

Comment Letters Received
Draft Clean Air Action Plan 2017 Update
(as of August 29, 2017)

Click on the link to be taken directly to the letter. Attachments referenced in the letters are available upon request. For comments on the Discussion Document, click [here](#).

1. David Thornburg
2. R. Hicks
3. Andrew Boven
4. LeRoy Onishi, Pacific Enterprise Bank
5. Pacific Merchant Shipping Association West Coast Trade Report, August 2017
6. Paul Buss, Bank of America
7. Dick Peterson
8. City of Carson
9. Pacific Merchant Shipping Association, press release
10. Huy Le
11. Ofelia Medina
12. Alexandra Radford
13. Joseph Landau
14. Rafael Renteria
15. Joseph Mueller
16. Jason Gutierrez
17. Jessica Andrade
18. Katrina Harding
19. Richard Hopkins
20. Michael Busman
21. Kim Carroll
22. Sean Carroll
23. Robert Brennan
24. Jason Takaki
25. Donald Sachs
26. Andy Carrasco
27. Angela Bradford
28. Christophe Dupin de Saint Cyr
29. Charlotte Castillo
30. Cynthia Mann
31. Devin O'Brien
32. Jason Takaki
33. John Smith
34. John Bradford
35. Juliette Carillo
36. Maricella Cardona
37. Monique McCollam

38. Rebecca Coleman
39. Roberto Carneiro
40. Rochelle Serna
41. William Brown
42. Carole Grover
43. S.M. Jones

From: [DeMoss, Tim](#)
To: [Coluso, Amber](#)
Cc: [Pisano, Teresa](#)
Subject: Fwd: CAAP CTP Criteria Discussion
Date: Monday, July 17, 2017 7:22:06 AM

Please place this in the CAAP comments folder, and send out to the group.

Sent from my iPhone

Begin forwarded message:

From: "Luzzi, Carlo" <carlo.luzzi@polb.com>
Date: July 17, 2017 at 6:09:39 AM PDT
To: David Thornburg <dwthornburg@outlook.com>, Tim DeMoss <tdemoss@portla.org>, "TPisano@portla.org" <TPisano@portla.org>
Cc: "Becker, Tom" <Tom.Becker@polb.com>
Subject: RE: CAAP CTP Criteria Discussion

Hello David,
I have forwarded your request to Tom Becker to follow up from POLB team.
Thanks,
Carlo Luzzi
POLB / Intermodal Operations Manager
(562) 283-7278
luzzi@polb.com

From: David Thornburg [<mailto:dwthornburg@outlook.com>]
Sent: Friday, July 14, 2017 4:57 PM
To: Tim DeMoss; TPisano@portla.org; Luzzi, Carlo
Subject: CAAP CTP Criteria Discussion

Happy Friday Carlo, Tim, and Teresa,

I would like to continue the conversation of the possibility of creating criteria that gives the ports an avenue to promote trucking companies that go above and beyond the required regulations, placing the goals of the CAAP first. Achieving such standards would highlight the trucking companies that are environmentally and socially conscience. Achieving this recognition would then get their names on a list, supplied and recommended by both ports which the companies BCO's and freight forwarders should be using. The list would be replaced by the list that presently resides on the POLA's website, https://www.portoflosangeles.org/ctp/ctp_Clean_Truck_Companies.pdf, and also placed on the POLB's site too.

List of Companies with Clean Trucks March 2017

www.portoflosangeles.org

List of Companies with Clean Trucks March 2017 Company Name DBA Name
SCAC Address City State Zip Executive Contact Name Email Phone
.....

This would encourage the use of trucking companies that meet the criteria set while encouraging other trucking companies to one day meet criteria to get on the list. Examples of the criteria used to develop such a list would be:

1. Asset based Companies - Trucking company owns the trucks
2. Employee model - Employer hires drivers, do not employ owner operators
3. AVG age of truck fleet - Trucking companies that have older polluting trucks do not get on the list.
4. Auxiliary Power Units - APU's allow the truck to operate in the queue without the engine running.
5. Good CSA Scores - which stands for Compliance, Safety, Accountability.
6. SmartWay Certified with the EPA.
7. Number of moves in/out of the terminal complex in a given month

One such example is the good work Duncan and Son Lines are doing. If you look at their company profile and philosophy, you will see the efforts they partake in are in line with what the Port's desire. The only reason you do not see them testing technology such as fuel cells or electric battery trucks is that the delivery distance of their loads does not allow for their use. The average trucking range from the ports for Duncan and Son is almost 400 miles. They are committed to testing the Cummings Westport 11.9L SX12 G CNG truck or other technology as it becomes available, whenever possible, and would like to work in close collaboration with the ports when such equipment is available for testing.

Duncan and Son uses an employee model and owns and operates all its trucks and chassis. They do use independent contractors for overflow, and peak periods, however, all those drivers are entirely independent contractors who run with their own authority, on their own base plates and their own insurance. The carriers Duncan uses are for overflow cargo and are not forced to work only for

DSL. The Independent Contractors used legitimately run their own companies.

1. All DSL Trucks have APU's, so there is no idling necessary when the trucks wait in the queuing area of the terminals or while there are unloading.
2. DSL's oldest model year truck is 2014, which will be retired by the end of 2017.
3. As of the first quarter, 2017 testing and purchase of 2018 model year trucks are active and underway.
4. DSL operates over 200 states of the art trucks that carry all the latest safety features such as onboard camera systems, automatic transmissions, which offer the best possible fuel economy.
5. The average odometer mileage of all of our trucks is currently 182,066.
6. 155 of 220 trucks have automatic transmissions, which increases to 195 of 220 by the end of 2017.
7. Our safety features include all-disc brakes, front end collision avoidance, adaptive cruise control, lane departure warning, blind spot warning detection systems, dual vision cameras (front facing and cab facing).
8. SmartWay certified trucker.
9. We buy the full fairing "eco" packages from the OEMs for increased fuel economy. We average in the high 7's/low 8's MPG; hard to do while pulling a container.
10. DSL owns over 1200 new chassis.

I look forward to further discussions and am available to meet if desired. Thank you

Sincerely,
David Thornburg
DW Thornburg, Inc.
6216 E. Pacific Coast Hwy, Suite 391
Long Beach, CA 90803
(562) 505-5581

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YES! Clean up the port air quality, regardless of cost!

