



San Pedro and Peninsula Homeowners Coalition

February 21, 2017

Secretary Rodriquez
California Environmental Protection Agency
1001 I Street
P.O Box 2815
Sacramento, CA 95812

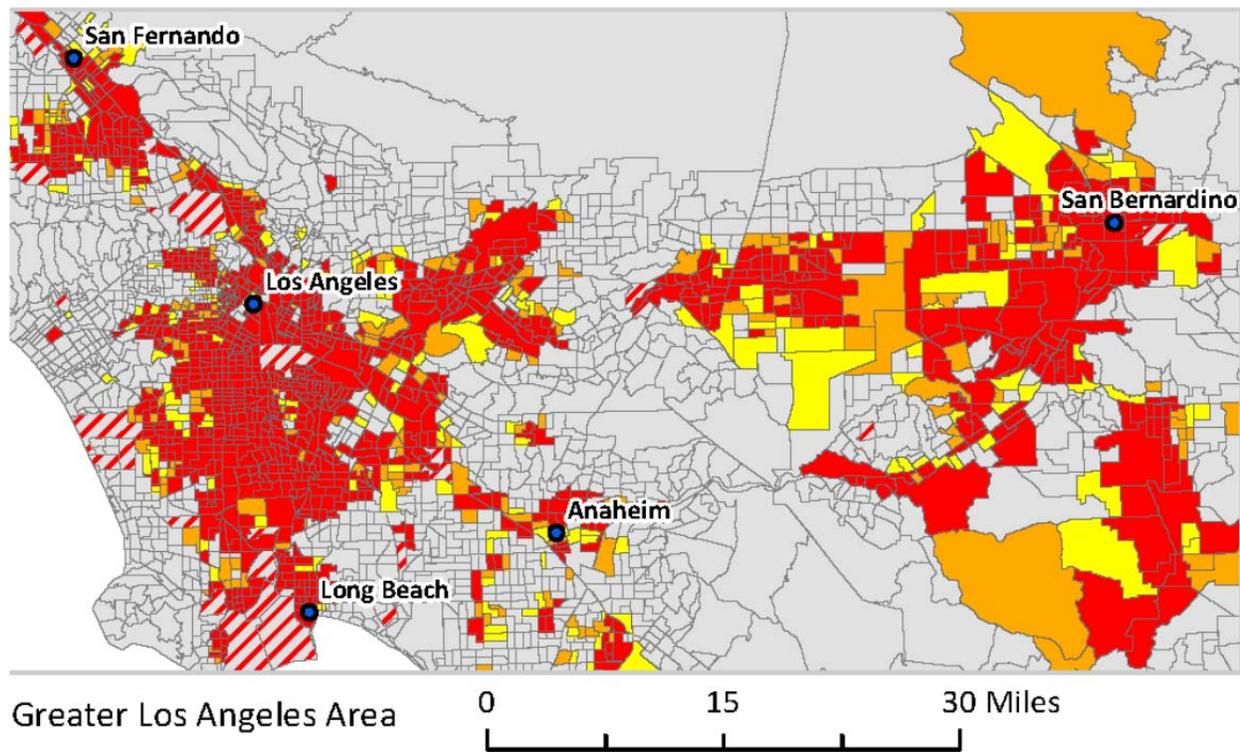
**Re: Community Meetings to Discuss Investments of Cap-and-Trade Auction
Proceeds to Benefit Disadvantaged and Low-Income Communities**

Dear Secretary Rodriquez:

On behalf of the undersigned organizations, we write regarding CAL EPA's concept paper on investments in disadvantaged and low-income communities. Our organizations have worked for years to clean up harmful freight pollution that plagues communities in the South Coast air basin. Despite the progress to clean up this

pollution to date, the air continues to be unsafe to breathe near large freight hubs. The San Pedro Bay Ports are a prime example of this continued struggle between the freight industry and adjacent communities. In addition to the acute local impacts, the ports also have the dubious distinction of being the largest fixed source of nitrogen oxide (NO_x) pollution in the region. While we are vigorously working to ensure proper regulatory oversight of these ports and the equipment that serves them, we want to make sure that funds available through the Greenhouse Gas Reduction Fund (GGRF) administered through the California Air Resources Board (CARB) provided for zero tailpipe emission projects are identified as benefiting the disadvantaged communities adjacent to the San Pedro Bay Ports.

In particular, we are concerned about Figure 5 for the Los Angeles/Inland Empire region, which is pasted below.



It appears that the San Pedro Bay Ports are in the “high pollution, no CES Score,” (i.e. red hatched areas) which means that funds provided to the ports or companies that operate at the ports through the GGRF funding would not qualify as benefiting disadvantaged communities. As your agencies are aware, the operations of these ports have devastating impacts on port adjacent communities and the region in general. As

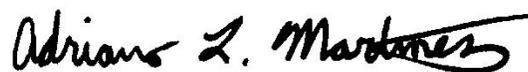
such, zero emissions projects that clean up these dirty port operations benefit adjacent communities. Accordingly, we recommend allowing GGRF funds spent on zero emission projects within the port area that reduce the heavy health, safety and quality of life burden faced by port adjacent communities count as benefiting disadvantaged communities.

The clustering and centralization of container vessels, yard equipment, rail operations, and truck traffic at the ports places a heavy burden on port adjacent communities. The short and long term effects of exposure to high levels of ambient air pollution on children, and adults, in these communities is a major concern based on a large body of research documenting associations between exposure to pollution from traffic-related sources and illness.

Finally, we are supportive of the ports having the ability to receive GGRF funding, but think it is important that Cal EPA and CARB encourage more robust community engagement as the San Pedro Bay Ports develop plans to clean up their operations. In addition, we request that state and local agencies commit to adopting complementary regulatory requirements for the ports instead of relying exclusively on voluntary initiatives. If state funds are being provided to these port authorities or their tenants, it is imperative that the ports engage in robust community engagement to ensure they are wisely investing in projects that will improve conditions in port adjacent communities. Similarly, it is imperative that the State couple use of incentive funds with mandatory replacement of equipment rather than merely transferring public funds to private industries with no long-term commitment to cleaning up the ports.

We appreciate your consideration of these comments. Please do not hesitate to contact Adrian Martinez if you have questions about these comments.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is written in a cursive, slightly slanted style.

Adriano L. Martinez
Earthjustice

Michele Hasson
Center for Community Action and Environmental Justice

Taylor Thomas
East Yard Communities for Environmental Justice

Gisele Fong
End Oil/ Communities for Clean Ports

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

Martha Dina Arguello
Physicians for Social Responsibility-Los Angeles

Kathleen Woodfield
San Pedro and Peninsula Homeowners United

CC: Mayor Garcetti, Los Angeles
Mayor Garcia, Long Beach