



RESPONSES TO PUBLIC COMMENTS/QUESTIONS RECEIVED AT FOUR PUBLIC MEETINGS

ORAL Comment #1: Support for container fees; Shippers should pay for pollution related to goods movement; SB 760 is good idea; Container fees should be listed in the plan as a funding mechanism.

Response #1: There were 26 speakers that commented on one or more of the above topic ideas; this was the most common topic area discussed at the public meetings. See Frequently Occurring Comments Response #7.

ORAL Comment #2: Appreciation for the cooperation between the two Ports and the air agencies.

Response #2: There were 16 speakers that shared this appreciation. Comment noted.

ORAL Comment #3: The CAAP is not as aggressive as the No Net Increase (NNI) Task Force report; In general, the CAAP is not aggressive enough.

Response #3: There were 14 comments related to this topic area. See Frequently Occurring Comments Responses #16 and #17.

ORAL Comment #4: Suffering with health problems due to port pollution; black soot everywhere.

Response #4: There were 14 comments related to this topic area. Section 1 of the Technical Report addresses the need for emission reductions and health risk reduction. The ports recognize that the links between air emissions and health impacts are complex and that significant emission reductions from all sectors, including "Goods Movement" are necessary for the South Coast Air Basin to reach attainment with the health-based National Ambient Air Quality Standards. Further, the CAAP identifies a health risk based project specific standard and the development of a San Pedro Bay wide standard between the ports and the agencies by Spring of 2007 to address public health risk associated with port related mobile sources.

ORAL Comment #5: Do not support the use of public Bond money; Public should not have to pay for cleanup.

Response #5: There were 13 comments related to this topic area. The public bond measure was not initiated by the Ports to help fund the CAAP. Instead, it is part of Governor's Goods Movement Action Plan. Under this plan, one of the options considered is bond funding for goods movement infrastructure improvement and goods movement related air quality mitigation. Further, the final draft proposal, as written, requires infrastructure improvement bond funds be matched in a 1:4 ratio and clean air projects be matched in a 1:1 ratio with matching funds from private or other appropriate local or federal funds. However, if the bond measure is ultimately approved, then the Ports will rightfully seek their proportional allocation



(i.e., fair share) of funding from this bond to help fund the Plan. In addition, the Ports are evaluating alternative funding mechanisms, as described in Frequently Occurring Comment Response #7.

ORAL Comment #6: Why aren't other alternative fuels such as biodiesel, Mag Lev, Electric Trains, Wind, Solar or Tidal Power highlighted in the CAAP?

Response #6: There were 10 speakers that raised ideas related to one or more of the above alternative fuels/technologies. See Frequently Occurring Comments Response # 32.

With regard to biodiesel, it is important to realize that while biodiesel fuel use does provide measurable diesel particulate matter (DPM) emission reductions, biodiesel does not achieve the significant NO_x reductions of other fuels such as LNG. In fact, some studies have shown that biodiesel increases NO_x emissions, so clearly, if public health priority is to be maximized, further study on biodiesel and its potential impacts is required.

ORAL Comment #7: Funding not adequate; Need to address it further in the Plan; The Plan can't rely on bond money.

Response #7: There were 9 speakers indicating these concerns. See Frequently Occurring Comment Response #7.

ORAL Comment#8: Need clear and enforceable standards/goals and timelines.

Response #8: There were 8 speakers indicating these concerns. See Frequently Occurring Comments Responses # 14 and #17.

ORAL Comment#9: Do not support port expansion without decreasing current pollution level or the use of a zero emissions cargo transport system.

Response #9: There were 7 speakers indicating a variant on these concerns. **The Clean Air Action Plan is designed to develop mitigation measures and incentive programs necessary to reduce air emissions and health risks while allowing port development to continue.** As background, the Ports have a legal responsibility to support goods movement, as required by Chapter 8 of the Coastal Act, which recognizes the benefits to the State of goods movement commerce, and also limits such commerce to existing port locations. It is important to realize that the Ports' primary ability to reduce emissions is tied to renegotiation of existing leases or negotiation of new leases. CAAP implementation primarily relies on the opportunity to negotiate lease modifications or new leases, for in-use and new categories, respectively. In addition, the Ports are committed to exploring and incorporating new technologies into port operations. See Frequently Occurring Comment Response #32.