Time: Wed, 19 Jul 2017 21:32:42 +0000 (UTC)
From: robyn <robynisrosy@yahoo.com>
To: "CAAP@cleanairactionplan.org" <CAAP@cleanairactionplan.org>
Subject: YES! Clean up the port air quality, regardless of cost!

Attachments: msg-25671-1458.html (1k)



Please follow through with this plan to greatly improve the air quality of the port. People have suffered long enough while businesses have profited. Please improve the air at whatever cost. Profits cannot be a city's only objective. Long Beach must address the terrible polluted air of the port!

R. Hicks
90804

Daily Breeze

Port clean-air plan risks rocking economic boat: Guest commentary



In a file photo, cargo is moved from ship to truck at West Basin Container Terminal at the Port of Los Angeles in San Pedro. (Photo by Robert Casillas/Southern California News Group)

By John McLaurin

Posted: 07/21/17, 9:20 AM PDT |

Since 2006, when the first Clean Air Action Plan was jointly adopted by the ports of Los Angeles and Long Beach, significant emissions reduction has occurred in San Pedro Bay. The latest Air Quality Report Card shows sulphur oxides emissions from ships is down 97 percent and diesel particulate matter from equipment at marine terminals is down 86 percent over 10 years.

As the new draft CAAP revision highlights, “These reductions are a testament to the CAAP’s cutting-edge strategies and the collaborative approach taken with the regulatory agencies and our industry partners to meet shared goals.”

With past progress in mind, we at the Pacific Merchant Shipping Association agree that further emissions and greenhouse gas reductions can and must occur. PMSA supports a revision that creates a smooth transition to zero-emissions technology while boosting both ports’ growth and recovering their lost market share, resulting in both a cleaner and more competitive San Pedro Bay port complex.

Unfortunately, the ports’ proposed revisions, released earlier this week, do not lay out the path to a win-win on the economy and the environment. Instead, their proposals focus on aggressive environmental mandates with no measure of cost-effectiveness, no comprehensive financial feasibility analysis, no funding plan and no business rationale for these goals.

One of these mandates is full zero-emissions electrification of all marine terminal equipment by 2030.

The only substantive cost estimate of moving to zero-emission technologies across San Pedro Bay is the Moffatt & Nichols study commissioned by PMSA. That analysis put the additional capital costs of moving to the only mature zero-emission technology available today at \$16 billion to \$28 billion statewide over 30 years, plus tens of billions more in additional operating costs. And that doesn’t include infrastructure costs outside the marine terminal gates.

But the proposed CAAP revision estimates that the cost to replace existing equipment with zero-emissions equipment will cost only \$1.8 billion and that port-side infrastructure will be \$2 billion.

To get such dramatically under-estimated costs, the CAAP revision is putting all of its eggs in one basket: unrealistically assuming that non-existent electrified cargo handling equipment technology will be developed, tested, work as planned and be affordably priced and produced in a quantity to meet the ports' rigid timelines.

That's a big assumption with no margin for error and no Plan B if and when something goes wrong.

What's more baffling is that this speculative exercise on technology and costs excludes the successes of commercially available automated electrified zero-emissions equipment in use at ports today. But, apparently because it is automated technology, the CAAP ignores it as an option.

Regardless of the specific equipment costs, the CAAP doesn't ask the baseline question of whether either the ports or their customers have the revenue available to pay for these dramatically higher equipment and infrastructure costs in a highly competitive market.

Nor does it consider that terminal operators don't have the luxury of the CAAP's "wait, see and hope" approach to new technology. If these aggressive timelines are to be met, plans need to be developed, permits approved and financing arranged, and construction needs to occur almost immediately. All of the above needs to be accomplished while terminals continue to operate.

If done poorly, the ports run the real risk of only becoming less competitive.

During the past 10 years, the ports' "growth" has been non-existent. Just this past month, their combined volume equaled what it was in 2006. Without a strategy to grow cargo volumes and then to utilize this growth to finance the most efficient, and cost-effective transition to a zero-emissions San Pedro Bay, the ports' CAAP is simply incomplete.

We have one shot to get this right. If we miss the opportunity to balance continued environmental progress with economic competitiveness policies that increase the volume of goods moving through the ports, then the region's economy, businesses and residents will suffer, and the emission reductions that are important to communities surrounding the ports may prove illusive.

PMSA stands ready, willing and able to work with the ports on a balanced, collaborative approach to the CAAP: one that's worked in the past and can work again in the future.

John McLaurin is president of the [Pacific Merchant Shipping Association](#).

Clean Air Action Plan

Time: Tue, 25 Jul 2017 18:45:52 +0000 (UTC)
From: Andrew Boven <andrewboven@yahoo.com>
To: "CAAP@cleanairactionplan.org" <CAAP@cleanairactionplan.org>
Subject: Clean Air Action Plan

Attachments: msg-18188-246.html (2k)



Hello,

As a resident of Long Beach I am very concerned about the pollution generated from the Port. Therefore, I am encouraged by the plan, as it aims to reduce pollution from trucks and other resources. As someone who is considering buying a house in Long Beach or moving to a different state, this plan would encourage me to stay, as I am very concerned about establishing roots in an area with high pollution rates.

Regards,

Andrew Boven
andrewboven@yahoo.com
954-675-6816
@andrew_boven

From: [DeMoss, Tim](#)
To: [Coluso, Amber](#)
Cc: [Pisano, Teresa](#); [Atkins, Carter](#); [Goldberg, Jacob](#)
Subject: FW: CAAP and Financing
Date: Friday, July 28, 2017 2:34:56 PM

Please file. Thanks!

From: Cannon, Chris
Sent: Friday, July 28, 2017 10:10 AM
To: Renee Moilanen; DeMoss, Tim; Wunder, Lisa
Subject: Fwd: CAAP and Financing

Sent from wireless

Begin forwarded message:

From: Leroy Onishi <lonishi@pacificenterprisebank.com>
Date: July 28, 2017 at 9:52:58 AM PDT
To: "Chris Cannon (CCannon@PortLA.org)" <CCannon@PortLA.org>, "Heather Tomley (Heather.Tomley@POLB.com)" <Heather.Tomley@POLB.com>
Cc: Marc Merino <mmerino@pacificenterprisebank.com>
Subject: CAAP and Financing

Chris and Heather,

Thank you for your presentation at the HTA meeting on Wednesday regarding the proposed revised Clean Air Action Plan ("CAAP"). It is a very ambitious plan to clean the air in and around the ports. If implemented, CAAP will affect hundreds if not thousands of independent owner-operators ("IOOs") who service the ports since it will require that they upgrade their existing trucks to newer, cleaner trucks. As we discussed after your presentation, they will need financial help both in the form of government assistance and private financing. As a bank that has been financing trucks for IOOs in Southern California for a number of years, we at Pacific Enterprise Bank may have some insight as to what lenders may require and the type of financing plans that will be necessary.

