will be exacerbated for any businesses forced to comply years before its competitors, particularly as business are attempting to recover from the drastic impacts of the pandemic.

The accelerated timelines for trucking and transportation set forth in the revised MCAS will be devasting for transportation companies serving San Diego and the Port tenants that rely on them for their cargo operations, resulting in a economic blow to our community at a time where many households are struggling in the ongoing COVID crisis. In a national transportation industry that is already extremely challenging and competitive, requiring all cargo trucks coming into the Port of San Diego to meet zero emissions ("ZE") standards up to 15 years before those standards are required in all other portions of California will undoubtedly create a transportation crisis for your tenants. In our discussions with our transportation partners and industry experts, we have been told it is extremely unrealistic that the national transportation industry will be ready to fully transition to ZE in 9 years. The accelerated MCAS deadlines are particularly concerning to tenants when considering the feasibility of long-haul transportation and the current availability of the actual trucks and infrastructure required for the industry to comply. Currently, more than 75% of Dole's cargo travels more than 150 miles from the Port. While we're encouraged by recent advancements in the hybrid and electric vehicle fields, the current reality is that technology is not where it needs to be for an electric truck to reliably travel long distances, nor is the national transportation infrastructure readily available to support the electric charging needed for cross country transportation. We cannot simply wish this infrastructure into existence through the implementation of faster timelines. State-wide pressure from the Executive Order may provide the catalyst needed to speed up progress, based on the significant market represented by the State of California; however, it is unrealistic to believe the transportation industry will expend the exponential resources necessary to meet the early deadlines proposed in the MCAS just to call at the Port of San Diego – particularly when the electric infrastructure within the rest of the State is expected to be built out over the longer periods imposed by the Executive Order. It is much more realistic for transportation providers to refuse to service the Port of San Diego during the interim period, to the peril of cargo operations and your tenants. It's also important to face the uncomfortable unintended effects of a San Diego-only timeline: rather than reducing air pollution throughout the state, the early imposition of ZE regulations only in the San Diego area will more likely have the effect of simply moving air pollution away from Port tideland communities to other area of the State when transportation providers refuse to service the area. Cleaner air for San Diego at the expense of our surrounding communities does not represent the goal of "health equity of all."

If ZE emissions are imposed early at the Port, this in turn will cause substantial reductions in trucking power available to the San Diego region. If there are no trucks willing and able to enter the Port of San Diego to bring cargo in and out, tenants will have no choice but to cease their cargo operations. Subsequently, there would no purpose for maritime cargo vessels to call at the Port of San Diego. Even if we were to ignore the disastrous direct impact this would have on your current cargo tenants, this would be greatly harmful to the surrounding community. Maritime commerce is a significant contributor to the District's economy- we estimate that Dole's operations alone contribute millions to the local economy. Forcing an early transition to ZE trucks by 2030 will jeopardize that economic impact, along

with jobs, livelihoods and businesses, for what would appear to be a minimal impact on emissions: per the MCAS, the transportation industry accounts for only 2% of the Port's total DPM emissions. We have to question whether the long-term effects of the competitive disadvantages and loss of economic vitality created by the acceleration are warranted by any marginal short-term gains to address only 2% of the emission problem?

To balance the needs of driving environmental sustainability and maintaining economic viability for the community's businesses, we would propose aligning the time frames in the MCAS to the deadlines set out in Executive Order N-79-20, which provides for the imposition of targets starting in 2035. This would provide the businesses impacted by the requirements adequate time to work on solving the issues surrounding economic feasibility, evolving and available technology, and logistics of implementing the requirements, and complete the necessary assessments and research to take meaningful, sustainable action.

We are committed to being vigilant stewards of the environment and partners with our local community and believe we have demonstrated this through the steps we have already taken to reduce our environmental impact at the Port and be continuing to explore and research further electrification opportunities for our business.

Sincerely,

Nelson Montoya
President, Dole Fresh Fruit North America

Sarah Marsh
Terminal Manager

From: dwood8@cox.net
To: Maritime Clean Air Strategy
Subject: Draft Revised Maritime Clean Air Strategy Available for Review
Date: Monday, August 16, 2021 11:04:33 AM
Attachments: JSA Brand Gray (XXSmall).png
71300ff1-465a-43b5-bba3-de46b9195414.png
6e3554ab-59e4-fc64-2156-2cce157957cc.png

Comment:

It seems unfortunate that after spending millions of dollars building its shore power system, the port district refuses to require that all ships coming here must use it, instead of continuing to make utilization of the system voluntary on the part of ships that berth at the docks with shore power capabilities. If the port were really serious about meeting its MCAS goals, it would make use of its shore power system mandatory now.

Don Wood
San Diego Waterfront Coalition
619-463-9035
Dwood8@cox.net

From: Daniel Reeves <daniel@junipersa.com>
Sent: Thursday, August 5, 2021 6:34 PM
Subject: Draft Revised Maritime Clean Air Strategy Available for Review

Good afternoon Maritime Clean Air Strategy Stakeholders,

I hope this message finds you all safe and well. On behalf of the Port of San Diego, thank you for your continued engagement on the important effort to refine the transformational Maritime Clean Air Strategy policy document. Your time and input has been essential to this process.

With this in mind, the Port is excited to announce that the Draft Revised Maritime Clean Air Strategy is now available for review and feedback. To review the Draft Revised MCAS, visit www.portofsandiego.org/MCAS, and to provide feedback, which will be accepted through Friday, September 3, please email MCAS@portofsandiego.org. There will also be a virtual update on the Draft Revised MCAS on Thursday, August 26 at 5:30 p.m. As someone who has been engaged in this effort, the Port encourages you to attend this public event. Please **click here** to register.

For your information and reference, please see the Port's press release on the release of the document, and the newly-established vision for the MCAS below.

As always, please don't hesitate to reach out with any questions. And once again, on behalf of the Port of San Diego, thank you for your continued interest and participation in this effort.

All the best,

From: Erich Lathers
To: Maritime Clean Air Strategy
Subject: MCAS acronym
Date: Friday, August 13, 2021 2:19:01 PM

Not a comment on the strategy, but most in San Diego know MCAS as Marine Corps Air Station, as in Miramar.

I saw your subject line and thought what is the Port doing at Miramar.

Erich

From: Joseph Calhoun <joseph.calhoun@propane.com>
Sent: Friday, August 13, 2021 5:59 PM
To: Brianne Page <bpage@portofsandiego.org>
Subject: Near zero solutions

Hello

I allow me to introduce myself and the Propane Education and Research Council. We are a unique energy organization promoting decarbonization with the use of clean burning propane. Propane provides an emissions profile today that is 98% cleaner than Diesel and 87% cleaner than gasoline.

When I read recently about the Port of San Diego's "Health equity for all" green initiative, I wanted to applaud you for the good work you are doing. With propane equipment at the port you can provide "near zero" emissions today on the path to zero emissions tomorrow.

The attached recent letter from the South Coast Air Quality Management District outlines the importance of near zero emissions as a clean option for today. The even better news is that renewable propane is already being used in California and production is increasing.

We would appreciate the opportunity to discuss with you further how we can help you decarbonize the Port of San Diego. If you have some times in the next couple of weeks when we could schedule a call, please let me know your availability.

Thank you for your consideration of propane #energyforeverybody

Joe Calhoun

Associate Director, Business Development

direct 717.526.8639 | **main** 202.452.8975

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
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Office of the Executive Officer

Wayne Nastri
909.396.2100, fax 909.396.3340

August 3, 2021

Alianza Coachella Valley
California Communities Against Toxics
California Environmental Justice Alliance
California Kids IAC
CEERT
Center for Community Action and Environmental Justice
Center on Race, Poverty and the Environment
Central California Asthma Collaborative
Central California Environmental Justice Network
Coalition for a Safe Environment
Community Dreams
Earthjustice
East Yard Communities for Environmental Justice
Environmental Health Coalition
International Brotherhood of Teamsters
LAANE
Leadership Counsel for Accountability and Justice
Little Manila Rising
Long Beach alliance for Children with Asthma
Natural Resources Defense Council
Peoples Collective for Environmental Justice
Sierra Club California
Union of Concerned Scientist
White Central Valley Air Quality Coalition
350 Silicon Valley

To Partners in Environmental Justice and Environmental Health:

Thank you for your letters received on June 28th and 29th. Both letters provided essentially the same message regarding your disappointment that we are not limiting our efforts to achieve clean air to strictly zero-emission (ZE) pathways. As a public health agency charged with protecting our residents from harmful air quality, we are dismayed to find ourselves at odds with organizations that also

advocate for clean air, and are further troubled that you falsely accuse us of representing oil and gas interests. Even more disturbing is that the position you espouse – investment *solely* in ZE technology – will necessarily delay attaining federal air quality standards, prolonging community exposure to unhealthy levels of smog, particulate matter, and toxic diesel exhaust. Given that several of the signatories of one letter overlapped with the other, we are writing to respond to both letters here.

First, let me be clear that the South Coast Air Quality Management District (South Coast AQMD) is a global leader in advocating for and adopting ZE technology. We know we need to transition the transportation and freight sectors to ZE technologies at large scale in order to clean the air in the long term. To that end, since 2008 South Coast AQMD has invested $37M for total project costs of $316M in multiple ZE demonstration and pilot projects. Largely due to our work to push and advance technology, we are now on the cusp of a future where widespread deployment of ZE technology is a reality. But we also know that reality simply isn't here yet - at least not for heavy-duty Class 8 trucks. Manufacturers make promises, the vehicles can be ordered, but cannot be delivered and put into service on anything other than a small-scale pilot basis. And even if they were ready to be manufactured at large scale today, there are substantial challenges regarding whether the duty cycles for ZE Class 8 vehicles can meet business needs, and whether a service network is available for businesses that acquire these vehicles. In addition, the cost of ZE technologies is substantially higher than non-ZE technologies, and while eventually we expect the total cost of ownership to be lower for ZE trucks, affordability remains a significant barrier to large-scale adoption. Finally, even if all these barriers were addressed, the charging/fueling infrastructure (plugs and hydrogen dispensing stations), the electrical distribution system (neighborhood transformers, substations, etc.) and the power/fuel supply to support widespread deployment will take many years to develop.[1]

As the agency responsible for clean air in the greater Los Angeles area we have a statutory obligation to take all reasonable and feasible steps to reduce emissions. We face a rapidly approaching hard legal deadline in 2023 to meet the 1997 ozone standard, and 2031 for the 2008 ozone standard. The only way to get there is a massive push for cleaner heavy-duty trucks – the largest source of smog-forming emissions in our region - as soon as possible. While the amount of emission reductions needed to attain clean air standards is daunting, it would be irresponsible for our agency to effectively throw up our hands and not explore all options for reducing emissions now.[2] Near-zero emission (NZE) technology has been commercially demonstrated and is available today, has sufficient fueling infrastructure that is largely funded by the private sector, and is at least 90% cleaner than new diesel trucks on NOx and 100% cleaner on cancer-causing diesel particulate matter. When fueled by renewable natural gas, these

[1] The real-world experience from light-duty vehicles is illustrative. For decades California has led the nation in policies supporting light-duty ZEVs. However, ZEVs still make up only about 9% of new sales, and about 2% of the entire light-duty fleet. In comparison, medium/heavy-duty vehicles are many years behind in their development cycle, and their existing fleet of ZEVs is much less than 1%. Ignoring the remaining 99% of vehicles while we await ZEV development for trucks is untenable.

