



FREQUENTLY OCCURRING COMMENTS RESPONSES

1: Support a strong, aggressive Clean Air Action Plan from the Port of Los Angeles and Port of Long Beach.

Response: The Ports recognize that their ability to accommodate the projected growth in trade will depend upon their ability to address adverse environmental impacts (and, in particular, air quality impacts) that results from such trade. The Clean Air Action Plan (CAAP) identifies mitigation measures and incentive programs necessary to reduce air emissions and health risks while allowing port development to continue. The San Pedro Bay Ports are committed to expeditiously and constantly reduce the public health risk associated with port-related mobile sources, and implement a program within five years that will achieve this goal.

2: The Ports are a significant contributor to Southern California's air pollution and this is one of the reasons for the South Coast Air Basin being in "non-attainment".

Response: The Ports acknowledge that port-related operations contribute significantly to Southern California's air pollution. Figures 1.6 through 1.8 in the Technical Report identify port-related source contributions to Basin emissions for the baseline year. The Ports recognize that in the future their contribution to the Basin emissions will increase over time if uncontrolled as other sources like stationary and area sources are further regulated. Based upon the recently released draft 2007 AQMP from SCAQMD, Figures 1.9, 1.10, and 1.11 in the Technical Report show the estimates for 2020 of the port-related sources compared to all other emissions in the basin. These projections predict that port related contributions will be significantly higher than the figures shown for the baseline year. Therefore, action must be taken now in order to help the basin meet its air quality goals and to protect public health.

3. The Plan requires revision to require immediate implementation of the strategies through tariffs, fees, or otherwise without delay.

Response: The ports are proposing aggressive emissions reduction requirements that in most cases accelerate regulatory requirements. It relies primarily on leases. However, the Plan also proposes other implementation mechanisms such as tariffs, fees and other strategies to accelerate emission reductions. The Ports believe this plan represents their most aggressive approach available for addressing emission reductions.

4. Writing of the CAAP failed to include the Public, Stakeholders, Medical and Scientific experts.

Response: The Ports have provided for significant public/stakeholder involvement in the development of the CAAP. In addition, this plan was built upon earlier work, including the public efforts of the No Net Increase Task Force.



The public was invited to a series of four public meetings that were attended by representatives from each Port as well as representatives from EPA, ARB and SCAQMD. This panel listened to extensive public comment and addressed specific questions from the public that were submitted in writing at each meeting. These public comment meetings were recorded and/or transcribed by court recorder for the record, which is available for public review upon request. Written summaries of each meeting were developed by Port staff and these meeting summaries were compiled into this comments response document, formalizing the Ports' response to the comments received.

In addition to the oral comments and questions received at the public meetings, the Ports accepted written comment submittals for staff consideration through August 28, 2006. Each port established an e-mail address to facilitate the submittal of written comments. A separate response document similar to this was prepared to address written public comments. In addition, follow-up meetings were conducted by Port staff upon stakeholder request as appropriate.

The Ports sought input from stakeholders through the conduct of above mentioned public meetings and extended comment period after the release of the draft plan. The changes in the revised draft plan reflect many of these comments that the Ports have received. In addition, the revised draft final along with the Ports responses to oral and public comments are being released for stakeholders review prior to Harbor Commissioners meeting to consider adoption of the plan.

As noted in the CAAP, periodic updates to the plan will be issued, at a minimum, on an annual basis, to track measure implementation progress and stakeholders review and comments. These updates will include annual updates to the Ports' emissions inventory, the best measure of the CAAP's effectiveness. All of these actions will be taken with public disclosure.

5: The Ports must provide backstop measures in the event that the assumptions prove false. The backstop measures should achieve the same estimated emissions reductions as the CAAP measure.

