

## Comment Letters Received

(September 19, 2017 to October 2, 2017)

*Click on the link to be taken directly to the letter. Attachments referenced in the letters are available upon request.*

[Dependable Global Express \(September 19, 2017\)](#)

[Diesel Technology Forum \(September 19, 2017\)](#)

[Eastern Car Liner \(Americas\) Inc., \(September 19, 2017\)](#)

[J & K Fresh, LLC \(September 19, 2017\)](#)

[The American Lung Association in California \(September 19, 2017\)](#)

[Mike Morra \(September 19, 2017\)](#)

[Tiana Chastain, Clean Energy \(September 19, 2017\)](#)

[Harbor Gateway North Neighborhood Council \(September 20, 2017\)](#)

[San Pedro Chamber of Commerce \(September 20, 2017\)](#)

[CMA CGM \(September 21, 2017\)](#)

[Rskillsta \(September 24, 2017\)](#)

[CLEARFreight Inc. \(September 27, 2017\)](#)

[Mike Todaro \(September 27, 2017\)](#)

[Robert Silence \(September 28, 2017\)](#)

### **ACT Now LA**

[Cynthia Sesso \(September 19, 2017\)](#)

[Eddie Shepherd \(September 19, 2017\)](#)

[Elizabeth Nagaseu \(September 19, 2017\)](#)

[Gala MacNeal \(September 19, 2017\)](#)

[Hadar Feingold \(September 19, 2017\)](#)

[Kevin Simpson \(September 19, 2017\)](#)

[Mark Darnell \(September 19, 2017\)](#)

[Mike Plichta \(September 19, 2017\)](#)

[Robert Mroski \(September 19, 2017\)](#)

[Sisi Borj \(September 19, 2017\)](#)

[Wayne Egner \(September 19, 2017\)](#)

[Andreas Tillmann \(September 20, 2017\)](#)

[Claudia Baker \(September 20, 2017\)](#)

[Craig Plank \(September 20, 2017\)](#)

[Louise Fernandez \(September 20, 2017\)](#)

[Neil Khadim \(September 20, 2017\)](#)

[Poros2000 \(September 20, 2017\)](#)

[Steve Aragon \(September 20, 2017\)](#)

[Tiana Chastain \(September 20, 2017\)](#)

[Albert Matinao \(September 21, 2017\)](#)

[Michael Etter \(September 21, 2017\)](#)



September 19, 2017

Mr. Chris Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Ms. Heather Tomley  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**Re: Draft Final 2017 Clean Air Action Plan Comments**

Dear Mr. Cannon and Ms. Tomley:

Dependable Global Express, Inc. dba DGX and DHX – Dependable Hawaiian Express, Inc., and our 200 employees in Los Angeles depend on the safe, competitive, and efficient movement of cargo through the Ports of Los Angeles and Long Beach for our livelihoods. We are located Rancho Dominguez. We are greatly concerned with several aspects of the Draft Clean Air Action Plan Update which threaten our business and many others, and our customers.

The draft plan's cost is uncertain, analysis of impact on the ports' future competitiveness is absent, certain technologies and fuels are excluded, and the air quality benefits are undefined. We fear that all additional costs will fall to the importers, exporters and service providers. Layering tens of billions of dollars in fees on the supply chain will be disincentive for shippers and cargo owners to use our California gateways.

In comparison to other North American port gateways, Los Angeles and Long Beach have lost market share during the past decade. While the CAAP's goals are laudable and well intentioned, given the hyper-competitive nature of global commerce, we would recommend the following actions by the Ports of Los Angeles and Long Beach be taken before adoption of these new programs:

- Conduct a thorough evaluation of the proposed measures' cost effectiveness and impacts on port competitiveness;
- Include the use of ultra-low emission technologies and all electrification options to achieve significant emissions reductions;
- Receive firm commitments of state and federal monies for research and development options for zero and near-zero emissions equipment, without limitations, before moving forward;
- Fully analyze the significant burden on the Ports' energy system and cyber security threats to both Ports if they were to be fully electrified and the impact to the trade community in the event of power disruption.

Please consider these changes; they are critical to our company and our employees here in Southern California.

Sincerely,  
  
Gloria Serrano  
Vice President - International Services  
DGX

cc: Brad Dechter  
President  
DHX/DGX

September 19, 2017

Gene Seroka  
Executive Director  
Port of Los Angeles  
425 South Palos Verdes Street,  
San Pedro, CA 90731

Mario Cordero  
Executive Director  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**RE: Clean Air Action Plan Update – Comment from the Diesel Technology Forum**

Dear Executive Directors Seroka and Cordero:

I am writing in reference to the updated proposed Clean Air Action Plan (“Plan”) published by the Ports of Los Angeles and Long Beach (POLA/POLB).

By way of background, the Diesel Technology Forum represents manufacturers and suppliers of diesel engines, vehicles and equipment. The Forum is a not-for-profit educational organization dedicated to raising awareness of the clean air and economic benefits of clean diesel technology. More information on the Forum is at [www.dieselforum.org](http://www.dieselforum.org).

The Ports of Los Angeles and Long Beach can achieve the greatest emissions reductions, at the lowest cost in the fastest timeframe, by upgrading or replacing older vehicles and equipment with the latest clean diesel technology. This strategy will do the most to deliver needed emission reductions to sensitive communities most in need of emission reductions in a timely manner. Further, POLA/POLB can achieve significant greenhouse gas reduction capabilities by utilizing renewable diesel fuel in all diesel engines and equipment. Municipalities and business across California are using the fuel today to reduce greenhouse gas emissions at very low cost.

Taken together, this strategy rapidly advances the low-carbon, near-zero emissions goals of the Ports in the fastest way possible.

As currently constructed, the Plan fails to strike the right balance between near term benefits and emphasis on alternative fuels availability, performance and acceptance, scale of adoption and rate of adoption in the Ports service setting. The potential for slowed or impaired progress in achieving clean air and greenhouse gas emissions reduction targets without a balanced fuel, technology and timeline approach is real.

Incentivizing the turnover of older technologies to new clean technologies and fuel now will provide significant short-term emission reductions to help the Ports achieve the remainder of their 2023 NO<sub>x</sub> and particulate matter (PM) targets while generating significant immediate term emission reductions for those sensitive communities located near port facilities and related goods movement facilities throughout the region.

According to the Clean Air Action Plan Update, the ports are well on their way to achieve emission reduction targets. In fact, the ports have already surpassed the 2023 emission reductions for diesel particulate matter and are on their way to achieve the 2023 target for NO<sub>x</sub> reduction. The introduction of clean diesel technology is also an important component of greenhouse gas reduction strategies. A growing number of municipalities and business across California are using renewable diesel fuel in their fleets of heavy-duty vehicles and equipment that significantly reduces greenhouse gas emissions at little cost to equipment owners. The use of the fuel provides the port an immediate term solution to achieve significant greenhouse gas reductions.

### **Clean Diesel Trucks and Off-Road Equipment Will Deliver Immediate Term Benefits for Communities**

Upgrading the fleet of trucks and large off-road equipment, such as switch locomotives and marine workboats, to the latest clean diesel technology will do the most to deliver immediate term emission reductions to sensitive communities located near ports and other goods movement facilities.

#### *Clean Trucks*

Clean diesel delivered the majority of the emission reduction benefits when the Clean Truck Program was implemented in 2012. Clean diesel can further contribute to even more emission reductions today. When the program was implemented in 2012, nine out of every 10 trucks required to meet the model year 2007 emissions standard were powered by diesel. That proportion still holds today. Since then, a new, near-zero NO<sub>x</sub> standard was established for model year 2010. According to the Clean Air Action Plan Update, about 60 percent of the fleet of roughly 16,000 trucks do not come with the technology to meet the latest near-zero tailpipe emissions standard set for model year 2010.

Upgrading these trucks to the latest clean diesel technology will do the most to provide immediate term emission reduction benefits for communities. According to data published by the U.S. Environmental Protection Agency's (EPA) National Port Strategy Assessment, replacing a model year 2007 Class 8 dray truck with a model year 2010 or newer diesel dray truck can reduce NO<sub>x</sub> emissions by 221 lbs. Multiplied over the 60 percent of the truck fleet that does not come with technology to meet the model year 2010 standard, the port could reduce emissions by 2.1 million lbs. of NO<sub>x</sub>. This significant emission reduction could be delivered immediately by technology that is sitting on dealer lots today, which does not require the lengthy and expensive buildout of refueling or recharging infrastructure.

| <b>Estimated MY 2007-2009 Truck Population</b> | <b>Replacement Strategy</b> | <b>Anticipated NOx Reduction (lbs.)</b> | <b>Estimated Cost of Technology</b> | <b>Total Cost of Achieving Reductions</b> | <b>Currently Available</b> |
|--|-----------------------------|---|-------------------------------------|---|----------------------------|
| 9,600  | MY 2010 Diesel              | 2.1 million                             | \$110,000                           | \$1.056 billion                           | Yes                        |
| 9,600  | Battery Electric            | 2.5 million                             | \$220,000                           | \$2.1 billion                             | No                         |

*SOURCE: Nation Port Strategy Assessment: Reducing Air Pollution and Greenhouse Gases at U.S. Ports, U.S. EPA.*

The Clean Air Action Plan Update should provide incentives for the owners of older trucks to purchase new clean diesel models to generate these substantial emission reductions. For example, the Update proposes to allow terminal operators to grant preferential access to ultra-low NOx and zero-emissions trucks. Today, a zero emission option is not available in a Class 8 truck capable of meeting the demanding duty cycle of a drayage truck. While a natural gas option is available to meet the ultra-low NOx standard, the fuel type has not been adopted widely in the dray truck fleet or in the commercial vehicle fleet statewide. Past experience demonstrates that given the choice, drayage truck operators clearly prefer cleaner diesel technology . Excluding the latest clean diesel trucks from eligibility in a potential preferential access scheme will ensure substantial delays in achieving emission reductions for sensitive communities.

The EPA’s National Port Strategy Assessment determines that the most immediate-term impact in reducing emissions from port trucks will occur from replacing older trucks with a clean diesel model, not replacing the latest diesel or natural gas trucks with a zero-emission option.

| <b>Truck Replacement Strategy</b>        | <b>Anticipated NOx Reduction (lbs.)</b> | <b>Current Availability</b> |
|--|---|-----------------------------|
| Replace MY 2007-2009 with MY 2010 diesel | 221                                     | Yes                         |
| Replace MY 2010 with Zero Emission       | 44                                      | No                          |

*SOURCE: Nation Port Strategy Assessment: Reducing Air Pollution and Greenhouse Gases at U.S. Ports, U.S. EPA. Page 46.*

*Clean Diesel Switchers and Harbor Craft*

Replacing the oldest engines found in switch locomotives and harbor craft with the latest clean diesel options delivers significant emission reduction benefits. Much like the model year 2010 standard established for commercial vehicles, similar near-zero “Tier 4” standards are now required of much larger engines that power locomotives and marine workboats. According to the EPA’s National Port Strategy Assessment, replacing a single old engine that powers a switch locomotive with a Tier 4 model can reduce NOx emissions by 37,000 lbs. of NOx and 974 lbs. of PM emissions. Replacing the older engine in the wide variety of marine workboats including tugs and ferries can have equally significant emissions reductions.

| <b>Replacing Older Engines with Tier 4 Option</b>  | <b>Anticipated NOx Reduction (lbs.)</b> | <b>Equivalent to Replacing MY 2007 Dray Trucks with MY 2010 Model</b> |
|--|---|---|
| Tug Boat   | 96,000                                  | 434   |
| Switch Locomotive  | 37,000                                  | 167   |
| Ferry  | 62,000                                  | 280   |
| <i>SOURCE: Nation Port Strategy Assessment: Reducing Air Pollution and Greenhouse Gases at U.S. Ports, U.S. EPA.</i> |   |   |

### **Clean Diesel Technology Delivers Immediate Term Greenhouse Gas Emission Reductions**

One of the benefits of the clean diesel platform is the technology's capability to operate on a range of fuels including advanced biofuels such as biodiesel and renewable diesel fuel. These fuels are considered an advanced biofuel by the U.S. Environmental Protection Agency and are capable of reducing greenhouse gas emissions by at least 50 percent. California is the largest market for renewable diesel fuel that, according to the California Air Resources Board, can reduce greenhouse gas emissions by upwards of 80 percent along with some additional NOx reduction capabilities. Renewable diesel fuel meets the same technical standard as petroleum diesel fuel and can be used in blends as high as 100 percent, or "neat," without any changes to engines, vehicles or equipment and does not require additional refueling infrastructure.

Today, California is the largest market for renewable diesel fuel and users of the fuel have consumed over 250 million gallons of the fuel. The California Energy Commission estimates that by 2020, over 400 million gallons of the fuel will be consumed in California. The cities of San Francisco, Oakland, Sacramento, San Diego, Walnut Creek and others are already exclusively using renewable diesel fuel in their fleets of heavy-duty trucks, buses and off-road equipment. The City of San Francisco, an early adopter of the renewable diesel, estimates that over 10,000 tons of greenhouse gas emissions have been reduced by using renewable diesel fuel to power 632 pieces of equipment and heavy-duty vehicles. The San Francisco Municipal Transportation Authority has eliminated 62,000 tons of greenhouse gas emissions by powering its fleet of almost 1,000 buses using renewable diesel fuel.<sup>1</sup>

The use of renewable diesel fuel is an important component of greenhouse gas reduction strategies. The use of this advanced biofuel across the wide variety of diesel powered vehicles and equipment types found in use in ports can significantly reduce greenhouse gas emissions. Coupled with the latest diesel engine technologies to meet stringent emissions standards for commercial vehicles and off-road equipment, clean diesel is a platform to deliver immediate term emission reductions to communities most in need while reducing greenhouse gas emissions to support goals to reduce CO2 emissions.

Thank you in advance for consideration of these comments. Please contact us at (301) 668-7230 with any questions or concerns.

Very truly yours,

---

<sup>1</sup> 2016 Transportation Technology Deployment Report: San Francisco Clean Cities Coalition. May 2017.

A handwritten signature in black ink, appearing to read "Allen R. Schaeffer". The signature is cursive and somewhat stylized.

Allen R. Schaeffer  
Executive Director



**EASTERN CAR LINER (AMERICAS) INC.**  
**dba ECL AMERICAS**

301 East Ocean Blvd., Suite 270  
Long Beach, CA 90802  
Tel: (562) 513-1170 Fax: (562) 513-1361  
www.eclamericas.com

Bill Christ, Executive VP & COO

19 September 2017

**Mr. Chris Cannon**  
**Port of Los Angeles**  
**425 South Palos Verdes Street**  
**San Pedro, CA 90731**

**Ms. Heather Tomley**  
**Port of Long Beach**  
**4801 Airport Plaza Drive**  
**Long Beach, CA 90815**

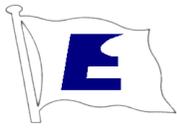
**Re: Draft Final 2017 Clean Air Action Plan Comments**

Dear Mr. Cannon and Ms. Tomley,

Eastern Car Liner (ECL) operates multi-purpose breakbulk vessels between Japan and other Far East Points to/from North America. We have been calling Long Beach every month for over 20 years. In addition, ECL Americas is a US D.O.T. licensed and bonded truck broker. We have maintained our primary North America office here the entire time. As Californians, we care about our regions environment and business climate. We commend both ports for their historical efforts to improve air quality. Indeed we direct our ships to participate in the reduced speed program, and for our truck brokerage works we insist our carriers' trucks are fully compliant.

However, we are greatly concerned with several aspects of the Draft Clean Air Action Plan Update which threaten our business and that of our customers. For ship operations especially, the draft plan's cost is uncertain, analysis of impact on the ports' future competitiveness is absent, certain technologies and fuels are excluded, and the air quality benefits are undefined. Small breakbulk ships such as ours do not comport well with cold ironing power sources. With only one terminal at each of the ports that are truly capable of breakbulk cargo we carry, we already know that plug in power is unrealistic. For each voyage, our ship's would berth anywhere from 204 thru 207. Would power be installed at each berth location? Often there are up to three ships at Pier F. We foresee having to hold the ship at anchorage awaiting berth and power. This means burning fuel and significant schedule delays and costs.

Emission capture and treatment systems have yet to be seen as a viable option. Relative to our ship operating and port call costs, these operations via barge mounted systems would be a significant factor that would seriously affect our commercial viability. Truck mounted systems on the dock would use up vital dock space needed for our type of cargo operations due to the relative small size of our ships (average 120 meters LOA). What would normally be a two shift operation would easily become three shifts meaning more time and costs at berth.



Even if we are able to survive the added ship operational costs, we would have to pass on significant costs to our customers and causing them as well to consider the high costs of continuing trade through Southern California.

Ships are diverse in design and function. We understand the dominant focus is on large container ships and the trucks. As a very small player in the industry with smaller ships, we fear regulations designed for the significant vessels will be difficult at least, and prohibitively expensive at worst, for us to comply with. I predict ECL would change our operations to ports in Oregon, Washington and Canada. Or withdraw completely from the trans-Pacific trades. We ask for continuation or modification of the present exemption for breakbulk ships.

We urge cautious and complete consideration of these changes and all factors before committing to objectives that not totally viable and cannot apply to all ships. Please consider how the proposed measures will impact operational economies and port competitiveness.

Sincerely,

---

Bill Christ, EVP & COO  
ECL Americas  
Representative of Eastern Car Liner, Inc.

CC

- Ms. Bynum, President POLB Harbor Commission
- Mr. Cordero, Executive Director POLB
- Ambassador Martinez, President POLA Harbor Commission
- Mr. Seroka, Executive Director POLA
- Mr. Suetsugu, ECL Marine Technical Department

## Draft Final 2017 Clean Air Action Plan Comments

---

**Time:** Tue, 19 Sep 2017 19:30:53 +0000  
**From:** Lynnette Keffer <lynnette@jkfresh.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
"gene\_seroka@portla.org" <gene\_seroka@portla.org> , "Mario.Cordero@polb.com" <Mario.Cordero@polb.com> ,  
**CC:** "commissioners@portla.org" <commissioners@portla.org> , "louanne.bynum@polb.com"  
<louanne.bynum@polb.com>  
**Subject:** Draft Final 2017 Clean Air Action Plan Comments

**Attachments:** doc02440220170919122706.pdf (521k)

Please see attached. Thank you!

Lynnette Keffer, LCB/CCS

Chief Executive Officer

J & K FRESH, LLC

2101 El Segundo Blvd., Suite 203

El Segundo, CA 90245

TEL: 310-419-8770

FAX: 310-419-8790

lynnette@jkfresh.com

[www.jkfresh.com](http://www.jkfresh.com)



2101 El Segundo Boulevard, Suite 203  
El Segundo, California 90245  
310-419-8770 info@jkfresh.com  
www.jkfresh.com

September 18, 2017

Mr. Chris Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Ms. Heather Tomley  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**Re: Draft Final 2017 Clean Air Action Plan Comments**

Dear Mr. Cannon and Ms. Tomley:

J&K Fresh, LLC and its 25 employees depend on the safe, competitive, and efficient movement of cargo through the Ports of Los Angeles and Long Beach for our livelihoods. JKF is located in El Segundo and represents dozens of fresh produce importers in the Southern California area. JKF's import clients as well as local associated logistic companies, warehouse and trucking firms, employ hundreds, all dependent on the efficiencies of the port. JKF is greatly concerned with several aspects of the Draft Clean Air Action Plan Update which threaten our business and many others, and our customers.

The draft plan's cost is uncertain, analysis of impact on the ports' future competitiveness is absent, certain technologies and fuels are excluded, and the air quality benefits are undefined. We fear that all additional costs will fall to the importers, exporters and service providers. Layering tens of billions of dollars in fees on the supply chain will be disincentive for shippers and cargo owners to use California gateways.

In comparison to other North American port gateways, Los Angeles and Long Beach have lost market share during the past decade. While the CAAP's goals are laudable and well intentioned, given the hyper-competitive nature of global commerce, we would recommend the following actions by the Ports of Los Angeles and Long Beach be taken before adoption of these new programs:

- Conduct a thorough evaluation of the proposed measures' cost effectiveness and impacts on port competitiveness;
- Include the use of ultra-low emission technologies and all electrification options to achieve significant emissions reductions;
- Receive firm commitments of state and federal monies for research and development options for zero and near-zero emissions equipment, without limitations, before moving forward;
- Fully analyze the significant burden on the Ports' energy system and cyber security threats to both Ports if they were to be fully electrified and the impact to the trade community in the event of power disruption.

Please consider this changes; they are critical to our company and our employees here in Southern California.

Sincerely,

Lynnette Keffer, LCB/CCS  
Chief Executive Officer

## Lung Association comments on CAAP

---

**Time:** Tue, 19 Sep 2017 19:25:05 +0000  
**From:** William Barrett <William.Barrett@lung.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Lung Association comments on CAAP

**Attachments:** msg-7403-191.html (3k)  
Lung Association CAAP comments\_9.18.17.pdf (133k)



Good afternoon,

The American Lung Association in California appreciates the opportunity to comment on the Clean Air Action Plan and thanks you for your work on this important effort.

Please let me know if you have any questions or problems with the attached file.

Thank you,

Will

**Will Barrett** | Senior Policy Analyst

American Lung Association in California

1531 I Street, Suite 201, Sacramento, CA 95814

Ph: 916.585.7663 | Cell: 916.607.4543 | Email: william.barrett@lung.org

September 18, 2017

Port of Long Beach  
Board of Harbor Commissioners  
4801 Airport Plaza Drive  
Long Beach, CA 90815

Port of Los Angeles  
Board of Harbor Commissioners  
425 South Palos Verdes Street  
San Pedro, CA 90731

**Subject: Support for Zero Emission Clean Air Action Plan**

Dear Commissioners:

On behalf of the American Lung Association in California, I am writing to express our strong endorsement of the Clean Air Action Plan (CAAP) targets for zero emission vehicles and equipment within the ports and to recommend milestones to achieve a strong ramp up toward the targets. The transition to zero emission freight technologies is necessary to securing clean air and a healthy climate for Californians suffering from smog and soot pollution, and many emission-free options are available now.

California is home to the most difficult air pollution challenges in the United States, largely due to our dependence on fossil fuel combustion in the transportation sector. The California Air Resources Board estimates that the freight sector is responsible for \$20 billion in annual health costs, thousands of deaths, hospitalizations and other health impacts. Reducing the harms caused by the freight sector is a top priority of the American Lung Association as we pursue all possible emission reductions to achieve our air quality standards and climate pollution reduction targets. Following are our comments:

**1) Support zero emission port technologies to save lives and improve health**

Port pollution contributes to increased asthma attacks, reduced lung function in children, increased risk of cancer and premature death. For the communities directly affected by port traffic and operations, these are daily realities that are unacceptable. Therefore, the American Lung Association in California strongly supports the proposed zero-emission targets at the ports of Los Angeles and Long Beach as a critical public health opportunity. We also support the use of incentives to accelerate use of these technologies. Achieving the ports' targets for zero

emission technologies will move us forward to attain smog, soot and climate protection goals.

**2) Adopt clear milestones to achieve success**

The proposal to achieve zero emission drayage trucks by 2035 and zero emission port equipment by 2030 must be guided by clear timetables. Simply setting a goal without an implementation schedule sets up the risk for delay. The ports must begin now with milestones for the phase-in of these technologies to ensure that progress is being made over time. Regular reports on progress toward zero emission goals must be made to the community, and must be coupled with commitments for any required course correction.