[2] We note that climate advocates rightfully push for California to take all feasible actions to address carbon emissions despite the marginal impacts these steps would likely have in slowing global climate change. Similarly, we owe it to our breathing public to do everything within our power to clean the air as soon as possible even if we have a long way to go.

vehicles can also provide substantial greenhouse gas emission reductions.[3] Further, these vehicles are far more cost-effective than ZE trucks, allowing limited incentive funds to stretch further. Given these benefits, it is disturbing that you advocate for investments *only* in technologies that are not yet ready for prime time, a position that would leave our residents no option but to continue to suffer the ill effects from diesel exhaust for years to come.

Your assertion that any investment in NZE technology is a tradeoff with investment in ZE frankly presents a false dichotomy. Today we need both – a pathway to get emission reductions now as well as plans for a ZE future. Investment in all forms of cleaner technologies does not impede progress in the development of ZE technologies. With the thousands of trucks that need to be replaced with cleaner options to meet both air quality standards and climate goals, there is plenty of space for both NZE and ZE technologies. For example, as of June the Clean Truck Program (CTP) statistics at the San Pedro Bay ports has 19,395 registered trucks of which 152 are NZE and 22 are ZE. That leaves 19,000 diesel trucks that are still in play. Even CARB's most aggressive action to date – Project 800 – would result in only 800 orders for trucks in 2021. Even if these 800 trucks were delivered in a timely manner – something we unfortunately have not observed in the current market – 800 trucks is a drop in the bucket of the thousands of trucks that need to be turned over.

There is also the looming unintended consequence of CARB's Truck and Bus rule that mandates pre-2010 model year trucks be turned over to model year 2014+ trucks by 2023. With ZE trucks unavailable on a widespread scale, as a practical matter these trucks will either be replaced by newer diesel trucks or NZE trucks. And without additional intervention, truck owners will choose to comply with the cheapest possible option – a model year 2014 truck that is only marginally cleaner than the truck it replaced.[4] From our perspective, it is far better to make sure as many of these trucks are turned over to the cleanest possible technology, which today is a NZE truck.

To build on the above point, the choice in trucks today is not between ZE and NZE trucks, but between NZE trucks and diesel. To the argument that investing in NZE trucks merely perpetuates another generation of fossil-fuel powered vehicles, if the choice is between NZE trucks and more cancer-causing diesel trucks, we choose NZE trucks. Given the average lifetimes of heavy-duty trucks in the fleet, the NZE trucks will be at the end of their useful lives by the time availability and cost of ZE trucks make them more feasible options. At that point the total cost of ownership of ZE trucks will make them far more attractive options than NZE trucks.

We recognize that there is tremendous desire in our impacted communities for ZE solutions today and hear that concern loudly and clearly. Nobody wants ZE trucks more than we do, but as outlined above and further detailed below, that is simply not possible in the near term beyond a pilot scale. This is not just our word; multiple recent technological assessments, including ones by the Ports of Los Angeles and Long Beach, and even the reports from the Luskin Center for Innovation and the ICCT that you reference

[3] Renewable natural gas or biomethane has a low carbon intensity under California's LCFS and can be used to establish a carbon credit provided it meets the requirements of the Cap and Trade Regulations. See Cal. Code Regs. § 95821.1.1.

[4] Your letter indicates that you believe MY 2014+ diesel vehicles meet the 0.02g/bhp NOx standard. That is not the case, and these vehicles are not substantially cleaner for NOx than the older vehicles.

in your letter concur with this position.[5] Unfortunately, that information is repeatedly glossed over and community groups have been misled into believing overly rosy projections by truck manufacturers as fact.

For the above reasons, investments in NZE trucks are needed today, and will continue to be needed for the next several years. This is neither blind advocacy for oil and gas interests as you have inferred, nor a "zealous push for NZE," but instead a fact-based position that is informed by science, frank conversations with ZE truck manufacturers, and the very real market conditions and performance issues we have observed through our years of leadership in this space. We fully acknowledge that the path in the future is ZE technology and will continue our leadership in funding demonstration projects and implementing incentives for ZE trucks and infrastructure – such as:

- Zero Emission Cargo Transport Project
- GGRF Zero Emission Drayage Truck Project
- DTNA Heavy Duty Battery Electric Truck and Infrastructure Project
- DTNA Commercial Zero Emission Truck Project
- Zero Emission Freight Facilities Project – Volvo LIGHTS
- Zero Emission Drayage Truck and Infrastructure Pilot Project

We further anticipate there will be a time where we pivot from our current approach and stop providing incentives for NZE trucks. But that time is unfortunately not here now, nor do we expect that it will be here in the next few years.

We provide more detail below setting the record straight on the misleading "false narratives and false solutions" you detail in your letter.

Setting the Record Straight

In addition to clearly outlining our position on NZE and ZE technologies, we feel it is important that we correct a number of errors and misstatements in your letters. These range from those that may be attributed to a difference in policy priorities, to others that are more far more egregious in nature.

<u>The upcoming deadlines to meet federal air quality standards are legally-binding and cannot be ignored</u>

As we have stated repeatedly, we are squarely focused on reducing emissions to meet federal ozone standards by 2023 and 2031. These are the deadlines for extreme ozone nonattainment areas under the Clean Air Act for the 1997 and 2008 8-hour standards respectively. While it is true that the South Coast region has experienced ozone nonattainment for decades, the Clean Air Act outlines a pathway and a hard stop by which regions must meet federal standards. That hard stop is upon our region now; as an extreme ozone nonattainment area there is no higher ozone classification that we can bump into as we

[5] See San Pedro Bay Ports Clean Air Action Plan, *2018 Feasibility Assessment for Drayage Trucks* (Mar 2019; updated May 2020), https://kentico.portoflosangeles.org/getmedia/0c341695-2dec-430a-b2d9-f828d4b2df1a/final-drayage-truck-feasibility-assessment-w-addendum (last accessed July 28, 2021).

have in the past when we failed to meet other deadlines. Failure to meet these deadlines could trigger economic sanctions including the withholding of federal highway funds.

Your position appears to be that because the amount of emission reductions needed to meet the standards is so large, we should give up and ignore those deadlines to focus instead on longer-term state climate goals. First, we take issue that actions taken today to reduce emissions undercut any progress toward climate goals – they can and must go hand-in-hand. Moreover, natural gas-fueled NZE vehicles often provide a greenhouse gas credit as about 75% of the natural gas available for transportation is renewable and continues to increase.[6] Second, we are obligated to take all feasible steps to reduce emissions now to attain federal air quality standards, even if it will be nearly impossible to meet those standards.[7] To suggest that we turn our backs on our central mandate and obligation to deliver clean air to the public as soon as possible is a tone-deaf approach that prioritizes climate goals in the future over public health today. Finally, we remind you that the emission reduction goals established by the state legislature and targets in Governor Newsom's Executive Order are discretionary and subject to change at any time. While these goals are important and laudable, they lack any legal consequence if they are not met, and do not supersede or obviate our obligation to meet legally enforceable deadlines to attain national air quality standards.

ZE Heavy Duty Trucks are not available today for widespread deployment

There are multiple reasons why, despite manufacturer promises to the contrary, as a practical matter ZE heavy-duty trucks are not available today. First, while there appear to be multiple heavy-duty ZE truck models available for order, getting these vehicles delivered in a timely manner is an entirely different matter. Second, there are ongoing concerns regarding whether ZE trucks can meet needed duty-cycles. Third, there is currently a dearth of charging infrastructure and concerns regarding sufficient power supply needed to support widespread electrification.

You allege that there are dozens of available ZE truck models available today, including 29 heavy-duty models, and that the number of ZE truck models is expected to grow rapidly in the next several years. We don't question that there are a limited number of Class 7 and 8 ZE truck models available for purchase or that new products are being announced every year. However, having models available for order and purchase does not translate to having ZE trucks on the road and in use today. That is a point underscored by the ICCT report that you cite in support of your statistics on ZE model availability. In that report, the authors were clear that their tally of ZE model availability "includes vehicle models that are in various stages of the pre-production phase – that is, *before the model is available for customer purchase*."[i][8] Indeed, reviewing the list of ZE models in that report reveals that for Class 7-8 tractor-trailers only one ZE model is classified by the ICCT as production-ready, and only 2 Class 7-8 rigid trucks are similarly classified. The 2019 Luskin report that you also cite supporting the readiness of ZE technology states that "NZE natural gas trucks have the highest technological readiness with a TRL 8, which indicates that the platform has reached a final or near-final stage and has exhibited technical

[6] See CARB LCFS data, https://ww3.arb.ca.gov/fuels/lcfs/lrtqsummaries.htm (last accessed July 28, 2021).
[7] CA Health and Safety Code 40913, 40914, 40920.5, Clean Air Act Section 172(a)(2).
[8] ICCT, *Race to Zero*, (Oct 2020) at 8 (emphasis added), https://theicct.org/publications/canada-race-to-zero-oct2020 (last accessed July 28. 2021).

viability through testing and demonstration. ZE battery electric trucks are quickly catching up and are currently at a TRL 6-7, a demonstration and initial systems conditioning stage."[9] While the ICCT study's authors point out that including models that are still in the pre-production phase is a simplification, this is in fact a critically important point regarding *actual* heavy duty ZE truck availability. Dismissing this point misleads our front-line communities into believing that ZE trucks are here today and that funding is the only barrier to their deployment.

We further note that in citing statistics regarding the availability of ZE trucks you are conflating the availability of the smaller ZE truck models (Class 6 and below) and buses with the Class 7-8 trucks. The trucks that are the largest source of smog-forming NOx in our region are the Class 7-8 trucks; they are the ones that need to be addressed for ozone and PM. As described above, almost all ZE models of this class of truck are in pre-production, and even those such as the model by BYD that you reference currently have a spotty track-record. On the other hand there are far more models of ZE medium-duty trucks both available and proven that are starting to be deployed in fleets. And – as you correctly point out – the total cost of ownership of these medium-duty ZE vehicles can be lower than that of conventional trucks, making them even more of an attractive option. But again, we are not yet at that point with the heavy-duty trucks, and it is disingenuous to suggest that because medium duty ZE trucks are available today the same holds true of the heavy-duty trucks.