Response: The Ports intend to work cooperatively with EPA, CARB and SCAQMD to make sure that the goals of the plan are met. The Ports expect that the Clean Air Action Plan will be the basis of control measures incorporated into the State Implementation Plan through the SCAQMD's AQMP. Due to the close coordination with SCAQMD and CARB, the Clean Air Action Plan will, it is hoped, represent the joint approach for reducing the "fair share" of emissions associated with port-related operations. It is the Ports' understanding that the SCAQMD's AQMP will include backstop measures to ensure emissions reductions in the CAAP are achieved in the event that the estimates fall short. In addition, CARB has announced several rulemaking processes that will also serve to backstop the CAAP.



6: The Ports must estimate the emissions reductions from every control measure, including those for locomotives and harbor craft.

Response: At this time, based on a number of variables, emissions reductions from locomotives and harbor craft cannot be quantified. There are uncertainties related to the implementation of line haul locomotive measures (RL2 and RL3). As stated under the RL2 milestones in Section 5.5, once the plan is approved, the Ports will meet and confer with representatives of the rail industry to draft a strategy for implementing the line haul locomotive measures. RL3 will be implemented for new and redeveloped rail yards, for which no schedule is currently defined. Once the implementation mechanisms are finalized and the 2005 locomotive emissions inventory is available, emissions reductions will be quantified and incorporated into future updates of the plan under the “living document concept”.

7: CAAP must support user fees as a funding mechanism for the Plan.

Response: At present, significant portions of the Clean Air Action Plan remain underfunded. As a result, the Ports are exploring various mechanisms to achieve the goals outlined in the Clean Air Action Plan. One mechanism that could alleviate the funding shortfall is the application of impact fees associated with the movement of cargo or sources (i.e., trucks, locomotives, vessels, etc.). Staff is committed to evaluate the use of fees to accelerate emission reductions from all source categories. However, for fees to achieve the desired results, they must be structured appropriately. Outlined below are principles that the Ports will consider when crafting any fee with the goal of reducing pollution.

- 1) The fee should target the source of pollution, not cargo in general, and the fee must be higher for those individual sources that cause the greatest impact, while bypassing those sources that meet clearly defined goals/standards. For instance, a truck that does not meet the goals of the Clean Air Action Plan could be assessed a fee based on how old and/or dirty that truck was; while a clean truck meeting the goals could assessed no fee or a small administrative fee necessary to cover the costs of monitoring compliance.
- 2) Fees collected should be used to clean up the source that generated the fee (i.e., fees assessed against a dirty truck should fund a retrofit or replacement truck).
- 3) Costs should ultimately be borne by those who benefit from goods movement. To the extent possible, fees should be shifted to the beneficial cargo owners (BCO). Programs similar to the successful PierPass program provide an example of how this can be done.
- 4) When a specific program achieves its goal, the fee must end. Broad-based fees that have no defined use may fail to garner sufficient support to be successful. In addition, they undermine the goals of the program by not rewarding those who achieve the goals.



These principles establish a framework for the successful use of fees. They ensure success in two ways. First, the program generates the funding necessary to achieve the emission reduction goals. Second, it holds the BCO accountable for their shipping decisions, making them pay the price for dirty modes of shipping and financially encouraging them to make more environmentally sound shipping decisions. While these principles are not absolute, adherence to them will more likely result in reduced emissions and increase the chances of broad-based support.

8: In order to maximize reductions in health risk, the Ports must commit to adopting SCAQMD and CARB land-use policies in their lease agreements and CEQA projects.

Response: Land-use decisions are an important factor in mitigating impacts from port operations. However, the Ports do not make land-use decisions outside their respective Harbor Districts. Outside the Harbor Districts, land-use authority is vested in Planning Commissions and Cities.

9: The Ports must adopt resolutions that favor on-dock rail over near-dock rail facilities.

Response: The Ports share a goal of maximizing the use of on-dock rail as demonstrated through the Ports investments in on-dock infrastructure. Approximately 40% of the containers (imports/exports and westbound empty containers) are transported to/from the Ports of Long Beach/Los Angeles via train, via either on-dock or off-dock facilities (current on-dock usage is about 25% of total throughput through the Ports). Approximately 10% of all containers are transloaded for ultimate non-local delivery either via truck or rail. Consequently, 60% of the containers need to come through the POLB/POLA simply because of their origins/destinations, and need to move via truck.

