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The Port of
LONG BEACH

December 6, 2007

California Air Resources Board
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Sacramento, California 95814

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MOBILE SOURCE CONTROL DIVISION

Subject: Proposed Shorepower and Drayage Truck Regulations

Dear Air Resources Board Members:

The Port of Long Beach appreciates the opportunity to provide comments on the California Air Resources Board proposed at-berth ocean-going vessel regulation and heavy-duty drayage trucks regulation. The Port has aggressively pursued a comprehensive plan to achieve emission reductions from both ocean-going vessels while at berth and drayage trucks. The initial plan was incorporated into the San Pedro Bay Clean Air Action Plan (CAAP) and major steps are being taken to implement the Port's commitment.

In the year since the plan was adopted, the Port has made significant progress in providing the facilities necessary to connect vessels to shore power. For example, at the BP Liquid Bulk Terminal at Berth T121, infrastructure and electrical system improvements are nearly complete, and system testing is scheduled to begin within weeks. At the Pier G ITS container terminal, the first new berth built with cold ironing capability is nearly complete; electrical system improvements are underway and the system is on schedule for a May 2008 start up. Engineering design for the retrofit of four berths at two other container terminals is also currently under way.

To further our efforts, the Port has also conducted a comprehensive, port-wide electrical master plan to assess future electrical demand and the electrical infrastructure's ability to accommodate a large increase in electrical use. We are working closely with Southern California Edison, our electrical utility provider, to meet the challenges this growth presents. The electrical system has sufficient capacity to accommodate near term needs; however, as electrical loads grow as a result of cold ironing, significant capacity improvements are necessary. Given concurrent implementation of cold-ironing infrastructure at multiple terminals, meeting the schedule presented in both the CAAP and proposed regulation is a challenge to achieve. However, the Port intends to meet that challenge and looks forward to working with CARB in implementing the proposed regulation.

The Port has also in the past year participated in, and provided input to, the CARB at-berth ocean-going vessel rule making process. We commend the level of professionalism, and the genuine desire of CARB staff to understand the maritime industry operational practices. The cold-ironing rule, as proposed, will achieve significant reduction in ship at-berth emissions and is supported by the Port of Long Beach. The successful retrofit of a sufficient number of berths to meet the regulation's 2014 requirements at the Ports' seven container terminals and one cruise terminal will necessitate an unprecedented combination of engineering design, utility-provider cooperation, tenant participation, and environmental permitting expertise. However, it is important to note that in many ways the implementation schedule contained in the proposed regulation is more aggressive than the Port's commitment in the CAAP, and requires a serious

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undertaking in order to be successful. We recognize the challenge and as stated earlier, the Port will mobilize all necessary resources to meet the spirit and letter of the regulation.

While the Port supports the proposed regulation, we also wish to bring to the Board's attention that the proposal by some groups to accelerate the proposed schedule is unrealistic for a number of reasons. Two items are at issue here: the schedule for providing grid-based power and the viability of alternatives to grid-based power.

It is not feasible to accelerate the schedule for grid-based power given the need to coordinate the number of entities involved. In order to accomplish the required capacity enhancements as well as ensure that service to each terminal is enhanced to accommodate additional loads, the Port and Southern California Edison are working in concert to plan, design, and permit a robust and reliable network. Portions of the improvements are being accomplished jointly and others are being implemented independently. Each case, however, is time-consuming and involves a number of entities. Construction of the necessary improvements could extend well beyond the CARB's cold ironing implementation date in 2014, and given the phased nature, of the work we have limited ability to move up completion of the initial work.

Another concern is the impact the retrofit of existing terminals will have on the tenants and cargo-moving operations. To construct the infrastructure necessary to connect a vessel to shore power, large segments of an operating terminal must be disrupted to install underground conduits. Ship berths must be taken off-line, often for days or weeks at a time, to install the outlets at the wharf. Terminal electrical system must also be upgraded, which requires system-wide outages. All of the elements can combine to delay cargo operations and can have the unintended consequences to the economy by backing up ships, delaying cargo handling, as well as train, and truck traffic causing extensive congestion in the cargo movement chain. At the Port of Long Beach, we are working to carefully plan for how the multiple concurrent retrofit projects can take place while minimizing a delay in cargo movement while reducing basin-wide diesel emissions. We do not believe acceleration of the implementation schedule could be achieved.