There are also real concerns regarding whether ZE heavy-duty trucks would be able to meet the duty-cycles required of current diesel vehicles. This includes the distance traveled – which is limited by battery capacity – and the time needed in service – which is hampered by long charging times. In your letter you assert that the real issue is that the freight industry can and must change how they use heavy-duty trucks to meet these duty-cycle limitations. However, as with your claims on the availability of ZE truck models, the very report you cite as support for that claim (the 2019 Luskin report) indicates the contrary. First, we note that we are very familiar with that report as our Chief Technology Officer, Dr. Matt Miyasato, was one of the lead reviewers of the report. Second, in acknowledging the long distances that drayage trucks travel the report recognizes that "ZE trucks have yet to be proven in large-scale drayage operations, but the technology is advancing rapidly."[10] The report further notes that "[w]hile driving a battery electric truck is similar to driving a diesel truck, fueling with electricity is a paradigm shift. Challenges include charging times that require trucks to remain stationary for extended periods."[11] Finally, even if the technology and duty-cycle issues were resolved, neither the fueling structure nor the electrons are available to support widespread heavy-duty ZE truck deployment. Charging infrastructure has proven difficult to implement in our pilot projects with power capacities just over 100 kW. Installing the thousands of chargers with future 500kW and 1MW capabilities to shorten charge times have serious infrastructure challenges that impacts not only local distribution but also main utility line distribution and generation. We have spent over $37 million to address the significant

[9] As the citation for the "Luskin report" is blank, we surmise that you meant the report by CJ. Di Filippo, C. Callahan, N. Golestani; *Zero-Emission Drayage Trucks – Challenges and Opportunities for the San Pedro* Ports. (Oct 2019), https://innovation.luskin.ucla.edu/wp-content/uploads/2019/10/Zero_Emission_Drayage_Trucks.pdf (last accessed July 28, 2021). See p. 12 for the relevant quote.
[10] Id. at 2.
[11] Id.

barriers that must be overcome to advance HD charging infrastructure. Unfortunately, it will be many years and tens of billions of dollars before this network is sufficient, utility infrastructure improvements made, and the installation process streamlined. As an example of the work needed, the California Energy Commission has forecast that approximately 141,000 50 kW chargers and 16,000 350 kW chargers would be needed statewide to support 180,000 electric medium and heavy-duty vehicles by 2030 (consistent with CARB's draft Mobile Source Strategy).[12] This is beyond the 31,000 50+ kW chargers (and the more than 1.2 million level 1 and 2 chargers) needed to support 8 million light duty ZE vehicles in 2030. As a comparison, there are only about 21,000 50+ kW chargers across the entire nation today.[13]

The inference that NZE trucks pose greater risks than diesel trucks is absurd and unsupported by science

You strongly suggest that NZE trucks threaten public health because 1) they are only "incrementally cleaner", 2) natural gas is a toxic fuel, and 3) NZE trucks produce more ultrafine particles. You further infer that NZE trucks may be more toxic than diesel trucks because of their ultrafine emissions. Neither of these statements is supported by science and belie a zealous belief that any technology associated with natural gas is inherently polluting over a more fact-based and objective view.

First, NZE trucks are not "incrementally cleaner" as you suggest. They emit 90% less NOx and 100% less cancer-causing DPM, a fact also acknowledged by the very literature you cite.[14] That represents a massive potential reduction in emissions and a substantial health-benefit that you appear to dismiss.

Second, it is unclear what you mean by your characterization of natural gas as a toxic fuel. Natural gas is a fossil fuel, but it burns relatively cleanly compared to most fuels. This is especially true in comparison to diesel, whose combustion by-products have been recognized as a carcinogenic air toxic in California for over 20 years, and are known to contribute the bulk of the air toxic risk in our region.[15] The health benefits of reducing DPM are both easily monetized and have been well-established for decades. It is puzzling that groups such as NRDC and UCS who rang early alarm bells on the toxicity of diesel particulate matter and estimated that every dollar spent on diesel emission reduction would yield $9-16 in monetized health benefits over 15 years ago are now claiming that such benefits are amorphous, defy quantification, and are less toxic than the combustion of natural gas.

Finally, you claim that NZE vehicles may be more harmful than diesel vehicles due to increased emissions of ultrafine particles. We fully acknowledge that ultrafine particles are an important and emerging threat. In fact, over 15 years ago we convened one of the earliest conferences to cover the

[12] CEC AB 2127 Report, https://efiling.energy.ca.gov/getdocument.aspx?tn=238853 (last accessed July 28, 2021).
[13] https://afdc.energy.gov/stations/#/analyze?fuel=ELEC&ev_levels=dc_fast&ev_levels=3 (last accessed July 28, 2021).
[14] Id. at 13.
[15] See OEHHA, *Health Effects of Diesel Exhaust* (May 2001), https://oehha.ca.gov/air/health-effects-diesel-exhaust (last accessed July 28, 2021); South Coast Air Quality Management District, *MATES V Multiple Air Toxics Exposure Study* (Draft, 2021) http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v (last accessed July 28, 2021).

science, technology and policy issues associated with ultrafines[16] and have characterized levels of ultrafines in our MATES IV and recent draft MATES V studies.[17] While the science continues to evolve, it is clear that 1) ultrafine particle pose health risks, and 2) the extent of these health risks are currently uncertain and likely vary with particulate composition.

We also know that *all* combustion sources produce ultrafine particles. Whether certain engine types produce more or less ultrafine particles is not well settled in the current science, and we agree this is an issue that should be tracked. However, given that particle composition very likely plays a key role in the toxicity of these particles, it is fair to say that ultrafine particles saturated with highly toxic cancer-causing PAH's and other by-products of diesel combustion are likely far more harmful than those that are not the result of diesel fuel.

The papers you cite in support of the ultrafine particle threat posed by NZE natural gas-fueled trucks are non-peer reviewed reports that don't shed much light on this subject. The report by Transport & Environment merely points out the risks posed by ultrafine particles and that in comparing zero emission vehicles and natural gas-fueled vehicles, the natural gas vehicles will pose additional health risks from ultrafine emissions. The one line suggesting that in narrow cases natural gas-fueled vehicles emit more ultrafines than diesel vehicles refers to a study evaluating the relative contribution of passenger vehicles meeting Euro VI emission standards and is not comparable to heavy-duty trucks.[18] The CENEX report, while reporting that the number of particles emitted by certain heavy-duty natural gas vehicles were higher than diesel vehicles only evaluated a limited number of natural gas-fueled engine types, did not evaluate the engines currently used in the U.S. (which meet far lower NOx standards and so are likely not comparable to the Euro VI engines), and compared the natural gas engines to diesel engines equipped with particle filters that would greatly reduce both particle mass and count. Indeed, the report's authors carefully caveat these results citing the limitations of this work and call for more research in this area.[19] This is a thin reed upon which to base a blanket claim that NZE heavy-duty vehicles emit more ultrafine particles than their diesel counterparts.

In summary, we are very disappointed by your continued campaign against the funding of NZE natural gas-fueled trucks as part of the solution needed to clean the air. It is a campaign that will necessarily prolong the use of diesel trucks and sacrifices short-term emission reductions and health benefits for climate goals decades in the future. It is a campaign that falsely pits NZE and ZE technologies against each other when an all-of-the-above approach is needed to eliminate diesel. It is a campaign that misleads the public into believing ZE heavy-duty technologies are ready to go today and that the only barrier is political will. Most disturbingly, it is a campaign that plays loose with fundamental facts and science. It is our sincere hope that we can move beyond this rhetoric and work together on policies

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[16] See South Coast Air Quality Management District, *Ultrafine Particles Conference* (May 2006). http://www.aqmd.gov/home/technology/cfpag/ultrafine-particles-conference (last accessed July 28, 2021).
[17] See MATES V Chapter 5, *Ultrafine Particles and Black Carbon Measurements*.
[18] See Transport & Environment, *Compressed Natural Gas Vehicles are not a Clean Solution for Transport* (June 2020), 2020_06_TE_CNG_particle_report.pdf (transportenvironment.org) (last accessed July 28, 2021) at 9.
[19] See CENEX, *An Innovate [sic] UK Research Project to Assess the Viability of Gas Vehicles* (Mar 2019) at 31-33.

informed by the best available science to achieve our mutual goals of cleaning the air and protecting public health.

Sincerely,

Wayne Nastri
Executive Officer

cc: South Coast AQMD Governing Board

From: Lisa Madsen
To: Maritime Clean Air Strategy
Cc: Elisa Arias; Phil Trom; Keri Robinson; Eva Sanchez; Garrett, Timothy
Subject: Port of San Diego Draft Revised Maritime Clean Air Strategy
Date: Thursday, September 2, 2021 10:09:54 AM
Attachments: image011.png
image012.png
image013.png
image014.png
image015.png

Good morning,

On behalf of SANDAG, thank you for the opportunity to comment on the San Diego Unified Port District's (Port's) Draft Revised Maritime Clean Air Strategy (MCAS). SANDAG commends the Port of San Diego for proposing strategies that go beyond State requirements and for proposing bold goals and objectives that will improve air quality in the Portside communities.

The Maritime Clean Air Strategy supports SANDAG's vision to promote clean transportation solutions that will help the region to exceed State and Federal climate targets, while also addressing historical inequities and improving the quality of life for San Diego residents. The MCAS strategies embody the new transportation vision that will be implemented in the draft SANDAG 2021 Regional Plan, which will strategically position the San Diego region to embrace innovative changes and reimagine how people and goods will move.

The MCAS also outlines Assembly Bill 617 (AB 617) efforts that the San Diego County Air Pollution Control District, Port, SANDAG, state and regional public agencies, community members, and private companies have developed to reduce emissions in the Portside communities. Consistent with the AB 617 efforts, SANDAG appreciates the Port incorporating additional resiliency and health equity strategies in this MCAS. Through a recently awarded California Energy Commission grant, SANDAG also looks forward to working with the Port on assessing medium/heavy-duty zero-emission truck fleets and infrastructure needs and developing near and long-term strategies that will help the San Diego region transition to zero-emission trucks.

We look forward to collaborating with the Port on ensuring that clean air strategies are prioritized in our region's underserved communities. When available, please send any additional documents related to this project to me at lisa.madsen@sandag.org. Lastly, if you have any questions or concerns regarding this email, please don't hesitate to contact me.

Best,
Lisa

Lisa Madsen (she/her/hers)
Senior Regional Planner

(619) 595-1432
401 B Street, Suite 800, San Diego, CA 92101

SANDAG hours: Tuesday-Friday and every other Monday from 8 a.m.-5 p.m.
Employees are teleworking while our offices are closed during the COVID-19 pandemic.

LEAGUE OF WOMEN VOTERS® OF SAN DIEGO
7710 Balboa Avenue, Suite 224D
San Diego, California 92111

September 2, 2021

Board of Port Commissioners
San Diego Unified Port District
3165 Pacific Highway
San Diego, California 92101
and by email to mcas@portofsandiego.org

Esteemed Port Commissioners,

Thank you for the opportunity to comment on the revised Port of San Diego Maritime Clean Air Strategy for the Port of San Diego tenants and Portside Communities.

- In order for the Port of San Diego to attain its identified goal of transitioning to 100% zero emission vehicles by 2030, the revised MCAS must accelerate its current objective of 20% zero emission vehicles and charging infrastructure by 2026. Charging stations should not add a further burden to marginalized communities.
- The Port of San Diego must immediately collaborate with the City of San Diego to enforce the established drayage truck route along Harbor Drive and prohibit drayage trucks from transiting residential streets where residents of Barrio Logan and National City are walking, shopping, recreating and children are going to school.
- Fleet Electrification. Via the American Rescue Act Plan Funds, State of California Green Finance Programs and implemented port fees and tariffs, there will be increased funding for fleet electrification, reducing diesel emissions and low-carbon transportation infrastructure. Therefore, we support the recommendations by the Environmental Health Coalition, the City Council of National City, Barrio Logan Planning Group and the S.D. Air Pollution Control District as admirable and doable by the Port of San Diego. It will be another way to show that San Diego is truly "America's Finest City" and a leader for other ports in California.

The League of Women Voters is a 100-year-old national organization that promotes informed participation of citizens in government and advocates for policy positions that have been adopted by our membership. Our positions include support for measures to establish air quality standards that will protect the public health and welfare, and the development of effective enforcement and implementation procedures to attain these standards. We support environmentally sound policies that reduce energy growth rates, emphasize energy conservation and encourage the use of renewable resources. Environmental

Justice focuses on preventing and repairing negative environmental effects in marginalized communities such as the Portside Communities identified in the MCAS.