The Ports plan is to maximize the use of on-dock rail as an effective way to limit emissions associated with operation of on-road trucks and rail yards near residential areas. Several factors effect use of on-dock rail, such as: shipper and steamship line logistics (e.g. transloading, transportation costs, etc.), railroad operations (equipment availability, train schedules, and steamship line contracts/arrangements), terminal operations/congestion, rail infrastructure outside the terminals within the Ports area, and on-dock railyard capacity. To accommodate projected increases in intermodal traffic, additional rail infrastructure beyond what currently exists needs to be constructed in both Ports. Rail infrastructure consists of on-dock railyards and trackage outside the terminals that connect with the Alameda Corridor. This additional rail capacity is important to maximize use of the Alameda Corridor, and consequently reduce truck trips.

Some of the rail infrastructure improvements can be constructed within the existing land area to marginally increase capacity. These projects include mainline track improvements where feasible, centralized train control (CTC) where feasible, and other in-port facilities (e.g., Alameda Corridor Terminus/Pier B Street Railyard expansion in the Port of Long Beach). Capacity of the existing on-dock railyards, can also be increased through expanded hours of



operations and improved efficiency in operational procedures. However, these minor physical improvements and operational changes are inadequate to accommodate the long-term cargo forecasts. Existing railyards need to be expanded, and new yards need to be constructed. However, the existing railyards cannot be expanded without additional land area. It is also important to note that although railyard expansions are needed, there is also a practical limit. The maximum potential size of an on-dock railyard is finite and dependent upon the size and shape of the overall terminal, which requires a balance between container yard acreage and rail yard acreage. The railyard cannot impinge upon the other terminal areas/operations (e.g., container cranes, gates, etc.).

If the proposed rail infrastructure is constructed within the Ports, it is estimated that approximately 30% of the proposed future throughput (which represents capacity) can be accommodated via on-dock rail. Therefore, approximately 10% of total throughput would move via off-dock rail.

10: Any HRAs conducted as part of CEQA or under CAAP should assess the level of cancer risk, as well as non-cancer risks from port operations, and evaluate cumulative risk.

Response: Under CAAP it is the Ports' goal to establish standards to reduce toxic pollutants such as DPM to acceptable levels and criteria pollutants to the levels that will assure that port-related sources decrease their "fair share" of regional emissions to enable the South Coast Air Basin to attain state and federal ambient air quality standards. Inclusion of toxic as well as criteria pollutants will ensure reduction in cancer as well as non-cancer related risk. Since, one of the foundations of CAAP is the focus on lease amendments/renewals and California Environmental Quality Act (CEQA) evaluations as mechanisms to establish provisions and requirements in leases consistent with meeting the CAAP goals, the Ports are ensuring that any HRA conducted as part of CEQA or under CAPP will maximize the reduction of public health risk, criteria pollutant mass emissions reductions, and meet the stated goals.

In order to evaluate cumulative risk, the Ports, first, need to establish San Pedro Bay Standards for reduction in health risk and "fair share" of criteria pollutants. Discussions between the Ports and the regulatory agencies to better define both a toxics health risk standard and the criteria emissions reduction standard ("fair share") for the San Pedro Bay have already begun. The goal of these discussions is to develop and present the agreed upon San Pedro Bay Standards to the Ports' Boards for their approval by Spring 2007. It is the goal of the Ports to establish these standards as soon as possible in order that they may be considered in the CEQA documents for a number of upcoming development projects. Due to the critical nature of these standards, the Ports and regulatory agencies will work together expeditiously to deliver sound proposals to the Boards as soon as possible



11: CAAP's Project Specific Standards to reduce criteria pollutants should go above and beyond what CEQA requires to help achieve attainment and health protective emissions levels.