While the Port envisions that alternatives to grid-based power have an important place in reducing emissions from ships, that technology is not currently mature, cannot meet the power needs of many vessels, and will be most suitable for vessels not targeted by the proposed regulation, such as bulk vessels. Specifically, no technology has been demonstrated that meets the requirements of the proposed regulation. Currently available technologies we have investigated have either insufficient capacity to serve the vessel loads envisioned at our facilities, and/or require significant infrastructure improvements similar to the grid-based shore power system. A disadvantage to distributed distribution systems is that a significant amount of space is required on the wharf adjacent to the vessel. As a result, the proposed technology would not obviate the need for infrastructure (and save time) since, unlike some other ports, terminals at the Port of Long Beach do not have space in front of quay cranes to position the equipment. At each of our container terminals, the waterside leg of the quay cranes is located on a fixed rail at the edge of the wharf. This prevents an alternative technology, such as distributed generation, to be located between a quay crane and the vessel. Since both quay cranes and cargo-handling equipment must be free to travel up and down the wharf it is not feasible to locate the generating system in between the crane legs. Rather, such equipment would need to be located in the terminal backlands with the necessary trenching and wharf improvements constructed at the

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berth. Relying on the alternative technology while following a path to grid-based power would potentially double the costs of the emission reductions while straining the resources of the Port's Engineering staff to meet divergent near-term and long-term cold ironing solutions.

Finally, it is important to point out that the Port of Long Beach does not operate the marine terminals, but rather leases facilities as a landlord. The proposed regulation appropriately assigns responsibility for emission reductions to those conducting the activities responsible for emissions: shipping lines and terminal operators. The Port does not determine operational activities at these facilities nor does it control vessel schedules. As a result, it would be inappropriate for the Port to determine which facilities would need to comply early while allowing others to delay compliance, as has been suggested by some proposals to accelerate the timeline. In addition, since the Port does not operate the facilities it would be impossible to provide offset emission reductions from other sources should the cold-ironing requirement not be met.

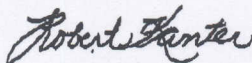
We would also like to take this opportunity to address the proposed port drayage truck rule that is before you for consideration. As you know, the ports of Long Beach and Los Angeles have been working on a Harbor District Clean Trucks Program that addresses this same issue. During that process, we have worked closely with CARB staff on these issues. We would like to again extend our thanks for the collaborative spirit that CARB staff has shown during the process.

The Port of Long Beach supports the proposed regulation before you, and urges the Board to adopt the measure. The proposed drayage truck program establishes a consistent, state-wide program for the significant reduction of pollution from drayage trucks serving California ports. One month ago, our own Board, with the Port of Los Angeles' Board, approved a progressive ban that eliminates dirty drayage trucks serving the two ports. Our program will require that drayage trucks meet 2007 emissions standards by 2012. While our program accelerates the CARB requirements locally, it remains consistent with the proposed state program. The two programs together provide a comprehensive approach to addressing port drayage emissions.

We look forward to continuing to work with CARB on this program. The next step on this program is for the ports and CARB to identify funding necessary to assist drivers trying to get into new, clean trucks. The scope of this effort necessitates a significant investment. The ports have committed their own funds and have committed to develop a cargo fee to raise the necessary funds to complete the task. We hope that we can count on the California Air Resources Board's support as the two ports seek Proposition 1B funds to help in this monumental task.

Again, we thank you for working with the ports and taking the necessary aggressive steps to assist the ports in reducing emissions in our local communities.

Sincerely,



Robert Kanter, Ph.D.
Managing Director of Environmental Affairs
and Planning