

# SAN PEDRO BAY PORTS CLEAN AIR ACTION PLAN

July 23, 2018

Mr. Richard W. Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
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**SUBJECT: COMMENTS ON AB 617 COMMUNITY AIR PROTECTION PROGRAM  
DRAFT BLUEPRINT**

The Port of Los Angeles (POLA) and the Port of Long Beach (POLB), jointly referred to as the Ports, appreciate the opportunity to comment on the California Air Resources Board's (CARB) AB 617 Community Air Protection Program Draft Blueprint (Blueprint).

The Blueprint outlines development of Community Emissions Reduction Programs, implementation of Community Air Monitoring Programs, and identification of new statewide strategies to further reduce greenhouse gases, criteria air pollutants, and toxic air contaminants in communities disproportionately affected by air pollution across the state.

Several of the CARB strategies outlined in the document apply to port-related operations. These include, but are not limited to, CARB's commercial harbor craft amendments, cargo handling measures, drayage truck measures, and rail yard equipment and truck idling restrictions. The Ports look forward to collaborating with CARB to develop and implement these strategies.

As you know, the Ports are committed to reducing emissions from port-related operations. The Ports set themselves firmly on the path towards zero-emissions in the 2017 Clean Air Action Plan (2017 CAAP Update) adopted on November 2, 2017. The 2017 CAAP update includes bold new strategies and emission-reduction targets for greenhouse gases and aggressive goals of zero-emissions for cargo handling equipment by 2030 and zero-emission for on-road drayage trucks serving the ports by 2035. Since our first CAAP in 2006 and through the 2010 update, the Ports have made significant strides in reducing pollution from a variety of measures.



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*The San Pedro Bay Ports Clean Air Action Plan was developed with the participation and cooperation of the staff of the US Environmental Protection Agency, California Air Resources Board and the South Coast Air Quality Management District.*

Implementation of voluntary CAAP measures, combined with source-specific regulation, access to incentives and grants, and private investment in newer equipment and engines, emissions of diesel particulate matter in the San Pedro Bay Port complex have reduced by 87%, oxides of nitrogen declined 56%, sulfur oxides were cut 97%, and greenhouse gas emissions are down 18%.

In addition, the Ports have had robust air monitoring programs, providing publically available, regulatory grade, real-time air quality data for the San Pedro Bay for over a decade. Monitoring equipment adheres to the same rigorous requirements as the air monitoring stations deployed by the South Coast Air Quality Management District. Both ports will continue to make their air quality data available to the public and to release detailed annual reports.

Through the goals established in the 2017 CAAP Update, the Ports are committed to continued emission reductions from port-related operations – especially in economically disadvantaged communities. We look forward to our on-going collaboration with CARB, SCAQMD, our tenants, the broader goods movement industry, and community members in the pursuit of continued emission reductions.

Sincerely,



CHRISTOPHER CANNON  
Director of Environmental Management



HEATHER TOMLEY  
Director of Environmental Planning