Sincerely,

Kim Knox
President, League of Women Voters of San Diego

From: M. Dan McKirnan
To: Maritime Clean Air Strategy
Subject: MCAS
Date: Friday, September 3, 2021 4:20:43 PM

Dear Port of San Diego,

I very concerned that the MCAS plan does not include specific goals and timelines to insure that the 2030 zero goal is attained. How can the communities impacted by air quality know that you are making progress along the way?

What accountability will be in place for progress on this plan?

Thank you,

M. Dan McKirnan
1404 Law St.
San Diego, CA 92109

From: Maritza Contreras
To: Maritime Clean Air Strategy
Subject: Port of San Diego MCAS workshop statement
Date: Thursday, August 26, 2021 8:30:32 AM

Hello Port of San Diego, my name is Maritza Garcia, and I am a resident of Logan Heights. As I have mentioned in previous meetings our community has long suffered from an abundance of pollution in our air caused by the Ports operations and other businesses associated with them. It is devastating that many suffer from asthma and other health complications due to this constant exposure and for the longest it seemed like no one cared about this negative affect on our community. I am thankful that the Port is in support of 100% ZEV trucks by 2030 because it finally feels like we are being heard. However, the August draft MCAS's ZEV related polices do not adequately address the Board's 7/13/21 motion on ZEV. IT is crucial that we continue to build upon the positive momentum that has been present in the past meetings. That is why we need much more urgent, specific, and aggressive regulations for existing tenants and new tenants as well as plans for charging infrastructure that will help to more clearly demonstrate how the Port will transition all its trucks to ZEV by 2030. As a 3rd generation resident of Logan I have seen all too well how dangerous our air is to the community, but with the Port's help we can continue to fight for the wellbeing of our future generations. Thank you for your time.

New Leaf Biofuel
2285 Newton Ave
San Diego CA 92113
P: 619-236-8500
F: 619-236-8585
www.newleafbiofuel.com

September 1, 2021

TO: Port of San Diego Port Commission Chair, Michael Zucchet MCAS@portofsandiego.org

FR: Jennifer Case, CEO of New Leaf Biofuel

RE: Follow-up Comments on Draft Revised Port of San Diego Maritime Clean Air Strategy

On behalf of New Leaf Biofuel, I previously submitted comments on the Maritime Clean Air Strategy (MCAS) dated April 20, 2021. Today I am submitting follow-up comments to request an opportunity for New Leaf Biofuel to meet with and work directly with the Port (the Port) of San Diego as you implement the MCAS program to improve air quality and reduce greenhouse gas emissions. As a business resident of Barrio Logan and a producer and supplier of biodiesel, New Leaf is uniquely situated to provide technical and logistical assistance to help the Port meet MCAS goals. New Leaf is happy to do this without compensation as a good neighbor who shares the Port's goals for cleaner air.

Today as I comment on the August 2021 revised draft MCAS, I appreciate that biodiesel blends, along with electric vehicles, are included on page 128 as an alternative fuel technology for use in equipment and vehicles that can be phased out under Fleet Goal 1 in section IV.4.3. Thus, I would like to meet with you to discuss the logistics of ensuring that biodiesel/renewable diesel blends (B20/RD80) and biodiesel/diesel blends (B20/Diesel80) are readily available for use in the MCAS implementation. I specifically request that you allow me to meet with you by phone or in person at your earliest convenience.

Because biodiesel is an essential tool for achieving the MCAS goals, I ask you to consider additional changes to the revised draft to ensure factual accuracy about biodiesel. On page 211, I note the revised draft states that biodiesel and renewable diesel (RD) blends "are not readily available" and "not considered a drop-in fuel." As a producer and supplier of biodiesel in Barrio Logan, I know that biodiesel is available now and will be available in greater quantities in the next few years. A blend of 80% renewable diesel with 20% biodiesel can reduce carbon emissions by 79%, reduce particulate matter by 29%, reduce aromatic compounds by 39%, reduce carbon monoxide by 23% and reduce NOx by 9%. A higher blend of biodiesel would increase GHG emissions even more. Addtionally, biodiesel blends are considered a drop in fuel because the majority of engine manufacturers have certified that biodiesel blends up to 20% are safe for diesel engines that are used in the port.

Thus, I request that page 211 of the report be re-worded to clarify that up to 20% biodiesel blends are currently available and are considered a drop-in fuel that could be

used to greatly reduce GHG's in the transition period before zero emission (ZE) heavy duty trucks are required in 2045.

Also, I ask that you add a recommendation on page in the Community goals that begin on page 13 that the Port work with community based CA ultralow carbon fuel producers, including New Leaf Biofuel, and trade associations, including the California Advanced Biofuels Association (CABA) and others, to access the availability of ultralow carbon fuel blends such as biodiesel and renewable diesel. These blends can serve as a transition fuel, starting now, until other measures you have identified can be implemented.

On page 112 in Setion IV.3.2.3, I request that you add a recommendation to investigate funding for and implementation of an ultralow carbon fueling station in the region of the San Diego ports. This station would supply biodiesel and biodiese/renewable diesel blends and encourage local residents, businesses and industry to use these fuels to protect the San Diego Community.

As a San Diego-based company, operating in Barrio Logan, less than one mile from Cesar Chavez Park, I offer these recommendations because I believe that the biodiesel we produce isthe solution to the question we heard numerous times during the Port's virtual public meeting onthe MCAS, held Wednesday, April 7, namely:

> **"What will the Port do between now and the Governor's 2035 electrificationdeadline to clean the air"?**

As a local business owner and member of CABA, I volunteer to work with interested parties to obtain information needed to fully investigate the recommendations I have offered. As a member of the San Diego Chamber, I also offer to work with local business to promote voluntaryuse of ultralow carbon blends that reduce GHG's.

Because my business has been located in Barrio Logan for more than 15 years, I share the Port's committment to improved air quality, reduced greenhouse gas emissions, and an economically thriving port-side community.

We are eager to work with the Port of San Diego, the Port Tenants' Association, the San Diego Chamber of Commerce, the Navy, NASSCO and other stakeholders in this process. We believe that there are many opportunities to clean the air in the 24 years between 2021 and 2045 and that biodiesel is an important solution to San Diego's challenges.

Respectfully,

Jennifer Case
Chief Executive Officer
New Leaf Biofuel

Attachment I

Specific Benefits of Biodiesel which were included in New Leaf's April 20, 2021 MCAS Comments

Biodiesel is America's largest advanced biofuel by volume. Biodiesel has contributed to cleaner air and reduced greenhouse gas emissions for over 20 years. Biodiesel is similar to renewable diesel in that it is made from renewable feedstocks. Most biodiesel in California is made from second use materials like used cooking oil, distillers corn oil and animal fats.

With a carbon intensity score of 15.86, biodiesel is one of the lowest carbon fuels for compliance obligations. Also, it is important to note that biodiesel reduces Greenhouse Gas (GHG) emissions by over 80% over petroleum diesel. GHG emissions are most closely associated with global warming and reducing these emissions now has an even greater impacton addressing global warming than waiting the decade (or more) it will take to fully decarbonizeand electrify the transportation system, especially the heavy-duty sector responsible for goods movement.

The California Advanced Biofuels Alliance (CABA), in its 2019 report: "A Roadmap forEliminating Petroleum Diesel in California by 2030" (https://www.caadvancedbiofuelsalliance.org/a-2030-roadmap) states:

> Most recently, petroleum diesel displacement has been a huge and largely unnoticed success. Since 2010, the renewable portion of California's diesel use has increased fromless than 1% to approximately 15%.
>
> California can realistically eliminate the use of petroleum diesel by 2030 through a combination of efficiency improvements, further electrification of vehicles currently usingdiesel, an increased use of renewable natural gas vehicles, and continued growth in theuse of sustainable diesel fuels (renewable diesel and biodiesel.)

In addition to reducing GHG emissions and criteria pollutants, biodiesel has also demonstrated:

- 72% reduction in cancer risk when heavy-duty trucks (such as semis) use 100%renewable fuel.
- Fewer or lessened asthma attacks based on vehicle use of biodiesel.
- Fewer sick days resulting from biodiesel use in heavy- duty trucks.

HARBORSIDE
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September 3, 2021

MCAS Committee
Port of San Diego
3165 Pacific Highway
San Diego, CA 92101

via MCAS@portofsandiego.org

Dear Committee,

San Diego Refrigerated Services – Harborside (SDRS) would like to take this opportunity to voice our concerns regarding the draft Maritime Clean Air Strategy (MCAS).

SDRS has been at Tenth Avenue Marine Terminal for 25 years and has a long-term lease. We were instrumental to initiate change by targeting and attracting “cleaner” cargoes that eliminated the need for on-site fumigation. These cleaner commodities included Chilean avocados, Australian citrus, and most notable Dole Fresh Fruit Company.

As a service provider for Dole. We load cargo from containers to commercial carriers. Our services significantly reduce the empty backhaul of containers within the region. The MCAS as written would unfairly ban CARB compliant vehicles from our facility. Effectively transforming the terminal from a Port to an Island for commerce. This is not an exaggeration.

The effects of pollution on the community and the State as a whole are still strongly felt, However as discussed by MCAS members, perhaps only 6% of the attributed emissions are from terminal traffic. That said, we also cannot ignore climate change because it’s in everyone’s best interest to find real solutions.

The drafted MCAS does not address solutions to the existing issues relating to jobs, commerce, viability; it only addresses “goals”. The introduction of these standards without real solutions is unfair to the businesses operating on the port and consumers reliant on these operations, because the goals are unrealistic.

I urge the Commission to reject the current MCAS and continue working on a Clean Air Strategy that will offer attainable results, on a real timeline, and maintain the commitment to promoting commerce.

Respectfully,

Frank Plant
Harborside

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August 30, 2021

Sent via Electronic Mail to MCAS@portofsandiego.org

Michael LaFleur
Vice President, Maritime
Port of San Diego
3165 Pacific Highway
San Diego, CA 92101

Re: Draft Revised Maritime Clean Air Strategy August 2021 Feedback

Vice President LaFleur:

We write on behalf of the longshoremen, marine clerks, and foremen at the Port of San Diego regarding the release of the Draft Revised Maritime Clean Air Strategy dated August 2021 ("Draft Revised MCAS" or "document"). After reviewing the Draft Revised MCAS, we seek to provide feedback in a number of areas.

We understand and appreciate the importance of improved air quality and reduced emissions; longshoremen, marine clerks, and foremen at the Port of San Diego feel the effects of emissions more than anyone as they work and live closest to the Port. Despite this, the Port must strongly consider the potential negative impacts to the workforce and surrounding communities that would occur should you regulate these men and women out of jobs.

As a general principle, it must be made clear in the Draft Revised MCAS that any new technologies invested in and deployed at the Port **do not in any way displace the workforce**. We were pleased to hear Port staff convey in prior briefings that they have no intention of advocating for automated equipment. However, if the "MCAS is intended to guide future decision-making and provide a planning framework for potential future actions that may be implemented to achieve the goals and objectives identified in the MCAS," that commitment must be included in the document, so the understanding is clear for the future. This could be done, in part, by revising pages ES-2 and I.3 to read in relevant part, "Goal for Cargo Handling Equipment: In advance of the State's goals identified in Executive Order No. N-79-20, the transition of diesel cargo handling equipment to *human-operated* 100% ZE by 2030." Page ES-4

should also be revised to read, in relevant part, "the overarching goal of 100% Zero Emissions Trucks and *human-operated* Cargo Handling Equipment by 2030." Pages ES-11 and IV.1-23 should be revised to read, in relevant part, "Cargo Handling Equipment Goal 1: Attain substantial reductions for cargo handling equipment related emissions by facilitating upgrades to *human-operated* zero emission/near zero emission equipment alternatives. Pages ES-25 and V.3 should be revised to read, in relevant part, "Enabling Objective 1A: Pursue a potential Memorandum of Understanding with the San Diego Air Pollution Control District to administer California Air Resources Board Funding to help fund zero emission/ near zero emission trucks and/or *human-operated* cargo handling equipment." Further, all references throughout the document to "100% zero emission Trucks and Cargo Handling Equipment by 2030," or "zero emission Trucks and Cargo Handling Equipment" should be revised to "zero emission Trucks and ***human-operated*** Cargo Handling Equipment."

