

# SAN PEDRO BAY PORTS CLEAN AIR ACTION PLAN

March 20, 2017

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, California 95814

**Re: Comments on the South Coast Air Quality Management District's *Final 2016 Air Quality Management Plan***

Dear Clerk:

For more than a decade, the ports of Long Beach and Los Angeles (“Ports”) have worked closely with the Air Resources Board (ARB) and other air quality regulatory agencies, local community members, environmental groups, our customers, and the broader goods movement industry to implement our Clean Air Action Plan (CAAP), which has contributed to significant emissions reductions in the South Coast Air Basin. While the 2016 Air Quality Management Plan (AQMP) includes a collaborative approach to develop strategies to reduce emissions from mobile sources, it also includes an indirect source rule provision which could pave the way for conflict between our agencies. The Ports strongly oppose the imposition of any indirect source rule, and respectfully request that ARB support collaborative approaches to identify and implement future clean air initiatives that would also include voluntary strategies to achieve full SIP credit for emission reductions, such as the Environmental Protection Agency’s Voluntary Mobile Source Emission Reduction Program (VMEP) or other similar strategies.

Over the last 10 years, the Ports have worked together with ARB staff not only on the CAAP but also on the development and implementation of source-specific regulations that sustain early actions taken by the Ports to reduce emissions from equipment and vehicles used in port-related operations. We are proud to say this collaboration has contributed to significant emissions reductions in the South Coast Air Basin, with more than 84% reduction in diesel particulate matter emissions, 97% reduction in sulfur oxides and 50% reduction in nitrogen oxides from port-related sources between 2005 and 2015, during a period when the Ports experienced a combined seven percent growth in container cargo volume. We recognize there is more work to be done and we look forward to ongoing collaboration to continue these successes into the future.



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

*The San Pedro Bay Ports Clean Air Action Plan was developed with the participation and cooperation of the staff of the US Environmental Protection Agency, California Air Resources Board and the South Coast Air Quality Management District.*

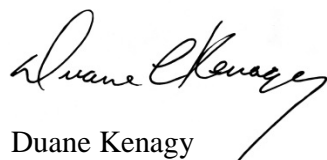
The Ports are currently in the process of developing a 2017 CAAP update that will identify the path to get to even cleaner operations by port-related sources, ultimately including zero emissions where it is feasible. These strategies are in alignment with the goals of the state's Sustainable Freight Action Plan. It is our intent that the process to develop and implement new CAAP strategies will continue to follow the collaborative approach that has been so successful to this point. We believe that this process and the strategies proposed in the 2017 CAAP update will serve as a local implementation mechanism to provide further support to ARB to expeditiously meet its emission reduction commitments.

For these reasons, the Ports wholeheartedly support a collaborative approach to identify and implement future clean air initiatives. However, while the 2016 AQMP includes a collaborative approach to develop strategies to reduce emissions from mobile sources, it also states that "if progress is not made in identifying specific actions" to meet unidentified emissions reductions targets, the AQMD may elect to move forward with rulemaking on an indirect source rule.

The Ports have consistently provided comments to the air quality agencies stating our serious concerns about an indirect source rule. These concerns have also been documented in our comment letters on the 2016 AQMP (attached), and we continue to believe an indirect source rule as proposed to be applied to the Ports is counterproductive, unnecessary and outside of the AQMD's authority to impose. We therefore feel the need to reiterate our strong opposition to the proposed indirect source rule option included in the 2016 AQMP. We believe conflict over rulemaking would be a waste of time and money, disrupt over ten years of productive partnership, and most importantly would delay our shared goal of implementing new initiatives to help clean the air in the South Coast Air Basin. Instead, as stated above, we encourage ARB to support continued collaboration with the Ports as the most effective way to continue to reduce emissions associated with port operations, and as part of this process consider voluntary strategies to achieve full SIP credit for emission reductions, such as the Environmental Protection Agency's Voluntary Mobile Source Emission Reduction Program (VMEP) or other strategies that use a similar approach for SIP credit.

The Ports appreciate this opportunity to provide additional comments on the 2016 AQMP. We look forward to continuing to work with ARB to advance our shared goals for clean air in the South Coast region.

Sincerely,



Duane Kenagy  
Interim Chief Executive  
Port of Long Beach



Gene Seroka  
Executive Director  
Port of Los Angeles

Attachments

cc: POLB Harbor Commission  
POLA Harbor Commission

Clerk of the Board  
Air Resources Board  
March 20, 2017  
Page 3

Wayne Natri, Executive Officer, South Coast Air Quality Management District  
Richard Corey, Executive Officer, California Air Resources Board  
Alexis Strauss, Acting Regional Administrator, Region 9