Response: The "San Pedro Bay Standards", "Project Specific Standards" and "Source Specific Performance Standards" as described in Section 2.2, are inter-related. Compliance with the Project Specific Standards may require that an individual terminal go beyond the Source Specific Performance Standards or advance the date of compliance with those performance standards. In addition, projects that meet the Project Specific Standard associated with health risk, must also meet the criteria pollutant emissions reductions associated with their "fair share" of regional emissions, and health risk reductions, as stated in the San Pedro Bay Standard. Since, the Ports have identified CEQA is one of the primary implementation mechanism for CAAP measures for new leases or upcoming redevelopment projects, in some cases CEQA requirements might be more stringent than what is required under normal CEQA guidelines, in order to meet the Port's Standards.

12: The Ports need to define what constitutes an appropriate "fair share" as articulated in Principle (4) of Section 1.5 in the Technical Report.

Response: The Ports and the agencies anticipate building upon modeled 2007 AQMP estimates for developing overall San Pedro Bay emissions targets for NO_x, SO_x and PM, with targets and milestones for 2014 and 2020. These targets will establish the San Pedro Bay Ports' "fair share" of regional emissions reductions. These targets will be a valuable tool for long-term air quality planning, aiding the Ports and the agencies with evaluating the long-term cumulative effects of future projects.

Discussions between the Ports and the regulatory agencies to better define both a toxics health risk standard and the criteria emissions reduction standard ("fair share") for the San Pedro Bay have already begun. The goal of these discussions is to develop and present the agreed upon San Pedro Bay Standards to the Ports' Boards for their approval by Spring 2007. Due to the critical nature of these standards, the Ports and regulatory agencies will work together expeditiously to deliver sound proposals for these standards to the Boards as soon as possible in order that they may be considered in the CEQA documents for a number of upcoming development projects.

13: Make polluters pay their fair share.

Response: Through the implementation strategies, this Plan shifts the cost of emissions reductions to the goods movement industry. Through leases, tariff changes, and fees, the Ports expect that terminal operators, shippers, and beneficial cargo owners will need to expend significant funds to achieve the goals of the Plan. The Ports themselves will also be contributing substantial funds particularly related to on-road heavy duty trucks and shore-side electrical power infrastructure.



14: Blanks should be filled in.

Response: The draft plan had placeholders for timelines. The Final Plan has set the schedule and defined the implementation timelines based on additional evaluation and review. These implementation timelines are identified as “Milestones” in the Technical Report.

15: To revise the CAAP every year is important but not enough. We need a long-term vision. Indeed, without a viable long-term vision, many measures that take years to implement may be precluded from consideration because they do not fall within the five-year window of this Plan.

Response: The primary purpose of the Plan is to address the near term needs to address immediate emissions reductions. The Plan evaluates all potentially feasible measures available in the immediate term, and has a program (Technology Advancement Program) to address emerging technologies as they are developed that can be integrated into the Plan as it is updated annually.

In addition, the Ports have a longer term vision. As defined in the CAAP, through the San Pedro Bay Standard, the long term vision is to reduce criteria pollutant emissions to levels that will assure that port-related sources decrease their “fair share” of regional emissions to enable the SoCAB to attain state and federal ambient air quality standards and to reduce public health risk from toxic air contaminants associated with port-related sources to acceptable levels.

16: The CAAP, as currently outlined, will not achieve enough reductions to return port emissions back to 2001 levels.

Response: When fully implemented, the CAAP is estimated to reduce emissions below 2001 levels of emissions before 2010 for NO_x and DPM. These emission reduction estimates include the effect of growth by using the growth rate assumptions from the CARB’s Goods Movement Plan. Please refer to Tables 6.1 through 6.2 and Figures 6.1 through 6.2 in the Technical Report. For further information, the CAAP also includes a comparison to the No Net Increase Task Force Report, detailed in Table 6.5 of the Technical Report.