**3) Maintain zero emission focus through investment in necessary infrastructure**

The ports must move aggressively to plan for and install the infrastructure needed to service zero emission technologies, whether battery electric or hydrogen fuel cell. The goal of zero emissions and public health protections must be maintained throughout the planning process to ensure that all infrastructure investments advance zero emission goals contained within the CAAP.

**4) Provide regular progress reports to the community**

The American Lung Association encourages the ports to provide ongoing, detailed reports on emission reductions and technology advancement to the public. By providing ongoing progress reports, the ports can become a partner in supporting community health, identify barriers and collaborate on overcoming challenges along the way to cleaner air.

In closing, we urge the Commissioners to adopt clear, strong and direct measures to ensure that zero emission technologies are the standard for the ports to protect air quality and public health, protect the climate and advance technologies that save lives and money. Our organization looks forward to working with you to improve regional air quality and health through reliance on emission-free freight technologies.

Sincerely,

John Yi  
Advocacy Director, Los Angeles



## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Tue, 19 Sep 2017 03:24:56 +0000  
**From:** Mike Morra <mike6540@hotmail.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Attachments:** msg-16441-12.html (2k)



Dear Sirs:

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

I'm a conservative voter from Georgia, but this is a "no-brainer."

Natural gas-powered trucks are the obvious way forward - no matter what you believe about global warming. Natural gas is an American resource that is less expensive and less polluting than diesel. We need to join major world cities like Paris, Madrid, Beijing and Mexico ASAP in banning diesel powered trucks in fewer than 17 years. Federal incentives need to be added to State incentives to accelerate the conversion. And President Trump could be incented to help out by promoting Federal assistance as a boon to American jobs while also creating energy independence.

Good luck,  
Michael Morra

## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Tue, 19 Sep 2017 23:27:08 +0000  
**From:** Tiana Chastain <Tiana.Chastain@cleanenergyfuels.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018

**Attachments:** msg-18888-27.html (4k)  
image001.jpg (2k)  
image002.png (1k)  
image003.png (1k)  
image004.png (1k)



We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

**Thank you,**

**Tiana Chastain**

Manager, Corporate Finance



949.437.1049 (Phone) | 562.774.5401 (Cell)

Tiana.Chastain@cleanenergyfuels.com



## Comment on CAAP from Harbor Gateway North NC

---

**Time:** Wed, 20 Sep 2017 22:36:22 +0000 (UTC)  
**From:** Harbor North <hgnc@sbcglobal.net>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**CC:** Pamela Thornton <chair@harbortownnorth.org>  
**Subject:** Comment on CAAP from Harbor Gateway North NC

**Attachments:** msg-17222-54.html (0k)  
HGNC letter - Clean Air Action Plan.pdf (555k)



Pamela Thornton – Chairperson  
Tim Richardson - Vice Chairperson  
Rosalee Preston - Recording Secretary  
Hannah Woods – Corres. Secretary  
Joan Jacobs - Treasurer  
Mark Lupfer - District 1 Rep.  
Clyde Noguchi - District 2 Rep.  
Reynaldo Paduani - District 3 Rep.  
Betty Hawkins - District 4 Representative



Harbor Gateway North  
Neighborhood Council  
P.O. Box 3723  
Gardena, CA 90247  
(310) 768-3853 tel (310) 538-9654 fax  
[www.harborgatewaynorth.org](http://www.harborgatewaynorth.org)  
[hgnc@sbcglobal.net](mailto:hgnc@sbcglobal.net)

Llewyn Fowlkes - District 5 Rep.  
Marvin Bell - District 6 Rep.  
Janet Mitchell - District 7 Rep.  
Larry J. Morrison - District 8 Rep.  
Deborah Lee – Community Org. Rep.  
Richard Lee - Youth Representative  
Theo Fowles - Outreach Representative  
Eva Cooper-Pace - At-Large Rep.

September 14, 2017

Mayor Eric Garcetti  
City Hall  
200 N. Spring Street  
Los Angeles, CA 90012

Mayor Robert Garcia  
333 W. Ocean Blvd., 14<sup>th</sup> Floor  
Long Beach, CA 90802

Re: Clean Air Action Plan

Dear Mayor Garcetti and Mayor Garcia:

On September 12, 2017, our Board voted 9-0-0 to send the following comments regarding the Clean Air Action Plan. The 110 Harbor Freeway and 105 Freeway cut through our Neighborhood Council area and we are already impacted by heavy truck traffic using those freeways to take goods from the port to locations within our area and beyond.

We support the Ports of Los Angeles and Long Beach completely switching to sustainable and zero emission operating technologies. However, our community cannot wait until the 2035 zero emission goal to breathe less polluted air. Meanwhile, there are numerous sustainable technologies that will become commercially available within the next five years.

Therefore, the Harbor Gateway North Neighborhood Council supports both ports completely phasing out diesel engines in all operations within five years. Trucks and other equipment that use diesel are the largest source of pollution in the Los Angeles Harbor Area. One fuel that can be used to phase out diesel is natural gas. To honor California and Los Angeles' goals to become more sustainable, we urge the ports to seek natural gas from renewable sources before fossil fuel sources. Renewable gas sources include landfills, food waste processing plants and even farms.

One of the City of Los Angeles' sustainability plans includes the Solid Waste Integrated Resource Plan. Part of the plan is to divert 90 percent of waste from landfills by 2025. In order to do this, the Department of Sanitation will expand the collection of organic waste, including food waste. This waste will be harnessed to produce natural gas. In addition, the city's Terminal Island Renewable Energy and Digester Gas Utilization projects already harness natural gas.

The Harbor Gateway North Neighborhood Council urges the Port of Los Angeles to utilize these and other sources of natural gas from the city's waste stream. However, even the combustion of renewable natural gas produces emissions. The Neighborhood Council does not want a renewable gas industry to become entrenched in the ports' operations. Zero emission ports must remain the ultimate goal.

Sincerely,



Hannah Woods, Corresponding Secretary  
Harbor Gateway North Neighborhood Council

cc: Councilmember Joe Buscaino – Council District 15  
David A. Roberts, Director of Economic Development and Planning - Council District 15  
Nathan Holmes, Planning Deputy - Council District 15  
John Jones III, Field Deputy – Council District 15



September 20, 2017

Mr. Chris Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, California 90731

RE: Comments on the Draft 2017 Clean Air Action Plan

Dear Mr. Cannon,

The San Pedro Chamber of Commerce Board of Directors strongly supports a competitive Port complex that uses the newest and cleanest technologies to reduce emissions from ships, locomotive engines, cargo handling equipment and other harbor craft. We applaud the significant progress the Port has made over the last 10 years in reducing emissions and improving air quality in the region. After reviewing the proposed strategies in the 2017 Draft Clean Air Action Plan (CAAP) Update, the Board would like to submit the following comments regarding the plan:

1) A San Pedro Bay Port competitiveness action plan: We support the comments submitted by Biz Fed. The ports of Los Angeles and Long Beach are on target to achieve volumes that haven't seen since 2006 – more than 10 years ago. This reflects over 10 years of no growth and the Ports continuing to lose market share. It is essential to the regional economy that the two Ports remain competitive with shippers. In fact, on page 22 of the CAAP, the document's authors acknowledge the issue of competitiveness: "Keeping the Ports economically competitive amidst this transition to more sustainable goods movement will be challenging."

2.) A cost-effectiveness study: We also agree with Biz Fed regarding the need for a study on the cost effectiveness of the plan: The "Economic and Workforce Considerations for the Clean Air Action Plan Update" estimates it will be three to five times more expensive for the industry to implement this plan than previous efforts. Specifically, the CAAP estimates it will cost up to \$14 billion and seeks to implement some zero-emission equipment that is still in development. We ask that as a part of the requested study, the Port evaluate the incremental cost effectiveness in \$/ton of emissions removed between near zero and zero emission technologies, and include the replacement costs to meet requirements vs. life cycle for technologies. We are request that the Ports coordinate with the South Coast Air Quality Management District to ensure that both public and private financial investments are prioritized in a manner that will achieve the most emission reduction benefits for the South Coast Basin.

3) Flexibility: Allow additional flexibility in the plan to accommodate available near zero-emission technology, and different fuel types, including natural gas and renewable natural gas to achieve results in the more immediate future, rather than relying on untested and developing technologies.

4) Cleaner, Sooner: Accelerate implementation of parts of the CAAP by allowing for currently available fuels and technologies (alternatives to diesel) to be implemented so that the Port can achieve significant emission reductions, particularly on heavy duty trucks, in a much shorter time period.

Thank you for the opportunity to engage in the public process on the Draft Clean Air Action Plan Update and we appreciate your consideration of our comments. Working together, we can achieve a competitive and environmentally sustainable Port complex.

Sincerely,

Tim McOsker  
Chairman  
San Pedro Chamber Board of Directors

Elise Swanson  
President/CEOS  
San Pedro Chamber of Commerce



## Draft Clean Air Action Plan 2017

---

**Time:** Thu, 21 Sep 2017 20:28:47 +0000  
**From:** TUTHILL Greg - NOR <usa.gtuthill@usa.cma-cgm.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**CC:** BRANDES Bryan - NPB <usa.bbrandes@usa.cma-cgm.com> , BOURDON Marc - NOR <usa.mbourdon@usa.cma-cgm.com> , MITTENZWEI Kurt - ERU <usa.kmittenzwei@usa.cma-cgm.com> , "gene\_seroka@portla.org" <gene\_seroka@portla.org> , "commissioners@portla.org" <commissioners@portla.org>  
**Subject:** Draft Clean Air Action Plan 2017

**Attachments:** msg-5665-1477.html (5k)  
image001.png (3k)  
image002.png (0k)  
Letter regarding CAAP from CMA CGM 9-21-17.docx (33k)



Dear Ms. Tomley and Mr. Cannon:

Please find attached a letter related to the Draft Clean Air Action Plan 2017.

I am open to a follow up conversation and or willing to provide any additional information should you have questions on the points outlined.

Regards,  
Greg Tuthill



**Gregory W. Tuthill**  
**Sr. Vice President and COO**

**CMA CGM (America) LLC**

5701 Lake Wright DR, Norfolk, VA  
23502

Office: 757-961-2451 Cell: 908-625-  
1473

[www.cma-cgm.com](http://www.cma-cgm.com)

---



CMA CGM (America) LLC  
5701 Lake Wright Drive  
Norfolk, VA 23502

September 15, 2017

Chris Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Heather Tomley  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**Re: Draft Final 2017 Clean Air Action Plan Comments**

Dear Ms. Tomley and Mr. Cannon:

I am writing to you today to express my concerns with the Draft Clean Air Action Plan 2017. As you may be aware, CMA-CGM is now the largest container shipping carrier in the USA moving more volume inbound and outbound from the US ports compared to any other carrier operating globally. The global CMA CGM volume grew 33% for the 2nd quarter of 2017 compared to 2<sup>nd</sup> quarter 2016. We continue to expand and generate more revenue over the US West Coast ports with aspirations to expand in this area by deploying larger vessels and launching new pacific coast west coast products in the near term. In addition and as you may be aware, we are now engaged in operating pier 300 and intend to continue to support this terminal given our equity share position we will maintain post the transaction closing date.

Marine terminals have partnered with the ports of Los Angeles and Long Beach for more than a decade to achieve significant reductions in pollutants and greenhouse gases. In fact, the Draft CAAP praises industry for its successful efforts to reduce air emissions. I wholeheartedly support these efforts and look forward to seeing them continue long into the future.

In spite of this significant progress and the partnership between the ports and industry, this plan is proposed at a time when the industry is in a major restructure struggling to return to financial profitability. Following review of the Draft CAAP 2017, I have serious concerns with the plan as it is proposed:

- Adding \$14 billion in costs will not increase the competitiveness of this gateway and will make it difficult to attract discretionary cargo.
  - Where will the money come from and who will pay for these costs?
  - The requirement to have all cargo handling equipment be zero emission by 2030 is a major concern since the technology is not available today and it is difficult to finance expensive equipment which will not provide any increased efficiencies.
  - The Draft CAAP leaves us unable to plan for the future based on an unavailable technology mandate. It is impossible for our company to develop a capital investment program with unknown technology.
- 
- The operational requirements for mandatory turn times and appointments with penalties on both parties will only create more burdensome rules and not increase the efficiency of the gateway. By including efficiency measures in the CAAP, the ports have turned their back on their customer driven process in the Supply Chain Optimization forum. Instead of bringing the stakeholders together to find solutions, these requirements increases conflict between the truckers and terminal operators.

We support a balanced approach of continuing towards a zero emission goal while maintaining a competitive gateway. We request you to extend the date for these zero emissions requirement to 2050 or allow “near zero” technology which is 90% cleaner than today’s equipment to be used instead of an “all electric zero” mandate. We also request the ports to reinstitute the stakeholder discussion on improving efficiencies in a forum for all parties to come to the table with solutions and not just mandates on one part of the supply chain.

Should you have any questions or need any additional information, please feel free to reach me by at (757) 961-2451 or by email at [USA.GTuthill@CMA-CGM.COM](mailto:USA.GTuthill@CMA-CGM.COM).

Sincerely,



**Gregory W. Tuthill**

**Sr. Vice President and COO**

cc: POLA Harbor Commission President, Ambassador Vilma Martinez  
POLB Harbor Commission President, Lou Anne Bynum  
POLA Executive Director, Gene Seroka  
POLB Executive Director, Mario Cordero

## Zero-Emission Plan Economically Unsustainable

---

**Time:** Sun, 24 Sep 2017 13:56:28 -0400  
**From:** rskillsta@aol.com  
**To:** caap@cleanairactionplan.org  
**Subject:** Zero-Emission Plan Economically Unsustainable

Another more taxes and fees piled on tons of other more taxes and fees in Los Angeles supposedly to make life better - no thanks.

This scam has been played over and over locally and it always backfires with businesses leaving the area because of costs outweighing staying in business.

Always the one-sided argument of cleaner world without telling people the real economic costs involved.

Fact that ACT Now sent out big fancy mailing shows another bureaucracy being created to justify salaries of those in charge.

The more L.A. politicians make life unaffordable, the closer Los Angeles ends up like Venezuela today.

Customs Broker  
Import/Export Transportation  
Air/Ocean Forwarder  
Drawback Specialist  
Affiliates Worldwide  
IATA Airfreight Agent - FMC 2995  
Los Angeles Office



880 Apollo Street, Suite 101 | El Segundo, California 90245  
Tel: 310.726.0400 Fax: 310.726.0420

September 27, 2017

Mr. Chris Cannon  
Port of Los Angeles  
425 South Palos Verdes Street  
San Pedro, CA 90731

Ms. Heather Tomley  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**Re: Draft Final 2017 Clean Air Action Plan Comments**

Dear Mr. Cannon and Ms. Tomley:

CLEARFreight and our 70 of employees depends on the safe, competitive, and efficient movement of cargo through the Ports of Los Angeles and Long Beach for our livelihoods. We are greatly concerned with several aspects of the Draft Clean Air Action Plan Update which threaten our business and many others, and our customers.

The draft plan's cost is uncertain, analysis of impact on the ports' future competitiveness is absent, certain technologies and fuels are excluded, and the air quality benefits are undefined. We fear that all additional costs will fall to the importers, exporters and service providers. Layering tens of billions of dollars in fees on the supply chain will be disincentive for shippers and cargo owners to use California gateways.

In comparison to other North American port gateways, Los Angeles and Long Beach have lost market share during the past decade. While the CAAP's goals are laudable and well intentioned, given the hyper-competitive nature of global commerce, we would recommend the following actions by the Ports of Los Angeles and Long Beach be taken before adoption of these new programs:

- Conduct a thorough evaluation of the proposed measures' cost effectiveness and impacts on port competitiveness;
- Include the use of ultra-low emission technologies and all electrification options to achieve significant emissions reductions;
- Receive firm commitments of state and federal monies for research and development options for zero and near-zero emissions equipment, without limitations, before moving forward;
- Fully analyze the significant burden on the Ports' energy system and cyber security threats to both Ports if they were to be fully electrified and the impact to the trade community in the event of power disruption.

Please consider these changes; they are critical to our company and our employees here in Southern California.

Sincerely,

Kenji Go  
President

## Comment on CAAP

---

**Time:** Wed, 27 Sep 2017 17:39:42 -0700  
**From:** Mike Todaro <mikefromlb@icloud.com>  
**To:** caap@cleanairactionplan.org  
**Subject:** Comment on CAAP

I have lived along the beach on Ocean Blvd. in Long Beach for 17 years and own a boat that I keep in a slip at Shoreline Marina.

My wife is asthmatic and continually coughs and has breathing problems. I have severe sinus and allergy issues.

Due to the local port pollution, we must continually clean the black dust that accumulates on our decks, furniture, screens and all surfaces inside our home.

The same conditions require that I clean my boat and canvas every two weeks.

And, we breath this in the air daily!

The port raves about it's progress to reduce environmental pollution but never openly mentions about the 2035 deadline to eliminate truck pollution. This is a disgraceful situation directly impacting all residents living and working around the port.

Please change the Clean Air Plan to a 5 year target!

Respectfully yours,  
Mike Todaro  
Alamitos Bay - Long Beach,CA

Sent from my iPad

## CAAP Comments - Electrify Wilmington!

---

**Time:** Thu, 28 Sep 2017 16:44:26 -0700  
**From:** Robert Silence <rsilence@gmail.com>  
**To:** CAAP@cleanairactionplan.org  
**Subject:** CAAP Comments - Electrify Wilmington!

**Attachments:** msg-5871-394.html (18k)  
CAAP-Comments-ElectrifyWilmington-2017-09-27.pdf (43k)  
msg-5871-395.html (0k)

[Attached to this email is a PDF form of the same comment, for your convenience.]

Electrify Wilmington!

First, let me say that I am beholden to no one. Although I may mention specific organizations in a positive light, and disparage others, I have no vested interest (financially) in any of them. Like Elon Musk\*, my goal is not to make money: My goal is to make the Earth a nice place to live.

\*[Anyone who says that Elon Musk is only 'in it' to make money, is probably a Capitalist; so be wary of anything they say.]

Every time I describe what I want to say in this document to people, they always say "leave Elon Musk out of it" --I don't understand: I want Elon Musk, and people like him, to be intimately involved: I am interested in people who want to do the right thing, which is also the long-term thing.

There is such a thing as "being on the right side of history". Usually, when people are not, it's because of short term money interests. When you are, you feel a sense of inner peace, because you did the right thing.

### Guiding Principles

If you are not thinking about or creating things which last for at least 100, 1000, 10000, or 100000 years into the future, you are a 'short-term' thinker [who's probably only 'in it' for the money].

### The "Long Tailpipe" Fallacy

People trying to continue to sell fossil fuels will tell you that the electric (or hydrogen fuel cell) vehicles pollute, because if you trace the source of the electricity (or hydrogen) it almost always comes from fossil fuels. However, there are several points which invalidate this claim from the perspective of the local residents:

- (1) It doesn't have to come from fossil fuels: And as time goes on, more and more electricity will come from more and more sustainable resources; thereby rendering the electric vehicles cleaner and cleaner.
- (2) If the electricity comes from fossil fuels, it can be better cleaned-up on an industrial scale, as opposed to local emissions from trucks and cars, which have to be continually checked and maintained, and are not as efficient as the large industrial source.
- (3) The emissions from the power plants are not in the local residents faces (figuratively and literally): They can be far away, and are not in the trucks that ply the neighborhood.

[For a detailed analysis, see the study produced by Eric Seilo, Transportation Electrification Project Manager at SCE.]

### Wilmington

I suggest that you read through the Plan of the Electrify America organization [<https://www.electrifyamerica.com/our-plan> <<https://www.electrifyamerica.com/our-plan>>] so that you can see how this effort has already begun, and only that I think it would be beneficial to everyone (and specifically to The Ports) to make Wilmington one of the First Fully Electrified Cities in the world.

From the Ports' perspective, there are two reasons; one emotional and the other practical.

- (1) For a long time, Wilmington has been relegated to a no-man's-land in between San Pedro and Long Beach, where anything goes, regarding how the community is treated. It would be great PR for the Ports if they were to show this commitment to finally addressing (once-and-for-all, I might say) the concerns of the community; and,
- (2) The Ports, along with both SCE and DWP are going to need a local, sustainable charging network for all of the electric trucks needed to handle their goods. Electrifying Wilmington can provide that network and sustainable energy source.

### Some Numbers

[These are just "back-of-the-napkin", round number calculations, meant to show feasibility; more detailed studies can be performed.]

A total of 53,815 people were living within Wilmington's 9.14 square miles, according to the 2010 U.S. census—averaging 5,887 people per square mile, among the lowest population densities in the city as a whole. The median age was 28. [Source Wikipedia] Median age 24. Median household income \$41k. Average household size 3.8. [Source: LA Times maps <http://maps.latimes.com/neighborhoods/neighborhood/wilmington/>]

Calculation:  $53,815/3.8 = 14,162$  households [cf. 13,254 from LA maps]

From my own personal example, only 25% of my roof is covered in solar panels, with a 4kW, 18-panel system, costing about \$26k in 2010, and it produces an average of 18kWh per day.

$14,000 * 18 * 10\text{ft}^2 = 2,520,000 \text{ ft}^2 = 0.09 \text{ miles}^2$  i.e. only 1% of total land area handles all domestic production for household use. (4kW per household, averaging 18kWh per day (from personal experience). Doubling the number of solar panels would provide an additional 18kWh/day, which would provide  $18\text{kWh} * 4 \text{ miles/kWh} = 72 \text{ miles}$  of EV travel per household per day.

9M TEUs per year = 25,000 TEUs per day

I'm not sure that that means 25,000 Trucks per day (because some containers may go out on rail, and some may be different lengths (35, or 40-ft); but 25,000 seems like a good high number.

Some of those could go out on hydrogen fuel cell vehicles; but what I am trying to show, is that if you could fill up the roofs of those houses (thereby adding another 36kWh/day to each house), and each EV Class 8 tractor-trailer truck got about 2 mi/kWh, then that would mean that the community of Wilmington could produce, locally, enough electricity to move 14,000 of those trucks  $36\text{kWh} * 2 \text{ miles/kWh} = 72 \text{ miles}$  away, where they could be processed at a desert warehouse, whose roof could supply the remaining energy needed to move the goods from there.

As Laura Renger, Principal Manager of Air & Climate Regulatory Affairs at SCE, pointed out at the AltCar Expo in Santa Monica recently, many used Electric Vehicles are coming off leases, and are available at very low prices, combined with great rebate programs ([cleanvehiclerebate.org/community](http://cleanvehiclerebate.org/community)), enabling people with low incomes to scrap their old gasoline vehicles and replace them with EVs.

It seems to me that the Ports of LA & Long Beach would do well to do everything in their power (no pun intended!) to similarly upgrade the entire community of Wilmington to solar energy, with emphasis on undergrounding power lines, charging network infrastructure upgrades, facilitate getting EVs to every family, battery systems to capture excess energy, etc., for the health of the community, the planet, and the further continued smooth (and quiet) operation of the Ports!

