

**BAY PLANNING COALITION**

10 Lombard Street, Suite 408  
San Francisco, CA 94111-6205  
☎ 415/397.2293 fax: 415/986.0694

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www.bayplanningcoalition.org

Ellen J. Johnick  
06-4-3

April 18, 2006

Via electronic mail and facsimile

Ms. Catherine Witherspoon  
Executive Officer  
Air Resources Board  
1001 I Street  
Sacramento, Ca. 95814

Attention: Ms. Sylvia Oey, Manager, Planning and Technical Support; Public Liaison

Subject: Draft Emissions Reduction Plan for Ports and International Goods Movement in California (CARB Plan)

Dear Ms. Witherspoon:

The Bay Planning Coalition (BPC) commends your public outreach and extensive research efforts to develop target goals for cleaner air in the marine emissions arena. Cleaner air and improved public health is critically important and something that we must all work on closely together if we are to achieve meaningful success. There are many laudable aspects to the CARB Plan as well as some limitations in this regard.

In general, our concern is that the Plan's method of proposing numerous regulations for each source type doesn't address the real problem. The reality is that there is now and will continue to be an ever-increasing population throughout the state and within our coastal port areas specifically with ever-increasing demands for goods, services and infrastructure and resulting air quality impacts and congestion. This is a challenge and a significant problem which must be confronted and solved in order to enable "Smart Growth". While the CARB Plan does recognize likely growth, absent is the recognition that emissions reduction can effectively occur within a planning strategy that integrates both growth and emissions reduction. We request that the CARB include a provision in the CARB Plan which endorses and accepts locally-developed alternative compliance strategies in the form of integrated regional plans to achieve emissions reductions.

There are at least two efforts that have been initiated (by BPC and the MGM Coalition) to develop local alternative compliance strategies. We refer you to Appendix G in the Plan (sponsored by the Maritime Goods Movement Coalition) as offering the basic concept. While we have a few concerns, and may not agree with some of the provisions in Appendix G, we support the general concept of a regional master plan which incorporates both growth and goods movement infrastructure projects linking these with emissions reduction strategies. We would like you to endorse and accept these local plans based on

the premise of linking growth with emissions reduction and which allows both the local private and public sectors as cooperating partners to meet the objectives of the ARB.

Founded in 1983, the BPC is a non-profit, membership-based organization, representing a broad spectrum of business-environmental activity in the San Francisco Bay-Delta region. Our members represent hundreds of employers who operate businesses that provide jobs to people to supply the goods and services that the public demands. Our objective is to conduct business with environmental compliance and stewardship and in ways that are economically feasible and cost effective. The members include the maritime industry, ports and local government, residential and commercial builders, landowners, recreational users, and professional firms providing engineering, planning, environmental science, construction and legal services. We advocate for the balanced regulation of resources to ensure the economic prosperity and environmental protection of the region.

To achieve our objectives over the years, we have developed successful collaborations with regulatory agencies and community groups to identify and implement solutions for port, energy, water supply, and transportation infrastructure maintenance and improvement, dredging and dredged material disposal, wetland restoration, water quality planning, endangered species protection, etc.

Most recently our attention has been focused on the state's goods movement planning and the associated air quality improvement program. We commend the state's attention and support for developing an integrated program to expedite the movement of freight efficiently and cost-effectively as well as to reduce emissions. An integrated plan is the only way to realistically solve both the economic growth as well as the environmental challenges in a balanced and practical manner.

We welcome the opportunity that this planning process allows to ensure a progressive environmental and public health agenda while meeting the public's demand for goods and expedited goods movement services at an ever-increasing volume.

Here are some additional points:

1. The CARB Plan should be expanded to acknowledge that marine emissions are only one component of the air pollution problem and must be considered in the context of the overall transportation network for the movement of all types of goods--from tomatoes to containers.
2. Plans are best implemented at the local level where there is good opportunity to develop private public partnerships and collaborations for integrated strategies that will achieve the greatest air quality benefit in a cost-effective manner. These typically link land use decisionmaking processes with environmental and

community mitigation and essential infrastructure projects. The CARB Plan should recognize this principle and give needed direction for a balanced approach.

3. Industry needs predictability and flexibility. We can agree with setting target reduction goals and performance standards, but the regulated community must be given the flexibility to design its own response and an economically-feasible method of achieving the standards.
4. BPC has begun discussions with our local agencies, BAAQMD, MTC and ABAG, towards the development of a regional master plan process for the San Francisco Bay Area. Suggested elements include establishing a baseline of reliable information on regional emissions sources, identifying performance measures to meet target reductions for each source, analyzing the relative cost-benefit of these performance measures and engaging participation from the community and environmental groups. A project-by-project, source-by-source regulatory approach is inadequate to meet the challenges of the 21<sup>st</sup> century with burgeoning population growth and ever-expanding expectations. More simply stated, it is a path to gridlock! And with gridlock, you cannot have effective emissions reductions.

We are committed to reaching our goals for economic growth along with air quality improvements, and so we encourage you to continue to facilitate collaborative solutions by fostering the integrated regional master plan concept.

We would be pleased to meet with you to describe our process for the San Francisco Bay region.

Sincerely yours,  
  
Ellen Joslin Johnek  
Executive Director

Cc: Jack Broadbent, Executive Director, Bay Area Air Quality Management District