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April 23, 2018

Clerk of the Board
California Air Resources Board
P.O. Box 2815 Sacramento, CA 95812

Submitted electronically

Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation and to the regulation on Commercialization of Alternative Diesel Fuels – COMMENTS

The below comments are being submitted on the behalf of the California Association of Port Authorities (CAPA); which is comprised on the 11 commercial, publicly owned ports in California and plays a vital role in educating state and federal policy makers on issues important to our members.

CAPA supports the California Air Resources Board's (CARB) consideration of funding additional incentive programs through the Low Carbon Fuel Standard (LCFS) by incorporating additional categories of Energy Economy Ratios (EERs). Incentivizing the Ships At-Berth Program, which requires vessels to turn off their onboard auxiliary engines and plug into the electric grid for power while docked, as well as Cargo Handling Equipment (CHE) clean fueling options, provides an ample opportunity to further lower emissions at California's seaports.

Our members regularly celebrate great achievements in air quality improvement, and in fact diesel particulate matter (DPM) from truck emissions at the Port of Oakland has been reduced by 98% over the last decade. The Ports of Long Beach and Los Angeles, which combined constitute the biggest port complex in the nation, have seen an 87% reduction in DPM, a 97% reduction in SOx, and a 56% reduction in NOx from port related sources.

Opening up the LCFS for consideration of CHE and At-Berth incentives provides additional opportunity to improve the air quality at our facilities and the neighboring disadvantaged communities.

Sincerely,

Tim Schott
Executive Director