17: Principles and Standards: In order to ensure reductions in criteria pollutants, and prevent an over-reliance on HRAs to gauge air quality and public health, CAAP’s Principles and Standards must include clear, measurable goals to reduce health risk both on and off port lands from toxic air contaminants and criteria pollutants. These goals must be at least as ambitious as those articulated by CARB and SCAQMD, and may include: (1) reducing air pollution levels to 2001 levels by 2010; (2) reducing the health risk from diesel PM by 85%, as compared to 2000 levels by 2020; (3) reducing NO_x emissions by at least 30% by 2015; and (4) further reducing NO_x emissions by 50% by 2020.



Response: All of the measures, by source category, included in the plan, are designed to achieve the maximum possible emissions reductions given the status of various emissions control strategies and the Ports' authority to require the implementation of those measures. Thus the goals for the reduction in criteria pollutants are tied to unit-based replacements or conversion to better technology. As identified in Section 6 of the Technical Report, using the growth assumptions from CARB's GMP and the CAAP assumptions for unit-based improvements, by the fifth year (2011), targeted emissions reductions due to implementation are at least 47% reduction in DPM, 45% reduction in NO_x, and 52% reduction in SO_x from OGV, CHE, and HDV source categories. Currently, there are no health risk standards defined by agencies such as USEPA, CARB or SCAQMD. The Ports have started discussions with the Technical Working Group (TWG) to define San Pedro Bay-wide health risk standards with these agencies as identified in the expanded discussion in Section 2.2. The Clean Air Action Plan contains a milestone for the Ports to develop a San Pedro Bay wide health risk standard with cumulative health risks goals by Spring 2007.

18: The Ports have the legal authority to require control measures through tariffs to maximize emissions reductions under the Plan. Because tariffs can be used to implement uniform rules applicable to all tenants, they can achieve emissions reductions faster than other approaches, and can serve as "backstop" measures in the event that lease-based measures, incentives, or voluntary programs fail to provide the reductions needed.

Response: The Ports will pursue all implementation options available to meet the goals of the CAAP. For example, the Ports are committed to exploring the use of tariffs for implementation of vessel fuel requirements, as stated in the milestone sections for measures OGV3 and OGV4.

It is important to note that many comments were received regarding legal issues, which demonstrates the complexity of the legal issues and the broad dichotomy of legal positions on those issues. For example, some comments take a broad view of the market participant doctrine while others take an exceptionally narrow view, especially as it relates to Tidelands trustees. The ports believe that the market participant doctrine does apply to some of the measures proposed in the CAAP. However, like many of the legal issues raised in the comments, the market participant doctrine analysis is fact-specific and must be looked at measure by measure.

Several comments question the authority of the ports to impose some of the measures within the CAAP. As clearly stated in the CAAP, each individual measure will be further defined and then analyzed from various perspectives, including economic, political and legal, before being adopted and implemented. The legal analysis will include careful consideration of all applicable constitutional and statutory provisions.



The CAAP also clearly states that it is a living document. Some measures may be changed or rejected as they are further investigated and other measures may be introduced. Many comments expressed a preference for detailed legal analysis of specific measures before adoption of the CAAP and before these measures have even been fully developed, but this is clearly not required prior to planning or policy development.

19: The ports have failed to provide a legal analysis of their authority to impose the control measures in the plan. In fact, the Ports acknowledge in the CAAP that “All control measures and implementation strategies/mechanisms are subject to further legal analysis by the City Attorneys of the respective ports.”

Response: See Response #18

20: We have numerous concerns regarding trading schemes, especially that of MGMC, and urge the Ports not to consider trading as an implementation mechanism for CAAP. Pollution trading programs generally limit public participation in the environmental decision making process.

Response: 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. Although, the Ports do not currently anticipate using market trading mechanisms for Plan implementation, the Ports will consider all mechanisms based on their ability to achieve the necessary emission reductions as rapidly and cost-effectively as possible.

21: The HDV1 measure should establish clear interim as well as final emissions reduction goals. Interim goals will allow this measure to be evaluated each year. Inserting goals will provide a clear indicator of progress and will provide feedback if a change in strategy is necessary.