Thank you for your time,  
...Bob Silence  
Naval Architect and Marine Engineer

References:

<https://www.electrifyamerica.com> <<https://www.electrifyamerica.com/>>

## Comment from Cynthia Sesso re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 06:20:58 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Cynthia Sesso re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Cynthia

Last Name: Sesso

Email: cynthia@ctsimages.com

ZIP Code: 90732

## Comment from Eddie Shepherd re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 00:50:30 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Eddie Shepherd re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

Eddie Shepherd  
eddie61@gmail.com  
Long Beach  
90807

## Comment from Elizabeth Nagaseu re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 00:48:17 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Elizabeth Nagaseu re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Elizabeth  
Last Name: Nagaseu  
Email: nagaseu34@yahoo.com  
ZIP Code: 90810

## Comment from Gala MacNeal re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 00:18:21 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Gala MacNeal re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Gala  
Last Name: MacNeal  
Email: sweet5007@aol.com  
ZIP Code: 90810  
Phone: 562-342-3930

## Comment from Hadar Feingold re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 06:21:56 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Hadar Feingold re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Hadar

Last Name: Feingold

Email: hadarfeingold@yahoo.com

ZIP Code: 90806

## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Tue, 19 Sep 2017 15:28:09 -0400  
**From:** Kevin Simpson <krays@atc.cc>  
**To:** caap@cleanairactionplan.org  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Tue, 19 Sep 2017 09:11:07 -0400  
**From:** Mark Darnell <markdarnell@yahoo.com>  
**To:** caap@cleanairactionplan.org  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

## Comment from Mike Plichta re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 00:17:30 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Mike Plichta re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Mike  
Last Name: Plichta  
Email: plics180@hotmail.com  
ZIP Code: 90802  
Phone: 303-359-3578

## Comment from Robert Mroski re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 16:57:03 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Robert Mroski re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Robert  
Last Name: Mroski  
Email: jamroski@usa.net  
ZIP Code: 78645

## Comment from Sisi Borj re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 06:34:00 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Sisi Borj re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Sisi

Last Name: Borj

Email: missygot@ymail.com

ZIP Code: 90732

## Comment from Wayne Egner re: CAAP - We Need Clean Air NOW

---

**Time:** Tue, 19 Sep 2017 16:56:56 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Wayne Egner re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Wayne  
Last Name: Egner  
Email: wayne.egner@hotmail.com  
ZIP Code: 92806  
Phone: 562-370-0240

**From:** Andreas Tillmann  
**To:** [Commissioners; bhc@polb.com](mailto:bhc@polb.com); [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org)  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Date:** Wednesday, September 20, 2017 3:34:20 PM

---

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

## Comment from Claudia Baker re: CAAP - We Need Clean Air NOW

---

**Time:** Wed, 20 Sep 2017 00:36:51 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Claudia Baker re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Claudia  
Last Name: Baker  
Email: claudia\_elyse@hotmail.com  
ZIP Code: 90505

## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Wed, 20 Sep 2017 15:17:29 +0000  
**From:** Craig Plank <Craig.Plank@cleanenergyfuels.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Attachments:** msg-30916-739.html (2k)



We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

**From:** louise fernandez  
**To:** [Commissioners](#); [bhc@polb.com](mailto:bhc@polb.com); [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [Mayor@longbeach.gov](mailto:Mayor@longbeach.gov)  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Date:** Wednesday, September 20, 2017 5:02:15 PM

---

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

Sent from [Outlook](#)

## Comment from Neil Khadim re: CAAP - We Need Clean Air NOW

---

**Time:** Wed, 20 Sep 2017 00:36:33 +0000  
**From:** ACT Now LA <info@actnowla.org>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Comment from Neil Khadim re: CAAP - We Need Clean Air NOW

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Neil  
Last Name: Khadim  
Email: nkhadim@sandaka.com  
ZIP Code: 11416

**From:** Lathrop, Monique  
**To:** [Tomley, Heather](#)  
**Subject:** FW: Accelerate the CAAP: incentivize trucks in 2018  
**Date:** Wednesday, September 20, 2017 12:54:26 PM

---

---

**From:** Poros2000@aol.com [mailto:Poros2000@aol.com]  
**Sent:** Wednesday, September 20, 2017 7:38 AM  
**To:** commissioners@portla.org; Board of Harbor Commissioners <bhc@polb.com>;  
mayor.garcetti@lacity.org; Mayor@longbeach.gov  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

**From:** Lathrop, Monique  
**To:** [Tomley, Heather](#)  
**Subject:** FW: Accelerate the CAAP: incentivize trucks in 2018  
**Date:** Wednesday, September 20, 2017 12:54:52 PM

---

-----Original Message-----

From: steve Aragon [<mailto:sa0072@icloud.com>]  
Sent: Wednesday, September 20, 2017 4:07 AM  
To: commissioners@portla.org; Board of Harbor Commissioners <[bhc@polb.com](mailto:bhc@polb.com)>; mayor.garcetti@lacity.org; Mayor@longbeach.gov  
Subject: Accelerate the CAAP: incentivize trucks in 2018

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

**From:** Tiana Izumita  
**To:** [Commissioners; bhc@polb.com](mailto:bhc@polb.com); [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [+Mayor@longbeach.gov](mailto:+Mayor@longbeach.gov)  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Date:** Wednesday, September 20, 2017 9:59:23 AM

---

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

Climate change is very real and the industrialized countries have a responsibility to lead the change toward cleaner energy now. Much of the instability in the world today can be attributed to climate change and its time to start repairing the damage we've caused to the environment before it's too late.

Regards,  
Tiana Chastain

**From:** ACT Now LA  
**Subject:** Comment from Albert Matinao re: CAAP - We Need Clean Air NOW  
**Date:** Thursday, September 21, 2017 5:34:44 PM

---

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Albert  
Last Name: Matinao  
Email: miematinao@gmail.com  
ZIP Code: 91344  
Phone: 818-799-5985

**From:** ACT Now LA  
**Subject:** Comment from Michael Etter re: CAAP - We Need Clean Air NOW  
**Date:** Thursday, September 21, 2017 5:34:29 PM

---

We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. The ACT Now Plan will replace all dirty diesel trucks with clean trucks powered by renewable fuel over the next 5 years, starting today. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Michael  
Last Name: Etter  
Email: [miketter@sbcglobal.net](mailto:miketter@sbcglobal.net)  
ZIP Code: 90710  
Phone: 310-428-7709



SAN PEDRO BAY PORTS  
**CLEAN AIR ACTION PLAN 2017**

Final 2017 Clean Air Action  
Plan Update Public Comments

OCTOBER 3, 2017 - OCTOBER 31, 2017

This page is intentionally blank.

## **Comment Letters Received**

**(October 3, 2017 to October 31, 2017)**

*Click on the link to be taken directly to the letter. Attachments referenced in the letters are available upon request.*

[Don Mitchell \(October 6, 2017\)](#)

[Ross S. Heckmann \(October 9, 2017\)](#)

[John McLaurin, Pacific Merchant Shipping Association – Daily Breeze \(October 12, 2017\)](#)

[Anne Wehner \(October 24, 2017\)](#)

[Brian Powers \(October 24, 2017\)](#)

[Camela Krebs \(October 24, 2017\)](#)

[Derik Turbide et al. \(October 24, 2017\)](#)

[Emelia Torlai \(October 24, 2017\)](#)

[Ingrid Harris \(October 24, 2017\)](#)

[Sahar Kamali \(October 24, 2017\)](#)

[Lily Nguyen \(October 24, 2017\)](#)

[Sheldon Schroeder \(October 24, 2017\)](#)

[Will Flanagan \(October 24, 2017\)](#)

[Barbara Johnson, Clean Energy Fuels \(October 24, 2017\)](#)

[Carlton Ding \(October 24, 2017\)](#)

[Christopher Ding \(October 24, 2017\)](#)

[Denis Ding \(October 24, 2017\)](#)

[Dyanna Peters, Clean Energy Fuels \(October 24, 2017\)](#)

[Jane Tran, Clean Energy Fuels \(October 24, 2017\)](#)

[Jeanine Chu \(October 24, 2017\)](#)

[Jeffrey J Ricketts \(October 24, 2017\)](#)

[John Short \(October 24, 2017\)](#)

[Alex Thomsen \(October 25, 2017\)](#)

[Fawna Kritzer \(October 25, 2017\)](#)

[Jelena Rowe \(October 25, 2017\)](#)

[Lanette Maes, Clean Energy Fuels \(October 25, 2017\)](#)

[Mark Theissen \(October 25, 2017\)](#)

[Staci Pratt \(October 25, 2017\)](#)

[Tom Bressler \(October 25, 2017\)](#)

[Tony Kritzer \(October 25, 2017\)](#)

[Mr. & Mrs. W. M. Parsch \(October 25, 2017\)](#)

[Warren Mitchell, Clean Energy Fuels \(October 25, 2017\)](#)

[Ron Thompson, Clean Energy Fuels \(October 25, 2017\)](#)

[Daniel Wellner \(October 25, 2017\)](#)

[Gary Jordan \(October 25, 2017\)](#)

[Harrison Clay \(October 25, 2017\)](#)

[Jim Taylor \(October 25, 2017\)](#)

[Charles Stevens \(October 26, 2017\)](#)

[Gayle Row \(October 26, 2017\)](#)

[California Natural Gas Vehicle Coalition \(October 26, 2017\)](#)

[Energy Vision \(October 26, 2017\)](#)

[Christopher Logan \(October 27, 2017\)](#)

[Jason Johnston \(October 27, 2017\)](#)

[Mitchell Pratt \(October 27, 2017\)](#)

[Reagan Clemens \(October 27, 2017\)](#)

[James Harger \(October 28, 2017\)](#)

[Michael R. Busman \(October 29, 2017\)](#)

[Coalition for Clean Air \(October 30, 2017\)](#)

[Dr. Julius J. Rim \(October 30, 2017\)](#)

[Scott Vazzana \(October 30, 2017\)](#)

[Lindsay Harrison \(October 30, 2017\)](#)

[Southern California Gas Company \(October 31, 2017\)](#)

[Lou Baglietto – Press Telegram \(October 31, 2017\)](#)

[Gary Vazzana \(October 31, 2017\)](#)

[Patricia Vazzana \(October 31, 2017\)](#)

[Dump Dirty Diesel Petition with Signature Pages \(October 17, 2017\)](#)

## Accelerate the CAAP: incentivize trucks in 2018

---

**Time:** Fri, 6 Oct 2017 14:56:33 +0000  
**From:** Don Mitchell <Don.Mitchell@cleanenergyfuels.com>  
**To:** "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>  
**Subject:** Accelerate the CAAP: incentivize trucks in 2018  
**Attachments:** msg-23230-219.html (2k)



We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

## ACT NOW for Clean Air!

---

**Time:** Mon, 9 Oct 2017 20:13:08 -0700  
**From:** Ross Heckmann <rosss.heckmann@gmail.com>  
**To:** caap@cleanairactionplan.org  
**Subject:** ACT NOW for Clean Air!

**Attachments:** msg-23230-225.html (0k)



We can't wait 17 years to get toxic diesel polluting trucks off our roads. Let's accelerate the CAAP: incentivize trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

Very truly yours,

Ross S. Heckmann  
1214 Valencia Way  
Arcadia, CA 91006

# Daily Breeze

## Clean Air Action Plan will reshape our ports — for the better or the worse

*Cleaning up the air around the Los Angeles and Long Beach ports with green technology could cost as much as \$14 billion, plan released on Wednesday revealed.*

By [John McLaurin](#) |

October 12, 2017 at 7:30 pm

The ports of Los Angeles and Long Beach's proposed Clean Air Action Plan is transformative and will reshape the Southern California waterfront — the question is, will the waterfront be reshaped for the better or the worse?

No one will be immune from the CAAP's recommended program — not longshoremen and truckers working on and around the waterfront, nor warehouse workers in the Inland Empire or agricultural exporters in the Central Valley. Everyone who touches or relies on freight in Southern California will be impacted.

The CAAP mandates the use of zero-emission, electric equipment at marine terminals by 2030 and zero emission trucks by 2035.

Given its far-reaching scope and significant impact to California's economy, the CAAP requires thoughtful analysis and honest discussion about its impact. Failure to adequately do so puts the ports and those depending on the ports at risk.

Ports and their tenants operate in a hyper-competitive global trade environment. But, we aren't "the only game in town." Numerous alternative gateways throughout North America for cargo interests to use exist. Whether it's Prince Rupert in Canada, Lazaro Cardenas in Mexico or Gulf and East Coast ports like Houston, Mobile, Jacksonville, Savannah, New York/New Jersey and others — the opportunities for cargo diversion are more plentiful than ever before.

All of the above trade gateways have enjoyed higher rates of growth during the past 10 years than the ports of Los Angeles and Long Beach. These non-Southern California gateways are aggressive and they all want this cargo. In addition, Los Angeles and Long Beach have lost market share to the competition.

As the current CAAP highlights, emissions from Southern California port operations have declined dramatically since the first CAAP was implemented in 2006. These reductions have been achieved through the active partnership between the ports, their tenants and customers, local communities and regulators. No other industrial sector has reduced emissions in such significant amounts so quickly. These emissions reductions are truly a cause for celebration — but not complacency.

Unfortunately, as we enter the CAAP's next phase, where the remaining emission reductions are small because there's not much left to reduce, the ports are attempting to dictate how the remaining emissions reductions are to be achieved irrespective of cost.

According to the ports of Los Angeles and Long Beach, \$2 billion was spent to reduce various pollutants from trucks and cargo-handling equipment by approximately 96 percent in the first two CAAPs. For CAAP Version 3, cost projections range from between \$8 to \$14 billion to reduce the remaining four percent to zero. We, as do the ports, believe these figures to be low and speculative as the cost estimates rely on technology and equipment that currently does not exist.

So, while the CAAP seeks zero emissions as its goal, the document does so without regard to cost, competitiveness or impact to jobs, and is carried out at an accelerated rate not required of any other industrial sector in California or the general motoring public, the largest emissions source in the state.

The current CAAP is a program based entirely on faith — the belief that the ports' mandated technology will be developed, work as envisioned, will be commercially available and that funding will magically appear.

The CAAP's first two versions represent the best of California's environmental leadership. Its success is inextricably linked to a partnership between all impacted parties. But the current draft CAAP takes a notably different, negative turn. While its objectives are admirable, it is arbitrary in its deadline, misleading in its impact and will likely be isolated in its application by other ports around the world.

On behalf of the Pacific Merchant Shipping Association, we enthusiastically support efforts by the ports of Los Angeles and Long Beach to transform both gateways. We support a cleaner, more energy efficient San Pedro Bay port complex which also creates jobs and bolsters the state's economy. However, based on what we've seen in the current CAAP, the "transformation process" that is recommended would result in a mutation that would likely harm an economic and environmental success story. We must proceed with caution.

*John McLaurin is president of the Pacific Merchant Shipping Association.*

**From:** Anne Wehner  
**To:** [Commissioners](#)  
**Subject:** ACT NOW  
**Date:** Tuesday, October 24, 2017 4:47:10 PM  
**Attachments:** [dataURI-1508888794450](#)  
[dataURI-1508886196111](#)

---

Don't delay please! No more dirty diesel trucks please! Let's be ahead of the game and go natural gas vehicles!

Diesel - ugh...dirty, pollution, allergies, global warming, illnesses, etc.

I urge you to be a visionary by adopting a strong CAAP that will deploy RNG trucks starting in 2018

Anne Wehner  
949.903.2382

Visit my website: <http://annewehner.arbonne.com>

*Take care of your body....it's the only place you have to live! Be Healthy. Live Beautifully*

**From:** Brian Powers  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](mailto:Lucia.Moreno); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com); [Brian Powers](#)  
**Subject:** CAAP Nov 2nd vote  
**Date:** Tuesday, October 24, 2017 2:33:18 PM

---

Dear Port Commissioners

On November 2<sup>nd</sup> you are going to make an important decision that will impact millions of people and I ask you vote to replacing diesel trucks NOW with those that operate on natural gas.

The negative health impacts of diesel are well known, diesel emission kills people, it is that simple!

Electric trucks sounds like a good idea right? Besides being very expensive, no cleaner than natural gas trucks, they're not very practicable. The duty cycle of electric vehicles is at best only 75% and the other 25% of the time they have to be plugged in getting charged. This means to do 12,000 trucks worth of work you will need 16,000 electric trucks! Additionally you will need at least 4000 more parking spots in the Port area that all have charging stations, parking is already at a premium. Electric makes some sense in small commuter cars, but it won't scales to trucks! Why wait for something that is untested and is so expensive.

I see absolutely no reason why you should wait of something better to come along, and how can you vote for more diesel pollution!

Please vote with your conscious and replace those diesel trucks with natural gas ones NOW.

Brian Powers  
Irvine

**From:** camela krebs  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners; [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Don't Wait - We Need Clean Air Now!!  
**Date:** Tuesday, October 24, 2017 2:13:55 PM

---

Dear Port Commissioners:

As a resident of San Pedro, I strongly encourage the adoption of requirements for Clean Trucks now. By replacing diesel with natural gas a fuel for trucks, we can save our environment and breath easier, literally.

The longer the delay in imposing new Clean Air rules, the longer harmful pollutants take a toll on our environment and lives.

Please act now! Fuel with Near Zero Natural Gas!

Respectfully,  
Camela Krebs

**From:** Bynum, Lou Anne  
**To:** [Cameron, Rick](#); [Tomley, Heather](#)  
**Subject:** Fwd: Please Adopt Clean Trucks and Clean Air Now!  
**Date:** Tuesday, October 24, 2017 4:57:28 PM

---

Just going to send these to you for documentation.....lab

Sent from my iPad

Begin forwarded message:

**From:** Derek Turbide <[derek.turbide@gmail.com](mailto:derek.turbide@gmail.com)>  
**Date:** October 24, 2017 at 3:59:32 PM PDT  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org), [mayor@longbeach.gov](mailto:mayor@longbeach.gov),  
[commissioners@portla.org](mailto:commissioners@portla.org), [commissioner\\_renwick@portla.org](mailto:commissioner_renwick@portla.org),  
[commissioner\\_arian@portla.org](mailto:commissioner_arian@portla.org), [commissioner\\_martinez@portla.org](mailto:commissioner_martinez@portla.org),  
[commissioner\\_pirozzi@portla.org](mailto:commissioner_pirozzi@portla.org), [commissioner\\_moreno@portla.org](mailto:commissioner_moreno@portla.org),  
[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com), [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com),  
[tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com), [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com),  
[frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject: Please Adopt Clean Trucks and Clean Air Now!**

Honorable Mayors, Councilmembers and Commissioners:

Thank you for your support of Clean air at our Ports. Time is of the essence. We need cleaner air now. I live near the ports; my kids and their teachers go to school near the Ports; and, my friends work in the Ports. I drive the freeways and see the black soot ridden diesel truck exhaust spewing into the air everyday. Do you too? It makes me sick; especially that it's preventable. I also see natural gas trucks that don't emit any visible exhaust, and because of the economics, most if not all trucks in California are running on renewable natural gas (RNG), which is naturally occurring methane that would have otherwise emitted into the environment if not captured and used. While electric trucks may be the future, RNG trucks are today's solution. There are 1000s on the road already.

My kids go to school at Mary Star of the Sea High School in San Pedro. They play football at Daniels field on Thursday and Friday nights and practice outdoors every day and so do over 500 other kids at Mary Star alone. My boys have asthma as do several of my other children and my wife. They, as well as the other people who live, work and play in and around our Port communities are the ones that suffer if we do nothing and postpone the replacement of thousands of diesel trucks. Please don't let this happen.

Please support a Clean Air Action Plan that requires a mass replacement of diesel trucks with clean, RNG, alternative fuel trucks in 2018 and no later. The technology, fueling stations and economics are all present today. As our local leaders and decision makers, we need your help to make this widely known and adopted.

Thank you for your consideration and support.

Sincerely,

Derek, Mary, Derek Jr., Adam, Teresa, Catherine, Laura, Sarah & Emily Turbide

**From:** Eugenio Benavides  
**To:** [Commissioners](#)  
**Subject:** I support clean vehicles in our Ports today!  
**Date:** Tuesday, October 24, 2017 6:56:22 PM

---

Dear Commissioners,

I'm emailing to express my support of the Ports of LA and Long Beach to take a bold and insightful stance on the Clean Air Action Plan. I support the Plan to encourage truck operators at the Ports to utilize renewable natural gas. Please read on to understand my thoughts.

Southern California has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution.

I'm aware of the efforts many public agencies such as LA Metro and LAX have made to reduce emissions from high polluting vehicles. I commend those agencies for their efforts and dedication to progress. The progress in California with alternative fuels has influenced the rest of the country and leaves California in the position of lead policy maker for alternative fuels. If California doesn't go with a cleaner fuel I'm fearful this will not only impact the air quality in Southern California, but also discourage public agencies in the rest of the US to stick with dirty diesel. California is the leader and has an opportunity on November 2 to behave as one.

Should the Ports wait for two years to implement a clean vehicle requirement? Should the Ports allow dirty diesel trucks to operate for two additional years causing an unknown amount of pollution and harm to the populations in and around our most populous ports? 12,000 trucks come in and out of the Ports, most of those trucks are diesel.

The technology is available today to clean our air. Why continue contributing to the suffering of asthma and other respiratory illness inflicted citizens? We CAN'T delay cleaning the air when clean Renewable Natural Gas (RNG) is available today. It reduces truck emission by 90%.

Climate change is a threatening global problem. We have the resources in our hands to do our part to reduce the threatening effects of climate change. RNG will not only reduce emissions at the tailpipe, but also reduce methane that otherwise would threaten our atmosphere. Electric claims to be zero emissions. This may be true at the tailpipe if they are using nuclear power plants to "fuel," but RNG could be considered negative emissions as they take emitting sources out of commission and utilize the methane as a fuel.

The money for this program to happen now is there...CA has allocated \$100s of millions to replace dirty diesel trucks and with a strong policy the truck operators can begin using this funding to convert trucks today.

Please vote to make a change today - the health of Southern California can not be delayed by two years.

Warmly,

Emelia Torlai

**From:** Ingrid Harris  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners; [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** CleanAirActionPlan2018  
**Date:** Tuesday, October 24, 2017 1:44:20 PM

---

Your Attention Please:

As a California resident, I am greatly concerned about the quality of air we breathe. I would like to ask you to require **in 2018 the Ports of Los Angeles and Long Beach to replace their diesel burning vehicles with Renewable Natural Gas Technology (RNG)**. I understand funding is available for this replacement. To postpone this measure diesel trucks would not only continue to pollute our air (the worst in our Nation) it would continue to put people's lives at risk to the numerous respiratory illnesses that have risen over these last years.

Please vote to have the **CleanAirActionPlan take effect in 2018**. Time is of essence to help clean the air we breathe!!

Thanking you in advance,

Ingrid Harris

**From:** Sahar Kamali  
**To:** [Martinez, Vilma](#)  
**Subject:** Let's not take our example from federal politics (CAAP)  
**Date:** Tuesday, October 24, 2017 2:18:15 PM

---

Dear Honorable Commissioner Martinez,

I am hopeful that LA, as a city that has always put the interests of the people first and foremost in its considerations and actions, will adopt a strong Clean Air Action Plan at the Ports of LA and Long Beach (CAAP) that will deploy near zero NOx emissions trucks starting in 2018. A plan that doesn't create immediate action and solutions for people from the communities surrounding the Ports will be a huge loss to our region, as the air quality continues to suffer. I know you know that a solution exists in the form of renewable natural gas (RNG) and near zero NOx emissions heavy duty trucks.

- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

As a former resident of LA and current resident of Orange County, I am hopeful that we don't take our example from federal politics where cronies and donors profit first, and maybe consider human and external costs second (if they even bother).

Let's be better!

Thank you,

Sahar Kamali

**From:** Lily Nguyen  
**To:** [Commissioners](#)  
**Subject:** Save our planet - Please replace those trucks with clean technology.  
**Date:** Tuesday, October 24, 2017 2:10:01 PM

---

To whom it may concern:

Please save our planet and start adopting Clean Air Action Plan (CAAP) at our Port of LA and Port of Long Beach where created the most polluted air in the nation from those heavy-duty diesel trucks.