ORAL Comment #10: How will the public comments be addressed, how will responses to public comment be reviewed by the public and progress be reported?

Response #10: There were 6 speakers with this question. See Frequently Occurring Comments Responses # 4 and #27. .

ORAL Comment #11: Do not support credit trading; or if you do credit trade - make sure to reduce more than you add; Credit trading is not appropriate for toxics.

Response #11: There were 6 speakers with this issue. Many mechanisms are being considered for implementing the CAAP. Given the breadth and scope of the Plan, more than one mechanism will need to be used. The Ports will consider all mechanisms based on their ability to achieve the necessary emission reductions as rapidly and cost-effectively as possible. However, the Ports are not pursuing credit trading programs at this time.

ORAL Comment #12: Supports Clean Air Action Plan as “living document”.

Response #12: There were 6 speakers on this topic. Comment noted.

ORAL Comment#13: Question on Air Monitoring Stations near Ports to track progress; expressed need for a daily or weekly map of air quality in the area.

Response #13: There were 6 speakers with this question/point. Both Ports are implementing air quality monitoring stations within their facilities and in San Pedro and Wilmington communities. In addition, the SCAQMD is planning to conduct an enhanced air monitoring program in the port community area. Special air monitoring studies conducted by other organizations indicated their desire to coordinate with the port community monitoring program. In particular, CARB is implementing a project entitled “Harbor Communities Monitoring Project”. The primary goal of this project is to develop improved tools to measure air pollutant concentrations and detect areas with high concentration of these pollutants. This project consists of three types of air pollution sampling: a network of passive samplers (stationary), a mobile platform, and a network of particle counters. The project team has contacted the SCAQMD to coordinate the location of their measurement program. The communities being studied include Wilmington, parts of Carson, West Long Beach, and San Pedro.

The objective of the SCAQMD program is to characterize the ambient air toxic and criteria pollutant concentrations and potential exposures in the port-community area. As part of this effort, the SCAQMD plans to deploy air monitoring equipment at several locations that complements the existing air monitoring stations operated by the ports (four by POLA and two by POLB). In addition, the SCAQMD has set up a technical working group which includes the two ports, ARB, U.S. EPA, community representatives, labor union, academia, and industry representatives to provide input into the process. Six fully instrumented sites are proposed for this program. Proposed sites include: North Long Beach, MATES II Wilmington Site, Hudson School, Drake Park or North, Wilmington Community, Carson



(Del Amo Elementary) and two additional fully instrumented monitoring platforms to be deployed to measure community impacts of I-710.

The two Port of Long Beach stations are located at: 1) the tip of the Navy Mole (in Gull Park), and 2) on Canal Ave., near Anaheim. The stations provide real-time emissions data that is reported on a website for public review (www.polb.com/air-monitoring). The website displaying the real-time data from the POLB stations have been operational since first week in October 2006. The website is linked from the POLB home page and includes information on air quality and meteorological parameters measured at the stations, both current and historical. Future updates to the website will include a comparison of the two stations to other regional air monitoring stations. These stations monitor meteorological conditions and nitrogen dioxide (NO₂), ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), as well as real-time PM₁₀ and PM_{2.5}. Filter-based PM₁₀ and PM_{2.5} samples will be collected for side-by-side comparison, and the first year will include speciation of the PM_{2.5} samples for metals, ions, elemental carbon/organic carbon (EC/OC) and polycyclic aromatic hydrocarbons (PAHs.)