Response: The goal of the HDV1 measure is to expedite the fleet transformation to “clean trucks” by replacing all frequent and replacing or retrofitting semi-frequent caller container trucks servicing both ports by the end of 2011. This measure, like all measures in the CAAP, does not establish arbitrary goals. Rather, it focuses on unit-based goals that define achievable emission reductions from each source category. The benefits of this program will be quantified and reflected in the annual updates to the Ports’ HDV emissions inventories. Further, progress toward achieving the truck fleet modernization unit-based goals will be monitored each year as part of the Ports’ CAAP performance tracking and reporting.



22: The Ports should ensure that the 0.1% S requirement on auxiliary engines is implemented.

Response: The Ports believe that taken together, OGV3 and OGV4 go substantially beyond the requirements of CARB's auxiliary engine rule. OGV3 requires 0.2% S fuel in auxiliaries during the early years of the Plan, when the CARB rule requires use of 0.5% S fuel in auxiliary engines only. Once CARB's rule requires 0.1% S in 2010, vessel operators will be required to comply with that level. The Plan does not take credit for this change. Under measure OGV3, the Ports will be performing a feasibility study and will make sure that the fuel necessary under this measure is available. The CARB and the Ports' share the same goal of ensuring that 0.1% S fuel is available in 2010 to be utilized in auxiliary engines. In order to avoid duplication of effort and resources, the Ports will work with CARB staff on their feasibility assessment study.

23: Will requirements be implemented on a case by case basis or will uniform requirements based on fixed percentages be established (for any of the measures)?

Response: When measures are implemented through leases, each lease will be negotiated on a case-by-case basis. Every port facility has unique operations, and this approach allows for the greatest flexibility for achieving the goals of the CAAP. Setting fixed percentages for uniform application will not always achieve the greatest emissions reductions. For example, requiring a fixed percentage of calls to cold-iron does not necessarily achieve the greatest emission reductions and can even work against the goals of the CAAP. Where uniform application of a measure is appropriate, tariffs are being considered.

24: Pollution from all regional goods movement activities, including those in the inland distribution centers, warehouses and intermodal railyards, should be addressed together with the equipment at the Ports of Los Angeles and Long Beach.

Response: Inland distribution centers, warehouses and intermodal railyards are outside the control of the Ports. Port authority is applicable to tenant operations within the harbor districts. The USEPA, ARB, and SCAQMD are the agencies who have jurisdiction over broader regions. It is the Ports' hope that these agencies will continue to build upon the Clean Air Action Plan process to formulate regional measures. In addition, it is important to note, much of the emissions reductions from the control measures within the Plan will have benefits over the broader region.



25: Will Green House Gases be addressed in the CAAP?

Response: In addition to the focus on DPM, oxides of nitrogen (NO_x), and oxides of sulfur (SO_x), greenhouse gases (such as carbon dioxide, methane, etc.) are also an important consideration when evaluating emissions from mobile sources, since they potentially have a global effect. While the immediate purpose of this Clean Air Action Plan is to address emissions that affect public health risk on a local basis, it is important to note that none of the emissions mitigations measures proposed in this plan will cause an increase in greenhouse gas (GHG) and that some, in fact, will reduce GHGs. Further, state-wide greenhouse gas emission reductions are expected to be achieved through AB 32, which was signed into law in September 2006, requiring CARB to develop regulations and market mechanisms to implement a cap on greenhouse gas emissions from stationary sources that will reduce California's greenhouse gas emissions to 1990 levels by 2020. In addition, the Port of Los Angeles has joined the California Climate Registry which requires the Port to estimate Green House Gas Emissions from various port operations by 2007.

26: The CAAP should maximize the utilization of alternative fuels like LNG to reduce the mobile emissions problems of NO_x, PM, and toxics.

Response: The Ports' Plan is generally fuel neutral and the choice of whether or not to convert from diesel to alternative fuels like LNG is ultimately the decision of the equipment or vehicle operators. Through the Plan, the Ports are attempting to ensure that whatever the choice, that the lowest emitting technology, within a specific fuel type, is purchased. That being said, the monetary incentives offered by the Ports, the SCAQMD and the federal government, as well as the establishment of LNG fueling infrastructure, should be sufficient to make LNG a viable option.

