

April 20, 2015

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

Subject: Comments on the Sustainable Freight Pathways to Zero and Near-Zero Emissions Document

To Whom It May Concern:

Thank you for the opportunity to comment on California Air Resources Board (CARB) discussion *Draft Sustainable Freight Pathways to Zero and Near-Zero Emissions* (Pathways). The Unified Port District of San Diego (District) is supportive of CARB's stated strategy of coordinating the modern freight system towards the transition of a zero and near-zero emissions strategy. We want to thank CARB for working with the State's transportation and energy agencies, receiving and implementing industry feedback in the draft document, and recognizing the complexity of moving towards a zero and near-zero emission freight network. We applaud the acknowledgement of a concurrent implementation strategy of near-term goals and a vision statement open for discussion. Leading in environmental stewardship, California ports have already made tremendous strides in reducing emissions since 2005, including:

- Reducing over 70% of diesel particulate emissions;
- Reducing over 70% of sulfur oxides emissions;
- Reducing over 50% of nitrogen oxides emissions and;
- Reducing over 20% of greenhouse gas emissions.

In order for the District to continue sustainable, on-going air quality improvements, and leverage funding availability we respectfully suggest CARB consider areas of concern as outlined below:

#### General Comments

- We support the development of an integrated long-term strategy for sustainable freight that integrates plans from the CARB, the California Energy Commission, the California Transportation Agency, and other freight or transportation agencies.
- We respectfully request that CARB consider regional differences in air quality and freight operations when developing a regulatory framework for the Sustainable Freight Strategy.

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- We respectfully request that CARB consider operational differences between ports when developing a regulatory framework.

**Specific Comments**

**Trucks**

- In regard to vehicles, the District recommends the studying implications of the Sustainable Freight Strategy on international and interstate trucks. Also, we recommend ensuring truck incentive programs provide opportunities for international and interstate trucks.

**Incentive Programs**

- The District supports regional allocations of funds to ensure appropriate distribution of funds in all goods movement corridors.
- The District supports additional allocations to existing incentive funding programs, including the Carl Moyer Program, the Air Quality Improvement Program, and the Proposition 1B Goods Movement Emissions Reductions Program.

**Electrification**

- The District requests that CARB coordinate with other state and federal agencies to prioritize the development for standards of the electrification of equipment.
- The District supports efforts to ensure favorable electricity rate structure for freight facilities.
- The District requests that CARB ensure advanced technology requirements, such as automated technology, are feasible and cost-effective for non-containerized cargo.

**Emissions Cap**

- The District supports working with local air districts to ensure any emissions caps support local air quality requirements.

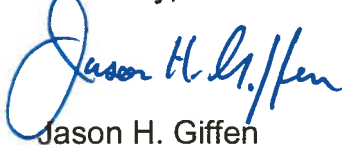
**Efficiencies and Automation**

- The District requests that any consideration of automation is achievable for smaller break bulk ports.
- The District requests CARB analyze the use of performance metrics to create a baseline that defines the state of the current freight transport system; and CARB sets goals that consider the differences in types of ports and their respective operations.
- The District requests that CARB consider operational efficiencies based on all type of port operations, and not just container operations.
- The District requests that CARB provide assurances that ports are held to maritime-related emissions and not non-maritime-related industries or freeways.

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In conclusion, California's public ports are a powerhouse of economic activity generating direct jobs and regional and state-wide economic activity. According to the American Association of Port Authorities (AAPA), international trade via seaports accounts for more than 32 percent of the U.S. Gross Domestic Product, with that value expected to increase to the equivalent of 37 percent in 2015, and 60 percent by 2030. The U.S. Chamber of Commerce estimates that nearly 15,000 jobs are created for every \$1 billion in manufactured goods that are exported through the nation's ports. The District published its quantified regional economic impact in 2015 and reported \$1.65 billion in direct economic output. Given the identified critical economic role ports play, it is vital that any CARB strategy and or implementation of best environmental practice complement competitiveness in local, national, and global trade. The District is committed to continue to work with CARB to maximize efficiency, reduce costs, and improve environmental quality by minimizing direct operational impacts on air, water, and the community.

Sincerely,



Jason H. Giffen  
Director, Environmental and Land Use Management

Cc:  
Dan Malcolm, Chairman, SDUPD  
John Bolduc, Acting President/CEO, SDUPD  
Randa Coniglio, Executive Vice President, Operations