

SAN PEDRO BAY PORTS CLEAN AIR ACTION PLAN

Comments on CAAP 2017 Update *(as of February 1, 2017)*

Since releasing the draft Clean Air Action Plan (CAAP) 2017 Update Discussion Document on November 17, 2016, Port staff have held over 27 meetings with and/or provided presentations to various organizations and companies, including a public workshop attended by nearly 90 people. These organizations have provided the following overarching comments on the various CAAP 2017 Update strategies.

Stakeholders are encouraged to submit additional comments to:

CAAP@cleanairactionplan.org



Port of Long Beach | Environmental Planning
4801 Airport Plaza Drive | Long Beach, CA 90815
562.283.7100



Port of Los Angeles | Environmental Management
425 S. Palos Verdes Street | San Pedro, CA 90731
310.732.3675

CLEAN AIR ACTION PLAN COMMENTS
General Comments
The Ports should evaluate the CAAP 2017 Update’s potential impact on economic competitiveness and strategize to win back market share.
Ports should present costs/benefits of each proposed program.
The Ports should revise existing emission reduction targets for criteria pollutants, add new emission reduction targets for criteria pollutants, and add an interim target for greenhouse gases (GHG).
The Ports should add a target for ozone.
The Ports should clarify that most of the CAAP environmental reductions occurred in its first 5 years.
The Ports should quantify the costs associated with these technologies.
The CAAP strategies exceed what is necessary for regulatory compliance.
The Ports should consider stronger strategies for rail.
The Ports should not support inland ports.
All stakeholders should be able to advise on availability/feasibility on zero-emission technologies.
Provide more information and data on harbor craft.
Provide a comparison chart of various advanced technologies.
Community Impacts and Outreach
Not enough emphasis has been placed on defining the problem and the health impacts; need to have a listening session before identifying solutions.
The Ports should include health benefits of proposed programs, as well as the health impacts of not taking action, including the cost of health impacts.
The Ports should commit to a Health Impact Assessment for the CAAP.
Use a facilitator for the public outreach/engagement process.
Not enough stakeholder engagement about what the nature of the problem is that must be addressed by the CAAP.
Extend the comment period.
The Ports need a more systematic way to receive, address, report, and provide meaningful feedback on comments to the CAAP.
Provide transportation and translation for community meetings on the CAAP.
Vary the times of the meetings for better accessibility.
Provide meeting materials ahead of time.
Trucks – Clean Trucks Program
It is good to see a hard deadline for zero-emissions trucks.
The Ports need to include interim targets for near-zero and zero-emissions truck penetration.
Need more discussion on enforcement of truck emissions requirements.
Need a discussion of community impacts of truck operations and impacts of failure to transition to cleaner equipment.
The Ports should consider near-zero emissions trucks as an end goal.
Near-zero and zero-emissions trucks are unproven technologies.

The 2018 timeline for instituting fees on 10-year-old trucks and the 2020 ban on pre-2010 trucks is too aggressive. The timelines do not give trucking companies adequate notice to prepare and budget for fleet replacements.
Many companies will not have the opportunity to realize the full useful lives of their existing trucks or to recoup their investments.
Near-zero emissions trucks are available today and should start being required for use in the Ports.
Engines meeting the near-zero standard are only available in the smaller 9L size. The larger size 12.9L engine required to meet the operational needs of the drayage industry are not yet available at near-zero standards.
Trucking industry is hesitant about investing in natural gas trucks.
Zero-emissions trucks are far more expensive in terms of capital costs and operating costs, and banks will not finance non-commercialized technologies.
The infrastructure is not available to support near-zero and zero-emission trucks, and it is unclear when this infrastructure will become available.
Improving gate turn times will help the industry recoup investments in newer trucks.
A fee on the 10 year or older trucks is arbitrary and unnecessary for emission reductions if the trucks are well maintained.
Fees will result in diversion of cargo.
Instead of zero-emissions, the focus should be on maximum feasible emissions reductions (and reducing carbon footprint) in the shortest time possible.
Institute a smog check program on trucks to ensure they are well maintained, functioning properly and meeting emission standards.
Need significant financial incentive support from state and federal agencies.
Grandfather the existing natural gas trucks that meet 2010 engine emission standards if they use renewable natural gas.
There is a need for additional drayage truck enforcement.
The Ports should consider strategies that include a mix of near-zero and zero-emissions.
Reduce Pier Pass fees for near-zero and zero-emission trucks.
Have local zero-emission miles for trucks that can switch between zero-emission and conventional fuel modes.
Plan for peel-off yards to be zero-emissions.
Terminals – Zero Emissions Equipment
2030 deadline for zero-emissions is too soon; 13 years is not enough time to transition.
There is no infrastructure in place to support zero-emissions equipment; delays in constructing the infrastructure shortens the window for terminal operators to make equipment investments, which causes financial hardship.
Need to clarify that the program is fuel neutral and the Ports are not mandating one technology pathway.
The Ports need to commit to an infrastructure plan with dates and deadlines to move to zero-emissions.
The Ports should track progress toward transition to zero-emission cargo handling equipment.
There are no zero-emissions top handlers.