A second issue that resonates throughout the Draft Revised MCAS is the failure to recognize that much of the technology envisioned in the Draft Revised MCAS cannot yet be feasibly implemented. This is a fact that was admitted by Port staff at the April 19, 2021 stakeholders meeting and on page IV.1-8 "it is important to note that several ZE/NZE CHE alternatives are not yet commercially available for purchase; many ZE/NZE pieces of CHE are still being built to specifications provided by the customer on a case-by-case basis and are not yet mass produced." It must be made clear throughout the document that the mandated technology must be reasonably feasible. This could be done, in part, by revising pages ES-3 and I.3 to read in relevant part, "Equip marine terminals with shore power and/or a *reasonably feasible* alternative technology to reduce ocean-going vessel emissions for ships that call to the Port."

Pages ES-7 and II.8's Health Objective 4 outlines the Port's plans to work with San Diego Air Pollution Control District (SDAPCD) to develop an indirect source rule. We would advise the Port to reconsider supporting an indirect source rule. Such a rule would provide additional incentive for terminal operators to automate and may result in litigation, as was the case when the South Coast Air Quality Management District implemented a similar rule for warehouses in their jurisdiction.

As for Cargo Handling Equipment, page ES-10 states in part "emissions associated with this activity would be eliminated if replaced with electric alternatives." This statement seems to ignore the emissions created by charging the electric alternatives. Further, as outlined in our April 19, 2021 letter as well as at that day's meeting with port staff, the Port must consider the current limitations of electric battery life. The Draft Revised MCAS should address the challenges that would be faced should the battery die on a piece of electric cargo handling equipment. Electric equipment with an insufficient battery life could cause dockworkers to stand idly by as the equipment is charged. This seems to have been considered on pages IV.1-10 and IV.1-15 where staff concedes, using conventional charging, "the [equipment] is in use for 8 hours, is charging for 8 hours, and cooling for 8 hours." Even with "rapid/opportunity charging, the battery charges for about 1-2 hours during the day, and…requires an 8-hour equalization charge once a week." As such, to prevent a stoppage in cargo movement, terminal operators would need to purchase multiple pieces of the same equipment to use while the other is charging. This would either cripple productivity or balloon terminal operators' operating costs, both of which would negatively impact business at the Port of San Diego.

With respect to Ocean-going vessels ("OGVs"), page ES-22 provides in relevant part, "Ocean-going vessel emissions can be reduced by a combination of reduced vessel speeds, investing in cleaner fuels and engine types, upgrading on-board equipment, and expanding shore power capabilities. Shore power infrastructure enables vessels to turn off their auxiliary engines and plug into the electrical grid while the vessel is at berth. For non-shore power equipped vessels, alternative pathways such as Emission Capture Control Systems (or Bonnet), may also help reduce pollution by capturing and treating emissions from a vessel's exhaust while it is at berth." As rolling blackouts and Governor Newsom's numerous Proclamations of a State of Emergency, most recently issued on July 30, 2021, which lifted the requirement of the use of shore power, have shown, the electrical grid is far from ready to be counted on for consistent operation. As such, we implore the Port to reconsider whether mandating shore power is in the best interest of all Californians when, in the words of Governor Newsom "it is necessary to take immediate action to reduce the strain on the energy infrastructure, increase energy capacity, and make energy supply more resilient this year to protect the health and safety of Californians." This same concern is raised by page ES-23's "Ocean-going Vessels At-Berth Goal 2: Reduce ocean-going vessels' at-berth emissions by expanding existing and/or developing new shore power systems and/or equivalent technologies at the Port's marine terminals" and corresponding objectives 2A and 2B, and most of pages IV.6-14 through IV.6-15.

Further, as stated in our prior letters and discussions, the Port must be cautious of requirements that are too onerous to comply with, such as requiring vessels to retrofit to be compatible with shore power or capture and control systems, or cargo will be diverted elsewhere. This is especially true for OGVs that do not regularly call at the Port of San Diego, and OGVs that carry discretionary cargo that is easily diverted. The need for vessels to be retrofitted for shore power use is conceded on page IV.6-15, "it is important to emphasize that in addition to installing the landside shore power system, the vessels also need to be retrofitted for shore power use. The General Cargo and Bulk Carriers that call to TAMT are largely spot calls and CARB does not have any pending or anticipated regulatory mandates that would require these vessel types to become shore power capable" as well as page IV.6-20, "in addition to infrastructure upgrades at the Port, individual vessels would also require retrofitting to participate in shore power at berth." There is no discussion in the Draft Revised MCAS of a plan in place to avoid cargo diversion, and, in turn, job loss should vessel owners refuse to retrofit. Should vessel owners refuse to retrofit and instead divert cargo, there would be no overall reduction in pollution. Vessels would simply call at another port with less stringent requirements and cargo would continue its journey by other means. In order to better achieve "Health Equity for All," it would be wise to keep those vessels in San Diego and work with them to achieve reasonably feasible emissions reductions rather than drive them elsewhere where emissions may be less of a concern. This would allow the Port to serve as a model for other ports seeking health equity.

As page ES-22 states, "there is only one company authorized by CARB…to install a Bonnet system on vessel emissions while at berth. While Bonnet technology is capable of reducing criteria pollutant emissions from a vessel's exhaust, greenhouse gas emissions are not captured. Although this technology is still developing, Bonnets may be another tool to help reduce emissions while vessels are at berth. It is also anticipated that other innovative concepts to reduce emissions at berth will be advanced in the coming years." However, there is no mention of the impact the COVID-19 pandemic has had on the economy or production. It would seem unwise to

operate under the assumption such technology will be available "in the coming years" without considering potential changes in the production timeline or demand caused by the pandemic. This same concern is raised by page IV.1-8's statement, "it is expected that ZE/NZE CHE pieces will be commercially available for purchase soon," on page IV.1-16 "several crane manufacturers are working to develop [electric top handlers and reach stackers] by 2021," and on page IV.1.21 "Port staff is optimistic that more electric models will become commercially available in the next few years."

With respect to Bonnet systems and shore power, the Draft Revised MCAS should take into account the length of time vessels are at berth. The vast majority of vessels that call at the Port are loaded and unloaded by our members in less than 8 hours. It is extremely rare for a vessel to be at berth for more than 10 to 12 hours due to their tight shipping schedules. We believe that with the current Bonnet system that is in use elsewhere, during the time it would take to affix the filtration system to the vessel's stack, loading and unloading would be well underway. As such, we propose including in the Draft Revised MCAS an exception to the use of a Bonnet system or shore power for vessels that are at berth for less than 8 hours.

Enabling Objective 1A found on pages ES-25 and V.3 states, "pursue a potential Memorandum of Understanding with the San Diego Air Pollution Control District to administer California Air Resources Board Funding to help fund zero emission/ near zero emission trucks and/or cargo handling equipment." As stated, "these programs have yielded few awards to Port tenants." As such, it should be expressly stated that the Port will work with existing and emerging tenants, particularly those that are struggling to help fund their goal to reach compliance, to obtain funding.

Enabling objective 2B, found on pages ES-26 and V.5 provides, "establish an Emissions Reduction Incentive Program." With regard to such a program, we should suggest discounted berthing as a potential incentive for those in compliance. Although not a direct incentive, as raised in our April 19, 2021 letter, we believe a tiered compliance structure would incentivize vessel owners to comply. Under such an approach, vessel owners who cannot achieve full compliance with all Draft Revised MCAS requirements but have made a demonstratable good faith effort to comply should not be penalized. Rather, they should be given additional time to comply, asked to pay into a fund, or some similar method of allowing them to continue to do business at the Port of San Diego.

We are glad to see pages ES-26 and V.5's Enabling Objective 2C calling for "a market study/feasibility analysis for the Board of Port Commissioners that explores a range of potential fees that can support zero emission/near zero emission reduction projects, as well as identify any implications the fee may have on the Port's revenue and maritime business opportunities" but respectfully request the direct and indirect impact on jobs also be considered in such a study.

We look forward to discussing the Draft Revised MCAS with you further and in more detail. Should you have any questions, please feel free to contact us at the above.

Sincerely,

Raymond Leyba	Daniel G. Miranda
President	*President*
ILWU Local 29	ILWU Local 94

cc: Josefina Khalidy

Joe Stuyvesant
President/CEO
San Diego Unified Port District
3165 Pacific Hwy
San Diego, CA 92101

September 3, 2021

Re: Comments-Maritime Clean Air Strategy

Dear Mr. Stuyesant,

We appreciate the opportunity to comment on the Maritime Clean Air Strategy ("Strategy"). The report clearly establishes that City of National City (National City) residents suffer the majority of the health related impacts associated with the operations of the National City Marine Terminal. National City believes that the Strategy adds to the body of evidence that our local community is disproportionately impacted by the Port of San Diego's (Port) operation of the Terminal and creates environmental injustices to our community. This is particularly self-evident when you compare the allocation of funding and staff resources provided to other membership cities. A clear pattern has emerged whereby Port staff holds numerous public workshops where lofty goals are set, but where delay is embraced over taking any meaningful actions to right the health risks wrongs to our community.

The City Council of National City recently took unanimous action to send a letter to the Port requesting that American Rescue Plan Act (ARPA) funds are prioritized for the public improvements of the Balanced Plan and the Strategy. This funding is a unique opportunity for the Port to utilize one time federal funds to address historic inequities in National City. Fulfilling this request is a step in the right direction, but more needs to be done. The Strategy falls far short of providing any meaningful health risk reductions. In sum, the Strategy's Objectives do little more than to provide a commitment to host more workshops, develop more conceptual plans, and to delay any effective reductions in toxic air pollutants.

Historic Trends:
Unlike the other Port membership cities, National City has the fewest parks by acre, the lowest level of Port funding per capita, and the longest delays in implementing its master planning objectives. Yet, National City has the highest levels of respiratory diseases found in San Diego County. For example the Strategy recognizes that:

> *"The Portside Community has some of the poorest air quality in San Diego County. Polluted air can contribute to higher rates of asthma, cardiovascular disease, and a variety of other health related impacts. These health impacts are often exacerbated by socioeconomic factors, including poverty, educational attainment, unemployment, language barriers, and housing burdens—all of which are prevalent in the Portside Community."* (MCAS Pg. ES-1).

Strategy Failures:

The Strategy is organized by first stating its "Goals" followed by defining it "Objectives" which are intended to be the implementation arm of the Strategy. Currently, the Objectives are in large part directed at the Port hosting more meetings, coordinating more with regulatory authorities, and conducting more studies, and then asserting a number of unenforceable policy goals.