Most IOOs are hard working individuals and know how to run a truck. However, as a group, they typically don't have pristine credit and do not qualify for loans from most banks. However, we have found a niche and ways to provide financing for this sector and have done a very good job in providing financing to them. In fact, in the past three years, we have financed an average of \$19 million in truck loans.

I don't profess to have a grand plan that will help the IOOs but I am willing to sit down with you to see if we can collectively provide some ideas. I will ask the head of our department, Marc Merino who is copied on this email, to join in as well. If you think our participation will be beneficial, let's schedule a meeting at your convenience.

Leroy B. Onishi
Vice President & Business Development Officer
PACIFIC ENTERPRISE BANK
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Pacific Enterprise Bank Performance Rankings:
#1 CalCAP Bank Lender in California since 2009
Top Ranked 100 Most Active SBA 7a Lenders in the United States
Top Ranked 100 Banks in the United States (out of 3,291 banks as reported by SNL Financial for 2014)
Rated 5 Stars out of 5 in the United States (by Bauer Financial Rankings for 2014)
Rated 5 Stars out of 5 by Bankrate.com in the United States

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EQUAL HOUSING LENDER



Jock O'Connell's Commentary: Musing Over CAAP 2017

Late last month, the Ports of Los Angeles and Long Beach released their proposed 2017 Clean Air Action Plan (CAAP) Update. The document, now open for public comment through September 18, outlines a highly aggressive strategy to "ultimately achieve zero emissions for trucks and terminal equipment."

The two ports have also released a detailed cost analysis by EnSafe, a Tennessee-based consulting firm. The numbers in the EnSafe analysis quickly fall into the daunting "a billion here, a billion there" category. Unfortunately, as we shall see, the numbers that are not in the EnSafe study are likely to be even more daunting.

Here we don't propose to do a full-blown audit of EnSafe's cost estimates. Instead, we simply would like to emphasize just how extraordinarily conditional those estimates are by highlighting the several times the folks at EnSafe candidly concede that their cost estimates could very well prove to be, well, fantastic.

The following quotes – pre-emptive *mea culpas* if you will – are from the introductory pages of the EnSafe report.

- *"In many cases, assumptions have been made to estimate the cost of technology that is not commercially available."*
- *"At this time, the state of near-zero and zero-emission technology development varies...The variability in the emerging near-zero and zero-emission market creates large uncertainties in the costs of future equipment and related infrastructure."*
- *"This analysis assumes terminal and Port operations remain the same or similar to existing conditions."*
- *"This analysis does not include maritime terminal costs resulting from implementation of the near-zero and zero-emission technology into ongoing terminal operations such as increased costs resulting from reduced productivity, lost revenue from repositioned cargo to other terminals during construction, or costs of phased construction."*

- *"The analysis does not include cost estimates for fueling or charging infrastructure for heavy-duty trucks, which is likely to exist outside the Harbor Districts and throughout the region."*
- *"Furthermore, estimates are based on costs in 2017; inflation and the 'future cost of money' have not been included in this analysis."*

These are all very reasonable and honest allusions to the conditionality of economic forecasting. Projecting costs or even future levels of maritime traffic at the two ports is fraught with the perils of prophecy, especially given the fluid nature of today's shipping industry (e.g., alliance consolidation, ever larger vessels, shifting trade routes) as well as the fairly peculiar competitive challenges posed by California's aggressive regulatory environment.

I am prepared to wager heavily that, by 2030, the cost estimates offered by EnSafe will be a mere fraction of the actual expenditures that will ultimately be required to implement CAAP 2017. So that is why many of us find the reluctance of public officials to squarely address what we believe is the most fundamental issue here: Who's going to pay?

Right now, neither the State of California nor the United States Government appears eager to contribute more than token amounts. Will the shipping lines, terminal operators, truckers, railroads pony up the billions that will be needed? Will the ILWU offer wage and benefit concessions? Will port pilots hold a bake sale? Will beneficial cargo owners agree to a CAAP compliance surcharge or would they just take their business elsewhere?

Perhaps, taking a cue from the President, we should just demand that the Chinese pay.

Jock's comments are his own and do not necessarily represent the views of PMSA.



The Clean Air Action Plan – Can Ports Compete If It Is Enacted?

By John McLaurin
President, Pacific Merchant Shipping Association

The Ports of Los Angeles and Long Beach have published a draft Clean Air Action Plan (CAAP), a document that was widely publicized and praised by the ports. According to port leaders, the CAAP, in terms that would make Star Trek's famous Captain James T. Kirk proud, would lead the ports to go "...where no port has gone before," through a "...new array of technologies and strategies to further lower port-related emissions in the decades ahead."

The success in reducing transportation emissions related to port activities is well-documented and a function of cooperative and voluntary efforts, as well as compliance with regulatory measures by marine terminal operators, ocean carriers, trucking companies and harbor craft. You would be hard pressed to name an industry that has seen such dramatic reductions in emissions in as such a short period of time as compared to the maritime industry.

But the CAAP will bring about even more transformational changes to the San Pedro waterfront. The draft CAAP represents a gamble on the part of those pushing for these changes to dramatically reduce emissions without negatively impacting jobs or trade volumes.

It is also a gamble by the International Longshore and Warehouse Union (ILWU), which has taken a back seat to the overall zero-emission debate – except to advocate the prohibition of the use of certain public funds for automated zero emissions equipment.

The CAAP's goals, while admirable, also raise significant questions – queries that must be answered before either port commission approves this document. The most fundamental questions revolve around whether the technology relied on in the CAAP will actually be in existence and commercially available to meet the zero-emission deadlines of 2030.

Second and equally important, where will the money come from (we're talking about billions of dollars) to pay for this equipment and will exceptionally high costs divert cargo to other gateways?