The Port of Los Angeles currently operates four air monitoring stations that monitor PM₁₀ and PM_{2.5}, as well as meteorological parameters. POLA conducts PM speciation for EC/OC, ions and metals. These stations are located at: Berth 47, Terminal Island, Liberty Hill Plaza (San Pedro Community site), and Saints Peter and Paul School (Wilmington Community site); a map of the station locations is provided on the POLA website. POLA is currently conducting filter-based sampling and posts the results on the POLA website periodically.

ORAL Comment #14: Do not support liquefied natural gas (LNG); Ultrafine PM from LNG a concern; Ensure that after further study, if UFPs are a problem, be sure to add them to CAAP.

Response #14: There were 6 speakers with one or both of these issues. The Port of Long Beach is currently evaluating the construction and operation of a LNG storage terminal. The issues associated with this project are distinct and separate from the CAAP's proposed use of LNG as a transportation fuel, and are part of a separate EIR process.

LNG-fueled vehicles have been in operation throughout the world for several years and have proven to be a reliable alternative transportation fuel that provides important environmental improvement benefits. Although EPA and CARB currently monitor and regulate PM₁₀ and PM_{2.5}, new research is being conducted on UFPs, which are particles classified as less than 0.1 micron in diameter. UFPs are usually formed by a combustion cycle, independent of fuel type. With diesel fuel, UFPs can be formed directly from the fuel during combustion. With gasoline and natural gas (liquefied or compressed), the UFPs are derived mostly from the engine's lubricant oil. UFPs are emitted directly from the tailpipe as solid particles (soot—elemental carbon and metal oxides) and semivolatile particles (sulfates and hydrocarbons) that coagulate to form particles.



Tailpipe emissions are significantly reduced compared to conventional diesel fueled vehicles and fuel supplies are not contingent upon the aforementioned storage facility. According to the SCAQMD, natural gas engines inherently have 70 percent less particulate (including UFP) emissions when compared to diesel (without after-treatment controls). However, diesel particulate emissions (including UFPs) are reduced to comparable levels with aftertreatment (particulate traps for diesel and oxidation catalysts for alternative fuels). While engines with aftertreatment devices have low UFP emissions, only the newer engines have verified aftertreatment devices available. More recently, all natural gas engines certified for sale in California in 2005 includes oxidation catalysts, which further reduce particulate emissions including UFPs. New diesel engines are not required to have aftertreatment until 2007 in order to meet new emissions standards. Also of note, if a post-combustion treatment fails on a diesel engine, the UFP emissions are higher than on an alternative fuel engine with a failed aftertreatment device. Nonetheless, UFPs are a serious new issue and consideration of UFP emissions impacts will be incorporated into the plan as new information is obtained and existing data are further studied.

Current UFP research primarily involves roadway exposure. Preliminary studies suggest that over 50 percent of an individual's daily exposure to UFPs is from driving on highways. Exposure levels appear to drop off rapidly as one moves away from major roadways. Little research has been conducted directly on ships and off-road vehicles. ARB will be commencing a study this summer at the San Pedro Bay Ports to measure pollutants including UFPs. Additional work effort is being conducted on filter technology, including filters for ships, which appears promising. The Ports actively participate in all CARB testing programs at the Ports and will comply with all future regulations regarding UFPs. Finally, it should be noted that measures included in the CAAP aim to reduce all emissions, port-wide.

ORAL Comment#15: Non-Cancer related health issues not addressed.

Response #15: There were 5 speakers with this concern. See Frequently Occurring Comments Response #10.

ORAL Comment#16: Plan should address how to pay for an individual's health care costs that result from Port pollution.

Response #16: There were 5 speakers with this comment. The Ports are included within a region (the South Coast Air Basin) that is in severe nonattainment. There are a large variety of sources that contribute to the region's air pollution, and it is impossible to assign any one source a proportional share of the responsibility for the health effects of this pollution. Air pollution is a regional problem that the Ports are a part of, and the CAAP was created to address our role in this problem. The CAAP is designed to reduce exposure of local residents to pollution caused by port activity. It is noteworthy that the agencies whose key responsibility



is to protect public health (i.e., SCAQMD, ARB, EPA) do not spend direct funding on health care costs.