Solution Framework:
The Strategy should instead focus on tangible actions that directly improve the health of its local Portside Community. Nowhere in the Strategy is a connection made between the National City Balanced Plan and the Strategy. Moreover, the Objectives fail to provide any real short term or long term improvements to air quality.

When the Ports of Los Angeles and Long Beach developed similar type plans their actions provided concrete emission reduction goals followed by mandates that drayage trucks meet those goals. If the trucking companies failed to do so they simply could not continue to operate on the terminals. The Port should take similar actions that improve the quality of life for the Portside Community by funding the National City Balanced Plan so that implementation can start next year and be completed within five years, require that all trucks entering the terminal become electric at a rate of ten percent a year, and that National City community service programs, police and fire receive the funding it needs to overcome decades of social injustices.

Comments:
The Port and National City spent years developing the National City Balanced Plan that included many of the transportation and greening objectives found in the Strategy. This Strategy seems to set aside the National City Balance Plan and replace it with new goals highlighted by objectives that fail to move the needle towards improved health and greater recreational access for City residents.

ES.4.1 – Public Health

Community Goal 1: Enrich the Portside Community through Education, Engagement, and Urban Greening.

Comment: The National City Balanced Plan should be the vehicle to obtain this goal.

Health Goal 1: Protect and improve community health by reducing emissions and lessening Portside Community residents' exposure to poor air quality.

Comment: Improving community health requires short and long term action plans that include stringent enforcement penalties. The Strategy Objectives do not provide concrete actions. Instead the Strategy Objectives study what we already know about truck emissions emanating from the National City Marine Terminal causing harm to the health of its community members. National City has had the highest rate of Covid-19 and the poor air quality has only intensified the negative health impacts on the local community.

Health Objective 1: By October 2021, identify existing health risk levels generated from the Port's Tenth Avenue Marine Terminal and the National City Marine Terminal for Diesel Particulate Matter (DPM) and other Toxic Air Contaminant emissions.

a. Reduce DPM Emissions: The Health Risk Assessment (HRA) may be used to inform an emission reduction goal.

b. Reduce Health Risk: The HRA may be used to inform a cancer risk reduction goal.

Comment: The data presented in Appendix A of this report establishes that the Port is well aware that the National City Marine Terminal generates a total of 36 tons of NOX and 13,894 tons of CO2e by trucks alone. The Port also knows that National City residents have significantly higher levels of respiratory illnesses and diseases compared to the Cities of San Diego, Chula Vista, Imperial Beach, and Coronado.

Health Objective 2: Assist the San Diego Air Pollution Control District (SDAPCD) and the California Air Resources Board with preparing a cumulative cancer risk analysis for the AB 617 Community Air Protection Plan by providing them with the Port's Health Risk Assessment (October 2021) and other operational related information.

Comment: This objective promises to have the Port complete a health risk assessment that is already underway and to coordinate with SDAPCD and the California Air Resources Board. It does nothing to advance the knowledge that has already been obtained to date or address the health impacts currently generated from Port operations.

Health Objective 3: Work collaboratively with the SDAPCD on the SDAPCD's Portside Air Quality Improvement and Relief (also known as PAIR) program, including pursuing a Memorandum of Understanding with the SDAPCD to contribute from the Port Maritime Industrial Impact Fund for the SDAPCD's purchase and installation of new portable air filtration devices at participating Portside Community residences.

Comment: This objective is stating that instead of mitigating the emissions from the trucks coming and going from the National City Marine Terminal the Port is going to provide some local residents with air filters. National City believes that the sources of the pollution should be the focus not merely providing residents with HEPA air purifiers. The burdens of mitigation should go to the polluters and not to those whom are being impacted. .

ES.4.5 - Trucks

Truck Goal 1: Improve the air quality in the Portside Community by accelerating the implementation of zero emission/near zero emission trucks.

Comment: Trucks generate the most harmful emissions to the the National City community, yet the below objectives call for more meetings with others, development of concept plans, and either follow existing laws or implement mitigation measures previously prescribed. To avoid these impacts, the Port should mandate that trucks entering the National City Marine Terminal should be electric at a rate of 10% per year.

Truck Objective 1A: 20% of the Port's annual truck trips will be performed by zero emission trucks by June 30, 2026.

Comment: Here the stated goal is 100% by 2035. That means that trucks entering the National City Marine Terminal should become electrified at a rate of 10% a year to produce any meaningful emissions

reductions. A 20% reduction is a compliance strategy not a beyond compliance strategy as stated in the plan.

Truck Objective 1B: By the end of 2022, Port staff will develop and present a short-haul, on-road, Zero Emission Truck Program for the Board's consideration that includes at least one collaborating trucking company and that targets having the necessary charging infrastructure in place by 2024, in order to displace approximately 65,000 diesel vehicle miles traveled.

Comment: Building a charging station does not align with the goal of displacing 65,000 diesel miles traveled. The Port should require that all trucks entering the terminal be electric at a rate of 10% per year.

Truck Objective 1C: Coordinate with the California Air Resources Board as they continue to develop the Advanced Clean Fleet Regulation regarding the transition to zero emission trucks to better understand associated State forecasts and forthcoming rulemaking.

Comment: This objective is or should be a normal operational activity of the Port, this objective does little to reduce emissions to National City residents.

Truck Objective 1D: In collaboration with the California Air Resources Board, the Port will utilize a truck registry or other system to summarize annual truck trips to the Port's marine cargo terminals and measure progress to achieve Port goals.

Comment: Coordination with a regulatory body is a normal operational practice of the Port, this objective does nothing to reduce emissions to the impacted community. Every truck entering the terminal already is registered as the drivers sign-in at the marine terminal gate. How is this objective of requiring a "truck registry" any different then what already happens on a daily basis at the marine terminal gate.

Truck Objective 1E: Provide status report to the Board of Port Commissioners with recommendations on zero emission truck technologies, as well as, an evaluation of potential impacts to small fleets and/or independent truck drivers, as part of a Biennial Emissions Report to better understand the transition zero emission truck technology.

Comment: Providing status reports to the Board of Port Commissioners does little more than summarize what is already known in the public domain. This objective has no benefit to the impacted National City residents. Instead the Port should set yearly goals for the electrification of trucks, cargo handling equipment, and other terminal equipment entering or using the National City Marine Terminal. Additionally, like the Ports of Los Angeles and Long Beach, if the drayage truck companies do not meet these standards they should not be allowed to operate on the terminal.

Truck Goal 2: Facilitate the deployment of infrastructure to support the transition to zero emission truck trips to the Port's marine cargo terminals.

Comment: The objectives below have no concrete actions other than a requirement to meet existing laws.

Truck Objective 2A: Within the fourth quarter of calendar year 2022, present a concept plan to the Board for its consideration that identifies four potential public-facing medium-duty/heavy-duty charging locations within the San Diego Region to support deployment of zero emission trucks, which may include locations in close proximity to or on the Tenth Avenue Marine Terminal and/or the National City Marine Terminal.

Comment: This is a plan to consider a plan. What it is not is a commitment to develop the necessary infrastructure to support electric drayage trucks or other cargo equipment.

Truck Objective 2B: Collaborate and coordinate with community residents, stakeholders, and agencies to ensure that the medium-duty/heavy-duty zero emission truck charging facilities identified in Objective 2A are aligned with and connect to the region's larger zero emission vehicle charging infrastructure system.

Comment: The Port has held countless workshops with residents to talk about what they might do. The objective should be to develop a plan to install charging stations that will meet the needs of the maritime trucking community.

Truck Goal 3: Support the designated truck route to avoid truck impacts on the local community.

Comment: This goal is already a requirement of previously certified EIR's for both the National City Marine and 10th Avenue Marine Terminals. The National City Balanced Plan establishes the truck routes and the reconfiguration of access roads to the terminals. How does this new plan conform to the National City Balance Plan? It seems to totally ignore the National City Balanced Plan in favor of a new conceptual plan.

Truck Objective 3A: Work with partners to continue advancement of the connected and flexible freight and transit haul route concept to provide more efficient freeway access and encourage truck drivers to avoid residential neighborhoods by leveraging technology to support dedicated lanes and signal prioritization.

Comment: This objective is a call for more meetings to present a conceptual plan for better transportation routes to the Port marine terminals. This objective marginalizes current mitigation requirements. Unlike, other Ports, the National City Marine Terminal has only one major artery leading to the terminal and only one major freeway that provides a connection to the terminal. Working with undescribed partners and developing a concept plan has little benefit to the impacted community.

ES.4.2 – Community Enrichment:

Community Goal 1: Enrich the AB 617 Portside Community through Education, Engagement, and Urban Greening.

Comment: Here again Port staff is willing to host more workshops in order to discuss planting more trees.

Community Objective 3: Port staff will convene a group of stakeholders to explore increasing tree canopy in the Portside Community and continue to work with groups like Urban Corps of San Diego County to advance this objective.

Comment: The Port can assume that all residents will favor the planting of more trees. What the community was promised was implementation of the National City Balance Plan. The National City Balanced Plan includes new landscape features. How is this Objective any different?

Community Objective 4: Support the expansion of the Port's existing outdoor educational programs to increase participation of youth that live in the AB 617 Portside Community.

Comment: The Port should not become a new educational organization. National City has a number of organizations that are far better equipped to provide these resources. What the City lacks is funding to advance these programs.

Conclusion:

The City views the Strategy in the same context as a long list of studies that have failed to produce any tangle results. As the Port continues to delay the implementation of the National City Balanced Plan our residents suffer. As Port staff plans to plan and meets to say that they met, our residents suffer from Port related truck emissions. The historic trends of delays needs to be replaced with commitments to a yearly reduction in all diesel related emissions. As called for by this Strategy, these emissions cannot be reduced by more workshops or development of more conceptual plans. The City requires the Port to transform this well packaged Strategy into a commitment to a 10% per year electrification program that includes all cargo handling equipment, drayage trucks, and all other terminal support equipment. To improve truck access to the terminal and to enhance recreational opportunities for National City residents the Port must fund the Balanced Plan and start its implementation next year and complete full Plan implementation in five years. These actions would align the lofty goals set by the Strategy to actual programs that will begin to remedy the social injustices our community suffers from being at the doorstep of Port operated facilities.

Sincerely,

Brad Raulston
City Manager
City of National City

cc: National City Mayor and Councilmembers
California State Lands Commission, Chair Eleni Kounalaskis
California Coastal Commission, Chair Steve Padilla
Board of Port Commissioners

PASHA AUTOMOTIVE SERVICES

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WORLDWIDE INTEGRATED TRANSPORTATION & LOGISTICS SERVICES

September 3, 2021

Chairman Zucchet
Board of Port Commissioners
San Diego Unified Port District
3160 Pacific Hwy
San Diego, CA 92101

Subject: Comments on Maritime Clean Air Strategy (MCAS)

Dear Chairman Zucchet,

Pasha Automotive Services (PAS), the operator of National City Marine Terminal, has participated in various MCAS subcommittees and San Diego Unified Port District (District) public outreach meetings. PAS supports the MCAS being a guidance document to facilitate partnerships, engage stakeholders and pursue opportunities for a more sustainable future for the district, its tenants and surrounding communities. Please take into consideration the following suggestions as you consider this the draft MCAS:

1. **Stakeholder outreach**: An overarching goal in the draft MCAS is for 100% of trucks visiting the terminals to be ZE by 2030, which is 5 and 15 years ahead of State of California goals depending on truck type. Trucking companies and independent/owner-operated truckers provide services to customers at both terminals; however, PAS does not have direct contracts or regular communication with trucking companies, and *trucker stakeholder input is missing* from this effort. **PAS recommends the District directly reach out to more trucking stakeholders (companies, owner/operators, associations, unions) to review the draft MCAS before voting on the 2030 ZE goal.** This will bring more awareness to truckers on the District's draft goals and will help determine feasibility from the trucking stakeholders' perspective.