Why does the CAAP specify a specific technology, power source and operational mandate? The CAAP declares itself to be "...technology-neutral, fuel-neutral, and operations neutral" – but the current draft has a clear preference for non-automated zero-emissions equipment...equipment that currently does not exist.

With regard to the ILWU, despite the CAAP's preference for non-automated zero-emissions equipment, will the cost of zero-emissions equipment coupled with operational restrictions and fines be so high as to actually encourage marine terminals to use automation as a way of achieving the port's zero-emission goals?

Ultimately, all questions about the CAAP circle back to those involving cost, cargo availability and velocity. According to the Ports of Los Angeles and Long Beach, the cost of the CAAP is estimated to be between \$8.5 and \$14 billion. Cost estimates utilize prices for "...zero emission options that do not exist." The port estimates also do not include a number of costs that would directly impact their tenants and customers such as:

- A fee assessed against cargo owners for use of dirty trucks starting in 2023.
- "...increased costs resulting from reduced [terminal] productivity, lost revenue from repositioning of cargo to other terminals during construction, or costs of phased construction."
- Ongoing operational or maintenance costs.

Continued



The Clean Air Action Plan – Can Ports Compete If It Is Enacted? [Continued](#)

- Fueling or charging infrastructure for heavy duty trucks, which will need to exist outside the harbor districts.
- Imposition of fines or penalties on trucking companies or terminal operators for failing to meet appointment window requirements – or the cost of reducing cargo volumes in order to avoid such penalties.

Despite these omissions, the CAAP repeatedly warns about the cost impacts that will be imposed on cargo owners, terminals, ocean carriers and the ports themselves by stating that, “Keeping the ports economically competitive... will be challenging” and that “...these strategies will place an enormous financial burden on the Ports and the goods movement industry.”

Interestingly, one solution offered by the ports is to impose some of the CAAP strategies and costs throughout the nation “...through state and federal mandates, in order to minimize impacts to economic competitiveness for our customers.” However, assuming

that other competing North American port gateways will follow the lead of the ports of Los Angeles and Long Beach is highly speculative, or naïve...or both.

The CAAP also acknowledges that it does not contain a “detailed economic analysis of individual CAAP strategies” and “does not purport to determine the net effect of the CAAP strategies on the industry or public health.” In other words, no one really knows what impact, either for good or bad, the CAAP will bring to the Ports of Los Angeles and Long Beach, surrounding communities and those that rely on the ports for jobs.

With as yet to be developed technology forming the basis of speculative cost estimates coupled with no reliable funding stream to meet a 2030 deadline that is without rationale, and in the absence of any analysis of the overall economic and environmental net effect, we are left with a CAAP that is based mostly on faith.

On behalf of all of us who work at the ports, let us all pray.