The SCAQMD primary charge is to monitor air pollution and develop approaches to reduce emissions (either regulatory or incentives) to meet state and federal air pollution laws. To assist in understanding the effects of air pollution, the SCAQMD sponsors and co-sponsors research to reduce emissions as expeditiously as possible.

ORAL Comment #17: How will the CAAP's progress be monitored and reported to public? Who is accountable if the Clean Air Action Plan does not work?

Response #17: There were 5 speakers with this comment. Progress reporting on implementation of the CAAP measures will be conducted on an annual basis, at a minimum. This reporting will be coupled with annual port-wide emissions inventory updates will provide excellent tools to measure the progress and effectiveness of CAAP implementation. Also, see Frequently Occurring Comments Response #5.

ORAL Comment #18: Current truck system is broken, need to address societal issues related to trucking as well as the pollution issues; need a results oriented approach (limit emissions while letting truck companies choose how to do so).

Response #18: There were 4 speakers with this comment. See revised and expanded control measure SPBP-HDV1 description in the Technical Report. In the short term, the CAAP addresses trucking emissions by ensuring that the old high-emitting trucks are replaced by newer low-emission trucks or retrofit to achieve significant emissions reductions. The CAAP recognizes that reducing emissions from container transport trucks has unique considerations, including the diverse nature of vehicle ownership, as well as affordability. Mechanisms to address these issues will be explored during development of the implementation plan for this measure.

ORAL Comment#19: Penalties for noncompliance should be included, turn away dirtiest 10% OGVs, trucks etc.

Response #19: There were 4 speakers with this comment. The primary implementation mechanisms will be lease requirements and tariff actions, both of which have noncompliance penalties. Any other mechanisms (i.e., incentive programs) that are developed for specific measures will have implementation requirements that will ensure that participants meet their obligations under the programs, with penalties for noncompliance (such as revocation of incentive funding). These requirements and penalties will be specified directly in the implementing leases, tariffs, and other programs rather than in the CAAP.

ORAL Comment#20: Does the Clean Air Action Plan need to be considered under a CEQA process?



Response #20: There were 4 speakers that addressed this comment area. The Boards of Harbor Commissioners for both Ports will make appropriate CEQA findings as required by the law before adopting the CAAP. Staff will recommend findings, including findings to the effect: (1) that the CAAP is a "general policy and procedure making" action, which is not a project for CEQA purposes, 14 California Code of Regulations, Section 15378(b)(2); and (2) that the CAAP is statutorily exempt from CEQA as a "feasibility and planning study" Section 15262; see also Section 15061(b)(3) and Section 15306.

ORAL Comment#21: The Ports should not invoke "overriding considerations" within CEQA.

Response #21: There was 1 speaker that addressed this comment area. The ability to use overriding considerations is vested in the Board of Harbor Commissioners. CEQA law allows this authority for lead agencies to use at their discretion, as necessary, in order to allow flexibility in policy making.

ORAL Comment#22: Ports should pay for the plan out of their operating budget.

Response #22: There were 5 speakers with this comment. Ports are paying a significant amount of funding from Port budgets for air quality improvement programs that include direct emission reduction projects, periodic emissions inventory updates, real-time air monitoring, etc. (See ORAL Comment # 23) The major source of funding for implementation of these measures however is placed on industry. See Frequently Occurring Comment Responses #7 and #13.

ORAL Comment#23: What percent of the Ports' operating budget is used to address pollution? It's too small an amount.

Response #23: There was 1 speaker with this comment. The Port of Los Angeles 2006-2007 operating budget is \$259 million. Of this, \$42 million is allocated for environmental programs. This represents 17 percent of POLA's operating budget. The Port of Long Beach 2006-2007 budget includes \$90 million for environmental programs including \$20 million for the CAAP. This represents nearly 19 percent of POLB's \$474 million 2006-2007 total budget.