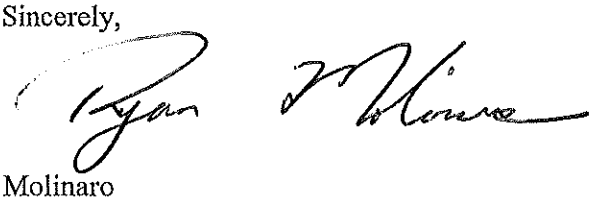
2. **Technology, operations, availability and pricing**: Technology for ZE trucks is advancing rapidly, and PAS plans to encourage and facilitate the use of ZE trucks via an onsite renewable project in the near future. However, in order to deem ZE trucking for long hauls (non-drayage trucking) feasible, ZE trucks must not only be technologically viable. The District and stakeholders must also determine future ZE trucks are affordable, operationally comparable to traditional trucks and commercially available. When determining commercial availability, please consider supply chain challenges in manufacturing which can often be unpredictable. Currently, some manufacturers of vehicles and trucks are down as much as 40% due to global parts shortages. **PAS recommends the Board reassess the 2030 goal of 100% ZE trucks for long hauls in 2026, or thereabouts, to determine that ZE trucks are not only on track *technologically*, but that they are on track to becoming *commercially available, operationally comparable* to traditional trucks and *affordably priced.*** If the District finds any of these items are not on track, PAS recommends the District reconsider the

timeline of the goal(s) or objective(s) to make the desired outcome of 100% ZE trucks attainable.

3. **Terminal jobs and truck driver shortage**: Fees are mentioned throughout the draft MCAS document as potential means to raise funds for achieving goals and objectives. PAS recommends the District **benchmark** all competing west coast ports for current tariffs and additional fees *before adding any new fees*, like a truck fee. This benchmarking will help determine what the "out the door" port fees are associated with each commodity, in comparison to other ports. Customers that choose to do business at the terminals study overall cost in each contract renewal period (every 3-5 years), and port fees are ultimately passed onto the customer(s). Additionally, small, independent owner/operator trucks would be most adversely impacted by new trucking fees, and with the nationwide truck driver shortage, **losing more truck drivers would further compound the nationwide shortage.** Lastly, if new and existing customers ultimately decide the Port of San Diego is not a good place to do business due to cost, this could cause job loss. **Please consider the employees of Port tenants and operators when making decisions that increase customers' cost of doing business at the Port of San Diego.**

Thank you for your consideration of our comments to the draft MCAS.

Most Sincerely,



Ryan Molinaro
Vice President of Operations
Pasha Automotive Services

PACIFIC ENVIRONMENT

September 2, 2021

Larry Hofreiter, AICP
Program Manager, Planning
Port of San Diego
3165 Pacific Hwy
San Diego, CA 92101
Via Electronic submittal

Re: Comments on the Revised Maritime Clean Air Strategy August 2021

Dear Mr. Hofreiter:

We appreciate the opportunity to comment on the Port of San Diego's Revised Maritime Clean Air Strategy August 2021 ("MCAS"). Thank you for all the community engagement and effort that port staff have put into revising the MCAS.

Pacific Environment is a California headquartered non-governmental organization that has earned rare permanent consultative status at the International Maritime Organization (IMO), the United Nations' entity that sets international shipping law. We urge the Port to make the following changes to the revised Maritime Clean Air Strategy (MCAS) in order for the Port to lead in emission reduction efforts and protect San Diego residents' public health:

Title of Strategy

We want to reiterate the importance of changing the Maritime Clean Air Strategy to "Maritime Clean Air **and Climate** Strategy." We have seen time and time again at the International Maritime Organization and with other ports around the world negative unintended consequences of regulating air pollutants without consideration for climate pollutants, and vice versa. Ports and port states must look at emissions reductions simultaneously from an air and climate lens if we are to put in place the best low/zero-emission policies possible.

MCAS Overarching Goal (ES-2)

We applaud the Port of San Diego for setting an Overarching Goal of 100% Zero Emission Trucks and Cargo Handling Equipment by 2030. **However, we would urge the Port to add in Zero Emission for Commercial Harbor Craft by 2035 and Ocean Going Vessels (OGV) by 2045.** As you cited in the Draft MCAS, Harbor crafts and OGVs are the biggest emitter of NOx, Diesel PM and CO2e. Therefore, it make sense to set an overarching goal for those two segments as well.

INTRO Table 1. MCAS Emissions Inventory Estimates Summary (tons)

Source	NOx		DPM		CO_2e	
Cargo Handling Equipment (CHE) [1]	8.4	1%[3]	0.1	1%	2,439	3%
Commercial Harbor Craft (CHC) [1]	283.6	38%	9.1	52%	25,495	35%
On-road Trucks [2]	51.4	7%	0.3	2%	16,095	22%
Oceangoing Vessels (OGV's) [1]	378.3	50%	6.7	38%	25,770	35%
Rail [2]	30.3	4%	1.2	7%	2,916	4%
Total	**752**	**100%**	**17.4**	**100%**	**72,715**	**100%**

[1] Updated based on 2019 activity
[2] Estimates based on Maritime Air Emissions Inventory 2016
[3] Percent of total maritime emissions based on 2016 Inventory data

- **For commercial harbor craft**, we think that it's feasible for all segments to go to zero emission by 2035. In addition to your list of examples of zero emission and hybrid technologies for the marine sector, DNV, the world's leading classification society for ocean vessels, maintains a list of battery powered zero emission ships, by class, ship type, country and technology. **Currently there's 331 ships with batteries in operation, and 194 on order.** Attached are letters from shipping companies and battery systems manufacturers submitted to California's Air Resource Board (CARB) that affirm our position that it is technologically feasible to go to zero emission by 2035.

- **Banning Fossil Fuel Ships by 2045** is critical to ensure the protection of port communities public health and accelerate shipping's zero-emission transition. Fossil-fueled Ocean Going vessels (OGVs) are massive climate polluters that cause significant air pollution globally and acutely in port communities. So long as OGVs run on fossil-fueled internal combustion engines, San Diego port communities will suffer from NOx and PM pollution. Strong market signals are needed now to force OGVs off of fossil fuel propulsion, and San Diego could be the first in the state and nation to set this landmark policy that many ports will soon follow.

Goal for Commercial Harbor Craft (ES-2)

The revised MCAS states: Tugboat related Diesel Particulate Matter (DPM) emissions identified in the Port's Emissions Inventory (2019) will be reduced by half by transitioning to ZE/near-zero emission (NZE) technologies and/or other lower-emitting engines or alternative fuels. We urge the Port to amend that the reduction by half should **be achieved by 2028** to be in line of achieving zero emission by 2035.

Goal for Ocean-Going Vessels (ES-22) : The goal for OGV to "reduce annual ocean-going vessel in-transit emissions" needs to be time bound. OGVs represents the largest emission source for NOx, and we would urge the MCAS set a **50% reduction by 2030** with a total ban on fossil fuel ships by 2045.

Establish an Emissions Reduction Incentive Program (Enabling Objective 2B)

We fully support establishing an Emission Reductions Incentive Program as proposed in the draft MCAS and recommend **waiving fees now for 100% zero-emission hydrogen-fueled vessels** to create market signals for clean ships.

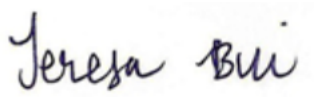
In addition, we recommend the Port introduce fossil fuel ship fines or pollution fees on ships that dock or anchor at the Port of San Diego to raise revenue for the infrastructure costs to achieve a zero-emission port. We note for the Port of San Diego that Port of Bergen in Norway has developed a landmark environmental approach for determining port fees for entering vessels, charging companies entry base on the amount and levels of criteria and GHG emissions they produce. The Port then uses the revenues generated to invest in cleaner and zero-emission technologies, equipment and infrastructure. It is within the Port's legal authority to do so and below is additional background information.

Memorandum of Understanding with the San Diego Air Pollution Control District (Enabling Objective 1A)

We are supportive of the Port increasing coordination to help fund zero emission trucks and/or cargo handling equipment. We urge the Port to add zero emission commercial harbor craft and ocean going vessel technology uptake as funding is critical to support new technologies.

Thank you for your consideration. We would be pleased to answer any questions or provide further information.

Sincerely,



Teresa Bui
State Climate Policy Director
Pacific Environment

Attachments: Letters from NAVTEK, Sterling PlanB and Corvus demonstrating feasibility of rapidly transitioning to zero-emission vessels and need for funding for marine sector.

DRAFT LETTER FOR Trucking VENDORS re: MCAS

We learned that the San Diego Port Authority is developing a Maritime Clean Air Strategy.

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The Port must conduct an economic study, which needs to be done prior to final adoption of the MCAS by the Port Commissioners. Economic impacts to the tenants directly impact the Port financially. Expansive outreach should also be done with those industries that serve the tidelands.

It is incomprehensible the Port is moving to finalize the MCAS without the critical data regarding the economic impacts and outreach to those tenants and industries that will have to deliver or stop doing business altogether.

We are extremely concerned requiring these measures have an existential threat to their businesses as well as to Port revenues without understanding economic impacts, technical availability, and commercial feasibilities of the demands you are proposing.

Ken Adams

Pathfinder Logistics
5790 Peachtree St.
Commerce, CA 90040

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PTI Transportation
Owner

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R. Sandoval

9/3/21

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RMA DISTRIBUTORS INC -
Ross Guillen
9.3.21

Royalane Trucking, LLC
3677 N 2000 W Suite A
Farr West, UT 84404

RE: MCAS

We learned that the San Diego Port Authority is developing a Maritime Clean Air Strategy.

We are deeply concerned with the aggressive timeline in which the goals outlined are expected to be implemented by the tenants and their vendors. Requiring all cargo trucks to be electric 15 years ahead of state goals will demolish the commercial viability of the port and institute a competitive advantage for every other west coast port that San Diego is competing against. Trucking companies that deliver to hospitality tenants will also be financially impacted by the increase in rates to conduct business in the tidelands area.

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We are extremely concerned requiring these measures have an existential threat to their businesses as well as to Port revenues without understanding economic impacts, technical availability, and commercial feasibilities of the demands you are proposing.

Dated: 08/02/2021

Bret Findlay, President

Ann Marie Goldsberry, Office Manager

Rex Reeve, Driver Manager

Dave Brown
David Brown, Maintenance Manager

Rob Stubbs
Robert Stubbs, Accounts Manager

From: Karin Robertson
To: Maritime Clean Air Strategy
Subject: Comment on Draft MCAS Plan
Date: Friday, September 3, 2021 4:20:37 PM
Attachments: image.png

image.png

San Diego Children and Nature works to encourage and support kids getting outdoors, but without good air quality that's a hollow goal. Today's children need clean air urgently. We urge the Port to implement a plan with clear benchmarks, milestones, and anticipated target dates in order to to track and accelerate progress towards greater health equity.

Karin Robertson
President
San Diego Children and Nature
http://www.sdchildrenandnature.org
krobertson@sdchildrenandnature.org

San Diego Port Tenants Association

Septemeber 3, 2021

TO: MCAS Committee via MCAS@portofsandiego.org

SUBJ: Comments re: Draft for the MCAS

We are becoming more concerned every day that our comments and feedback are not reflected in the latest draft of the Maritime Clean Air Strategy.

