



SENT VIA ELECTRONIC MAIL

December 11, 2017

Chair Mary Nichols
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Proposed FY 2017-2018 Funding Plan for Clean Transportation (FY 2017-2018 Funding Plan)

Dear Chair Nichols and ARB Members:

The Port of Oakland is pleased to submit comments on the FY 2017-2018 Funding Plan. The Port understands that ARB staff are proposing \$190 million in the Advanced Freight Equipment Demonstration and Deployment category. Of the \$190 million, ARB staff are recommending \$150 million for Zero- and Near-Zero Emission Freight Facilities (see Table ES-1: Proposed Project Allocations for FY 2017-2018 Funding Plan.)

The Port strongly supports the goals of the Freight Facilities Project and appreciates the innovation to consider projects in a "holistic" manner, i.e., "to support bold, transformative emissions strategies that can be emulated through freight facilities statewide." (Page 1-67.) The Port especially supports the focus on disadvantaged and low-income communities, especially regarding public health status and outcomes. As the ARB and ARB staff are well aware, the Port of Oakland's 2015 Emissions Inventory shows a -76% reduction in diesel particulate matter (DPM) – a toxic air contaminant – over the Year 2005 baseline. However, the Port is concerned that the current ARB staff proposal appears to restrict Freight Facilities Project eligibility to only those ports, marine terminals or berths, which are located in a CalEnviroScreen 3.0 and AB 1550 designated Disadvantaged Community ("DAC".) As proposed under a 100% DAC screening requirement, the Port of Oakland and other California seaports will be ineligible for incentives for cleaner off-road cargo-handling and shore-power equipment or technology.

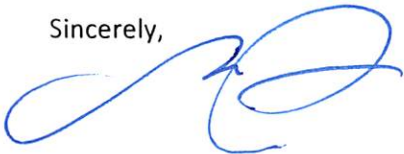
If California seeks additional DPM emissions reductions that benefit DACs (at Oakland Seaport, the DAC is West Oakland), the Port encourages providing ARB staff with flexibility to exercise professional judgment on Freight Facilities Project applications. A key to this flexibility is to eliminate the 100% DAC screening requirement as an eligibility requirement. For example, in approving applications, ARB staff can consider applications that demonstrate that cleaner equipment or facilities would render air quality and other public health benefits to a DAC, regardless of CES 3.0 location. In such a case, the Port believes these proposals merit strong ARB support.

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Finally, the Port views the proposed 50-50 match requirement as adding a heavy burden that may slow the deployment of additional electrical infrastructure to support shore power. With ARB's proposed amendments to the At-Berth Regulation, additional infrastructure will be necessary and may depend upon State funding levels. Hence, increasing the State match will accelerate the deployment of this needed infrastructure on behalf of reduced DPM emissions and improved public health. The Port encourages the ARB to re-balance the match requirement to allow for greater participation and accessibility by applicants.

The Port of Oakland appreciates the opportunity to provide these comments. Please contact me at 510-627-1182 or rsinkoff@portoakland.com for follow up on this subject or related air quality matters.

Sincerely,



Richard Sinkoff
Director of Environmental Programs and Planning

CC: Jack Kitowski, ARB
Cynthia Marvin, ARB
J. Christopher Lytle, Executive Director, Port of Oakland
Chris Chan, Director of Engineering, Port of Oakland
Matthew Davis, Director of Governmental Affairs, Port of Oakland