



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chair
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Edmund G. Brown Jr.
Governor

April 29, 2016

Mr. Larry Hofreiter
San Diego Unified Port District
Planning and Green Port
3165 Pacific Highway
San Diego, California 92101

Dear Mr. Hofreiter:

Thank you for providing the California Air Resources Board (ARB) the opportunity to comment on the Draft Environmental Impact Report for the Dole Fresh Fruit Refrigerated Rack Improvements Project (project). This new proposed project provides an opportunity to create a terminal that promotes the use of the cleanest technologies and practices available during both the construction phase and full project build-out.

We applaud the important work the Dole Fresh Fruit Company and the San Diego Unified Port District is doing to make the Tenth Avenue Marine Terminal state-of-the-art by improving the terminal's efficiency and increasing refrigerated container plugs at the terminal. There will be substantial emissions benefits gained from having all transport refrigerated containers at the Dole facility run on electricity from the grid. The upcoming Tier 2 Dole ocean going vessels that are all shore power equipped, along with several other mitigation measures, will also reduce air pollution emissions at the terminal. These gains will help to advance our State and regional air quality and greenhouse gas emission goals, as well as reduce localized health risk for communities near the Port. Additionally, we want to thank you for utilizing the highest cargo throughput for the analysis of project impacts and using the most current Office of Environmental Health Hazard Assessment guidance for the health risk assessment.

Although the air quality impact of the proposed project was found to be less than significant, the associated increase in throughput and activity at the Port will still contribute to emissions, affecting nearby communities and sensitive receptors. Ultimately, to meet our public health mandates and air quality and climate goals, California's freight transport system will need to operate with zero emissions everywhere feasible and near-zero emissions with renewable fuels everywhere else. We recognize that this project goes a long way in helping to achieve that vision.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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However, every gain in emission reductions is important so we ask that the Dole Fresh Fruit Company and the San Diego Unified Port District continue to push the envelope and consider additional avenues to minimize or eliminate air pollution emissions.

We understand the critical role the proposed project will play in keeping the San Diego Unified Port District competitive well into the future. The proposed project provides the City of San Diego and the San Diego Unified Port District an opportunity to set a benchmark for environmental leadership for freight transport in California while expanding economic opportunities.

Background

The proposed project will install five new refrigerated racks with an additional 94 outdoor refrigerated cargo outlets at the Dole Leasehold at the Tenth Avenue Marine Terminal within the San Diego Unified Port District. As a result of this project, it is expected that all refrigerated cargo containers will plug into the grid and run off of electricity, throughput will increase by 283 trucks per week, and activity at the Port will increase by 192 truck hours per week. Additionally, Dole is in the process of replacing their existing ocean going vessels with three new Tier 2, shore power equipped, larger capacity vessels in 2016.

Existing land uses surrounding the Tenth Avenue Marine Terminal include several sensitive receptors: Cesar Chavez Park, Perkins Elementary School, and Monarch School, as well as the residences, schools, childcare facilities, and healthcare facilities along the truck routes that would be used by the additional trucks entering and leaving the Tenth Avenue Marine Terminal. Also adjacent is the San Diego community of Barrio Logan, which is already determined by the California Environmental Protection Agency to be among the worst five percent in the State for cumulative pollution burden.¹

Further Considerations

We recognize that the proposed project has implemented a number of measures to help reduce environmental impacts associated with terminal activity. To further advance State and regional air pollution and greenhouse gas emission goals, as well as reduce localized health risk for communities near the Port, we ask that you also consider implementation of the following measures:

¹ Office of Environmental Health Hazard Assessment, "CalEnviro Screen Version 2.0," November, 10, 2014, <<http://oehha.ca.gov/ej/ces2.html>>, accessed April 30, 2015.

- 1) Incorporate zero and near-zero emission technologies, especially for yard and on-road trucks, that are commercially available from opening year in 2016 through to the end of the project in 2036. We believe that uses of these technologies are feasible within the project's operational lifetime. ARB's Technology and Fuels Assessments provide information on the current and projected development of mobile source technologies and fuels, including current and anticipated costs at widespread deployment. The assessments can be found at <http://www.arb.ca.gov/msprog/tech/tech.htm>.
- 2) Implement, and plan accordingly for, the necessary infrastructure to support the zero emission and near-zero emission technology vehicles and equipment that will be operating at the Dole leasehold from opening year in 2016 through to the end of the project in 2036.
- 3) Install an electronic gate access system (using Radio Frequency Identification tags for example) at the centralized common gate. This will allow for more efficient movement through the gate and will improve compliance with current regulations and programs for on-road trucks.
- 4) Ensure compliance and monitor compliance with all current air quality regulations for on-road trucks and cargo handling equipment including ARB's Heavy-Duty Greenhouse Gas Regulation and Truck and Bus Regulation. ARB is available to provide assistance in implementing this recommendation.
- 5) Coordinate and consult with the community on truck traffic circulation. We recognize the important work the Port has previously done in collaborating with the community to identify truck routes that divert truck traffic away from neighborhood streets. We request that you continue that coordination and consultation with the community, especially Barrio Logan, while considering truck traffic impacts and circulation that will result from this project.

Closing

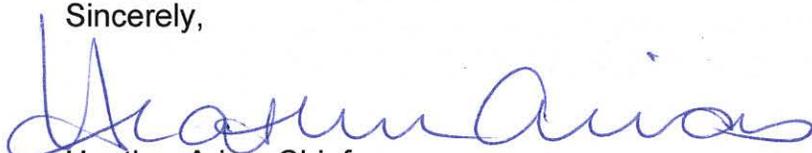
ARB staff appreciates the opportunity to comment on the Draft Environmental Impact Report for the proposed project. We are pleased to provide assistance for successful implementation and deployment of a state-of-the-art facility that serves the region's distribution and air quality needs, while protecting public health.

If you would like to understand more about ARB's freight related work, please see our Sustainable Freight: Pathways to Zero and Near-Zero Emissions Discussion Document at <http://www.arb.ca.gov/gmp/sfti/sfti.htm>.

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Please include ARB on your State Clearinghouse list of selected State agencies that will receive the Final Environmental Impact Report as part of the comment period. If you have questions, please contact Ms. Kelly Kerber, Air Pollution Specialist, Freight Transport Branch, at (916) 322-7194 or via Kelly.Kerber@arb.ca.gov.

Sincerely,



Heather Arias, Chief
Freight Transport Branch
Transportation and Toxics Division

cc: State Clearinghouse
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cc: (continued)

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