With today's technology, we can reduce greenhouse gas emission so why wait until 2020 and let's not do it in 2018. Please replace those truck with clean technology the earlier the better to have cleaner air to help reduce asthma and respiratory problem for people, to save our planet and make it last longer for later generations

**From:** sheldonschroeder@mchsi.com  
**Subject:** CAAP  
**Date:** Tuesday, October 24, 2017 2:07:18 PM

---

I appreciate your obvious concern for the extreme pollution which has been a serious health threat in Southern California for decades. Many wonderful strides have been made to improve the quality of air. We can rejoice in what has been accomplished but we have a long ways to go to achieve what is necessary in providing clean air for our children and grandchildren in the future.

There continues to be over 12,000 diesel trucks routinely serving the port areas. With the new LoNox natural gas engines I have read about along with Renewable Natural Gas available in California we (you) have the opportunity to make a major impact on the pollution and carbon footprint by doing whatever you can to encourage the replacement of diesel engines with the new generation natural gas trucks.

In my opinion we can't wait until 2020 or later to implement these measures! Now is the time to react and set the stage for improving our air in 2018.

I appreciate your consideration of encouraging it for us now and generations to come!

Sheldon Schroeder

**From:** Will Flanagan  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners; [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** The CAAP needs RNG!  
**Date:** Tuesday, October 24, 2017 12:43:31 PM

---

Esteemed Leaders,

The dirty diesel trucks in the Port of LA and Long Beach cause Southern California to have the worst air quality in the US. Worse, the children who live in an around the port are hit the hardest.

We need bold action from you next week! Include a mandate for RNG in 2018 in the Clean Air Action PlanWe can't afford to wait -- renewable natural gas can help us immediately and you have the power to make that happen.

Thanks,  
Will Flanagan

Tustin, CA  
[William.j.flanagan.1@gmail.com](mailto:William.j.flanagan.1@gmail.com)

**From:** Bynum, Lou Anne  
**To:** [Jordan, Richard](#)  
**Cc:** [Cordero, Mario](#); [Cameron, Rick](#); [Tomley, Heather](#)  
**Subject:** Fwd: Clean Air - A sustainable future!  
**Date:** Tuesday, October 24, 2017 1:34:03 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Cutter,

Can you please forward this to to the Commissioners? Thanks

Sent from my iPad

Begin forwarded message:

**From:** "Barbara A. Johnson" <[Barbara.Johnson@cleanenergyfuels.com](mailto:Barbara.Johnson@cleanenergyfuels.com)>  
**Date:** October 24, 2017 at 1:18:15 PM PDT  
**To:** "[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com)" <[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com)>  
**Subject: Clean Air - A sustainable future!**

Dear Lou Anne,

Thank you for your leadership as Harbor Commission President for the Port of Long Beach. With your direction and influence, air quality can improve sooner rather than later. With over 12,000 diesel trucks servicing the Port, it is critical that the Clean Air Action Plan encourage and support the cleanest engine technology available today. That technology is fueled with renewable natural gas (RNG). RNG technology is available and reduces truck emissions by 90% to 99% compared to diesel. RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.

As you know, California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong Clean Air Action Plan will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting. Implementing clean fuel technology will also create new jobs for mechanics who work on clean natural gas engines. Taking action now will mean cleaner air, more jobs and a Clean Port that will become the sustainable showcase for Ports across the country.

Thank you for standing up for Clean Air Now!

Sincerely,

**Barbara A. Johnson**  
**Vice President, Administration**



**4675 MacArthur Court, Suite 800| Newport Beach CA 92660**

**office direct 949-437-1130**

**office 949-437-1000 | mobile 714-336-0511**

**email [bjohnson@cleanenergyfuels.com](mailto:bjohnson@cleanenergyfuels.com)**



Confidentiality Notice: The contents of this e-mail and any attachments to it may contain privileged and confidential information from Clean Energy or its affiliates. This information is only for the viewing or use of the intended recipient. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of, or the taking of any action in reliance upon, the information contained in this e-mail, or any of the attachments to this e-mail, is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender by replying to this message and delete it from your system.

**From:** Bynum, Lou Anne  
**To:** [Cordero, Mario](#); [Cameron, Rick](#); [Jordan, Richard](#); [Tomley, Heather](#)  
**Subject:** Fwd: Port of Los Angeles and Long Beach – Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 4:56:23 PM

---

Etc....

Sent from my iPad

Begin forwarded message:

**From:** Denis Ding <[carltonding@aol.com](mailto:carltonding@aol.com)>  
**Date:** October 24, 2017 at 4:04:23 PM PDT  
**To:** [commissioners@portla.org](mailto:commissioners@portla.org), [commissioner\\_renwick@portla.org](mailto:commissioner_renwick@portla.org),  
[commissioner\\_arian@portla.org](mailto:commissioner_arian@portla.org), [commissioner\\_martinez@portla.org](mailto:commissioner_martinez@portla.org),  
[commissioner\\_pirozzi@portla.org](mailto:commissioner_pirozzi@portla.org), [commissioner\\_moreno@portla.org](mailto:commissioner_moreno@portla.org),  
[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com), [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com),  
[tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com), [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com),  
[frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject: Port of Los Angeles and Long Beach – Clean Air Action Plan**

Dear Sir/Madam,

I am writing regarding the Port of Los Angeles and Long Beach Clean Air Action Plan.

I am a middle school student and my parents have discussed the importance of using clean vehicles and the different clean vehicle technologies available today and in the future.

My Dad drives a CNG car and CNG running on renewable natural gas seems to be the best available option at this time.

From what I understand there are still many challenges for electric trucks. Who knows whether it will be 1 year, 3 years, 5 years, 10 years or longer before the electric grid will be scale up to handle EV trucks?

As an interested middle school student, for our health, for those that suffer from asthma or lung related illness, please keep using the cleanest available vehicle technology, CNG and replace those dirty diesel trucks asap.

Sincerely,

Carlton Ding

Inland Empire Resident

**From:** Christopher Ding  
**To:** [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](#); [loriann.guzman@polb.com](#); [tracy.egoscue@polb.com](#); [bonnie.lowenthal@polb.com](#); [frank.colonna@polb.com](#)  
**Subject:** Port of Los Angeles and Long Beach – Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 4:00:17 PM

---

Dear Sir/Madam,

I am writing regarding the Port of Los Angeles and Long Beach Clean Air Action Plan.

I am a senior high school student and my teachers have discussed the different clean vehicle technologies available today and in the future.

CNG running on renewable natural gas seems to be the best available option at this time.

From what I understand there are still many challenges for electric trucks. Who knows whether it will be 1 year, 3 years, 5 years, 10 years or longer before the electric grid will be scale up to handle EV trucks?

As an interested high school student, for our health, for those that suffer from asthma or lung related illness, please keep using the cleanest available vehicle technology, CNG and replace those dirty diesel trucks asap.

Sincerely,

Christopher Ding

Inland Empire Resident

**From:** denisdng@aol.com  
**To:** [Commissioners](#)  
**Subject:** Port of Los Angeles and Long Beach – Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 3:42:20 PM

---

Dear Sir/Madam,

I am writing regarding the Port of Los Angeles and Long Beach recent discussion of using Clean Air - Low Emission Trucks.

Been a CA resident of over 20 years and have definitely seen the air quality improved over the years. I have seen school buses, transit buses and trash trucks that run on CNG (compressed natural gas) and there are no doubts in my mind that these vehicles are much, much cleaner than their diesel equivalent.

From what I have read, electric trucks are not ready for full scale deployment now and we should not wait. Who knows whether it will be 1 year, 3 years, 5 years, 10 years or longer before the electric grid will be scale up to handle EV trucks?

For all of us that lives in CA, for our health, for those that suffer from asthma or lung related illness, please keep using the cleanest available vehicle technology, CNG and replace those dirty diesel trucks asap.

Sincerely,

Denis Ding

Inland Empire Resident

**From:** Dyanna Peters  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Needless pollution and respiratory illnesses  
**Date:** Wednesday, October 25, 2017 10:28:22 AM  
**Attachments:** [image003.png](#)  
**Importance:** High

---

Dear Mayor Garcia,

As an educator, you recognize the importance of knowing the facts. Your focus on sustainability for the City of Long Beach is very important. Air pollution is a matter of public health which is one reason we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks operating in the Ports of Los Angeles and Long Beach beginning in 2018. Too many people suffer from asthma and other respiratory illnesses caused by air pollution: we can't delay cleaning the air when clean renewable natural gas (RNG) technology is available today. I urge you to adopt immediate requirements for clean fueled trucks at the Ports of Los Angeles and Long Beach. Waiting means more emissions of smog-forming pollution and greenhouse gases when RNG (renewable natural gas) technology is 90% to 99% cleaner than diesel AND is available now. How many residents will continue to suffer with respiratory illnesses when there is a solution available today? Your vision tells me that you understand this urgency. I trust that you will lead the charge by requiring use of the cleanest technology available today which is natural gas!

Thank you for leading us to cleaner and clearer skies!

My sig block-BAJ



**From:** Bynum, Lou Anne  
**To:** [Cordero, Mario](#); [Cameron, Rick](#); [Jordan, Richard](#); [Tomley, Heather](#)  
**Subject:** Fwd: Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 1:35:49 PM  
**Attachments:** [image001.png](#)

---

More....

Sent from my iPad

Begin forwarded message:

**From:** Jane Tran <[Jane.Tran@cleanenergyfuels.com](mailto:Jane.Tran@cleanenergyfuels.com)>  
**Date:** October 24, 2017 at 1:34:51 PM PDT  
**To:** "[lee.peterson@polb.com](mailto:lee.peterson@polb.com)" <[lee.peterson@polb.com](mailto:lee.peterson@polb.com)>, "[mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org)" <[mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org)>, "[mayor@longbeach.gov](mailto:mayor@longbeach.gov)" <[mayor@longbeach.gov](mailto:mayor@longbeach.gov)>, "[commissioners@portla.org](mailto:commissioners@portla.org)" <[commissioners@portla.org](mailto:commissioners@portla.org)>, "[commissioner\\_renwick@portla.org](mailto:commissioner_renwick@portla.org)" <[commissioner\\_renwick@portla.org](mailto:commissioner_renwick@portla.org)>, "[commissioner\\_arian@portla.org](mailto:commissioner_arian@portla.org)" <[commissioner\\_arian@portla.org](mailto:commissioner_arian@portla.org)>, "[commissioner\\_martinez@portla.org](mailto:commissioner_martinez@portla.org)" <[commissioner\\_martinez@portla.org](mailto:commissioner_martinez@portla.org)>, "[commissioner\\_pirozzi@portla.org](mailto:commissioner_pirozzi@portla.org)" <[commissioner\\_pirozzi@portla.org](mailto:commissioner_pirozzi@portla.org)>, "[commissioner\\_moreno@portla.org](mailto:commissioner_moreno@portla.org)" <[commissioner\\_moreno@portla.org](mailto:commissioner_moreno@portla.org)>, "[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com)" <[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com)>, "[loriann.guzman@polb.com](mailto:loriann.guzman@polb.com)" <[loriann.guzman@polb.com](mailto:loriann.guzman@polb.com)>, "[tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com)" <[tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com)>, "[bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com)" <[bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com)>, "[frank.colonna@polb.com](mailto:frank.colonna@polb.com)" <[frank.colonna@polb.com](mailto:frank.colonna@polb.com)>, "[psanfield@portla.org](mailto:psanfield@portla.org)" <[psanfield@portla.org](mailto:psanfield@portla.org)>  
**Cc:** David Walker <[David.Walker@cleanenergyfuels.com](mailto:David.Walker@cleanenergyfuels.com)>  
**Subject: Clean Air Action Plan**

Good Afternoon Commissioners Port of LA & Commissioners Port of Long Beach

We know the leading source of California's air pollution is the transportation industry. More than 90% percent of Californians live in areas like Long Beach and Los Angeles that fail to meet federal health protective air quality standards. Motor Vehicles emissions present long lasting threats of public health.. We are seeing the effects of pollution and how global warming has impacted us in many ways. We have real evidence that our climate and air quality from the pollutants we contribute is changing our world. If we have the opportunity for all Californian's to make some immediate changes to help better our air quality and environment and enforce with Clean Air policies, it can surely help change this growing issue. We have to make hard decisions and changes in order to see the results we expect. Commissioners of Los Angeles and Long Beach you are our leaders to help guide the community and making the right

changes for us.

When I first started here with Clean Energy I was excited to be part of this company and what we stood for. I believe that we will change how America will fuel in the future. California remains to have the most polluted air in America. Until we actually take a stance on this matter than we can truly start to see the right changes being made. Clean Energy has the solution to this issue with our Near Zero Natural Gas with Renewable natural gas. Vehicles that will emit 90% less Nox and 90% less carbon. Clean Energy has made the commitment to our business to finding ways for clean fuel solutions and it has always been our mission to protect our environment and transforming the transportation industry to taking the advantages of natural gas. Helping the ports achieve their desired goals to reducing pollutants by helping the ports make the right switch by enforcing transportation industry too using vehicles of natural gas and renewable gas that will reduce the amount of pollution by 90%. I hope that Commissioners of Los Angeles and Commissioners of Long Beach will also share the vision as I do, to making the right changes in the current policies and commit to clean air policy and standards to help provide healthier environment for the generations to come.

Jane Tran  
Tax Specialist



4675 MacArthur Court Suite 800  
Newport Beach California 92660  
Office: 949-437-1022 Fax 949-743-5060  
Email [jtran@cleanenergyfuels.com](mailto:jtran@cleanenergyfuels.com)

**From:** Jeanine Chu  
**To:** [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Port of Los Angeles and Long Beach – Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 3:54:38 PM

---

Dear Sir/Madam,

I am writing regarding the Port of Los Angeles and Long Beach Clean Air Action Plan.

Been a CA resident of over 15 years and have definitely seen the air quality improved over the years. I have seen school buses, transit buses and trash trucks that run on CNG (compressed natural gas) and there are no doubts in my mind that these vehicles are much, much cleaner than their diesel equivalent.

From what I have read, electric trucks are not ready for full scale deployment now and we should not wait. Who knows whether it will be 1 year, 3 years, 5 years, 10 years or longer before the electric grid will be scaled up to handle EV trucks?

As a concerned mother of two boys growing up in CA, for our health, for those that suffer from asthma or lung related illness, please keep using the cleanest available vehicle technology, CNG and replace those dirty diesel trucks asap.

Sincerely,

Jeanine Chu

Inland Empire Resident

**From:** Jeff Ricketts  
**To:** [Commissioners](#)  
**Subject:** CAAP  
**Date:** Tuesday, October 24, 2017 3:20:50 PM

---

I am writing to express my concern for our air quality here in the area around the Port of LA. I not only live on the water but I am a boater here too. I have been inspired by the results over the past years for CARB's efforts on air quality the efforts to improve the beaches and the sea. Now you have the opportunity to make another great stride in improving our environment the CAAP. I encourage you to act bold and decisively and implement this in 2018 and do not delay. Every year with the diesels running in and out of the Port and on the highways of Southern California is just adding to the problem. The technology is here. The Natural gas trucks function well. Many large companies ( UPS, Fed Ex, Kroger, Waste Mgmt, Republic Waste, LAMTA) are using them and experiencing great results. They have been utilized in the port and they are great, cleaner and quieter than their diesel counterparts.

Waiting means more emissions of smog-forming pollution and greenhouse gases when RNG technology that is 90% to 99% cleaner than diesel is available now. The Ports can either be the catalyst for clean trucks now and throughout California and the US, or stick with the status quo and delay bringing relief.

- Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018.
- Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.
- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

I thank you for taking the time to read this and for your visionary action on this vote

Jeffrey J Ricketts

3566 Windspun Drive

Huntington Bch

**From:** Bynum, Lou Anne  
**To:** [Cordero, Mario](#); [Jordan, Richard](#); [Cameron, Rick](#); [Tomley, Heather](#)  
**Subject:** Fwd: Clean Air Action Plan  
**Date:** Tuesday, October 24, 2017 1:35:18 PM

---

FYI. LounAnne

Sent from my iPad

Begin forwarded message:

**From:** John Short <[jshort@cadengineering.net](mailto:jshort@cadengineering.net)>  
**Date:** October 24, 2017 at 1:32:21 PM PDT  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org), [mayor@longbeach.gov](mailto:mayor@longbeach.gov),  
[commissioners@portla.org](mailto:commissioners@portla.org), [commissioner\\_renwick@portla.org](mailto:commissioner_renwick@portla.org),  
[commissioner\\_arian@portla.org](mailto:commissioner_arian@portla.org), [commissioner\\_martinez@portla.org](mailto:commissioner_martinez@portla.org),  
[commissioner\\_pirozzi@portla.org](mailto:commissioner_pirozzi@portla.org), [commissioner\\_moreno@portla.org](mailto:commissioner_moreno@portla.org),  
[louanne.bynum@polb.com](mailto:louanne.bynum@polb.com), [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com),  
[tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com), [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com),  
[frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject: Clean Air Action Plan**

Dear Fellow American policy makers,

I urge you each to vote wisely to clean up our Air, Environment and Eco-System by voting to replace heavy duty diesel trucks with clean technology.  
Diesel trucks are the largest source of smog-forming pollution.  
There are over 12,000 diesel trucks that routinely service our Ports

- Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018.
- Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.
- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

Thank you for your Patriotism and Leadership in this matter.

Sincerely,  
John Short - President  
CAD Engineering Inc.

Cypress, CA 90630  
Cell: 562-762-8405  
Email: [jshort@cadengineering.net](mailto:jshort@cadengineering.net)  
Website: [www.cadengineering.net](http://www.cadengineering.net)

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe that you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use the information. Please indicate to the sender that you have received this e-mail in error, and delete the copy you received. Thank you.

EXPORT COMPLIANCE STATEMENT: The information contained herein is or may be controlled by the International Traffic in Arms Regulations (ITAR), 22 CFR 120 - 130, and may not be exported, or disclosed to a foreign person, whether in the United States or abroad, without prior U.S. Government written approval.

**From:** Alex R Thomsen  
**To:** [Commissioners](#)  
**Subject:** CAAP  
**Date:** Wednesday, October 25, 2017 5:27:45 PM

---

Dear Commissioners,

I am writing today to encourage you to act positively on the proposed CAAP November 2. Diesel trucks are among the most polluting sources in Southern California. It is urgent to not delay in implementing cleaner air regulations for our region. Cleaner technology such as electrically powered trucks will surely evolve but they're not ready now. We know RNG and CNG trucks are nearly pollution free when compared to their diesel counterparts and it seems immediately practical to flush them into the Port fleets.

Having lived in Southern California for over 45 years I can attest to the damage our air has caused. I now function with a little over 55% lung capacity, decidedly owing to the air we breathe. I never smoked or worked with or around chemicals hazardous to my lungs. And though I love living in Southern California, it seems ill-advised at best to promote the continuance of poor air quality that will affect my children and grandchildren.

This is an urgent plea, I encourage you to implement the Clean Air Action Plan.

Alex Thomsen  
PO Box 2122  
Newport Beach, CA 92659  
Cell: (949) 510-2677  
[alexthom@sbcglobal.net](mailto:alexthom@sbcglobal.net)

**From:** Fawna Kritzer  
**Subject:** Air pollution is a matter of public health  
**Date:** Wednesday, October 25, 2017 1:53:17 PM

---

To whom it may concern,

There is an urgent need to improve the extremely poor air quality at the Ports, and requiring the thousands of trucks that operate on dirty diesel at the ports to be replaced with new zero-NOx engines fueled by Renewable Natural Gas will have an immediate impact on the air quality while keeping the ports economically competitive. There is no other immediate solution currently available or proposed that can make that claim. Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018. Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks. California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting. Please act in the best interest of public health for the port communities and Southern California basin.

Sincerely,

Fawna Kritzer

A concerned citizen

**From:** Jelena Rowe  
**To:** [Commissioners](#)  
**Subject:** Adopt a STRONG CAAP that will protect our air quality...  
**Date:** Wednesday, October 25, 2017 11:59:39 AM

---

Dear Commissioners,

I urge you to be bold and visionary by adopting a strong CAAP that will deploy RNG trucks starting in 2018. As you know, Southern California has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution. I grew up in San Pedro and still have family and friends who live there.

Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018. Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.

If we wait, waiting means more emissions of smog-forming pollution and greenhouse gases when RNG technology that is 90% to 99% cleaner than diesel is available now.

I look forward to you to make the right decision for our community.

Regards,  
Jelena Rowe

**From:** Lanette Maes  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners: Renwick, Edward; Arian, David; Martinez, Vilma; Anthony Pirozzi; Lucia Moreno; louanne.bynum@polb.com; loriann.guzman@polb.com; tracy.egoscue@polb.com; bonnie.lowenthal@polb.com; frank.colonna@polb.com](#)  
**Subject:** RE: The Ports of Los Angeles and Long Beach - Clean Air Action Plan  
**Date:** Wednesday, October 25, 2017 3:37:25 PM

---

Hello,

As a native of California for over 60 years, I am concerned about our air quality especially at the Los Angeles Port and the Long Beach Port. It has come to my attention you have the instrument to change our air quality by adopting the Clean Air Action Plan (CAAP). With that being said, I'm urging you not to hesitate in bureaucracy red tape or be influenced by the diesel industry as many have been, but to adopt CAAP without further delay.

As you are aware, waiting until 2020 further delays the steps to clean Southern California's air quality now and CAAP will start aggressively replacing diesel trucks in 2018. This is a public health issue that's been delayed already too long. This is affecting the health of those that suffer from asthma and other respiratory illnesses, which in turn, affects our healthcare industry when numerous people are coming down with long-term illnesses due to air pollution.

Many companies have been developing alternative fuels to clean up the air pollution in Southern California and one of the alternative fuels is Renewable Natural Gas (RNG). RNG is practical and available in the ports, it's cost-effective, and the trucks are reliable. Quite frankly, I'm surprised that the trucking industry isn't promoting this instead of delaying since California has allocated hundreds of millions of dollars to replace dirty diesel trucks. With your vote supporting CAAP, it will encourage truck owners to use the incentive funding that's currently available to them.

Adopting CAAP is the right thing to do for the quality of life for the residents in California, which also includes you, your family and friends.

Thank you for your time,

Lanette Maes

**From:** Mark Theissen  
**To:** [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](#); [loriann.guzman@polb.com](#); [tracy.egoscue@polb.com](#); [bonnie.lowenthal@polb.com](#); [frank.colonna@polb.com](#)  
**Subject:** FW: Ports of LA and LB CAAP Vote  
**Date:** Wednesday, October 25, 2017 7:37:22 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)

---

Hello,

I understand the Ports of LA and Long Beach will be voting on a Clean Air Action Plan (CAAP) November 2<sup>nd</sup>. Seldom is there such an important decision at local levels of government that has such magnified importance across a region and a state. Southern California has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution. There are over 12,000 diesel trucks that routinely service the Ports and the CAAP will determine the policy of replacing these trucks with clean technology. The decision that will be made by the Ports comes down to urgency: should the Ports adopt immediate requirements for clean trucks starting in 2018; or wait until 2020 or later so that diesel can try again to clean up its act. Waiting means more emissions of smog-forming pollution and greenhouse gases when Renewable Natural Gas (RNG) technology that is 90% to 99% cleaner than diesel is available now.

I urge the Ports of LA and LB to vote for using RNG as the cornerstone of the CAAP in order to get improved air quality sooner rather than later. In doing this transportation companies and owner / operators will be able to take advantage of the tens of millions of dollars available the state to replace dirty diesel trucks. The best thing is that these funds are available now. A strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting. We all want clean air sooner!