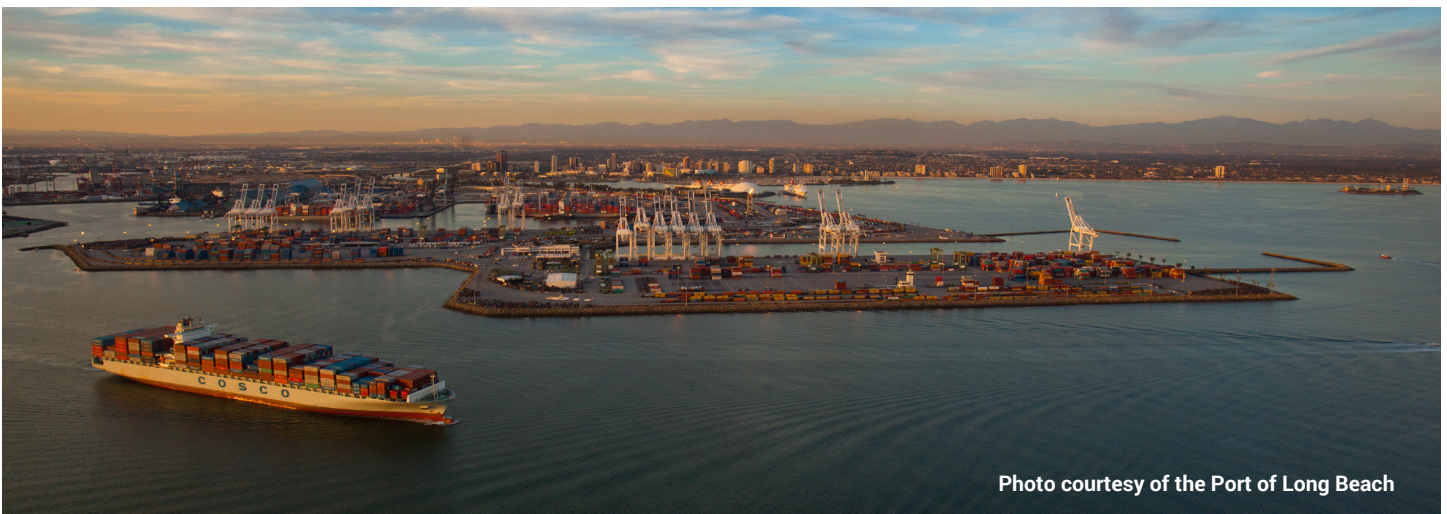
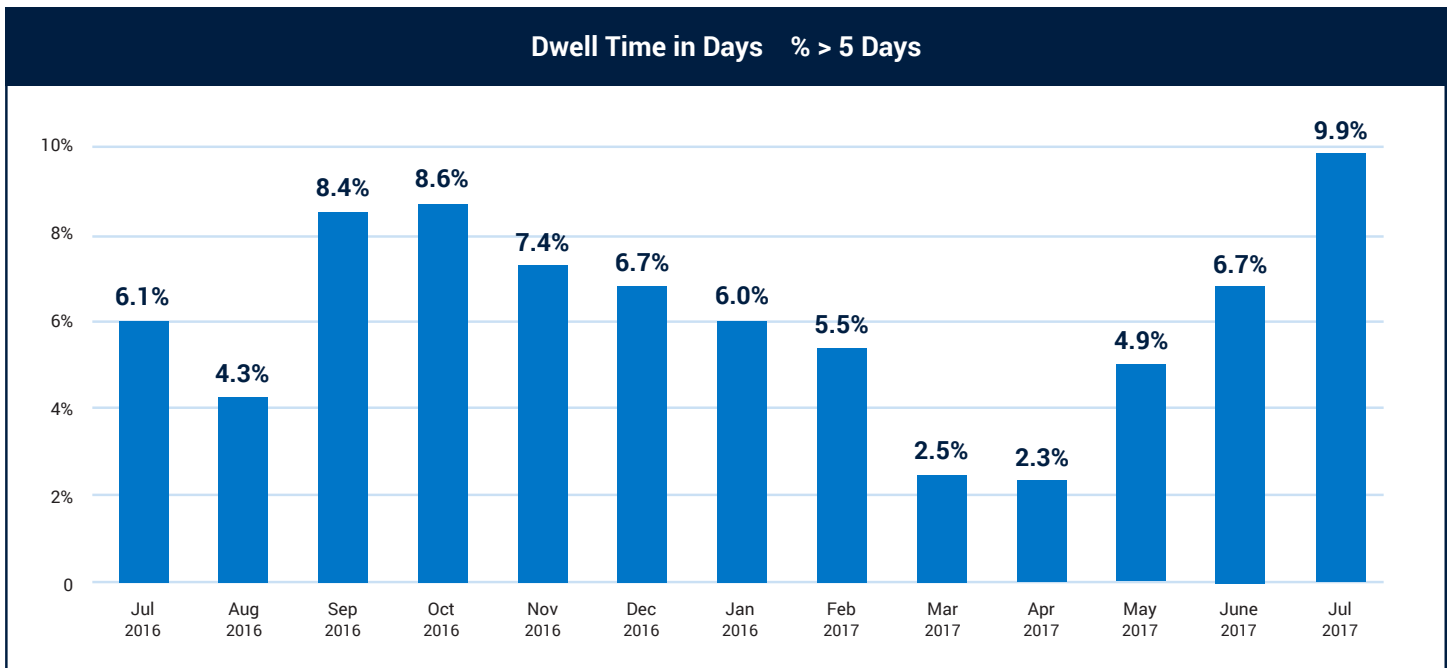
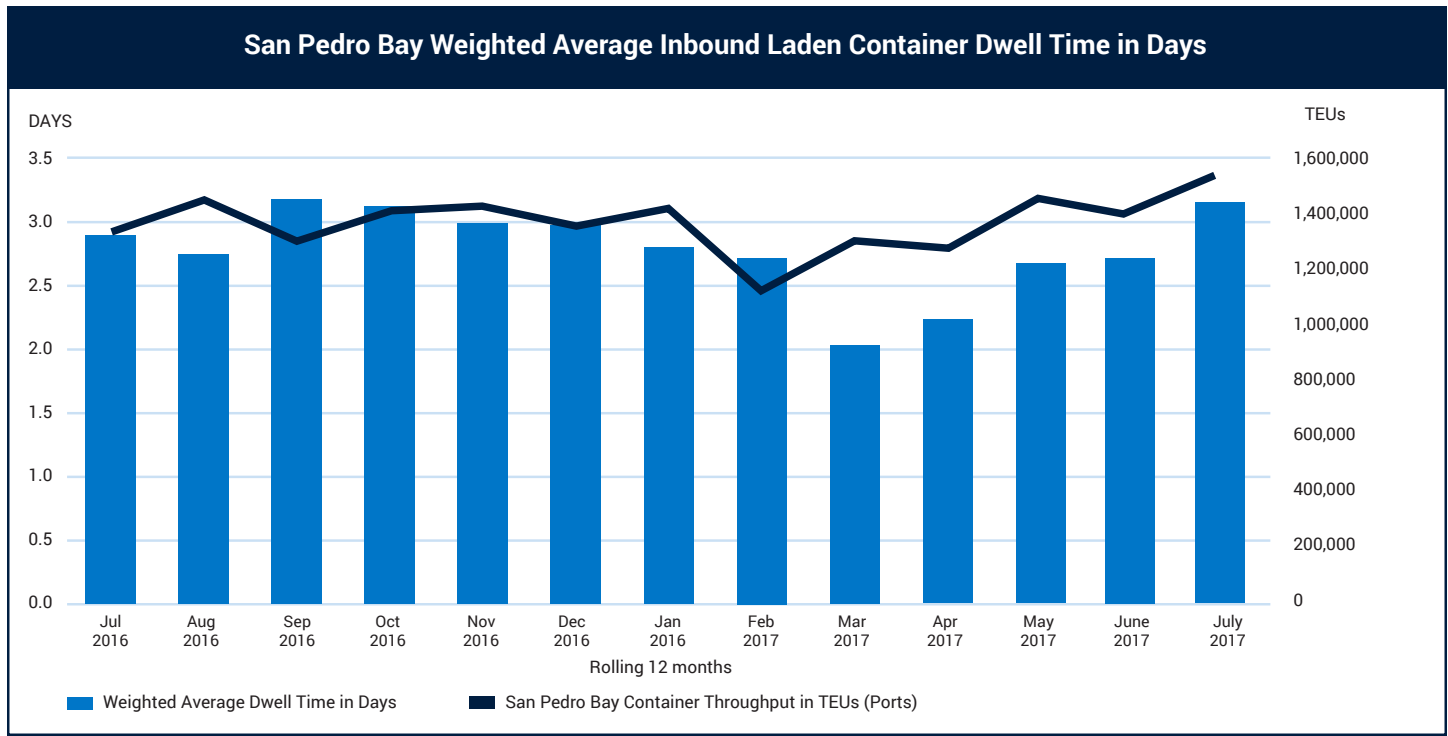


Photo courtesy of the Port of Long Beach



Container Dwell Time Increases In July



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From: [DeMoss, Tim](#)
To: [Coluso, Amber](#)
Subject: FW: HTA Presentation
Date: Wednesday, August 02, 2017 10:33:45 AM

For the files...

From: Tomley, Heather [mailto:heather.tomley@polb.com]
Sent: Wednesday, August 02, 2017 10:09 AM
To: Buss, Paul H
Cc: Cannon, Chris; Moilanen, Renee; DeMoss, Tim
Subject: RE: HTA Presentation

Hi Paul –

The best place to start would be to review the proposed program in the Draft 2017 CAAP Update available here:

<http://www.cleanairactionplan.org/2017-clean-air-action-plan-update/>

We are currently seeking public review and comment on the draft document. No new requirements are in place at this time, however if the plan is approved, that would initiate the process for new requirements to be developed. The plan will be considered for approval by our Boards in November, after which time we would start the tariff amendment process to implement the program.

