

SAN PEDRO BAY PORTS CLEAN AIR ACTION PLAN

October 19, 2015

Submitted Electronically: <http://www.arb.ca.gov/lispub/comm/bclist.php>

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

SUBJECT: COMMENTS ON CALIFORNIA AIR RESOURCES BOARD SOURCE STRATEGY (OCTOBER 2015 DISCUSSION DRAFT)

Dear Staff of the California Air Resources Board:

The City of Los Angeles Harbor Department and the City of Long Beach Harbor Department appreciate the opportunity to submit comments on the California Air Resources Board's (ARB) Mobile Source Strategy Discussion Draft (Discussion Draft) document which contains, in part, strategies for reducing air emissions from the major sources that move freight in and out of the Ports of Los Angeles and Long Beach (Ports). The Ports recognize the hard work that has gone into producing this Discussion Draft and applaud you for your efforts.

The Ports support the efforts of the ARB to work with the United States Environmental Protection Agency, South Coast Air Quality Management District, and International Maritime Organization to achieve emissions reductions from goods movement. Specifically, we support the proposed measure concepts identified in the Discussion Draft, including the development of low-NOx engine standards for on-road heavy-duty trucks; Tier 5 national locomotive emissions standards; and development of Tier 4 engine emissions standards and amendments to the At-Berth regulation for ocean-going vessels. Because the Ports do not possess the authority to regulate these sources, we believe that rulemaking at the national or state level is the most effective way to ensure emission reductions.

The development and advancement of transformative technologies, including zero-emission equipment, described in the Discussion Draft, will come at a significant price. The Ports support the use of monetary incentives and funding programs provided through the ARB to ensure successful deployment of these new technologies.



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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.

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We are also supportive of potential measures that include the use of strategies described in the Discussion Draft to increase operational efficiency at the Ports. We recommend that the ARB conduct detailed reviews or assessments of each efficiency strategy in order to ensure that the strategy will result in air pollution reductions.

We thank you again for the opportunity to comment and look forward to continuing our work with the ARB. If you have any questions or would like to discuss the comments raised in this letter please contact us.

Sincerely,



CHRISTOPHER CANNON
Director of Environmental Management
Port of Los Angeles



HEATHER TOMLEY
Director of Environmental Planning
Port of Long Beach