Respectfully,



**mark theissen**

president

see jane go, inc.

o: 949.899.8555, ext 32

m: 714.267.0022

[mark@seejanego.co](mailto:mark@seejanego.co)

[www.seejanego.co](http://www.seejanego.co)

**From:** Staci Pratt  
**To:** [Commissioners](#)  
**Subject:** Please Read: CCAP - Vote YES!  
**Date:** Wednesday, October 25, 2017 12:31:41 PM

---

Dear Commissioners Port of LA,

I have never written to any politicians before, nor have I truly found the urgency until now. I have grown up in Orange County and have seen and experienced the influx in pricing, traffic and now pollution.

The Los Angeles and Long Beach ports are the largest ports in all of the US, and is now labeled the "diesel death zone." The children, families and parents working in these zones are suffering from immediate asthma and respiratory illnesses, that I'm sure will be linked to various types of cancer as time goes on.

Please, on November 2nd you have the opportunity to change and create new standards for what is acceptable in our ports by voting YES on the Clean Air Action Plan! Diesel has effected these ports for far to long, and you have the power to stand up for the children, families, and voters in our community, and do the right thing starting in 2018! The RNG technology that is available to be used in the CCAP will reduce the truck emissions by 90% to 99% compared to diesel, in addition to reducing greenhouse gas emissions better than any other technology we have right now, including electric. We cannot wait for this bill to be pushed to 2020 or even farther down the road. Natural Gas is a huge resource that is ready to be used today, and we should be taking advantage of it.

Governor Brown already signed bills to increase the gas and vehicle tax on everyone this year. If our politicians are really looking to make an effective change to our environment, it's not about increasing taxes, and keeping the same standards on big diesel companies; but about making a change! This CCAP is a bill that can actually change the standards and make a difference in peoples lives beginning next year. We cannot wait any longer. Please, this is your opportunity to really stand up for us, be our positive voice and make the best difference in our community.

The change must take place now and it is up to you. Your vote. Your voice. Your YES!

Sincerely yours,

Staci Pratt

**From:** tbressler3020@gmail.com  
**To:** [Commissioners](#)  
**Subject:** Don't Delay the Ports Clean Air Action Plan  
**Date:** Wednesday, October 25, 2017 7:07:25 AM

---

Dear Commissioners,

I have become aware that the Ports of Long Beach and Port of Los Angeles are looking at delaying new Ports Clean Air Action Plan all the way to 2020.

I already had an understanding that the ports understood the pollution you produce is the major contributor to Southern California Air Pollution.

Delaying implementation, when we already have viable Clean- Extremely Low emission trucks is immoral and sounds politically weak.

The emissions from the port are negatively affecting my Grandchildren that live in Long Beach, Anaheim and Tustin, 3 of my daughters, my wife and myself.

Please get these dirt diesel trucks off our road NOW.

Thank you for reading my email.

Tom Bressler  
[500 S. Peregrine](#)  
[Anaheim CA.](#)

Sent from my iPad

**From:** Tony Kritzer  
**To:** [Commissioners](#)  
**Subject:** Urgent need to clean up the Ports of LA and Long Beach  
**Date:** Wednesday, October 25, 2017 1:45:01 PM

---

To whom it may concern,

There is an urgent need to improve the extremely poor air quality at the Ports, and requiring the thousands of trucks that operate on dirty diesel at the ports to be replaced with new zero-NOx engines fueled by Renewable Natural Gas will have an immediate impact on the air quality while keeping the ports economically competitive. There is no other immediate solution currently available or proposed that can make that claim. Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018. Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks. California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting. Please act in the best interest of public health for the port communities and Southern California basin

Sincerely,

Tony Kritzer  
A concerned citizen

**From:** Dolores Parsch  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners; [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Clean Air Action Plan 2018  
**Date:** Wednesday, October 25, 2017 1:37:23 PM

---

## **Subject: CleanAirActionPlan2018**

Your Attention Please:

As a California resident, I am greatly concerned about the quality of air we breathe. I would like to ask you to require **in 2018 the Ports of Los Angeles and Long Beach to replace their diesel burning vehicles with Renewable Natural Gas Technology (RNG)**. I understand funding is available for this replacement. To postpone this measure diesel trucks would not only continue to pollute our air (the worst in our Nation) it would continue to put people's lives at risk to the numerous respiratory illnesses that have risen over these last years.

Please vote to have the **CleanAirActionPlan take effect in 2018**. Time is of essence to help clean the air we breathe!!

Thanking you in advance,

Mr & Mrs W. M. Parsch

**From:** Warren Mitchell  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Cc:** [Lanette Maes](#)  
**Subject:** The Ports of Los Angeles and Long Beach - Clean Air Action Plan  
**Date:** Wednesday, October 25, 2017 12:19:20 PM

---

All,

I am writing to urge you to adopt the Clean Air Action Plan that will start aggressively replacing diesel trucks in 2018. It is not acceptable to wait until 2020. People are suffering from respiratory ailments caused by air pollution and we need to act now. Renewable natural gas technology is available now that reduces emissions compared to diesel by 90% to 99%. California has allocated hundreds of millions of dollars to replace dirty diesel trucks and your leadership in cleaning up the air with a strong CAAP, will encourage truck owners to use the incentive funding now. The RNG fuel is available; it is practical and available in the ports, and it is cost effective. The trucks are reliable, dependable, durable, cost effective and available.

Please do not miss this opportunity to make a huge difference in the quality of life for the residents in California by doing the right thing. Other technologies may become available over the next 15 or 20 years, and when they do and become cost effective, we can improve further. But, we cannot make up for lost time when we don't capitalize on a winning opportunity that solves significant and sometimes fatal health problems. Act Now!

Best regards,

Warren Mitchell, eighty year resident of Southern California  
Chairman of the Energy Coalition, a 501C3 Non Profit Corporation  
Former President and Chairman of Southern California Gas Company  
Former Chairman of San Diego Gas and Electric

**From:** Ron Thompson  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners: Renwick, Edward; Arian, David; Martinez, Vilma; Anthony Pirozzi; Lucia Moreno; louanne.bynum@polb.com; loriann.guzman@polb.com; tracy.egoscue@polb.com; bonnie.lowenthal@polb.com; frank.colonna@polb.com; mayor.garcetti@lacity.org; mayor@longbeach.gov; Commissioners: Renwick, Edward; Arian, David; Martinez, Vilma; Anthony Pirozzi; Lucia Moreno; louanne.bynum@polb.com; loriann.guzman@polb.com; tracy.egoscue@polb.com; bonnie.lowenthal@polb.com; frank.colonna@polb.com](#)  
**Cc:** [Andrew J. Littlefair](#)  
**Subject:** clean tucks  
**Date:** Wednesday, October 25, 2017 10:33:18 AM

---

Good Day All,

I am sending this note to all folks I believe should understand my feelings

I am a 60 year old 2 time cancer survivor, I also have a daughter that is a survivor ( Ronette ), My mom ( Sylvia ) is now terminal, we live east

Of Chicago, one of the filthiest environments in the country, I believe this is because of the things we breath, and eat,

I have also been involved with Natural Gas powered vehicles, and dispensing equipment, and know the positive impact this power plant offers.

I would ask that you folks please consider instituting clean power trucks and yard equipment as soon as you can, if we can prevent 1 person every week, the

Fight of survival, or the cost to our economy, and the suffering, as well as the stress it places on the care giver, it is worth the investment

The health care institute, reports that 87 billion dollars was the approx. price tag in year 2014, There are 15 million folks with cancer in our country,

I know in your area air quality is a huge concern, as well the health of your own families and self.

If the investment, can save our country and the folks that live and work here just 10% annually, that would be a huge blessing,

I would like to think we left our grandchildren a country better than what we have created.

I want to thank you for your time

Respectfully

Ron

**From:** Daniel Wellner  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); **Commissioners:** [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Clean Air Action Plan concerning the Ports of LA and Long Beach.  
**Date:** Wednesday, October 25, 2017 8:50:22 AM

---

Please don't wait!! This vote has to pass now for 2018 Clean Air Action Plan.

- Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018.
- Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.
- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

Best regards,  
Daniel Wellner

**From:** Gary Jordan  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners: Renwick, Edward; Arian, David; Martinez, Vilma; Anthony Pirozzi; Lucia Moreno; louanne.bynum@polb.com; loriann.guzman@polb.com; tracy.egoscue@polb.com; bonnie.lowenthal@polb.com; frank.colonna@polb.com](#)  
**Subject:** Clean Air Action Plan 2 November  
**Date:** Wednesday, October 25, 2017 8:15:56 AM

---

Good morning! I am emailing concerning the upcoming vote for the Clean Air Action Plan (CAAP) on 2 November 2017.

Seldom is there such an important decision at local levels of government that has such magnified importance across a region and a state. Southern California has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution. There are over 12,000 diesel trucks that routinely service the Ports and the CAAP will determine the policy of replacing these trucks with clean technology. The decision that will be made by the Ports comes down to urgency: should the Ports adopt immediate requirements for clean trucks starting in 2018; or wait until 2020 or later so that diesel can try again to clean up its act. Waiting means more emissions of smog-forming pollution and greenhouse gases when RNG technology that is 90% to 99% cleaner than diesel is available now. The Ports can either be the catalyst for clean trucks now and throughout California and the US, or stick with the status quo and delay bringing relief.

- Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018.
- Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.
- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

Please, be bold and visionary by adopting a strong CAAP that will deploy RNG trucks starting in 2018. I want my kids and grandkids to have a better future and world that we live in.

Regards,

Gary Jordan

**From:** Harrison Clay  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); **Commissioners:** [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** CAAP  
**Date:** Wednesday, October 25, 2017 12:48:02 PM

---

Dear Port Harbor Commissioners:

I write to you today about the Clean Air Action Plan (CAAP) that will be voted on by the Ports of LA and Long Beach [on November 2<sup>nd</sup>](#).

I am a Los Angeles County resident and father to three young children who are growing up 15 miles from the ports. I am also an entrepreneur who has dedicated his career to finding ways to cut air pollution and GHG from our transport fuel use without sacrificing jobs or a vibrant economy.

The ports are crucial to this in two ways: they are the largest source of air pollution in the basin and perhaps the single most critical piece of infrastructure supporting Southern California's vibrant economy.

A workable, meaningful Clean Air Action Plan is critical to reducing the environmental impact of the ports on our communities while preserving their importance to the economy. California has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution. There are over 12,000 diesel trucks that routinely service the Ports and the CAAP will determine the policy of replacing these trucks with clean technology. The decision that will be made by the Ports comes down to urgency: should the Ports adopt immediate requirements for clean trucks starting in 2018; or wait until 2020 or later so that diesel can try again to clean up its act. Waiting means more emissions of smog-forming pollution and greenhouse gases when Renewable Natural Gas technology that is 90% to 99% cleaner than diesel is available now. The Ports can either be the catalyst for clean trucks now and throughout California and the US, or stick with the status quo and delay bringing relief and forgo the opportunity to lead.

I beg you to be bold and visionary by adopting a strong CAAP that will deploy the cleanest trucks available as soon as possible, with no delay. Specifically the ports must seize the opportunity to drive large scale adoption of ultra low NOx trucks running on renewable natural gas NOW. To this end I note:

- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any technology that can meet the range and haulage requirements of heavy duty trucks serving the ports.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

The families that live in and near the ports should not have to wait for cleaner air when a readily available solution is available that can dramatically improve the air quality in the ports

today. True change requires bold and decisive action by our leaders. Do not let this opportunity to lead and to serve the people who elected you this pass you by.

Sincerely,  
Harrison Clay  
Manhattan Beach CA

**From:** fourtaylors  
**To:** [Commissioners](#)  
**Subject:** Clean Air Action Plan  
**Date:** Wednesday, October 25, 2017 6:13:11 AM

---

I am writing to express my thoughts and concerns on the Clean Air Action Plan currently under consideration by the Ports of LA and Long Beach. It's important that Southern California do something in 2018 as it has the most polluted air in the nation and heavy duty diesel trucks are the largest source of smog-forming pollution. Waiting means more emissions of smog-forming pollution and greenhouse gases when Renewable Natural Gas (RNG) technology that is 90% to 99% cleaner than diesel is available now.

- Air pollution is a matter of public health and we can't wait until 2020 or later to get started cleaning the air, we should start replacing diesel trucks in 2018.
- Too many people suffer from asthma and other respiratory illnesses caused by air pollution, we can't delay cleaning the air when clean RNG technology is available.
- RNG technology is available that reduces truck emissions by 90% to 99% compared to diesel.
- Climate change is a global problem and RNG can reduce greenhouse gas emissions more than any other technology, even battery electric trucks.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

Thank you for your consideration on this very important topic.

Respectfully submitted,

Jim Taylor

**From:** Dave  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners: [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Cc:** [Councilmember Roberto Uranga](#)  
**Subject:** CAAP Vote  
**Date:** Thursday, October 26, 2017 11:57:09 AM

---

As a concerned citizen, resident and native of Long Beach, CA. I urge the Ports of Long Beach and Los Angeles to vote in favor of implementing the changes in the CAAP starting in 2018, not 2020. In the 70's (age 20 - 30) I was a participant in a UCLA study measuring the effects of air quality on long term residents of the Long Beach area. I have diminished lung capacity and function, a condition not unusual for an area with high air pollution. Besides, what can the fuel producers do to improve the emission quality from diesel trucks in 2 years that will not require significant changes to equipment. both at the production and end user, that could be implemented in 2 years? Not much, and at what cost to both. Providing a 2 year leeway will only encourage more standoffs, threats and delays demanded by the producers and the users. Be leaders, show the way to improved air quality and accept the responsibility for making our air cleaner and healthier.

Sincerely,  
Charles Stevens  
Long Beach, CA

**From:** Gayle Pratt  
**To:** [Martinez, Vilma](#)  
**Subject:** CAAP Vote on November 2nd  
**Date:** Thursday, October 26, 2017 1:21:52 PM

---

Dear Commissioner Martinez,

I have lived in Southern California since 1976 and most of that has been in Orange County. My husband and I raised our kids here and now we have a 2 1/2 year old grandson. I am concerned for his health as well as other kids growing up here; we don't have the clean air we once could brag about and that's very sad since it doesn't have to be that way. As if the traffic wasn't a big enough problem, we have learned just how horrible the Los Angeles and Long Beach ports are polluting!

We've heard the ports labeled as the "diesel death zone." How awful for the children and families as well as the parents working in those areas. It's frightening to think of the respiratory illnesses people are suffering from and who knows what other serious illnesses will be related to that! Besides living in an expensive part of California, we now have to suffer health issues from diesel being spewed into the air which can be stopped!

On November 2nd, please vote YES on the Clean Air Action Plan! You have the power to stand up for the children, families, and voters in our community, and do the right thing starting in 2018. Please don't let the bill be pushed to 2020 or even farther down the road. Natural gas is a huge resource, not imported and ready to be used. I really don't understand why it's not already a huge part of our economy!

The CAAP bill can actually change the standards and make a difference in our wellbeing beginning next year. Let's not wait any longer, it just doesn't make good sense. What a great legacy you could leave if you would be our voice for clean air and what is best for the people of Southern California!

Your yes vote would mean so much to the people living here now as well as future residents, please be the positive change we could finally have.

Respectfully yours,

Gayle Row



California Natural  
Gas Vehicle Coalition

October 26, 2017

Port of Los Angeles Harbor Commission  
Ambassador Vilma Martinez, President  
425 South Palos Verdes Street  
San Pedro CA 90731

Port of Long Beach Harbor Commission  
Lou Anne Bynum, President  
4801 Airport Drive  
Long Beach CA 90815

Subject: 10-23-17 Proposed Clean Air Action Plan

Dear Harbor Commissioners:

The California Natural Gas Vehicle Coalition (CNGVC) applauds the progress made by the Cities of Los Angeles and Long Beach, and the Ports of Los Angeles and Long Beach (Ports), in reducing port-related emissions since the first bold and visionary Clean Air Action Plan (CAAP) was adopted over a decade ago. We owe much to the leaders that took bold action back then and to the Ports for implementing programs that made this vision a reality. The Cities of Los Angeles and Long Beach and the Ports now stand at the next decision point in the quest to drive emissions to zero. Unfortunately, the proposed CAAP that was released on October 23, 2017, misses the opportunity to reduce NOx and GHG emissions beginning in 2018, and risks placing the costs of truck replacements on small businesses and owner-operators.

**Truck Fees Should Have a Firm Start Date in 2018**

The CAAP acknowledges that public health issues are a call to action (“Public Health-Call to Action”). Every year of excess NOx and GHG emissions at the ports and along Southern California’s freeway corridors is a missed opportunity to address our public health crisis. The CAAP truck program is contingent on CARB’s adoption of a required NOx standard for heavy duty engines. This is a big risk because CARB’s NOx rulemaking is not guaranteed to be completed by 2020 as acknowledged by the CAAP. If CARB’s rulemaking is delayed, then the CAAP truck program is delayed. If the truck program is delayed, then the most significant contributor to pollution in the Los Angeles basin – heavy-duty, trucks using diesel engines – will continue to be used indefinitely. In addition, industry is faced with risk and uncertainty over the start date of the program. Starting truck fees in 2018 provides a market incentive for truck owners to take advantage of the funding available from the state and begin transitioning to clean trucks immediately. Early reductions of NOx and GHG are the most important reductions because they have a cumulative beneficial effect on health and climate change.

### **The CAAP Should Move to Clean Technologies; Not Perpetuate Diesel**

CARB plans to adopt a new heavy duty engine NOx standard. However, the emission standard that will come from the rulemaking is unknown. We hope CARB will set the new engine standard to achieve a 90% NOx reduction below the current diesel engine standard. This 90% reduction has already been achieved in practice and should be the technology driving standard. However, the new NOx standard could also be set at a less stringent 50% or 75% reduction target, or could start out at these less stringent levels with the goal of meeting the most stringent standard over some period of time. This would keep diesel trucks on the road for an unspecified period of time.

Either way, relying on CARB to adopt an undefined standard in future years creates uncertainty for the Port Industry with both the timing of the requirement and an unknown standard. All of this risk and uncertainty is because the CAAP strategy depends on diesel. This is not a technology-neutral policy, this is policy driven by giving one technology more time in the future to reduce emissions – a technology that has failed to clean the air as promised. Recall that the so-called “clean diesel” technology that is today’s current emission standard has been found to emit 5 times to 9 times higher NOx levels than certification standards when operated in both port drayage and local delivery modes. The time has come to set the CAAP standard at 90% cleaner than today’s heavy-duty truck emissions standard and let all clean technologies compete on this level playing field.

### **Truck Funding Is Available Today**

California has committed unprecedented levels of funding designed to reduce diesel truck pollution. AB134 (2017) and the Volkswagen Settlement Fund Part D exist to help drivers get into near-zero trucks starting in 2018. This funding is allocated and will be spent. Either port trucks get their share of funds or other sectors within transportation will take the money. Setting the fee start date in 2018 provides the market incentive for replacing port trucks with the available funds now. An unknown fee start date sends the market signal to wait until there is program certainty. Generous state funding may not be available at some future date, especially if funds set aside this year go unused. Under this scenario, truckers potentially would need to absorb the entire cost of new trucks without assistance. This creates risk to our region’s goods movement industry and could create a shock to the overall system.

### **Recommended Changes**

Final Clean Air Action Plan Update, page 38:

The proposed Clean Trucks Program should be amended as follows:

- Beginning in mid-2018, new trucks entering the Ports’ Drayage Truck Registry (PDTR) must be certified to meet 0.02 g/bhp-hr NOx or better ~~have a 2014 engine model year (MY) or newer~~. Existing trucks already registered in the PDTR can continue to operate.
- Beginning in 2018 ~~early 2020, following promulgation of the state’s near-zero emission heavy-duty engine standard~~, all heavy-duty trucks will be charged a rate to enter the ports’ terminals, with exemptions for trucks that are certified to meet 0.02 g/bhp-hr NOx ~~this near-zero standard~~ or better.
- Starting in 2020, heavy-duty trucks will reduce GHG emissions by 40% compared to diesel through energy efficiency or low carbon fuel use.
- ~~Starting in 2023, or when the state’s near-zero emission heavy-duty engine standard is required for new truck engine manufacturers, new trucks entering the PDTR must have engines that meet this near-~~

California Natural Gas Vehicle Coalition  
Clean Air Action Plan  
October 26, 2017

~~zero emissions standard or better. Existing trucks already registered in the PDTR can continue to operate.~~

- Modify the truck rate so that by 2035 only trucks that are certified to meet zero emissions will be exempt from the rate.

Thank you for this opportunity to provide comments. I urge you to be bold and visionary as were your predecessors 10 years ago.

Sincerely,



Thomas Lawson  
President, California Natural Gas Vehicle Coalition  
(888) 538-7036  
[thomas@cngvc.org](mailto:thomas@cngvc.org)

cc:

Honorable Eric Garcetti, Mayor of Los Angeles  
Honorable Robert Garcia, Mayor of Long Beach  
Gene Seroka, Executive Director, Port of Los Angeles  
Mike DiBernardo, Deputy Executive Director, Port of Los Angeles  
Chris Cannon, Director, Environmental Management Division, Port of Los Angeles  
Mario Cordero, Executive Director, Port of Long Beach  
Rick Cameron, Managing Director Environmental Affairs & Planning, Port of Long Beach  
Heather Tomley, Division Director, Environmental Planning, Port of Long Beach



ENERGY VISION 138 East 13<sup>th</sup> Street New York, NY 10003

Tel: 212-228-0225 Cell: 347-201-1698 Web: energy-vision.org Twitter: @Energy\_Vision

BOARD OF DIRECTORS

October 26, 2017

Joanna D. Underwood  
Board Chair

To:

Cynthia Adler

The Mayor of Los Angeles  
The Mayor of Long Beach  
Commissioners of the Port of Los Angeles  
Harbor Commissioners at the Port of Long Beach

Bipasha Chatterjee

Dear Mayors and Commissioners,

Johannes D. Escudero

We are writing on behalf of the national environmental organization, Energy Vision, to urge the Ports of L.A. and Long Beach in their vote under the Clean Air Action Plan to move swiftly to clean up the 12,000 diesel trucks servicing the ports beginning in 2018. There are two key reasons to do so: first, because they have a fuel option – commercially viable today – that will bear the most significant environmental, health and climate change benefits in moving the ports toward meeting the goals of the CAAP; and second, because the generous State incentives provided under the California Clean Air Initiative will facilitate progress. The fuel option we are referring to is organic waste-based renewable natural gas.

Michael S. Gruen

John J. Magovern

Joan C. Pearlman

Energy Vision, a national environmental organization, recognized as a leading independent expert in the alternative vehicle fuels arena, has compared technologies for heavy-duty bus and truck fleets over the last decade. Our research has found, through study of projects across the US, that this new fuel has many benefits:

Brendan Sexton

Norman Steisel

Simon Sylvester-Chaudhuri

1) This fuel is made from the biogases emitted by **a renewable resource** – the organic wastes coming from communities, farms and factories and wastewater facilities day after day. It eliminates any reliance on petroleum and converts what has been a costly waste burden into a valuable energy source.

Eric Verkerke

Dr. Bailus Walker, Jr.