Terminal operators cannot plan for expensive future capital investments when they have no certainty if their company will have the lease in 10-20 years.
Consider near-zero standard as an end goal for types of equipment where zero-emissions technologies are less likely to develop.
Terminal operators must be able to get the useful life out of the equipment; if they need a new top handler within the next 3-5 years, they must purchase diesel, and then they will not be able to recoup the investment if they must scrap it in 10 years.
There should not be a hard deadline; rather, the Ports should adopt a process that leads to zero-emissions terminals through natural transition in leases.
Not all equipment is available in zero-emissions form; consider a sliding timeline that allows for operators to get the useful life out of existing equipment while ensuring future purchases are zero-emissions when the technology is ready.
Consider replacements with best available technology at the time of replacement.
Provide more details on the feasibility assessments – what will be evaluated? Include economic feasibility.
Reduce free storage time for cargo on terminals.
Need significant financial incentive support from state and federal agencies.
Federal attainment for NOx could be met with ultra-low NOx engines.
Use of ultra-low NOx engines as a transitional technology, but zero-emissions must be the end goal as soon as possible.
Combination of near-zero emissions technology with renewable fuel can be done on a faster timetable and is cheaper than zero-emission technology.
Should look at technology that can be proven to be carbon neutral (net zero) or carbon negative with possible local offsets to make it carbon neutral.
Should require conversion of all equipment that has already commercially available zero-emissions options.
The Ports need to incentivize the new technology to get them to market, and then let the market decide what will eventually be the preferred technology.
Cargo growth is needed in order to pay for new equipment otherwise there may not be enough money to pay for it.
Ships - Vessel Speed Reduction Program
Keep the 20 nm incentive to avoid losing existing participation.
Track VSR vessel by vessel (instead of by fleets).
To maintain schedules, vessels may speed up outside of the 40 nm zone; Ports must consider the unintended consequences.
Ships – Clean Ships Program
Fees are a huge concern for industry and will result in diverting cargo.
Operators have invested in shore power-capable ships to meet the State’s shore power requirement, which may hamper the introduction of Tier 3 ships.
The industry needs flexibility to meet cleaner engine requirements.
Vessels are placed in certain services based upon economic factors that are more significant than small incentives can influence.
What are the specific incentives/grants that will be given to help companies get new ships?
Be more aggressive in having ships use alternative fuels.

Require retrofit technologies.
Audit ships to identify potential emissions reductions.
Require use of alternative at-berth technologies.
Require compliance with state ship regulations and at-berth regulations.
Trucks – Green Truck Priority Program
Priority program is shortsighted, as it focuses only on getting trucks into the gate, and not on moving cargo faster and more efficiently throughout the system.
It would greatly accelerate transition to cleaner trucks; if truckers can make more turns and thus more money, they would invest in cleaner trucks.
Not anticipated this would have much effect. Efficiency issues within the terminals are affecting the time it takes to make turns, not just time waiting at the gate (chassis piles, road-ability inspections, etc.).
Need 5 full night gates per week, plus Saturday gates and staggered lunch schedules to keep cargo moving efficiently.
Effective appointment systems could help with increasing efficiency and improving turn times. Look at appointment systems used by terminals that are working well, and expand throughout the complex through a common portal.
Appointment systems should not just identify a time to enter a terminal to pick up cargo, but should allow for dynamic adjustments to the time slots, include a confirmation that a chassis will be available, and appointments for empties.
Truckers should be responsible for bringing their own chassis.
Evaluate free flow cargo “medallion” system, where arriving trucks pick up the next container available.
Must be mandatory and included in the tariff, otherwise the terminals will not do it.
There is not enough physical space at the terminals to have dedicated lanes.
Could worsen congestion for other, “dirtier” trucks and reduce efficiency.
Would be difficult for terminals to “police” on-terminal priority.
Terminals – Green Terminal Recognition Program
Consider a LEED like program for other partners, such as trucking companies.
Consider working with regulatory agency programs, like EPA Smartway, to expand the reach of the program beyond San Pedro Bay.
How will the Green Terminal Program be implemented?
Need to identify key indicators of more efficient operations.
Efficiency and Energy
Inland ports just shift the impacts to a new location – e.g. increased emissions, congestion, and safety issues.
Would need inland ports to be serviced by zero-emission equipment and locomotives. Concern for derailment = more safety inspections.
Need for infrastructure for on-dock rail.
Use of renewable fuels (Diesel HPR).
Have provisions for near-zero and zero-emissions locomotive for PHL & Class 1 lines.
Need to provide education and maintenance training for new equipment.

Incentivize efficiency technologies and methods (i.e. platooning, appointment programs).

Terminal lighting should all be LED and possibly linked to motion sensors.