ORAL Comment#24: PierPass not a good thing - increases pollution.

Response #24: There were three speakers expressing this opinion. The PierPass Program was designed as a congestion relief strategy. PierPass' goal is to reduce peak congestion on freeways and roads serving the Ports by redistributing some of the truck trips that would normally occur between 8am-5pm to off-peak hours. By redistributing existing trips, PierPass improves traffic conditions particularly on Interstate 710. Since its inception, PierPass has moved approximately one-third of all truck trips to off-peak hours. While air quality improvement is not a primary goal of PierPass, congestion relief strategies like PierPass have real and significant air quality benefits. Reducing congestion results in better traffic flow,



which can significantly reduce emissions. PierPass does not increase air pollution since the program does not generate any new or additional trips, but reduces air pollution by improving traffic conditions on freeways and roads used by trucks servicing the Ports. The Ports are not aware of any emissions impact analysis specific to this program. Also, risks may differ due to nighttime emissions under more stable meteorological conditions.

ORAL Comment #25: Clean Air Action Plan inadequate in addressing public health crisis and costs. Where are the health protective goals?

Response #25: There were four speakers that addressed this comment area. See Frequently Occurring Responses #10 and #11.

ORAL Comment #26: Need extension for comments.

Response #26: Three speakers requested an extension of the comment period. The Ports granted a 30-day extension for written comments (August 28, 2006). However, stakeholders should keep in mind that the CAAP is a “living” document, and there will be many opportunities to participate in the evolution of this plan and the programs that it generates. See Frequently Occurring Comments Response #4.

ORAL Comment#27: Lease based implementation not aggressive enough.

Response #27: There were three speakers that addressed this comment area. Regulatory agencies (SCAMQD, CARB and EPA) have indicated a strong desire that the Ports utilize the lease negotiation/renegotiation mechanism as an enforceable measure. Lease-based implementation was also one of the key recommended approaches from the No Net Increase Task Force as a leading enforceable emissions reduction measure implementation strategy. The CAAP is designed to use a mix of strategies though, and all legal options are being explored in detail to maximize the success of CAAP measure implementation. CAAP has been amended to include schedules to develop tariffs, where feasible, to expedite controls.

ORAL Comment #28: Health Risk Assessment goal of 10 in million is not stringent enough.

Response #28: There were three speakers that addressed this comment area. The 10 in 1,000,000 excess residential cancer risk threshold proposed in the CAAP is an aggressive criterion, consistent with SCAQMD CEQA guidance. A risk threshold of 0 in 1,000,000 is not a realistic criterion since it would essentially create a prohibition on development not only at the Ports, but basin-wide. All combustion sources emit pollutants that increase risk, and as a result, any project that involves any mobile source has the potential to increase health risk. The Ports will take aggressive action, as detailed in the CAAP, to minimize health risks to the extent possible.



ORAL Comment#29: Support for more on-dock terminal facilities because it reduces truck traffic; Why does the plan only say “we favor on-dock rail” instead of requiring it; Port to rail infrastructure should be required and paid by rail industry.

Response #29:

There were three speakers that addressed this comment area. See Frequently Occurring Response #9.

With regard to financing, it is expected that improvements to on-dock yards inside the terminals would be paid for through terminal leases. See Frequently Occurring Comment Response #13. Improvements outside the terminals will require alternate funding sources. The ports will be seeking contributions from the proposed state General Obligation Bonds through SB 1266 and contributions from industry stakeholders.

ORAL Comment #30: Need a port-wide pollutant significance level, not project-by-project, what will be done about the cases (5,000) that are already experienced at current pollutant levels?

Response #30: There were three speakers that addressed this comment area. This issue will be addressed during development of the San Pedro Bay Standard (SPBS). The SPBS is a cumulative standard for the port area and will facilitate application of a port-wide significance level as requested in this comment. At this time, there is no existing model which to base this San Pedro Bay wide standard and the Ports will be working with the agencies through Spring 2007 to determine the appropriate threshold. In addition, see Frequently Occurring Comment Response #13.