I hope that helps.

Thanks,
Heather

From: Buss, Paul H [mailto:paul.buss@baml.com]
Sent: Tuesday, August 01, 2017 5:02 PM
To: Tomley, Heather <heather.tomley@polb.com>
Subject: HTA Presentation

Heather,

I attended the HTA meeting last week and I would love to get more information on the new rules affecting customers with the Ports. As you can guess by my position I am looking to advise my clients on purchases and help them get financing to keep things moving. Thanks in advance.

Paul H. Buss

Vice President

Relationship Manager

Commercial Banking

Bank of America Merrill Lynch

Bank of America, N.A.

CA8-518-08-04, 21250 Hawthorne Blvd. Ste. 850, Torrance, CA 90503

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[view my website](#)

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From: [Wunder, Lisa](#)
To: [Coluso, Amber](#)
Cc: [DeMoss, Tim](#)
Subject: FW: Are new-tech trucks ready to replace diesel
Date: Monday, August 14, 2017 3:04:53 PM

I think this would qualify as a CAAP comment. Thanks.

From: Cannon, Chris
Sent: Monday, August 14, 2017 2:42 PM
To: DeMoss, Tim; Wunder, Lisa
Subject: FW: Are new-tech trucks ready to replace diesel

Christopher Cannon

Environmental Management Division
Port of Los Angeles
425 South Palos Verdes Street
San Pedro, CA 90731
310-732-3763 dir
310-547-4643 fax

From: Tankersley, Eileen
Sent: Monday, August 14, 2017 11:01 AM
To: Seroka, Gene; Cannon, Chris; DiBernardo, Michael
Cc: Calhoun, Erica
Subject: FW: Are new-tech trucks ready to replace diesel

FYI

Eileen Tankersley
Assistant to Gene Seroka, Executive Director
Port of Los Angeles | 425 S. Palos Verdes Street | San Pedro, CA 90731
(310) 732-3456 | etankersley@portla.org



From: Richard Peterson [<mailto:rpeterson@angtl.com>]
Sent: Friday, August 11, 2017 1:38 PM
To: Tankersley, Eileen
Subject: Are new-tech trucks ready to replace diesel

Executive Director Seroka,

Although I live in Alaska, I keep a sail boat in San Pedro at CBYC so I stay up with Port happenings. Rachel Uranga with the LA Daily News had an interesting article July 30,

2017, titled "Are new-tech trucks ready to replace diesel, keep California's pollution-fighting promise?". She mentioned how the Port of LA under your leadership has been looking for lower emission vehicles for Port operations. As a boat owner who constantly has to clean the "soot" off my decks, I strongly support your efforts. Good article although she missed one important fact. *Synthetic diesel made from natural gas.*

While natural gas is a present day player with a checkered past there is a well proven natural gas technology called gas to liquids or GTL that gets around the short comings of both CNG and LNG.

Synthetic Fischer-Tropsch diesel (F-T diesel) made with the GTL process is an exact replacement for ultra low sulfur diesel. It burns as clean as both CNG and LNG but doesn't require any changes or modifications to fuel storage, transportation, or delivery systems nor the engines. Unlike CNG and LNG, F-T diesel has the same energy content of ULSD so the diesel truck doesn't end up with lower power or reduce mileage, a common complaint of many users of CNG or LNG. F-T diesel has no sulfur, "zero sulfur" and more importantly it has almost zero aromatics. You may recall that CARB lowered the aromatic content for California diesel from 30% to 10% because aromatics produce the smoke and particulates partially responsible for California's historic smog issues. The EPA in the late 1990's ruled that F-T diesel was non-toxic.

UNOCAL wanted a synthetic drilling fluid it could discharge into the ocean. See *EPA Water Docket, EB 57 located at 401 M Street SW Washington DC, 20460 Reference Docket No. W-98-26 in UNOCAL data file 4.A.a.3, Vol 13.*

You may ask why isn't F-T synthetic diesel in the California market? It is in very small quantities.

It was used as a blending fuel to improve the output of a small refinery. However, the majority of the world's production goes to Europe where they actually value this ultra clean burning fuel.

There are billions of gallons of F-T diesel already sold throughout Europe. Two plants recently came on line in Qatar producing over 7 million gallons per day of GTL products. Almost all is destined for Europe.

Like hydrogen and zero emission electric trucks the GTL process is expensive. Unlike wind, solar, electric cars or bio-renewable transport fuels, the GTL process has no State or Federal support to help defray these extraordinary costs. They do in Europe so that's why the majority of F-T diesel is sold in Europe. Fischer-Tropsch, the F-T in the process has well over 400,000 barrels per day (over 6 billion gallons per year) of plants operating around the world.

Again nice article but she missed the real technology that works today and we believe could be a great bridge transport fuel to get to the nirvana of "zero emission" vehicles.

Warm regards,

Dick Peterson

Richard Peterson
ANGTL/ANRTL
310 K Street, Suite 200
Anchorage, Alaska
(907) 264-6709 office
(907) 360-0909 cell
rpeterson@angtl.com
www.angtl.com web



CITY OF CARSON

August 15, 2017

Renee Moilanen
Port of Long Beach
4801 Airport Plaza Drive
Long Beach, CA 90815
caap@cleanairactionplan.org

Re: Ports Clean Action Plan - Request for Presentation on the CAAP in Carson

Dear Ms. Moilanen,

The City of Carson appreciates the opportunity to provide comments on the Clean Air Action Plan. Many residents of the City of Carson are negatively impacted by Port operations including the extensive emissions from trains and trucks utilizing the Alameda Corridor, truck routes through the City, and area freeways. Therefore, we would like to formally request a public presentation on the CAAP in the City of Carson.

The CAAP provides for many programs to address air emissions at the Ports. However, the CAAP does not adequately address the impacts of emissions associated with the extensive rail lines, truck routes, and freeways that travel immediately adjacent to residential areas and communities, as well as the extensive distribution centers, truck yards, and container yards within the City of Carson. The City of Carson is one area with a residential community located between the Alameda Corridor and the 710 freeway, both substantial port-related transportation corridors and large sources of diesel particulate emissions.