Our concerns continue to be with the aggressive timeline in which the goals outlined are expected to be implemented by the tenants and with the overall economic feasibility, availability of alternative fuel as well as, evolving and available technology, and logistics of implementing the requirements. For example, requiring all cargo trucks that pick up from the terminal to be electric 15 years ahead of state goals will demolish the commercial viability of the port and institute a competitive advantage for every other west coast port that San Diego is competing against. These type of impacts can be addressed by the Port producing an economic study, which should be done prior to final adoption of the MCAS by the Port Commissioners. Economic impacts to the tenants directly impact the Port financially.

We are also concerned that outreach has not been done to truly capture the substantial level of economic impacts. For example, what outreach if any has been done to the trucking industry. How will the deliveries by the trucking industry be impacted if required to have an electric only truck?

It is troubling the speed in which the Port is moving to finalize the MCAS without the critical data regarding the economic impacts and outreach to those tenants and industries that will have to deliver or stop doing business all together.

Our questions and concerns remain the same.

- How do we work to make the already existing grant funds more widely available?
- What scientific data was relied upon in determining benefits to the quality of air and water come in transitioning from tier 3 to tier 4?
- What consideration was given to factors impacting air quality outside of the control of those operating within the port tidelands?

The port must rely upon its tenant partners in order to achieve the aspirational goals set forth. As partners, we suggest that each goal should satisfy the following criteria;

2390 Shelter Island Drive, Suite 210 · San Diego, California 92106 · (619) 226-6546 · Fax (619) 566-4056
Email: Sharon@sdpta.com, Corchelle@sdpta.com, Chelsea@sdpta.com
Web: www.sdpta.com

- Technical Availability – equipment must meet industry standards
    - Proven, tested and approved by relevant agencies for use in the specified circumstances with a verifiable track record of successful use for that purpose
- Commercial Feasibility – equipment needs to be generally available to the market, and operationally practical
    - For example, equipment needs to have a battery life that is equivalent to the former equipment. Today, some battery-operated machinery requires a 2:1 ratio, meaning two pieces of equipment are required to do the work of one older piece of equipment – meaning the new machinery is not commercially feasible yet.
- Economic Viability – allow a fiscally responsible timeframe for capital investment for replacement, phased conversion, modifications or absorbing additional operating costs for implementation within a reasonable amount of time for financing and amortization.
    - Tenants are partners with the port and must fit replacement equipment into their business plans to recoup their investments over the period of their port leases.

As stated earlier, we remain extremely concerned these measures pose an existential threat to our businesses as well as to Port revenues.

John Laun
Chairman

Sharon Cloward
President

From: simplespeedinc@gmail.com
To: Maritime Clean Air Strategy
Subject: Trucker Concerns
Date: Friday, September 3, 2021 11:38:16 AM
Attachments: Fw MCAS DRAFT LETTER FOR TRUCKERS.png

Cindy

DRAFT LETTER FOR Trucking VENDORS re: MCAS

We learned that the San Diego Port Authority is developing a Maritime Clean Air Strategy.

We are deeply concerned with the aggressive timeline in which the goals outlined are expected to be implemented by the tenants and their vendors. Requiring all cargo trucks to be electric 15 years ahead of state goals will demolish the commercial viability of the port and institute a competitive advantage for every other west coast port that San Diego is competing against. Trucking companies that deliver to hospitality tenants will also be financially impacted by the increase in rates to conduct business in the tidelands area.

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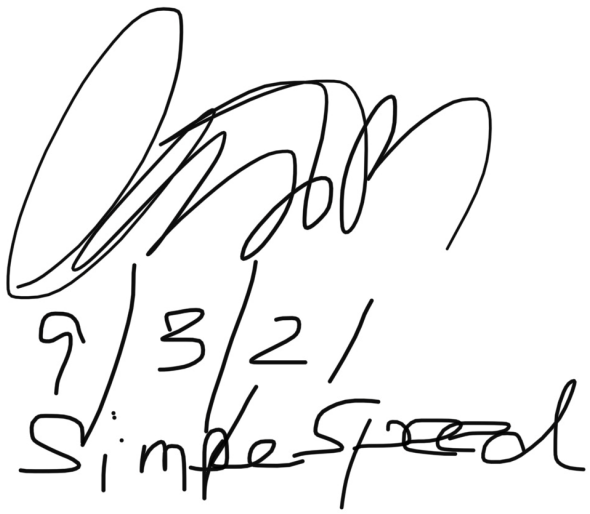

SSA Marine
1131 SW Klickitat Way
Seattle, WA 98143

September 3, 2021

Port of San Diego
Board of Port Commissioners
3165 Pacific Hwy
San Diego, CA 92101

RE: SSA Marine comment on the draft revised Port of San Diego draft Maritime Clean Air Strategy (MCAS)

Dear Port of San Diego Board of Port Commissioners,

SSA Marine appreciates the opportunity to provide comments on the draft revised Maritime Clean Air Strategy. We support the efforts of the Port of San Diego to take a proactive and comprehensive approach to reducing emission impacts from maritime operations on the environment and the communities that support the Port.

SSA Marine and its affiliated entities have been industry leaders in the testing and development of low and zero-emissions cargo handling equipment (CHE) at our facilities around the world. To that end, SSA Marine has demonstrated and/or deployed a number of zero-emission CHE projects, including:

- 4 battery electric Taylor top handlers (Oakland, Long Beach)
- Converted 9 ZPMC Diesel-Electric 946-1,043 hp RTGs to 100% electric grid-tied RTGs (Long Beach)
- 38 DINA electric UTRs (Oakland, Long Beach)
- First global deployment of 6 Wiggins e-Bull 36,000-lb zero-emission forklifts (Stockton, West Sacramento)
- 24 Orange e-hostlers at RMS rail ramps
- Currently deploying 15 Peterbuilt Class 8 battery plug-in drayage trucks for Shippers Transport Express
- Converted 58 Diesel RTG's to electric grid-tied RTGs and purchased 6 new e-RTGs (Manzanillo, Panama)
- Recently received funding from the Northwest Seaport Alliance to build infrastructure to support 6 electric yard tractors for RMS operations (Tacoma)

SSA Marine is committed to actively participating in enhancing environmental performance in the marine terminal industry and incorporating environmental sustainability best practices into our operations, provided that the technology is both feasible for our operations and our business model.

While we support the efforts of the Port of San Diego to reduce emissions from maritime operations, we do have concerns about the viability of the proposed goals in the draft revised MCAS. Our concerns are specific to the objectives and goals proposed for cargo handling equipment:

CHE Objective 1: SSA Marine has concerns related to the identification of the 20 highest emitting pieces of CHE that the draft revised MCAS would require to be replaced with electric models. Although the draft revised MCAS identifies these pieces of CHE in Table IV.1-13, the Port has not shared ownership information for this equipment with SSA Marine. Without this information, it is difficult for SSA Marine to understand the operational impacts of CHE Objective 1. We also would like to understand if the Port of San Diego has evaluated the benefits of Tier 4 diesel engines and near-zero emissions CHE against zero-emissions CHE.

CHE Goal 1: SSA Marine is concerned about the practicality of requiring 100% zero-emission CHE at the Port of San Diego by 2030. Many of the zero-emission CHE technologies are still in the demonstration phase and not viable for full-scale deployment on a marine terminal, both from an operational and a cost perspective. Further, CHE Goal 1 is in advance of the California Air Resources Board (CARB) completing their rulemaking process to amend their existing CHE regulation to transition to zero-emissions engines. SSA Marine recommends that the MCAS be revised to align with the CARB rulemaking process, which will allow for the zero-emissions CHE technology to mature so that it is compatible with marine terminal operations, as well as to provide for a level playing field across the State of California.

In addition, SSA Marine is concerned about the availability of electricity to power zero-emissions CHE at such a large scale. As highlighted by the June 2021 Moffat & Nichol report commissioned by the Pacific Merchant Shipping Association, there are serious questions about the ability of California's power grid to meet zero emission goals. The report findings include:

- Ensuring sufficient power is available during marine terminal hours of operation with the ability to meet peak demand for stationary sources and electric vehicles;
- Providing additional power capacity for operations that may overlap with regional peak power demand;
- Requiring sufficient, dependable power redundancy, to allow rapid recovery from a natural or manmade disaster; and
- Executing needed improvement in the electricity infrastructure to create a stable and reliable power grid.

We urge the Port of San Diego to consider the findings of the Moffat & Nichol report in developing the final MCAS and to identify specific goals to address these concerns that are implemented concurrently with the deployment of ZE equipment and infrastructure in order to successfully transition to electrified goods movement operations.

SSA Marine is committed to working with the Port of San Diego to reduce emissions from maritime operations, and we look forward to establishing a dialogue with Port staff to assist in the development of the final Maritime Clean Air Strategy.

Sincerely,

Sarah Mouriño
Sustainability Director
206-331-0484
sarah.mourino@ssamarine.com

From: Dennis J. Williams
To: Maritime Clean Air Strategy
Cc: Scott J. Smit
Subject: Maritime Clean Air Strategy
Date: Friday, September 3, 2021 11:46:51 AM
Attachments: image001.jpg

We learned that the San Diego Port Authority is developing a Maritime Clean Air Strategy.

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We are extremely concerned requiring these measures have an existential threat to their businesses as well as to Port revenues without understanding economic impacts, technical availability, and commercial feasibilities of the demands you are proposing.

Thank you,

Dennis J. Williams

President and Chief Executive Officer
Trans-System
Trans-System.com

Main: (509) 623-4000
Direct: (509) 625-3970
djwilliams@trans-system.com

DRAFT LETTER FOR Trucking VENDORS re: MCAS

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MUDASAR ABID

09/03/2021

Western ag inc

The City of SAN DIEGO

Office of the Chief Operating Officer

September 10, 2021

Joe Stuyvesant
President and Chief Executive Officer
Port of San Diego
3165 Pacific Highway
San Diego, CA 92101

Re: Support for Maritime Clean Air Strategy – Health Equity for All

Dear Mr. Stuyvesant:

On behalf of the City of San Diego, I am in strong support of the Port of San Diego's Draft Revised Maritime Clean Air Strategy (MCAS), as presented last month.

The MCAS sets ambitious goals to improve air quality and health outcomes in some of San Diego's most vulnerable neighborhoods near the Tenth Avenue and National City terminals, such as Barrio Logan, Logan Heights, and Sherman Heights, as well as the working waterfront. These neighborhoods are located within the City's federally designated Promise Zone and are recognized as Communities of Concern per the San Diego Climate Equity Index.

The MCAS is well aligned with the Air Pollution Control District's (APCD) Portside Community Emissions Reductions Plan (CERP), and its respective community-focused actions to reduce exposure to air pollution in disproportionately burdened communities. The MCAS is also in alignment with City priorities to expand the focus of our climate action work and Climate Equity Fund, which are designed to address the public health impacts of poor air quality from climate change.

Thank you for your work to improve the quality of life for residents of our City's Communities of Concern, we look forward to continuing our long history of partnership with the Port of San Diego.

Sincerely,

Jeff Sturak
Deputy Chief Operating Officer
City of San Diego

202 C St., MS 9A
San Diego, CA 92101
JeffSturak@sandiego.gov

T (619) 533-3628
sandiego.gov