27: How will our input be incorporated into the Plan?

Response: Please refer to response #4 . In addition, the CAAP clearly states that it is a "living document". The CAAP will be updated annually and stakeholder input will be encouraged during each update. Based upon the input received and the Port's tracking of the performance of each measure, some measures may be changed to make them more effective and other measures may be introduced.

28: The CAAP needs to consider public health and industry costs.

Response: The Ports did not quantify: 1) new equipment, infrastructure, or increased operational and maintenance costs that the industry may incur or 2) air pollution related health impacts and cost to the public. The CAAP was developed primarily as a tool for the Ports to identify measures to be implemented for reducing air quality impacts from port operations. Therefore, in the context of a planning document for the Ports, only the costs that needed to be considered for the Ports' future budget planning were estimated.



29: The CAAP should be consistent with other state, regional, or local emission reduction plans and rules.

Response: The Ports agree and are working closely with representatives of the Environmental Protection Agency, California Air Resources Board, and the South Coast Air Quality Management District. While the Ports will ensure that the CAAP will not conflict with state, regional or federal rules, specific CAAP measures may go beyond the requirements within those other rules. The Ports also expect that the Clean Air Action Plan will be the basis of control measures incorporated into the State Implementation Plan through the SCAQMD's AQMP. Due to the close coordination with SCAQMD and CARB, the Clean Air Action Plan will, it is hoped, represent the joint approach for reducing the "fair share" of emissions associated with port-related operations. It is expected that CARB's Good Movement Plan and SCAQMD's 2007 AQMP will complement the CAAP.

30: The Ports should work cooperatively with the all of the regulatory and oversight agencies.

Response: The Ports agree and are worked closely with representatives of the Environmental Protection Agency (EPA-Region-9), California Air Resources Board, and the South Coast Air Quality Management District to develop the scope and the breadth of the San Pedro Bay Clean Air Action Plan. The CAAP document is the prime example of cooperation between regulatory agencies and the regulated community where, for the first time, these three government agencies and the two Ports have worked so closely together, to develop a joint plan of action to reduce Port related emissions.

31: The Ports should make a commitment to engage international partners to target pollution from port sources.

Response: Ports have already taken steps to reach out to international trading partners. As an example, Port of Los Angeles has developed a Pacific Ports Air Quality Collaborative initiative with the Shanghai Municipal Port Administrative Center. In addition, the Port of Los Angeles, Long Beach and Rotterdam are taking a leading role to provide an environment and work platform in developing a shore-to-ship power standard through the International Organization of Standards (ISO) Technical Committee 8, Sub-Committee 3.

32: The Port's should consider new technologies (e.g. Maglev, fuel cells, etc.)

Response: A major focus of the CAAP is the Technology Advancement Program, as detailed in Section 5.7 of the Technical Report. It is envisioned that the Technology Advancement Program would be the catalyst for identifying, evaluating, and demonstrating/piloting new and emerging emissions reduction technologies/strategies that could then be utilized in future updates to the Clean Air Action Plan as new control measures, alternatives to existing strategies, or as additional mitigation options for new projects that will ultimately result in significant reductions of DPM, NO_x, and other criteria pollutants.



Final 2006

San Pedro Bay Ports Clean Air Action Plan Comments Compendium

An additional component of the Technology Advancement Program is development of Green Container Transport Solutions. The two Ports have already released a joint RFP for advanced cargo transportation technology evaluation and comparison with regards to container transport to near dock rail facilities. Advance technologies included for evaluation include: linear induction motor systems, electric container conveyor systems including “mag-lev,” freight shuttle systems, aerospace freight options, etc. As part of the scope, the Ports will develop an RFP to undertake design and construction of prototype systems.

The Ports have committed a minimum of \$15 million to this program over the next five years.