ORAL Comment#31: Questions on Truck retrofit/replacement program and how it will work.

Response #31: There were two speakers that requested additional information on the truck replacement program. The CAAP was revised to provide additional information that better describes measure SPBP-HDV-1 in section 5 of the Technical Report.

ORAL Comment #32: Stated asthma and cancer rates are higher for near port residents than average.

Response #32: There were two speakers that addressed this comment area. Asthma and cancer have multiple and complex causes. The purpose for implementation of the San Pedro Bay Ports Clean Air Action Plan is to reduce emissions and health risks to local residents from pollution caused by port activity.

ORAL Comment #33: Ports should have their own bunkering to provide low sulfur fuels.

Response #33: There were two speakers that addressed this comment area. The marketplace can provide fuel more efficiently to tenants than a public agency; this suggestion is not an efficient way to supply fuel to tenants in that costs and logistics would be higher/more



complex than letting market forces provide supplies. The CAAP measures SPBP-OGV3 and SPBP-OGV4 will require the use of low sulfur fuels for vessels. These measures include a fuel availability analysis, to be completed by the end of 2007.

ORAL Comment #34: Lot of loophole wording for commitment but strong statement about support for growth in the plan.

Response #34: There were two speakers that addressed this comment area. The CAAP is being implemented to ensure that inevitable growth in port throughput does not adversely impact neighboring communities and the region beyond. See response to ORAL Comment #9. Each CAAP measure is a commitment to pursue emission reductions in the respective category, where some categories are new equipment and others address in-use, or existing, equipment. The CAAP was revised to complete the placeholder blanks in the draft version, providing firm timelines and targets for CAAP measure implementation. See Frequently Occurring Comment Response #14. The stringent and sometimes technology-forcing nature of many of the measures requires that a certain amount of flexibility is built into them to allow the ports to react to new information. For example, new technologies (or new uses for existing technologies) may become available or proposed technologies or methods may be proven infeasible. The plan has been written to include commitments to implement effective emission reduction measures and also to include the flexibility to adjust the measures as needed to meet equivalent or greater emissions reductions.

ORAL Comment #35: Would AMP aggravate residential power supply shortage during hot summer days?

Response #35: There were two speakers that addressed this comment area. The Ports are working with their respective electricity suppliers to address this issue.

ORAL Comment#36: Support Aggressive use of Tariff.

Response #36: There were two speakers that addressed this comment area. See Frequently Occurring Response #3.

ORAL Comment#37: What is the impact of Clean Air Action Plan on other Ports' Environmental Plans?

Response #37: There was one speaker with this comment. The CAAP is a policy document that will be a road map to guide future projects to address any air quality mitigation requirements.

ORAL Comment#38: Truckers and public are getting the short end.

Response #38: There was one speaker with this comment. A huge percent of the budget for CAAP implementation is dedicated to achieving emission reductions from trucks. Further, the CAAP itself was designed to maximize the benefit to the public of the emission reduction strategies therein.



ORAL Comment#39: Public outreach not good.

Response #39: During the first public meeting, one speaker said that not many public members had heard about the first public meeting. However, the four public meetings that were held were very well attended and the Ports received hundreds of written comments in addition to the oral comments received at the meetings. Further, the CAAP was issued in six languages in order to maximize its exposure and the Ports extended the public comment period by an additional 30-days to accommodate public requests. Further, copies of the CAAP were available at public libraries throughout the local community and the first Long Beach public workshop was televised on local access cable and webcast from the City of Long Beach website.

ORAL Comment #40: Gateway Cities Program not effective.