The CAAP does not sufficiently address these potential indirect impacts from transportation sources. CARB studies on rail yards show extensive health risks from diesel particulate emissions associated with rail activities and the residences of the City of Carson are substantially impacted by these port-related activities. The health risk assessments in the CAAP analyze a distance only out to 2 km and do not assess the fact that health risks are increased along rail lines and freeways, and near distribution centers, truck yards, and container yards that experience a substantial increase in usage as a result of port activities. These risks should be quantified in more detail in the CAAP and fully disclosed to the public.

Rail implementation of clean locomotives will eventually reduce some of these rail-related health risks, but the implementation of clean locomotives is expected to be substantially slower than the implementation of clean trucks. EPA estimates that clean locomotives will not become the dominant locomotive type for more than 20-30 years. Pre-emption on the part of railroad companies may also reduce the extent to which clean locomotives can be utilized.

Quantification and disclosure of indirect sources, including from rail and freeway emissions through communities such as the City of Carson, are important sources of health risk that need to be addressed.

Thank you for your important work on cleaning our ports and reducing the impacts of emissions from port activities on area communities. Please contact me about when a presentation on the CAAP in the City of Carson can be scheduled.

Sincerely,

A handwritten signature in black ink, appearing to read "AL R", followed by a period.

Albert Robles
Mayor

Cc: Mayor Pro Tem Lula Davis-Holmes
Councilmember Elito Santarina
Councilmember Jawane Hilton
Councilmember Cedric Hicks
City Manager Ken Farfsing
Community Development Director John Raymond
Planning Manager Saied Naaseh
City Attorney Sunny Soltani

Contact:
Thomas Jelenić
562-432-4043
tjelenic@pmsaship.com

COSTLY ENVIRONMENTAL POLICIES MAY RESULT IN INCREASED GREENHOUSE GAS EMISSIONS IF CARGO BYPASSES LA/LB PORTS FOR DISTANT EAST AND GULF COAST PORTS

LONG BEACH, CALIF. – An analysis released today that was commissioned by the Pacific Merchant Shipping Association (PMSA) and conducted by Starcrest Consulting Group demonstrates that greenhouse gas (GHG) may increase if cargo is diverted from West Coast ports. The GHG increases are dependent on a number of factors including port of origin, port of destination, inland destination and container vessel sizes moving the cargo.

Policy proposals at the ports of Los Angeles and Long Beach, as well as those introduced by the state of California, to reduce GHGs could have an opposite effect than intended. Shippers and cargo owners, in response to increased costs due to regulation, may divert cargo from higher-cost West Coast ports to lower-cost East Coast and Gulf Coast ports. The analysis tool can be used to illustrate numerous scenarios, and many of them result in increased emissions.

As the analysis highlights, regulations intended to reduce greenhouse gas emissions associated with the supply chain may increase operational costs for cargo owners. As a result, cargo owners may shift their products to less expensive gateways with longer transit times and distances. The Starcrest analysis found that GHG emissions may average up to 22 percent higher, when cargo originating from Asia bypasses the ports of Los Angeles and Long Beach in favor of ports on the East Coast and Gulf Coast, with final destinations of Chicago, St. Louis and Memphis.

The analysis highlights three important factors when cargo owners decide where to send shipments – destination, reliability and cost. California ports offer the most direct shipping route from Asia to the U.S., and to inland U.S. destinations given their proximity to infrastructure, logistics networks and population centers.

However, with the increased costs of proposed regulations, today's cargo owners have more gateway options and, as regulations increase prices, other gateways are becoming viable transit options.

“Cargo owners around the world make decisions based on their pocket-books,” contends PMSA President John McLaurin. “We urge policy-makers to take a more holistic view and include global competitiveness as a factor in developing regulations to clean the air – doing so is essential to keep cargo and jobs in Los Angeles and Long Beach, and to avoid unintended GHG emissions increases.”

A spreadsheet-based Greenhouse Gas Route Comparison Tool developed by Starcrest Consulting Group is being made publically available by PMSA. The GHG Route Comparison Tool analyzes emissions associated with trips from South Korea, China and Singapore to West Coast, Gulf Coast and East Coast ports via the Pacific Ocean, Suez and Panama canals.

“Ultimately, this analysis paints a cautionary picture of the unintended consequences that may result from policy proposals designed to reduce GHG emissions but which may actually increase them due to the many options which exist for cargo owners,” concluded McLaurin. “Look no further than the Clean Air Action Plan. This proposal would add more than \$14 billion in costs without counterbalancing programs or funding to increase efficiency or competitiveness.”

About the Pacific Merchant Shipping Association

The Pacific Merchant Shipping Association (PMSA) is an independent, not-for-profit association focused on global trade. PMSA operates offices in Oakland, Long Beach and Seattle, and represents owners and operators of marine terminals and U.S. and foreign vessels operating throughout the world. For more information, visit www.pmsaship.com.

About Starcrest Consulting, L.L.C.

Starcrest Consulting Group specializes in assisting port and maritime clients address their technical and policy related air quality, climate, sustainability, and data management needs. For more information, visit www.starcrestllc.com.

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[EDITOR’S NOTE]

Download a copy of the Starcrest report [here](#).

Download a report infographic [here](#).

Download a copy of the Pacific Northwest Greenhouse Gas Comparison Tool [here](#).

Download a copy of the California Greenhouse Gas Comparison Tool [here](#).

Comment from Huy Le re: CAAP - We Need Clean Air NOW

Time: Mon, 21 Aug 2017 20:05:48 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Huy Le 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: incentive trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Huy
Last Name: Le
Email: huydlecsulb@gmail.com
ZIP Code: 90249
Phone: 310-597-1478

Comment from Ofelia Medina

Time: Mon, 21 Aug 2017 20:03:59 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Ofelia Medina

Attachments: msg-27362-16.html (3k)



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

Name: Ofelia Medina

Email: Ofelia.miguel22.om@gmail.com

Zip Code: 90806

Phone: 3105005136

Comment from Alexandra Radford re: CAAP - We Need Clean Air NOW

Time: Tue, 22 Aug 2017 19:30:48 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Alexandra Radford 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: incentive trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Alexandra
Last Name: Radford
Email: alexglucas@gmail.com
ZIP Code: 90814
Phone:

Comment from joseph landau re: CAAP - We Need Clean Air NOW

Time: Tue, 22 Aug 2017 19:23:14 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from joseph landau 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: incentive trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: joseph
Last Name: landau
Email: jklandau@gmail.com
ZIP Code: 90802
Phone: 562-435-6990

Comment from Rafael Renteria re: CAAP - We Need Clean Air NOW

Time: Tue, 22 Aug 2017 19:30:23 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Rafael Renteria 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: incentive trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Rafael
Last Name: Renteria
Email: fathers_wish@yahoo.com
ZIP Code: 90810
Phone:

Comment from joseph mueller re: CAAP - We Need Clean Air NOW

Time: Wed, 23 Aug 2017 18:10:43 +0000
From: Mandy Xu <mxu@icgworldwide.com>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from joseph mueller 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: incentive trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: joseph
Last Name: mueller
Email: jstplnjoe3@hotmail.com
ZIP Code: 90807
Phone:

Comment from Jason Gutierrez re: CAAP - We Need Clean Air NOW

Time: Wed, 23 Aug 2017 17:59:43 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Jason Gutierrez 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Jason
Last Name: Gutierrez
Email: jason.gutierrez@godependable.com
ZIP Code: 90802
Phone:

ACT NOW for Clean Air!