2) RNG is **the cleanest burning fuel**: it can best protect the health of millions of Californians TODAY. Used in heavy-duty vehicles, RNG results in virtually none of the health-threatening NOx and particulates that are emitted with the use of diesel fuel (and which are emitted in greater and greater quantities as diesel vehicles age). This fuel, used in the new “Near Zero” natural gas engine certified by US EPA and CARB, reduces lung-damaging nitrogen oxide emissions 90% below the EPA standard. A new UC Riverside study concluded that this engine/fuel combination is equal as a zero emission vehicle to electric trucks powered by California-grid energy.

3) RNG is **a clear climate-change winner as a fuel for heavy-duty fleets**. It cuts greenhouse gases by 70% to 300%, as verified by thorough CARB analyses. When food waste or animal manure are the main feedstock, the fuel is actually net-carbon-negative. More greenhouse gases (GHGs) are captured in producing the fuel than are emitted by

the vehicles burning it. The Port fleets converted from diesel to RNG fuel will meet or exceed the international GHG reduction goal (80% by 2050), not decades from now but right away.

4) Today's natural gas **engines are 50 to 80% quieter than diesel** engines, so vehicle operations at night do not disrupt communities and do not damage the hearing of vehicle operators.

5) RNG is a **fully commercial choice**. Santa Monica's transit bus fleet is using RNG fuel in Near Zero engines, and LA Metro will soon be using 295 of these buses. In the last decade, more than 40 plants have been built that are producing RNG fuel and more than 20,000 heavy-duty trucks are using it nationwide. And the pace of growth of this industry is accelerating.

6) RNG is a **secure, moderately priced fuel for the long haul**. Organic feedstocks, just within the state of California, if dedicated to production of this fuel, could displace not just the diesel in the port fleets but 90% of the diesel used in transportation in the State. In the case of floods, power outages, or the cutoff of petroleum-based fuels in the future, RNG fuel would be accessible.

We have seen this year not only the hurricanes in Houston, Florida, the US Virgin Islands and Puerto Rico, but also the worsening forest fires raging in the Northwest and in Northern California, bringing with them vast wreckage and loss of life. The costs to the federal government of such events over the past decade alone have totaled \$350 billion, according to a recent GAO report. Given the urgency of the existential threat our country and our world faces with a warming planet, and having frightening new evidence every year of the impacts, it is imperative that the Ports of L.A. and Long Beach begin aggressively deploying ultra-low-carbon and near-zero tailpipe emission technologies today.

Despite great strides, California — and especially the L.A. basin — still suffers from the worst ozone and particle pollution in the country, much of which is attributed to diesel exhaust. Taking the RNG path at the Ports of L.A. and Long Beach would address this challenge most effectively. It would sustain California's leadership in moving toward the most ambitious greenhouse gas reduction, air quality, waste, energy and transportation goals in the country. It would, also importantly, have ripple effects across the country. If we can provide further information we would be happy to do so.



Matthew P. Tomich, President



Joanna D. Underwood, Board Chair

**From:** Christopher Logan  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); [Commissioners](#); [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Cc:** [Christopher.J.Logan13@gmail.com](mailto:Christopher.J.Logan13@gmail.com)  
**Subject:** CAAP Plan  
**Date:** Friday, October 27, 2017 2:34:37 PM

---

To the Honorable Mayors Garcetti & Garcia, & Port Commissioners,

I am a resident that lives outside of your city, but well within the impact zone of the Port of LA, and it is for this reason that I am writing you this letter.

First, I would like to commend both the City and the Ports for the work that they have done to begin the arduous process of cleaning such a dirty environment. Compared to when I was a child, the region, as a whole, is significantly better in terms of air quality. For that I am grateful, as no one would want their sons or daughters to grow up in the horrible air that my wife and I grew up in. Thank you for all of your work in this regard.

What strikes me as alarming, however, is what I see to be a call to inaction with the recently published Clean Air Action Plan. Planning for a future technology that the Ports are pretty sure will materialize sometime in the future as the answer to a significant problem, is both irresponsible and dangerous.

Irresponsible because there are steps that can be taken today to immediately effect change.

Dangerous because people will continue to suffer, get sick and in some cases die, from the poisons in the air while we wait for this future technology.

From the perspective of the layman, the electric car and electric truck appear to be “zero emissions.” That’s what they are told to believe. That’s what Tesla tells the world. That’s what the politicians tell the world. And it just sounds good. It’s an electable platform, and it frankly takes less time to explain to the world.

We know, however, that it is not true. Setting aside the significant human rights and highly pollutive battery mining issue, the battery disposal issue, and the battery manufacturing and importation issues, you have the electrical generation, distribution and charging infrastructure issues.

Southern California already suffers from a significant electrical shortage issue. Rolling brown-outs in the hottest of days. Requests to not turn on appliances until 7PM, or air conditioning until even later, and yet the Board of the Ports think the answer to our diesel emissions problem in the ports is to add a significant amount of electrical load to an already strained supply network, and to add hundreds of millions of infrastructure in support of this. Potentially even requiring new electrical supply generation. All because the public has been told to believe, and naively do so, that electric is “zero emission.”

According the Energy Information Administration (EIA), the average electrical distribution lines in the US lose 5% of their generated electricity during distribution. Consider this, if we are having to provide significant new electrical loads to the Port area from the power generation stations, and we have to increase the production, all the while losing 5% of our increased production, we are being wasteful of an already sacred resource.

Additionally, as recently as 2016, per the EIA as much as 30% of our electricity was still generated by coal in this country. Why does that matter in California? Because we are the leaders in this nation for all things clean and renewable. Our Ports are the model that will be followed elsewhere. With our current Presidential situation, it only makes sense that this 30% figure will be rising in the near term, not shrinking, meaning the more electricity that we use for this “zero emission” truck policy, the more dirty electricity will be made in our country.

Meanwhile, we ALREADY HAVE Renewable Natural Gas (RNG), and existing heavy-duty natural gas powered engines proven by pathways done within the State of California to “fall as much as 14 times (lower) from what could be achieved using electrified trucks power by electricity generated from today’s power plants” according to a Trucks.com article on studies published by Gladstein, Neandross and Associates.

These trucks are currently working in the greater LA Basin and throughout the State of California in the Cummins 9 liter and 12 liter engine platforms, hauling everything from waste to groceries, to shoes, and already operating within the Ports areas. That means, not only could fix this entire problem TODAY, we could do so at a level BETTER than electric.

Sure, electric sounds good to the voters. It looks sexy as a Tesla. It makes sense for you and me to drive to and from work and school, but it doesn’t make sense for trucks. It doesn’t even exist as anything more than a test science experiment yet. It doesn’t make sense for HEALTH and WELL BEING of the residents in the impact zone. And it DOESN’T FIX THE PROBLEM NOW.

Please ask yourself these questions:

1. Do I want to worry about what's right, or about what's sexy, and election worthy?
2. Do I want to count on a maybe, sometime down the road, when the answer is already been given.

One final question for you; is it the Ports plan to simply move the pollution to another part of the country? Out of sight, out of mind? Or is it the desire of this leadership team, to step America in the right direction, as a model to the rest of the country?

Fix pollution now. Don't move pollution elsewhere by going to electric sometime in the future, and watching that 30% coal power figure move up, because somewhere, thousands of miles away, my tailpipe appears to be "zero emissions."

I don't know about you, but pushing a problem into someone else's yard, is not a lesson I am willing to teach my children. How about you?

Sincerely,

Christopher Logan

Ports of LA & Long Beach Impact Zone Resident

**From:** Jason Johnston  
**To:** [mayor.garcetti@lacity.org](mailto:mayor.garcetti@lacity.org); [mayor@longbeach.gov](mailto:mayor@longbeach.gov); Commissioners; [Renwick, Edward](#); [Arian, David](#); [Martinez, Vilma](#); [Anthony Pirozzi](#); [Lucia Moreno](#); [louanne.bynum@polb.com](mailto:louanne.bynum@polb.com); [loriann.guzman@polb.com](mailto:loriann.guzman@polb.com); [tracy.egoscue@polb.com](mailto:tracy.egoscue@polb.com); [bonnie.lowenthal@polb.com](mailto:bonnie.lowenthal@polb.com); [frank.colonna@polb.com](mailto:frank.colonna@polb.com)  
**Subject:** Your Future or Our Health? What's more important?  
**Date:** Friday, October 27, 2017 8:28:42 AM

---

- Get Diesel Semi's off of our roads now.
- California has allocated hundreds of millions of dollars to replace dirty diesel trucks and a strong CAAP will encourage truck owners to use the incentive funding to buy clean trucks rather than waiting.

**From:** Mitch Pratt  
**To:** [Commissioners](#)  
**Subject:** CAAP Decision - Nov 2nd  
**Date:** Friday, October 27, 2017 6:31:21 PM

---

Dear Commissioners & Staff:

It's a great sound-bite to be talking about electric trucks in 2035 but citizens, family members of all ages, are having their health seriously impacted each and every day. Having a CAAP that effectively promotes staying with diesel is offensive and politically inexcusable policy for the health and safety of the community particularly in an area known as the "diesel death zone".

Waiting to implement fees based on having CARB set a new emission standard is unnecessary particularly when they have already set an optional standard of 0.02 gm NOx/bhp-hr. Further, today, the natural gas truck engine made by Cummins Westport already achieves this standard so the Ports should move forward now to clean the air I breath. Natural gas trucks are in operation today with UPS and other major operators having successfully used these vehicles for millions of miles. Waiting for electric technology that is in development and has many implementation issues is not necessary when you consider that the emissions from power plants, and that DWP still gets about 30% of its power from Coal, results in a total emissions profile higher than what these low NOx natural gas engines provide today.

CARB, and the Ports, enabled the use of Prop 1B funds to go for diesel to diesel replacements and adding traps after the first CAAP rather than cleaning the air with more natural gas trucks. A big missed opportunity that residents are still paying for today. The UC Riverside study clearly shows that the in use emissions from these trucks are far worse than their certifications and continue to actively poison the air. This can't happen again.

We have an opportunity to keep pace with many EU countries as they are actively banning diesel. There are regular articles noting the EU shift in its truck fleets to utilize natural gas today and we need to do the same. Given that the State of California has set aside millions of dollars of incentive monies to support this shift we NEED to take full advantage of this opportunity now. Go grab the available funding to launch natural gas trucks today.

I urge you to please adopt a CAAP with the following provisions:

1. Implement fees beginning by April 1, 2018,
2. Set the immediate standard to avoid fees at 0.02 gm NOx / bhp-hr,
3. Actively pursue with AQMD and others to grab available funds and don't let CARB miss-appropriate funds for their other pet projects rather than an aggressive funding of NG trucks,
4. Set a difficult approval process and one that is VERY PUBLIC for any fleet that is granted an compliance exemption as we need change now.

You have the opportunity to be a global clean air leader today by implementing natural gas trucks while protecting the community's health. Don't shy away from the right opportunity - you can do it and set an impressive California, National and Global standard.

Thank you for your consideration,

Mitchell Pratt

**From:** Reagan Clemens  
**To:** [Commissioners](#)  
**Subject:** Clean Air Action Plan (CAAP) vote on November 2nd  
**Date:** Friday, October 27, 2017 10:45:01 AM

---

Dear Commissioners,

Thank you for taking the time to read this email.

My email is regarding the CAAP that is being developed for both Ports. As a resident of Southern California, I felt the need to express my opinion about how urgent it is to get these old dirty diesel vehicles off the road.

There is technology that is available TODAY that can help us fight against air pollution. People in the surrounding areas of the Ports are suffering from asthma and other respiratory illnesses that are caused by air pollution.

Renewable Natural Gas (RNG) is an alternative that can be implemented TODAY and have positive impact on the environment. RNG can reduce greenhouse gas emissions **more** than any other technology, even battery electric trucks.

California has allocated the resources to replace these dirty diesel trucks and my hope is that you can decide to clean up our environment TODAY.

Best Regards,

Reagan Clemens

**From:** James Harger  
**To:** [Commissioners](#)  
**Subject:** Clean Air Action Plan for the Ports  
**Date:** Saturday, October 28, 2017 8:33:00 AM

---

Dear Commissioners,

I have been a resident of the South Bay my entire life (nearly 60 years) and have come to appreciate the operations at the Ports of Los Angeles and Long Beach. They're not only two of the largest employers and economic engines in the country, they also generate nearly 25% of the air pollution in the Los Angeles Basin. We need to address the Ports' contribution to dirty air and the opportunity is now.

Interestingly, nearly 10 years ago, the Ports and local policy makers required all new trucks operating at the Ports to meet the EPA's 2007 emission standards. Nearly 15,000 gross polluting diesel trucks had to be retired. Natural Gas Trucks were part of the plan, however, the natural gas engines exceeded this requirement by meeting the 2010 EPA emission standards three years ahead of schedule. This saved millions of tons of emissions had they been diesel. Thanks to the leadership in Southern California, the truck manufacturers saw an opportunity. They engineered a natural gas option for their trucks, produced them on their respective assembly lines and made them available through their dealer networks. As a result, natural gas trucks now move goods across the country in nearly every state.

It's now 2017 and another Clean Air opportunity presents itself for the residents who live near the Ports and Southern California. Natural gas engines are now 10 times cleaner than the 2010 EPA standard and can run on renewable natural gas that will further reduce greenhouse gases by up to 100% compared to diesel. What an opportunity for the Ports to set proactive policy again and require Natural Gas Trucks to move goods to/from the Ports.

Let's not wait but ACT Now and require cleaner burning Natural Gas Trucks to be deployed in 2018 versus waiting for diesel to clean up its act.

Thank you for your consideration.

James Harger  
Manhattan Beach  
562.619.4032

**From:** Michael Busman  
**To:** [Commissioners](#)  
**Subject:** Clean Air Action Plan  
**Date:** Sunday, October 29, 2017 12:44:45 PM

---

Dear Commissioners:

I have reviewed the Clean Air Action Plan (CAAP) as well as the two web sites [www.actnowla.org](http://www.actnowla.org) and <http://www.rngcoalition.com/what-is-rng/>. Although the action plan is one way to improve local air quality around the ports, I have reservations whether the plan represents the best use of the tremendous investments directed to natural gas vehicles and infrastructure. I do not believe it is necessary to wait until 2035 for the final transition to electric vehicles when electrification should be a short-term priority **NOW**. Please understand that my viewpoints are from my experience as an engineer involved in energy efficiency, renewable energy, energy storage, and energy infrastructure upgrade projects. I first cut my teeth in energy conservation as the Energy Manager at the Atlanta Hilton Hotel following my graduation from Cornell University in 1976. I retired recently so I was in the business for over 41 years. My comments and opinions were submitted previously as public comment.

To be totally upfront, I'll try to summarize how I believe the gas industry is sugar coating the push for natural gas vehicles. What I gleaned from the websites is that there is a tremendous cost for natural gas vehicles and infrastructure for an interim solution until about 2035 for final transition to electric vehicles. What happens to the sunk cost of natural gas vehicles and infrastructure at that point in time? I am sure that there will be those in the gas industry who would complain quite vocally about the sunk cost in equipment and systems that are still functioning. I know that Tesla and Cummins, as well as the other major truck manufacturers are already working on EV trucks that could be powered by the utility grid, solar and other renewable power, perhaps, through Community Choice Aggregation (CCA). The commercial availability of EV trucks is just around the corner. In my review of the CAAP and the web sites noted above, I observed several conflicting bits of information and numbers thrown around. Anyway, below I will summarize my review.

- The video from the Act Now web site blames the majority of pollution on trucks servicing the ports. The CAAP web site strategies web page cites ships as being the largest source of emissions at the ports of Long Beach and Los Angeles. Now which is it – trucks or ships?
- Even with 100% clean diesel trucks, the area/ports would still be out of compliance with EPA standards.
- New natural gas engines are claimed to reduce NOx 80% and get to 0 and near 0 emission trucks.
- The Advanced Clean Trucks (ACT) Plan aims to accelerate the San Pedro Ports Clean Air Action Plan (CAAP)
  - The plan claims it is a cost-effective opportunity to immediately reduce emissions from the 13,000 trucks serving the ports of LA & Long Beach.
- The ACT plan includes all 0 and near 0 emission technologies and fuels such as "renewable" natural gas, propane, battery electric, hydrogen fuel cell EVs (one still needs natural gas to break out the hydrogen for a fuel as electrolysis of water is not economically viable yet), and others that meet the California Air Resources Board (CARB) alternative standard of 0.02g/bhp-hr (0.02 grams/horsepower-hour) and achieve a minimum 40% reduction of greenhouse gas emissions using "renewable" fuels or energy. There is actually very little discussion in the plan about electric trucks.....mostly natural gas.
- The ACT plan claims it would provide a 99% reduction in NOx emissions, 100% reduction in petroleum consumption, would require \$1billion - \$1.3 billion of private sector investment in fueling infrastructure and immediate based job creation in the next 5-10 years. What is overlooked is that one fossil fuel is essentially be replaced by another fossil fuel. Additionally, where will the private

sector investment come from?

- The ACT plan is supported by the California Natural Gas Vehicle Coalition (CNGVC). Why am I not surprised?
  - It would replace 100% of the truck fleet by 2023.
  - The plan talks about capture and use of waste methane as an ultra-low carbon fuel. I assume this is a reference to natural gas released at wells, distribution & storage facilities, and/or biogas.
  - Engineering and construction related jobs are falsely referred to as "Green Tech". There is very little to nothing green about burning fossil fuels.
  - Although it might be the lowest cost pathway to cleaning truck emissions, I question whether this temporary solution is the best long-term solution or just kicking the can down the road until 2035.
  - There are approximately 700 existing, in-use natural gas trucks now.
- Funding:
  - Funding would come from existing fees, an alleged \$100's of millions in available incentives and a "variety" of other sources. Would any of this be placed on the backs of individual truck drivers?
  - CNGVC "recommends" grants of \$100k/zero or near zero emission truck. Unless my tired old eyes missed it, I don't recall reading where CNGVC mentioned where the grants would come from.
  - 13,000 trucks would equal about \$1.3 billion in incentives required by an incentive program. That's about the same number quoted above for fueling infrastructure. Is it possible somebody's math is a bit off? What about natural gas compressor stations, pipelines, and other fueling infrastructure?
  - There would be 50-100 new refueling stations required in Southern California and the southwestern states (\$235 million quoted). Pipeline improvements for compressed natural gas or liquefied natural gas production plants another \$200 - \$250 million. A number of in-state "renewable" natural gas production facilities (\$570 million).
  - 100% of the required \$1 billion-\$1.3 billion in fueling infrastructure to come from the private sector.
  - Dept. of Energy (doubtful given Trump's reduced budget).
  - \$318 million from the Volkswagen settlement over tampering to make emissions from diesel cars look better.
  - AB1613 - \$900 million pot of funds to draw from.
  - AB118 - \$100 million from the Cal. Energy Commission.
  - Initial deployments of natural gas trucks, electric trucks to be phased in as commercially available and economically viable up to the year 2035.

The Coalition for Renewable Natural Gas web site discusses "renewable" natural gas (RNG) or biogas, which is methane that comes from landfills, wastewater treatment plant sewage digesters, and agricultural digesters using cattle manure or food processing waste. I've looked at landfill gas and wastewater treatment plant digester gas and most if not all of the landfills or treatment plants of a size to be economically viable already capture the biogas and produce electricity on site. Agricultural digesters, although possible present the problems of gathering the livestock manure, building the digesters, producing pipeline quality gas, and piping it to the nearest gas company pipelines. Production of pipeline quality gas requires cleanup systems to remove siloxanes and other "nasties" that can ruin boilers, engine-driven electric generators, and vehicle engines. Additionally, the methane and heat content of biogas is only about 50% of the content in regular natural gas, requiring the removal of CO<sub>2</sub>. The November, 2016 article "Hard To Digest: Greenwashing Manure Into Renewable Energy" from Food & Water Watch, debunks the theory of using anaerobic digested manure as a renewable fuel. The article discusses the problems of digested waste disposal, release of "fugitive methane" from digester facilities, and the need for taxpayer subsidies as in most cases, manure digesters do not make economic sense as

sources of electricity alone. So, in theory this may sound great, but I don't think there exists the potential for significant amounts of NEW biogas.

In closing, I would like to recommend that the adoption of EV trucks be accelerated versus the short-term and expensive solution of conversion to natural gas vehicles. I would also recommend that a close review be made of those companies or organizations promoting natural gas as they stand to gain the most from the conversion. It is definitely not the citizens who breath the air in the vicinity of the ports.

Thank you.

Michael R. Busman  
22489 Kent Avenue  
Torrance, CA 90505  
Tel.: 424-283-0626

**From:** Coalition for Clean Air  
**To:** [Commissioners](#)  
**Subject:** Action Alert | Clean Air Action Plan | Thursday Nov 2  
**Date:** Monday, October 30, 2017 2:03:01 PM

---



## On Thursday Tell the Ports You Want a Stronger Clean Air Action Plan.

**What:** [San Pedro Bay Ports Commissioners Meeting](#) to adopt the Clean Air Action Plan.

**Where:** Crowne Plaza Harbor Hotel; 601 S. Palos Verdes St. San Pedro, CA 90731

**When:** Thursday November 2 at 8:30 am

**Why:** See below.

The San Pedro Bay Ports, which include the ports of Los Angeles and Long Beach, are the largest source of air pollution in the most polluted air basin in the country. We've made them one of the Coalition for Clean Air's highest priorities.

In previous [action alerts](#), we told you about our disappointment with their Clean Air Action Plan Draft. Unfortunately, the [final draft Clean Air Action Plan](#) being presented on Thursday addresses little of our concerns. In fact, it's downright bad.

While we are pleased to know they've set a zero-emission target for 2035, **it is critical that they strengthen the interim steps needed to reduce emissions today**. When we know that diesel truck emissions are responsible for an ever increasing list of [health impacts](#), every year we wait to reduce emissions is another year people die. The freight industry is responsible for 40% of the region's smog-forming emissions\*.

**The Clean Air Action Plan must focus on the ultimate goal of making the air safe to breathe** for all residents living in the vicinity of the Ports, regardless of the goods movement growth projections. We appreciate the inclusion of a greenhouse gas emission reduction target, but the other air pollution targets need to be updated and strengthened. This document has to be about accountability, and metrics for success are critical. The CAAP must send a clear signal that reliance on fossil fuels will come to an end.

**California needs to move urgently** to slash emissions from heavy-duty vehicles, including trucks, locomotives, ships, and other equipment used in goods movement, construction and agriculture. Policies should spur the development and deployment of the cleanest viable vehicles and technologies.

It is critical that the Ports take steps to reduce pollution immediately, especially when there are [plans and technologies](#) that will drastically reduce emissions. Join us in demanding the Ports put the cleanest trucks on the road today.

The Coalition for Clean Air advocates for effective and integrated freight transportation policy solutions that support a zero emission technology where feasible and near-zero emission technology using low-carbon fuels everywhere else. Learn more at <http://www.ccair.org/our-goals/portsfreight/>.

---

In Case You Missed It:  
Sacramento get's a B- for it's clean air efforts. Read our [latest clean air blog post](#) to find out why.

---

The Coalition for Clean Air protects public health, improves air quality, and prevents climate change. Thank you for being a part of our efforts to restore clean air to California.



Coalition for Clean Air, 660 S. Figueroa St; Suite 1140, Los Angeles, CA 90017

[SafeUnsubscribe™](#) [commissioners@portla.org](mailto:commissioners@portla.org)

[brian@ccair.org](mailto:brian@ccair.org) | [Update Profile](#) | [About our service provider](#)

Sent by [air@ccair.org](mailto:air@ccair.org) in collaboration with

**(OPEN LETTER to Save Clean Air)**

**Stop “Dump Diesel-Buy EV” policy. Start “Retrofit Diesel with new H-EGR Technology” for the USA**

By Julius J. Rim, Ph.D email: [dieseltrap@gmail.com](mailto:dieseltrap@gmail.com)

Oct. 30, 2017

*(The Ports of LA and Long Beach are advertising “Dump Diesel, Buy Electric” policy to save air-quality. They are considering joining Paris, London, Mexico City, and other cities around the world in making clean air a priority and banning diesel. A US inventor says his H-EGR system can fix that problem.)*

The Ports are committed to improving the air-quality, but they are urged not to follow those Cities like Paris, Mexico City, etc. It is because our H-EGR technology can make all in-use diesel engines clean-air by a simple retrofit.