Response #40: There was one speaker that addressed this comment area. The Ports disagree with this comment. The Ports believe that the Gateway Cities Program has been successful within the constraints it is required to work within. CAAP measure SPBP-HDV1 will investigate all available options for implementation, including the Gateway Cities Program and the need to eliminate existing constraints in order to ensure that the program is scalable. Any deficiencies in the program that are found would be addressed in the new program that is ultimately implemented for this measure.

ORAL Comment #41: Support port expansion with flexible mitigation measures.

Response #41: There was one speaker that addressed this comment area. The Clean Air Action Plan is designed to develop mitigation measures and incentive programs necessary to reduce air emissions and health risks while allowing port development to continue. The range of measures listed in CAAP indicates the flexibility in the plan to better assist the Ports and their customers in their consideration of new and redeveloped projects. In the CAAP, the Ports have compiled all currently feasible emissions control measures to reduce emissions from various Port-related emissions sources. Of course, Ports will consider additional measures or future new technologies that may emerge and provide equivalent or greater emissions reduction results.

ORAL Comment #42: Alameda Corridor concept not working-no reduction in truck traffic.

Response #42: Containers that are transported through on-dock rail systems have to go through the Southern Pacific San Pedro Branch along Alameda Street. The pre-Alameda corridor rail system would not have been able to handle the increased on-dock rail use. The Alameda Corridor (Corridor) has resulted in several environmental mitigation and capacity enhancement features as described below:



- The Corridor is 22 miles of track with train speeds of 40 miles per hour. The Corridor consolidated four branch lines with speeds near 10 miles per hour.
- Train traffic along the corridor has increased from 39 trains per day in 2002 to 47 trains per day in 2005.
- The ratio of container transport by train versus truck along the corridor has increased from 2:1 to 3:1.
- The corridor eliminated 200 grade crossings which in turn eliminated vehicular idle emissions at those crossings.
- The Corridor has reduced train stops which in turn reduced train emissions by 75%.
- The Alameda corridor is the primary mitigation measure for increased on-dock rail use. In 2005, the on-dock container traffic exceeded the pre-Alameda Corridor capacity and without the Corridor there would have been a significant increase in truck traffic.

According to Alameda Corridor Transportation Authority, the Corridor has resulted in a 518 tons per year reduction of NO_x and 21 tons per year reduction in PM emissions in the year 2005.

ORAL Comment #43: The CAAP should also reduce CO₂ and other greenhouse gas (GHG) emissions.

Response #43: There was one speaker that specified this comment area. See Frequently Occurring Comments Response #25.

ORAL Comment #44: Would like to see an independent consultant or environmentalist group on the panel to judge the Plan and participate in public meetings.

Response #44: There was one speaker with this suggestion. See Frequently Occurring Comment Response #4.

ORAL Comment #45: Plan progress should be measured in terms of "more healthy people".

Response #45: There was one speaker with this suggestion. The Clean Air Action Plan is designed to develop mitigation measures and incentive programs necessary to reduce air emissions and health risks to the local communities. The plan will be monitored by a combination of the milestones specified in each plan measure and the periodic emissions inventory updates that will be developed for port operations.

ORAL Comment #46: Why are NNI and ARB Growth rates higher than Clean Air Action Plan Growth rates?

Response #46: There was one speaker with this question. CAAP uses the CARB growth factors contained in the Goods Movement Plan (GMP), which is based on the most up-to-date information available to CARB at the time they completed their work on the GMP. It is



noteworthy that the growth factors used for Ocean Going Vessels, currently the biggest contributor towards emissions from all ports sources, are same as used in NNI.

ORAL Comment #47: IMO Standards are not stringent and shouldn't be relied upon for meaningful reductions; speaker quoted many other sources to support this.

Response #47: There was one speaker with this comment. The Ports agree that the IMO standards are not stringent enough. Under CAAP, the Ports will be pushing for more stringent IMO standards, since IMO is the only option for international standards that will lead to global reductions. It may not currently promulgate the most stringent standards, but it is the only mechanism through which the Ports may work for more stringent standards that apply globally. As noted in the CAAP, there are a number of different approaches, including the support of more stringent IMO standards, being implemented to ensure a successful CAAP result. However, the Ports are not waiting for IMO to develop standards to meet CAAP air quality goals.

