

15-3-4
Ron Powell

From: Ronald Powell [<mailto:rpowell@portofsandiego.org>]
Sent: Wednesday, April 22, 2015 2:45 PM
To: Toomer, Charista
Cc: Job Nelson; Jerine Rosato; Michelle White
Subject: Port comments on a Sustainable Freight Strategy

Honorable Supervisor Roberts,

I am submitting these comments to you in advance of tomorrow's meeting of the California Air Resources Board (CARB) on which you serve. The Port of San Diego is keenly interested in one item on the agenda: "Update to the Board on Sustainable Freight Strategy."

It is the Port's view that while the effort to reduce emissions from California's freight system "toward zero or near-zero emissions" is lofty, it is not technologically possible and would hurt business and job creation at the Port of San Diego and at California's 10 other major seaports.

The Port of San Diego is a green port, an environmental steward of San Diego Bay, and a regional leader in environmental sustainability. We have already taken solid steps to reduce greenhouse gas emissions in our cargo and cruise business lines, including:

- Adoption in 2010 of a diesel truck retrofit program to reduce emissions;
- The installation of shore power equipment at the Tenth Avenue Marine Terminal for use by all Dole vessels, eliminating the need to idle diesel-powered engines while at berth;
- The installation of shore power at our cruise ship terminal on the North Embarcadero; and
- Our pursuit of grant money this year through the federal TIGER program to expand shore power capability at the Tenth Avenue Marine Terminal.

The Port of San Diego is committed to reducing emissions and will work closely with CARB and our local air district on long-term emissions reductions.

In drafting a regulatory framework for the statewide Sustainable Freight Strategy we hope that CARB will consider regional differences in air quality and freight operations, and will also consider operational differences between ports. The Port of San Diego supports the development of an integrated long-term strategy for sustainable freight that blends plans from CARB, the California Energy Commission, the California Transportation Agency, and other freight and transportation agencies.

We also hope that CARB, when addressing a sustainable freight strategy, will:

- Consider the implications of such a strategy on international and interstate trucks;
- Support regional allocations of funds to ensure fairness in all goods movement corridors;
- Support additional allocations to existing incentive programs – including the Carl Moyer Program, the Air Quality Improvement Program, and the Proposition 1B Goods Movement Emissions Reductions Program;
- Coordinate with other state and federal agencies to prioritize the development of standards for the electrification of equipment; and
- Ensure advanced technology requirements, such as automated technology, are feasible for non-containerized cargo.

The Port also supports efforts to ensure favorable electricity rate structures for freight facilities.

In closing, the Port of San Diego supports greenhouse gas reduction, and will press ahead on many fronts to reduce our carbon footprint. However, we are seeking your help to make sure that any sustainable freight strategy is reasonable for California's system of goods movement through ports.

Thank you for your consideration and for your continued partnership.

Ron



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