Our nation’s heavy duty trucking industry is being urged to adopt our advanced H-EGR retrofit technology with the Ports leading the way.

Dr. Julius J. Rim, an Award-Winner from the Port of LA, commented that this idea of “Dump Diesel. Buy EV Now!” is a flawed concept that needs to consider the following:

- 1) In European Union more than 41% of 250 Million cars are diesel-cars. In the USA, fully 92% of the heavy-duty transport industry is diesel-powered. There aren’t many diesel cars (2%) in the USA. This can be laid at the feet of GM’s for the disaster of their diesel car failure. However, Dr. Rim predicts diesel car market can grow up to 100 million level in the USA by 2027, as in EU.
- 2) The electricity required for charging these new hybrid and Electric vehicles has to come from mostly Coal fired or nuclear power plants. At this time, solar or wind power generation is not capable of handling the KW that are needed. In essence, these EV’s being classified as a Zero-Emission is not true. The power plants emit significant emissions. And thus EVs are Not ZERO, but NEAR-ZERO-EMISSION.
- 3) A true Clean-diesel engine becomes Near-Zero Emission only after using after-treatment such as DPF, EGR, and Urea-SCR, plus our H-EGR system. If Emission Regulators establish this retrofit mandate rule for all in-use engines without exception, then there would no need to Dump Diesel to save the air-quality.
- 4) Our “H-EGR” system can reduce NOx without Urea-SCR, and was pilot tested on the marine engine. The Project was sponsored by a Grant Award from the Port of LA. This technology can reduce NOx and increase Fuel-economy for all trucks in the USA. One strong support for our technology came from Europe: BMW-M4 GTS car maker is using water-injection. (please see our short-term proposal at the end)
- 5) The US-Trump Administration has recently agreed to leave in place the Fuel-efficiency regulation ( reducing CO2 emission by 1 billion tons from all trucks in the USA by 2027).

6) Another glaring problem that seems to be overlooked will be the reduction of the road-use taxes that are levied via the gasoline and diesel taxes. Where will the agencies responsible for maintaining our road system get their funding? It seems that the DUMP DIESEL movement is something of a fantasy as it will not work.

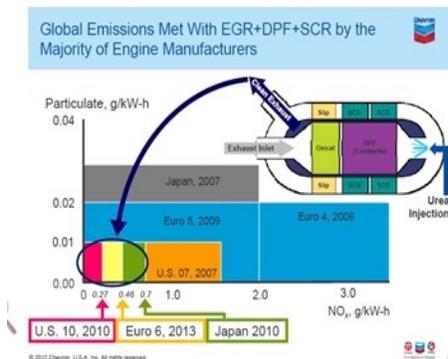
7) The sheer amount of energy going to be needed to power these vehicles with current generating capacity is not sustainable and all of the brown-outs are expected soon in California.

**Concluding Remark:**

The air-quality, especially NOx, can be improved by retrofitting all in-use diesel engines with our “H-EGR” retrofit system. This technology will remain popular among truck-operators, because they save money, enjoy power-increase, and prolong engine-life by adding water into muffler system,(not Urea-water solution)and using Oil-Borne-Catalyst. BMW reported it’s water-injection achieved fuel-saving upto 13% and power-increase by adding water upto 15% of fuel volume. Our H-EGR system can add more water upto 20% of fuel-volume, all passively (meaning a simple & low-cost installation).

**Proposal of short-term verification tests:**

Our truck (1999 Peterbilt owned by Krisda, Inc) had served the Ports for 2 years under special approval from the CARB and Port of LA. Dr. Rim requests the Ports to offer a short-term contract to install that truck and other trucks with our H-EGR system and measure Emission by using Portable Emission Measurement System(PEMS). This work can be carried out in both Michigan and California. This PEMS which revealed VW-dieseltgate NOx issue, is available near our facility in Michigan.



**From:** Scott V  
**To:** [Commissioners](#)  
**Subject:** Clean Air in 2018 - CAAP  
**Date:** Monday, October 30, 2017 5:00:09 AM

---

Dear Community Leader and Steward of the Environment:

As you are aware, a decision must be made [on November 2<sup>nd</sup>](#) at the Ports of LA and Long Beach, relative to the Clean Air Action Plain (CAAP). This initiative is a tremendous opportunity for the Southern California community to clean up the most polluted air in our country and to set an example for other communities nationwide. The Ports and their operations are ideally suited to take advantage of the benefits of alternative fuels. Eliminating the use of diesel trucks and replacing them with trucks that operate on renewable natural gas (RNG) would reduce emissions by up to 99%. There is no reason to wait until 2020 or later to phase-out diesel trucks, RNG is proven and is available for use as a transportation fuel today.

We are fortunate to have clean options available and we depend on your leadership and sound decision-making to take advantage of those options. Please vote for clean air now and transition the Ports away from diesel trucks and towards renewable natural gas starting in 2018.

Sincerely,  
Scott Vazzana

**From:** tayh@aol.com  
**To:** [Commissioners](#)  
**Subject:** CAAP  
**Date:** Monday, October 30, 2017 8:26:05 AM

---

Good Morning Commissioners:

I am writing to encourage you to impose Clean Air Action Plan to begin to require action in 2018 rather than starting in 2020. As you are well aware, the Ports of Long Beach and Los Angeles have the worst air quality in Southern California.

With over 12,000 trucks on the road servicing these ports, air quality has led to asthmas and other respiratory illnesses caused by air pollution. With the new Low NoX natural gas engine and renewable natural gas, there is a product available today that can make a difference for your citizens and future generations. Please vote to help the citizens of these cities by encouraging the Port operators to deploy clean trucks today.

Best Regards,

Lindsay Harrison

tayh@aol.com



NOx. Waiting for a potentially higher emitting standard would result in lower emission reductions than what can be achieved today. A standard of 0.1g would be five times higher than CARB's existing Optional Low NOx Standard of 0.02g. Technology exists today that can achieve 0.02g NOx, therefore it is imperative to begin transition to the cleanest trucks as soon as possible rather than waiting for CARB. Regardless of what level CARB selects, there is still a great deal of uncertainty around its ultimate approval, particularly since approval of a California-only manufacturing standard would require a waiver granted by the federal Environmental Protection Agency (EPA). The current EPA does not seem willing to grant waivers for single state requirements. The CAAP states that the rate is contingent on CARB's new standard. Therefore, if no standard is approved, there will not be a rate assessed, which would essentially eliminate the program. Waiting for CARB to promulgate a standard could ultimately result in no program at all.

### **Leverage Incentive Funding Immediately**

Incentive funding is integral to the success of the Clean Truck Program. California has committed unprecedented levels of funding designed to reduce diesel truck pollution. AB134 (2017) and the Volkswagen Settlement Fund Part D exist to help drivers purchase near-zero trucks starting in 2018. Either port trucks get their share of funds or other sectors within transportation will utilize the funds. Moving up the rate and immediately setting the rate threshold at 0.02g NOx provides the market incentive for replacing port trucks with the available funds now. A later start date and an unknown rate exemption threshold sends the market signal to wait until there is program certainty. Generous state funding may not be available at some future date, especially if funds set aside this year go unused. Under this scenario, truckers potentially would need to absorb the entire cost of new trucks without assistance. It is imperative to use the available funds immediately.

We support the formation of an Incentive Working Group that would leverage the resources and expertise of partners in developing and implementing funding programs. We request that SoCal Gas be included in the Working Group as it is developed.

SoCal Gas looks forward to partnering with the ports on this important effort. We will assist as best we can to get the cleanest trucks to the port to reduce emissions and keep the ports competitive.

Respectfully submitted,



Kevin Maggay  
Energy and Environmental Affairs

# Press Telegram

## Opinion

### Cleaner air doesn't have to risk jobs at our local ports



*AP Photo/Nick Ut - Containers unloaded from cargo ships at APM Terminals in the Port of Los Angeles on Wednesday, Dec. 5, 2012.*

By [Lou Baglietto](#) |

PUBLISHED: October 31, 2017 at 6:20 pm | UPDATED: October 31, 2017 at 6:31 pm

California leads the world in progressive environmental policies aimed at lowering carbon emissions. Who is more environmentally friendly than California? But another area where California is a leader is in unemployment; it ranks in the top-10 for highest unemployment rate in the nation (tied for seventh place). To bring it home, the Los Angeles metropolitan area unemployment rate is at 5.1 percent and the national average is 4.2 percent.

It is in this abysmal economic setting that, on Nov. 2, the Los Angeles and Long Beach ports will jointly be voting on the final draft of the San Pedro Bay Ports Clean Air Action Plan proposal set by the mayors and ports of both cities to further reduce air emissions. On the surface the plan's aggressive goal sounds like a good idea: make the Southland a cleaner, more comfortable place in which to live. The problem is that these regulations, in their current proposal, go way too far and will not achieve the desired outcome.

Los Angeles boasts of being America's No. 1 port, and Long Beach isn't that far behind, but it's a title that won't last long. While the ports have seen steady growth in the last 10 years, when you compare them to other ports, they fail miserably. Many of the other ports have seen 20 percent to 150 percent more growth than our own San Pedro Bay Ports. For the most part, our growth has been stagnant, and with increasing competitiveness across the country and across the globe, we cannot implement more regulations that kill jobs and industry for our region. The Los Angeles region and the state are losing out to more competitive states and countries.

Since the 2006 CAAP plan was enacted, we have seen a 96 percent drop in diesel particulate matter from cargo equipment and heavy duty trucks — which is no small feat. Thanks to the original CAAP, we saw a drastic reduction in emissions, but these cuts didn't come without major consequences, and the

new plan will cut even deeper. In order to reduce the last 4 percent of emissions of the 96 percent reduction we have already seen, the CAAP estimates that it will cost \$14 billion — and to make matters worse, it assumes that the port will be using technology that does not yet exist.

While we in the Southland should always support innovation and continue to back worthy pursuits like investment in technology that makes our air cleaner, Los Angeles cannot afford the hefty price we'd have to pay to achieve the milestones of the CAAP, as currently proposed. The Los Angeles and Long Beach ports should adopt the following two guidelines:

First, a competitiveness action plan. It is essential that our ports remain competitive with shippers for our economy. The ports should do a cost effectiveness study to make sure that not only will we reach our goals, but they are economically feasible. Having clean air and competitive ports are not mutually exclusive — in fact they go hand in hand to ensure good jobs, low prices and clean air for us all.

Secondly, a cost effectiveness study. The “Economic and Workforce Considerations for the Clean Air Action Plan Update” estimates it will be three to five times more expensive for the industry to implement this plan than previous efforts. Specifically, the CAAP estimates it will cost up to \$14 billion and seeks to implement some zero-emission equipment that is still in development. The port should evaluate the incremental cost effectiveness in dollar/ton of emissions removed between near zero and zero emission technologies and include the replacement costs to meet requirements vs. life cycle for technologies. The ports should also coordinate with the South Coast Air Quality Management District to ensure that both public and private financial investments are prioritized in a manner that will achieve the most emission-reduction benefits for the South Coast Basin.

If the Los Angeles and Long Beach ports simply make these amendments to the plan, Angelenos won't have to pay for clean air at the expense of families missing rent. We want the Los Angeles and Long Beach ports to become the model for innovation, not the model for recession. The voting members need to seriously consider the 900,000 bread-winners' jobs here in Southern California and do the right thing by amending the current CAAP proposal. The Southland can be both an economic powerhouse as well as an environmental leader in emission reductions and sustainability.

*Lou Baglietto is a long-time Long Beach resident, a founding member of the Los Angeles County Business Federation (BizFed) and past-president of the Los Angeles Gateway Chamber of Commerce*

**From:** Gary Vazzana  
**To:** [Commissioners](#)  
**Subject:** Saving the Environment  
**Date:** Tuesday, October 31, 2017 3:58:26 PM

---

Dear Community Leader,

I have become aware of the Nov. 2 environmental decision at the Ports of LA and Long Beach. As a concerned citizen, I believe that Americans everywhere should support the use of alternative fuels to cut air pollution. We are running out of time. Renewable natural gas can greatly reduce air pollution. The sooner we move to renewable natural gas at the Ports starting in 2018, the better.

Gary Vazzana

Sent from my iPad

**From:** Patricia Vazzana  
**To:** [Commissioners](#)  
**Subject:** Support Clean Air  
**Date:** Tuesday, October 31, 2017 3:14:43 PM

---

As Nov. 2 is the decision date for the Clean Air Action Plan (CAAP), it is a great chance for Southern California to lead communities all over the US by adopting alternative fuels and trucks that will reduce pollution with renewable natural gas (RNG). This is an alternative that is immediately available. Please set this example by casting your vote in favor of this alternative.

Patricia Vazzana

**GASP! (Coalition for Green and Sustainable Ports) \* Natural Resources Defense Council \* Earthjustice \* East Yard Communities for Environmental Justice \* Long Beach Alliance for Children with Asthma \* San Pedro Peninsula Homeowners Coalition**

November 1, 2017

Board of Harbor Commissioners  
Port of Los Angeles  
425 S. Palos Verdes Street  
Los Angeles, CA 90731

Board of Harbor Commissioners  
Port of Long Beach  
925 Harbor Plaza  
Long Beach, CA 90802

**Re: Request to Strengthen the Clean Air Action Plan Update**

Dear Members of Los Angeles and Long Beach Boards of Harbor Commissioners:

On behalf of the undersigned members of the GASP! coalition and allies, we submit this letter regarding the Final 2017 Clean Air Action Plan Update. We appreciate the Ports' collective effort to date to reduce pollution. As the CAAP articulates, cleaning up deadly port pollution is critical to protecting the health, safety, and quality of life of local communities, reducing harmful regional pollution, and doing our part to combat harmful climate change. We understand there has been progress in reducing pollution at the ports, but this CAAP Update is the most critical port clean air planning document in more than a decade. In its current state, the plan falls flat, and it should be amended to address several flaws.

Initially, we are very supportive of the CAAP codifying the Los Angeles and Long Beach Mayors' executive directive to achieve 100% zero emission trucks by 2035. Unfortunately, the plan delays implementing policies to phase-in zero emission trucks, instead focusing on shifting more than 10,000 trucks to natural gas technologies, which would be the most rapid single fleet transformation to natural gas in the history of the United States. While we understand the natural gas industry-backed coalition has been vociferous in pushing for this shift to natural gas technologies, they have jaded and confused the discussion to date. As such, the Harbor Commissioners should have the courage to stand up to the natural gas industry and implement these three changes to the proposed truck strategy.

- **Near-Term Economic Incentives for Zero Emissions:** The current plan proposes a rate incentivize turnover to near-zero or zero emission trucks in 2020; this approach treats both near-zero and zero emission trucks the same. Given the

superiority of zero emission trucks from an air pollution and climate perspective, the ports should implement economic incentives that benefit zero emissions trucks, over near-zero, as soon as possible. In addition to the economic incentive contained in the rate, the ports should also implement other kinds of incentives to encourage zero emission trucks, such as through the universal port-wide truck appointment system, or a rebate provided for trips made with zero emission trucks. Trucks operating at the ports overwhelm community streets and bring diesel emissions closer to vulnerable populations who bear the burden of polluted air with poor health outcomes. The urgency of the health concerns from freight pollution means the ports cannot wait to implement policies that will meet Mayors Garcia and Garcetti's clear zero emission goals.

- **The Plan Must Include Interim Zero Emission Milestones:** The current plan includes no interim milestones for the phase-in of zero emission trucks to the port drayage fleet. This goes against the Mayors' directive, which calls for "a clear timeline and sets measureable milestones." This is important to hold the ports and cities accountable, and give needed assurance to the business community and local residents alike that we remain on track.
- **Drivers Deserve Better Than Lip Service:** The current plan does not propose much to satisfy the public that drivers will be treated fairly and with dignity in this new system. In fact, the program sounds like a lot of the same old strategies. Massive incentives for new trucks, and it is clear that this industry has a propensity to push these types of increased fees onto drivers. As such, we need a stronger commitment from the ports that they will address the abuse and exploitation of drivers. A good start would be to include drivers and labor unions in the stakeholder process to examine port trucking issues.<sup>1</sup>

While trucking issues have dominated the attention of these discussions, we are concerned about the lack of measures to address deadly ship pollution. In particular, the plan is lacking in details and erased specific financial commitments (\$2 million) to address pollution reductions for the largest source of diesel particulate matter and nitrogen oxides at the Ports. The current plan proposes so much attention to pursuing a fleet transformation to natural gas trucks that we fear this will mean ship pollution will receive little to no attention while this fleet conversion is taking place. The plan must include more resources and strategies to address deadly ship pollution. As such, the Clean Air Action Plan should include:

---

<sup>1</sup> There is no mention of labor unions and drivers on page 49 of the CAAP Update where the Ports discuss who they will work with on the Clean Trucks Program implementation.

November 1, 2017

- **A Robust Commitment to Funds for Ship Mitigation; and**
- **Interim Milestones to Achieve Greater Pollution Reductions from Ships (even in the near term).**

Fixing the flaws with the trucking and ship portions of the plan is vital. The staff of both ports need direction from both Boards of Harbor Commissioners that fulfilling the Mayors' Executive Directive and tackling these major sources of pollution at the ports is a singular priority. The children living in the harbor area deserve no less. We appreciate your consideration of these comments.

Sincerely,



Adrian Martinez  
Earthjustice

Taylor Thomas  
East Yard Communities for Environmental Justice

Sylvia Betancourt  
Long Beach Alliance for Children with Asthma

Morgan Wyenn  
Natural Resources Defense Council

Kathleen Woodfield  
San Pedro Peninsula Homeowner's Coalition

Harbor Association of Industry & Commerce  
6216 E. Pacific Coast Hwy. #407  
Long Beach, CA 90803  
Tel 888-454-2957-6459 Fax 562-269-5539  
info@harborassn.com  
www.harborassn.com



November 1, 2017

### **RE: Comments Regarding Clean Air Action Plan 3.0**

On behalf of the Harbor Association of Industry & Commerce, I would like to submit this letter regarding the Clean Air Action Plan. The Harbor Association of Industry & Commerce (HAIC) was established in 1975 to be a collective voice and advocate for the harbor business community. HAIC is a non-profit industrial and commercial trade association which serves as a united voice on trade, transportation, energy, environmental and land-use issues affecting the harbor business communities.

First, I think it is important to acknowledge the efforts of port staff to conduct a complete and thorough outreach process. Without a doubt, this Clean Air Action Plan (CAAP) feels like a much more inclusive process engaging all stakeholders to ensure that all parties are heard.

Our organization has thoroughly reviewed the document, and while we support the purpose of the CAAP to improve air quality and pave the way for more environmentally sustainable operations for decades to come, we have a few concerns for the ports to consider before final adoption of any CAAP.

#### **Competitiveness**

First and foremost, it is the mission of the twin ports to move cargo. Second to moving freight is to do so efficiently and sustainably. Since 2006, competing ports have seen faster growth and have increased their market share as global trade has continued to grow. There are many contributing factors, however regulatory uncertainty and cost are undoubtedly a concern for importers and exporters using the San Pedro Bay Ports.

Above all, it is necessary to preserve our competitive advantages and make an effort to both reduce emissions while increasing market share at both the container and non-container terminals. Certain elements of this CAAP could drive up the cost to the extent that would make it hard for our region to compete in a global marketplace. It is essential to preserve commercial sustainability while improving environmental sustainability.

Harbor Association of Industry & Commerce | 6216 E. Pacific Coast Hwy. #407 Long Beach, CA 90803  
Phone (888) 454-2957 | Fax (562) 269-5539 | Email: [info@harborassn.com](mailto:info@harborassn.com)  
Website: [www.harborassn.com](http://www.harborassn.com)

## **Technology**

A primary concern threatening the global competitiveness of our ports is the current cost and availability of technological solutions. Currently, the port estimates that the replacement cost of equipment will be between \$7-14 Billion. This price does not lineup with creating a competitive edge for the Ports of Los Angeles and Long Beach.

The lack of availability of near-zero emission (NZE) and zero emission (ZE) technologies that have been proven and are commercially viable is cause for concern. During the first CAAP, the technology that was deployed was not thoroughly tested and proved to be insufficient for port operations. This was exacerbated by the exorbitant cost and stringent deadlines.

We do applaud the ports addressing the need for pilot programs and establishing regular check-ins to diagnose the commercial viability of the technology. Above all, we implore the ports to remain technology neutral and to allow the industry to participate in pilot programs and stay flexible on the adoption milestones for NZE and ZE technologies. It is the industries using the technology that should decide which ones make the most sense for their respective business needs.

## **Efficiency**

Before implementing costly new technologies that are widely unproven, the ports need to create more efficiencies to current port operations. By moving cargo more efficiently, there is the opportunity for both increased productivity and increased capacity within the same constructs we operate in today. This will help with both a reduction of emissions, as well as increased earning ability for companies operating in the port allowing for more available private capital to invest in new technology.

The Draft CAAP states several areas of needed improvement including increased on-dock rail, faster truck turn times, and the implementation of dynamic technology solutions such as portals. We encourage the continued effort to explore and adopt effective measures that help the short and long-term success of the twin ports.

## **Funding**

The final area of concern is funding for the overall costs. The Draft CAAP identifies several areas of possible funding solutions including public and private monies. There is a substantial concern where the \$7-14B will come from to fund much of this technological overhaul at the ports. There is no guarantee for state or federal funding, and private industry cannot foot this bill without passing the cost along to customers and consumers. This creates a great concern to the ability to maintain competitiveness.

One of the major successes of the first CAAP, was the amount of grant money made available for early adopters. The cost of the program was far less onerous than the current Draft CAAP

outlines, and roughly half of the investment came from public funding sources. To correctly implement new technology, it needs to be available, affordable, and there need to be incentives available for the early adopters who serve as the quality control and initial investors in new technology.

### **Conclusion**

In conclusion, we think that a balanced and cautious approach that allows for successful implementation of new technologies in a commercially viable method is necessary. The top priority of the ports should be to maintain competitiveness while implementing strategies to move cargo in a manner that is both more efficient and more sustainable. We ask that the ports work with industry to help develop and test new technology, and not to deploy new technology until it is both proven and the cost makes the technology commercially viable.

Thank you for the opportunity to comment on the Draft CAAP 3.0. We look forward to continued work in partnership with the ports to ensure its success.

Thanks,

A handwritten signature in black ink, appearing to read 'W LaBar', with a long horizontal flourish extending to the right.

Weston LaBar  
Executive Director



**PAUL KREKORIAN**  
LOS ANGELES CITY COUNCIL MEMBER

November 1, 2017

Lou Anne Bynum  
President, Harbor Commission  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

**Re: 2017 Clean Air Action Plan Emission Goals**

Dear President Bynum:

Since 2006, the adoption of the Clean Air Action Plan has resulted in tremendous reductions in air pollution from the ships, trains, trucks, terminal equipment and harbor craft that operate in and around the Ports of Los Angeles and Long Beach. While the ports have made notable progress on this environmental initiative, the final 2017 Clean Air Action Plan update provides us with an opportunity to build on this success.