ORAL Comment #48: How much smoke/steam coming out of OGV breather pipes; what is the exposure of this to workers?

Response #48: There was one speaker with this question. It is believed that the speaker is referring to "breather pipes" or pressure relief systems for fuel tanks. Generally, this system is to allow venting/breathing of the fuel tanks when they are filled and additionally for pressure relief should the pressure (due to heat) in the tank become higher than the pressure relief valve on the breather pipe. It is believed that bunkering would be the primary reason for emissions to be discharged through this system. Due to the low volatility of bunker fuels, the volatile organic compounds (VOCs) levels associated with the limited bunkering at the ports is minimal.

ORAL Comment #49: Public Education is needed regarding pollution sources and how, as consumers, people pollute

Response #49: There was one speaker with this comment. The Ports agree public education is important in this area.

ORAL Comment #50: Rail industry has contributed significant effort to reduce emissions and looks forward to working with the team.

Response #50: There was one speaker with this comment. Comment noted.

ORAL Comment #51: Supports the use of LNG.

Response #51: There was one speaker with this comment. Comment noted.

ORAL Comment #52: Support for truck engine retrofit systems.

Response #52: There was one speaker with this comment. Comment noted.



ORAL Comment #53: Reservations expressed about the efficiency of fuel switching and availability of low sulfur fuel.

Response #53: There was one speaker with this comment. Implementation of SPBP-OGV3 and SPBP-OGV4 will include an analysis of market availability and technical and safety issues. These measures will require some work on the part of affected parties to implement, and some market adaptation will have to take place regarding availability of the appropriate fuels. However, the Ports believe these are workable measures and will take steps to implement them accordingly.

ORAL Comment #54: Supports truck fleet turnover.

Response #54: There was one speaker with this comment. Comment noted.

ORAL Comment #55: Do not support tweaking of Plan; need to begin implementation now.

Response #55: There was one speaker with this comment. The Ports received significant comments from the general public, community groups, environmental associations and industry stakeholders that deserve response and the CAAP will be revised as appropriate to address these comments. However, implementation of the CAAP will not be stalled by this process.

ORAL Comment #56: Include other technologies such as urban forestry, nano-technology, etc.

Response #56: There was one speaker with this comment. The Ports will consider all technologies that could potentially contribute to the overall CAAP goals. The key mechanism to evaluate such technologies is the CAAP's Technology Advancement Program as described in section 5 of the Technical Report and in Frequently Occurring Comment Response #32.

ORAL Comment #57: Question on documents mailed to residents by www.cleanports.org, do the Ports know about this group?

Response #57: There was one speaker with this comment. Question noted. The Ports are not knowledgeable about this group beyond the information provided in the mailers.

ORAL Comment#58: Long Beach City Council was not briefed prior to this public briefing.

Response #58: There was one speaker with this comment. A special presentation on the plan was made to the Long Beach City Council on August 1, 2006.

ORAL Comment#59: Likes and support the Clean Air Action Plan, challenges neighbors to get involved and support the plan.

Response #59: There was one speaker with this comment. Comment noted.



Final 2006

San Pedro Bay Ports Clean Air Action Plan Comments Compendium

ORAL Comment#60: Los Angeles Alliance for a New Economy (LAANE) is an organization that expressed a willingness to work with Ports to develop a better HDV program that considers the truckers.

Response #60: There was one speaker with this comment. Comment noted.

ORAL Comment#61: The Federal government should pay for this plan since the whole country benefits from goods moved through these ports.

Response #61: There was one speaker with this comment. The Ports agree that the federal government should share in the burden of reducing emissions from port-related sources. However, in the absence of such funding, other mechanisms must be developed to expeditiously reduce emissions. See Frequently Occurring Comment Responses #7 and #13.