In a joint executive directive, Los Angeles Mayor Eric Garcetti and Long Beach Mayor Robert Garcia announced their commitment to transition to a zero emission drayage fleet by 2035 and to zero emission cargo handling and yard equipment by 2030. While the CAAP acknowledged this timeline, without interim milestones, these goals will remain aspirational.

For this reason, I am writing to urge the Ports of Los Angeles and Long Beach to set interim targets by committing to specific percentages of zero emission trucks and port-wide cargo handling equipment by specific years in order to reach these respective goals (e.g., 25 percent zero emission trucks by 2024, 60 percent by 2028, etc.).

By establishing interim milestones, we will create a stronger system of accountability and better adjust our strategies to meet our zero emission goals.

Should you or your staff have any questions, please don't hesitate to contact my Policy Deputy, Julia Gould, at [julia.gould@lacity.org](mailto:julia.gould@lacity.org) or (213) 473-7002.

Very truly yours,



PAUL KREKORIAN

LA City Councilmember, Second District

Cc: Ambassador Vilma Martinez, President, Los Angeles Board of Harbor Commissioners  
Commissioner David Arian, Los Angeles Board of Harbor Commissioners  
Commissioner Lucia Moreno-Linares, Los Angeles Board of Harbor Commissioners  
Commissioner Anthony Pirozzi, Jr., Los Angeles Board of Harbor Commissioners  
Commissioner Edward Renwick, Los Angeles Board of Harbor Commissioners  
Commissioner Tracy J. Egoscue, Long Beach Harbor Commission  
Commissioner Lori Ann Guzmán, Long Beach Harbor Commission  
Commissioner Bonnie Lowenthal, Long Beach Harbor Commission  
Commissioner Frank Colonna, Long Beach Harbor Commission  
Chris Cannon, Director of Environmental Management, Port of Los Angeles  
Heather Tomley, Director of Environmental Planning, Port of Long Beach

# ATTN - MAYOR GARCETTI ATTN - MAYOR GARCIA

## We All Want Clean Air, But It's Illegal For Our Employers to Make Us Pay For It!

"**Mayors:** Drivers like us get **banned from the ports** if we break the rules. So why is there a **double standard** for the trucking companies? They are breaking the law and **putting us in poverty** by forcing us to pay for the clean trucks!"



"We want to **breathe clean air** but the companies are breaking the law by misclassifying us as **independent contractors**. Every government investigating agency has determined it is wrong. **We need you to stand with us.**"



**JOSE HERRERA**  
XPO LOGISTICS

**TRACY ELLIS**  
SHIPPERS TRANSPORT EXPRESS

**SEKO UAINA**  
INTERMODAL BRIDGE TRANSPORT

**LUIS KINA**  
PAC 9 (FORMERLY CMI)



#REALHEROESWEARVESTS - JUSTICEFORPORTDRIVERS.ORG

**GASP! (Coalition for Green and Sustainable Ports) \* Natural Resources Defense Council \* Earthjustice \* East Yard Communities for Environmental Justice \* Long Beach Alliance for Children with Asthma \* San Pedro Peninsula Homeowners Coalition**

November 1, 2017

Board of Harbor Commissioners  
Port of Los Angeles  
425 S. Palos Verdes Street  
Los Angeles, CA 90731

Board of Harbor Commissioners  
Port of Long Beach  
925 Harbor Plaza  
Long Beach, CA 90802

**Re: Request to Strengthen the Clean Air Action Plan Update**

Dear Members of Los Angeles and Long Beach Boards of Harbor Commissioners:

On behalf of the undersigned members of the GASP! coalition and allies, we submit this letter regarding the Final 2017 Clean Air Action Plan Update. We appreciate the Ports' collective effort to date to reduce pollution. As the CAAP articulates, cleaning up deadly port pollution is critical to protecting the health, safety, and quality of life of local communities, reducing harmful regional pollution, and doing our part to combat harmful climate change. We understand there has been progress in reducing pollution at the ports, but this CAAP Update is the most critical port clean air planning document in more than a decade. In its current state, the plan falls flat, and it should be amended to address several flaws.

Initially, we are very supportive of the CAAP codifying the Los Angeles and Long Beach Mayors' executive directive to achieve 100% zero emission trucks by 2035. Unfortunately, the plan delays implementing policies to phase-in zero emission trucks, instead focusing on shifting more than 10,000 trucks to natural gas technologies, which would be the most rapid single fleet transformation to natural gas in the history of the United States. While we understand the natural gas industry-backed coalition has been vociferous in pushing for this shift to natural gas technologies, they have jaded and confused the discussion to date. As such, the Harbor Commissioners should have the courage to stand up to the natural gas industry and implement these three changes to the proposed truck strategy.

- **Near-Term Economic Incentives for Zero Emissions:** The current plan proposes a rate incentivize turnover to near-zero or zero emission trucks in 2020; this approach treats both near-zero and zero emission trucks the same. Given the

superiority of zero emission trucks from an air pollution and climate perspective, the ports should implement economic incentives that benefit zero emissions trucks, over near-zero, as soon as possible. In addition to the economic incentive contained in the rate, the ports should also implement other kinds of incentives to encourage zero emission trucks, such as through the universal port-wide truck appointment system, or a rebate provided for trips made with zero emission trucks. Trucks operating at the ports overwhelm community streets and bring diesel emissions closer to vulnerable populations who bear the burden of polluted air with poor health outcomes. The urgency of the health concerns from freight pollution means the ports cannot wait to implement policies that will meet Mayors Garcia and Garcetti's clear zero emission goals.

- **The Plan Must Include Interim Zero Emission Milestones:** The current plan includes no interim milestones for the phase-in of zero emission trucks to the port drayage fleet. This goes against the Mayors' directive, which calls for "a clear timeline and sets measureable milestones." This is important to hold the ports and cities accountable, and give needed assurance to the business community and local residents alike that we remain on track.
- **Drivers Deserve Better Than Lip Service:** The current plan does not propose much to satisfy the public that drivers will be treated fairly and with dignity in this new system. In fact, the program sounds like a lot of the same old strategies. Massive incentives for new trucks, and it is clear that this industry has a propensity to push these types of increased fees onto drivers. As such, we need a stronger commitment from the ports that they will address the abuse and exploitation of drivers. A good start would be to include drivers and labor unions in the stakeholder process to examine port trucking issues.<sup>1</sup>

While trucking issues have dominated the attention of these discussions, we are concerned about the lack of measures to address deadly ship pollution. In particular, the plan is lacking in details and erased specific financial commitments (\$2 million) to address pollution reductions for the largest source of diesel particulate matter and nitrogen oxides at the Ports. The current plan proposes so much attention to pursuing a fleet transformation to natural gas trucks that we fear this will mean ship pollution will receive little to no attention while this fleet conversion is taking place. The plan must include more resources and strategies to address deadly ship pollution. As such, the Clean Air Action Plan should include:

---

<sup>1</sup> There is no mention of labor unions and drivers on page 49 of the CAAP Update where the Ports discuss who they will work with on the Clean Trucks Program implementation.

- **A Robust Commitment to Funds for Ship Mitigation; and**
- **Interim Milestones to Achieve Greater Pollution Reductions from Ships (even in the near term).**

Fixing the flaws with the trucking and ship portions of the plan is vital. The staff of both ports need direction from both Boards of Harbor Commissioners that fulfilling the Mayors' Executive Directive and tackling these major sources of pollution at the ports is a singular priority. The children living in the harbor area deserve no less. We appreciate your consideration of these comments.

Sincerely,



Adrian Martinez  
Earthjustice

Taylor Thomas  
East Yard Communities for Environmental Justice

Sylvia Betancourt  
Long Beach Alliance for Children with Asthma

Morgan Wyenn  
Natural Resources Defense Council

Kathleen Woodfield  
San Pedro Peninsula Homeowner's Coalition



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

*Office of the Executive Officer*  
*Wayne Natri*  
909.396.2100, fax 909.396.3340

November 1, 2017

Harbor Commissioners  
Port of Long Beach  
4801 Airport Plaza Drive  
Long Beach, CA 90815

Harbor Commissioners  
Port of Los Angeles  
425 South Palos Verdes St.  
San Pedro, CA 90731

Re: Final Board Approved CAAP Letter

Dear Honorable Harbor Commissioners:

The SCAQMD staff appreciates the hard work that the two commission staffs have put into crafting the Clean Air Action Plan update, and their openness in working with SCAQMD staff and others during its development. We see this plan as an important first step to meeting our regional and local clean air needs. But much of the hard work remains, and it must begin immediately. The attached submittal recommends specific actions and targets for the Port's mobile sources in order to achieve the needed emission reductions for meeting the federally mandated ozone standard in the Basin by 2023. SCAQMD staff is committed to work collaboratively with the Ports and all stakeholders regarding incentive funding and resource allocations, as well as technology and economic assessments, to achieve the goals set forth in these recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Wayne Natri".

Wayne Natri  
Executive Officer

WN/drw/af  
Enclosures

## SCAQMD Staff Specific Recommendations on the Final CAAP Update

SCAQMD staff recommends the following actions and targets for the Ports mobile sources toward achieving the needed emission reductions for meeting the federally mandated ozone standard in the Basin by 2023. SCAQMD staff is committed to work collaboratively with the Ports and all stakeholders regarding incentive funding and resource allocations, as well as technology and economic assessments, to achieve the goals set forth below. The Ports should implement these goals through available mechanisms including but not limited to lease provisions where feasible:

1. Drayage Trucks - The Ports project that by the end of 2024, 70-90% of trucks will be Near-Zero Emissions Trucks.
  - a. **Establish a 70% target for NZE trucks for 2023 subject to incentive funding, commercial availability and feasibility assessments to work in concert with the Ports proposed rate structure program**
    - i. **Establish a requirement for pre-2010 trucks to apply for available funding**
  - b. **Set a minimum target of 500 ZE trucks by 2023 (demonstration and operation) subject to funding availability**
  - c. **Initiate development of necessary infrastructure immediately to support transition to NZE and ZE units**
  
2. Ocean-Going Vessels – We are offering the following recommendations:
  - a. **Vessel Speed Reduction – Establish a 95% target of 12 knots within 40 nm by 2023 for all vessel calls**
  - b. **At-Berth Controls – Establish a 95% target for all calls made by regulated vessels (container, reefer, cruise ships) by 2023 beyond CARB’s existing regulation and a 50% target for all calls made by other vessels (tankers, bulk, cargo) by 2023, subject to feasibility assessment by 2020**
  - c. **Clean Ships Program – Accelerate the proposed variable rate structure beginning in 2018 to strongly incentivize cleaner vessels (with Tier 3 engines) through incentive funding (provided by the Ports, CARB, and AQMD) and discourage older vessels (with Tier 0 and 1 engines) with a goal of eliminating vessels with Tier 0 engines and reducing the number of calls by vessels with Tier 1 engines to 25% or less by 2023**
  - d. **Transit and Maneuvering Emissions – Conduct technology demonstrations for on-board retrofit controls and advanced engine modifications for main and auxiliary engines and boilers working closely with ship engine manufactures, technology providers, shipping lines, agencies (AQMD, CARB, U.S. EPA) and other stakeholders to be completed by the end of 2019 with the goal of establishing incentive programs by 2023**

3. Cargo Handling Equipment - With the CAAP's focus on a 2030 zero-emissions target, there are no efforts to maximize emissions reductions from CHE in 2023. The terminals' procurement plan process would require purchases of NZE and ZE, if and when feasible, but does not require the replacement or retirement of existing older equipment based on available technologies.
  - a. **Require all the following by 2023:**
    - i. **Retire all pre-Tier 4 final diesel equipment and pre 2010 LPG and gasoline powered equipment as part of the Port's review of the terminals' inventory and procurement plans in 2019/2020,**
    - ii. **Require replacement of the retired units with ZE units if feasible and NZE units if ZE units are not feasible,**
    - iii. **If neither ZE or NZE units are feasible, require Tier 4 final (for diesel equipment) or 2010+ (for LPG or gasoline equipment) equipment**
    - iv. **By June 2018, establish a requirement for pre-2010 diesel equipment and pre-2010 LPG and gasoline equipment to apply for available funding**
    - v. **Initiate development of necessary infrastructure immediately to support transition to NZE and ZE units**
4. Rail – Tier 4 switcher and line haul locomotives capable of achieving significant NOx and PM reductions are available today.
  - a. **Establish a 100% target for Tier 4 switcher locomotives operating at the ports in 2023 subject to funding availability**
  - b. **Work with Railroads, CARB, and AQMD on specific actions and agreements to reduce emissions including maximizing Tier 4 line haul locomotives operating at the Ports by 2023**
5. Harbor Craft – There are still a significant number of older harbor craft operating at the ports.
  - a. **Require all remaining harbor vessels equipped with Tier 0 and Tier 1 engines to repower with Tier 4 engines (or Tier 3 if Tier 4 not feasible) by 2023 through available incentive funding**

## Clean Air Action Plan comment

My name is Kat Janowicz. I am a consultant for the goods movement and transportation industry, a small business owner and a resident of Long Beach.

I cannot stress enough how important the continuation of emission reduction efforts is to our community and businesses. The accomplishments thus far are remarkable. I commend the port staff and harbor commissioners for conducting such a thorough stakeholder outreach and engagement process for CAAP 3.0

I have a few concerns which I'd like to address.

We should be focused on goals and remain open to any and all forms of technology and fuels necessary to achieve those goals. Many of the technologies under consideration are cost prohibitive and their commercial availability, limited. In addition, there is a lot of confusion about technology availability and readiness. Until we have a full understanding, it is difficult to make informed decisions.

Furthermore, we should not disregard the lifecycle approach. A focus on tailpipe emissions alone may result not only in a slower than desired pace of emission reduction but also an unsatisfactory shift of emissions from the LA area to other regions.

CAAP addresses 6 strategies and all deserve our attention. Unfortunately, discussions about trucks dominate. We should consider a holistic approach to all 6 CAAP strategies, set realistic expectations but with a vision to move forward. For example, moving more cargo by rail may require a re-evaluation of regional infrastructure needs.

Another example is energy. With growing demand and an increasing number of large capital projects in the region, future demand may surpass the available supply. In addition, electric cars require power. Currently less than 30% of that power comes from renewable sources. Therefore, it is crucial for the ports to work with other regional agencies and utilities to understand this future impact on our region.

And we cannot forget about LNG. The new 2020 IMO low sulfur standards caused some forward-thinking shippers to invest in dual-fuel vessels. They will eventually need access to the fuel, and there are no LNG bunkering facilities on the West Coast.

Environmental achievements alone will be unsuccessful, if we don't address economic development, competitiveness, and supply chain efficiency. We all must recognize where the real competition is. Not only do we want to keep discretionary cargo here, we also want to increase our market share. Only then we can achieve high levels of prosperity, investment and innovation.

We all need clean air, fresh water, and jobs to live. As much as I'd like to see our community to be zero-emission ~~tomorrow~~ *today*, I understand the importance of a balanced approach and realistic transformation.

Kat Janowicz, MSME, MBA, CEM, LEED GA, ENV SP  
President  
3COTECH, Inc.

November 2, 2017

Hand out BHC 11/2/17

**Coalition For A Safe Environment  
California Kids IAQ  
Community Dreams  
Apostolic Faith Center  
EMERGE  
American Legion Post 6  
Wilmington Improvement Network  
San Pedro & Peninsula Homeowners Coalition  
NAACP- San Pedro-Wilmington Branch # 1069  
St. Philomena Social Justice Ministry  
California Communities Against Toxics  
California Safe Schools  
Society For Positive Action  
Del Amo Action Committee  
Action Now**

November 2, 2017

Port of Los Angeles (POLA)  
Los Angeles Harbor Department  
Attn: Christopher Cannon  
Director of Environmental Management  
Environmental Management Division  
425 S. Palos Verde St., San Pedro, CA 90733-0151  
ccannon@portla.org  
310-732-3675 Office  
310-547-4643 Fax

Port of Long Beach  
Attn: Heather Tomley  
Director of Environmental Planning  
4801 Airport Plaza Drive  
Long Beach, CA 90815  
heather.tomley@polb.com  
562-283-7100

caap@cleanairactionplan.org

Re: San Pedro Bay Ports Final CAAP 2017 November 2017  
Su: Submission of Public Comments

The Coalition For A Safe Environment et al co-signature organizations and individuals respectfully submit these Public Comments on behalf of our members, organization affiliations and the public regarding the Final CAAP 2017 November 2017.

We request that the Final San Pedro Bay Clean Air Action Plan (CAAP) 2017 Update include an Annual Implementation Plan, Measures, Emission Reductions Targets and a Timeline Schedule to comply with all mandatory state executive orders, legislation, rules, regulations, programs, goals, objectives and measures applicable to the Ports and Goods Movement. To include but not limited to our Public Comments submitted on February 17, 2017 and September 2017.

Jesse Martinez

BHC 11/2/17  
Hand-out

We respectfully submit our joint public comments for consideration and inclusion in the Final Clean Air Action Plan 2017 Update.

1. Adoption of Zero-Emissions Goals for trucks and cargo-handling equipment is the primary # 1 objective of the public and environmental justice communities and the End Goal.
2. The Governors Executive Order and numerous other public sponsored legislation have provided the direction for California's State Agencies and Ports to transition to Zero Emission Technologies, the reduction of environmental impacts, reduction of public health impacts, community sustainability, toxic emission monitoring and the investment of public funds as soon-as-possible.
3. We the public have acknowledged via numerous public supported funding mechanism such as Measure M, Prop 1B, Cap & Trade, Carl Moyer Program and others, that the of use of public funds to support the pilot testing, demonstration projects, the phase-in of Zero Emissions Technologies and Infrastructure is our primary Goal and Objective. The Ports and Goods Movement Industry are not providing the annual Billions of Dollars to support the transition to Clean Zero Emission Technologies. Public funds are currently available to subsidize the extra cost of Zero Emission Technologies and new Infrastructure.
4. Current Pilot and Demonstration Projects are proving that Zero Emission Technologies are meeting the challenge of replacing all diesel fuel technologies within the next 3-5 years. As of today, Zero Emission Trucks can replace all diesel trucks for short hauls of less than 20 miles in an 8-10 hour shift.
5. Port staff has misrepresented the Cost Effectiveness of Zero Emissions Technologies by constantly stating the high-cost of zero emission technologies investment vs fossil fuels without providing Zero Emissions Manufacturer Cost-Benefit Analysis Studies which show that over the life-time of a truck or CHE, a zero-emissions truck is more cost-effective, requires 50%-70% less maintenance costs and the cost of energy \$ 0.35 per gallon vs diesel fuel \$ 3.00 per gallon is cheaper so a company actually makes a higher net profit. The Ports and Industry also fail to mention that investment in purchasing Zero Emission Technology is capital equipment which is a 100% tax reduction and the cost written-off over the 7 years life-time of a truck as an example.
6. Information on the current commercial availability of Zero-Emission Trucks, Cargo Handling Equipment and Green Construction Technologies was provided by CFASE and others, contradicts staffs portrayal of Zero-Emission Trucks and Cargo Handling Equipment not being ready for incorporation into the Final CAAP. Zero Emission Technologies can meet all public proposed phase-in timeframes.
7. Port staff have provided no evidence that our CFASE proposed CAAP Freight System & Technologies Transition Schedule cannot be met:

25% by 2020

50% by 2023

75% by 2025

100% 2030

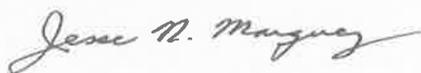
8. CFASE provided a recommended Zero Emission Technologies Funding Transition Proposal which included a \$ 25.00 Per Container Import Tariff and a \$ 0.05 Per Metric Ton Dry/Liquid Bulk Import Tariff which would provide funding to the Freight Transportation Industry transition which was ignored. The big box importers like Walmart, Costco, Home Depot and others make significant high-profits by forcing the freight industry to absorb the cost of freight transportation modernization.
  
9. The Ports provided a short list of Supporting Documents but left out entirely all the Zero Emission Technologies Cost-Effectiveness Studies, Technology Status Surveys and Technology Assessments.

CFASE et al organizations are non-profit community based public interest organizations actively involved in local, regional, state and federal legislation, rules, regulations, public policy, public programs, environmental, environmental justice, public health, public safety, family preservation, urban planning, community sustainability, public education, wildlife conservation, socio-economic justice, human rights and quality of life issues.

The Coalition For A Safe Environment is a non-profit Environmental Justice advocacy public policy organization involved in Ports, Goods Movement, Energy and Petroleum Industry issues.

The primary contact for these public comments and information is Jesse N. Marquez, Executive Director for the Coalition For A Safe Environment.

Respectfully Submitted,



Jesse N. Marquez  
Executive Director

Jesse N. Marquez  
Executive Director  
Coalition For A Safe Environment  
1601 N. Wilmington Blvd., Ste. B  
Wilmington, CA 90744  
jnm4ej@yahoo.com  
310-590-0177 310-704-1265

Ricardo Pulido  
Executive Director  
Community Dreams  
1601 N. Wilmington Blvd., Ste. B2  
Wilmington, CA 90744  
mr.rpulido@gmail.com  
310-567-0748

Magali Sanchez-Hall, MPH  
Executive Director  
EMERGE  
913 East O Street  
Wilmington, CA 90744  
mssanchezhall7@gmail.com  
646-436-0306

Anabell Romero Chavez  
Wilmington Improvement Network  
Board Member  
1239 Ronan Ave.  
Wilmington, CA 90744  
anab3ll310@yahoo.com  
310-940-4515

Joe R. Gatlin  
Vice President  
NAACP  
San Pedro-Wilmington Branch # 1069  
225 S. Cabrillo Ave.  
San Pedro, CA 90731  
joergatlin45k@gmail.com  
310-766-5399

Robina Suwol  
Executive Director  
California Safe Schools  
P.O. Box 2756  
Toluca Lake, CA 91610  
robinasuwol@earthlink.net  
818-261-7965

Cynthia Babich  
Executive Director

Drew Wood  
Executive Director  
California Kids IAQ  
1601 N. Wilmington Blvd., Ste. B4  
Wilmington, CA 90744  
californiakidsiaq@gmail.com  
916-616-5913

Pastor Alfred Carrillo  
Apostolic Faith Center  
1510 E. Robidoux St.  
Wilmington, CA 90744  
alfredcarrillo@msn.com  
310-940-6281

Chaplin Anthony Quezada  
American Legion Post 6  
1927 E. Plymouth St.  
Long Beach, CA 90810  
quezadaanthony85@yahoo.com  
310-466-2724

Dr. John G. Miller, MD  
San Pedro & Peninsula Homeowners Coalition  
President  
1479 Paseo Del Mar  
San Pedro, CA 90731  
igornla@cox.net  
310-548-4420

Modesta Pulido  
Chairperson  
St. Philomena Social Justice Ministry  
22106 Gulf Ave.  
Carson, CA 90745  
vdepulido@gmail.com  
310-513-1178

Shabaka Heru  
Executive Director  
Society For Positive Action  
P.O. Box 59541  
Los Angeles, CA 90059  
shabaka4ej@yahoo.com  
310-462-6732

Mitzi Shpak  
Executive Director

Del Amo Action Committee  
4542 Irone Ave.  
Rosamond, CA 93560  
delamoactioncommittee@gmail.com  
310-769-4813

Action Now  
2062 Lewis Ave.  
Altadena, CA 91001  
msmshpak@gmail.com  
626-825-9795

Jane Williams  
Executive Director  
California Communities Against Toxics  
P.O. Box 845  
Rosamond, CA 93560  
dcapjane@aol.com  
661-256-2101