Time: Wed, 23 Aug 2017 22:35:31 -0700
From: Jessica Andrade <jessand289@gmail.com>
To: caap@cleanairactionplan.org
Subject: ACT NOW for Clean Air!

Attachments: msg-30708-8.html (Ok)



Due to air pollution my children 5,3,1 suffer from asthma and bronchitis

Comment from Jessica Andrade re: CAAP - We Need Clean Air NOW

Time: Thu, 24 Aug 2017 17:35:23 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Jessica Andrade 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: incentive trucks in 2018 – instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Jessica
Last Name: Andrade
Email: jessand289@gmail.com
ZIP Code: 90744

Comment from Katrina Harding re: CAAP - We Need Clean Air NOW

Time: Thu, 24 Aug 2017 19:25:44 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Katrina Harding 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Katrina
Last Name: Harding
Email: katiharding@yahoo.com
ZIP Code: 90813

Clean Air Action Plan

Time: Thu, 24 Aug 2017 23:03:36 -0400
From: Richard Hopkins <rhopkins03@verizon.net>
To: caap@cleanairactionplan.org
Subject: Clean Air Action Plan

Attachments: msg-11439-107.html (36k)



Dear Commisioners,

I do not want to wait until 2035 for clean air. Communities and the planet cannot wait that long. Please implement the fees as soon as possible to encourage the use of existing technologies that achieve NOx and GHG emissions now. We need to have clean air as soon as possible.

Richard Hopkins
562-696-0967
(c) 562-318-8016

Comment from Michael Busman re: CAAP - We Need Clean Air NOW

Time: Fri, 25 Aug 2017 19:58:08 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Michael Busman 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Michael
Last Name: Busman
Email: mbusman04@gmail.com
ZIP Code: 90505
Phone: 424-383-1753

Comment from Kim Carroll re: CAAP - We Need Clean Air NOW

Time: Sat, 26 Aug 2017 00:12:32 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Kim Carroll 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Kim
Last Name: Carroll
Email: kim@kimcarrollphoto.com
ZIP Code: 90807
Phone: 562-305-0137

Comment from Sean Carroll re: CAAP - We Need Clean Air NOW

Time: Sat, 26 Aug 2017 00:13:04 +0000
From: Mandy Xu <mxu@icgworldwide.com>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Sean Carroll 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: incentive trucks in 2018 - instead of waiting six years. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Sean
Last Name: Carroll
Email: scarroll@e-hii.com
ZIP Code: 90807

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

Time: Sat, 26 Aug 2017 00:34:33 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Robert Brennan 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Robert
Last Name: Brennan
Email: sat062098@aol.com
ZIP Code: 90814

Clean Air Now

Time: Sat, 26 Aug 2017 19:33:16 -0700
From: jasontakaki@gmail.com
To: caap@cleanairactionplan.org
Subject: Clean Air Now

Attachments: msg-7091-168.html (0k)



To whom it may concern,

As a sufferer who went through asthma, and now whooping cough pertussis, I plead to have better air now. I've been away for two years in Denver and while there I never suffered from any cough, now that I've returned since May, I developed a cough again.

Thank you,
Jason Takaki

CAAP-Heavy Duty Truck Plan

Time: Mon, 28 Aug 2017 15:41:55 -0700
From: Donald Sachs <dsachs@mtsac.edu>
To: caap@cleanairactionplan.org
Subject: CAAP-Heavy Duty Truck Plan

Attachments: msg-16391-62.html (2k)
msg-16391-63.jpg (15k)



To: Staff and Commissioners from both Ports,

I think you folks are missing the boat!

Despite significant improvements over the years, the South Coast Air Basin has some of the worst air quality in the nation. Based on current facts the region needs action now regarding emission reductions from trucks to meet federally mandated air quality standards. The proposed plan does not reduce impacts to public health in the near term, it does not help the region meet 2023 attainment standards, nor does it address GHG emissions or climate change impacts.

The technology exists today with near zero emission engines that can serve the trucking industry today. A study conducted by U C Riverside showed that in port applications NOx emissions are reduced by 99.8%. When near zero engines are paired with renewable natural gas, GHG emissions can be NET NEGATIVE.

As an individual, I strongly encourage the ports to implement the fees as soon as possible to support the use of existing technologies that achieve NOx and GHG emissions now.

Sincerely,

Donald Sachs



Donald Sachs

Special Assistant to the President

909.274.5722-Direct
909.274.2994-Fax
dsachs@mtsac.edu

Comment from Andy Carrasco re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:45:09 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Andy Carrasco 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Andy
Last Name: Carrasco
Email: acarrasco@semprautilities.com
ZIP Code: 91205

Comment from angela bradford re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:47:22 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from angela bradford 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: angela
Last Name: bradford
Email: angelaparent23@gmail.com
ZIP Code: 90804

FW: Comment from Christophe Dupin de Saint Cyr re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:47:58 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: FW: Comment from Christophe Dupin de Saint Cyr 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Christophe
Last Name: Dupin de Saint Cyr
Email: christophedupin@gmail.com
ZIP Code: 90732

Comment from Charlotte Castillo re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:45:30 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Charlotte Castillo 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Charlotte
Last Name: Castillo
Email: charlotte@infiniteblue.com
ZIP Code: 90806
Phone: 310-210-6251

Comment from cynthia mann re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 23:39:42 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from cynthia mann 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: cynthia
Last Name: mann
Email: cynwm@aol.com
ZIP Code: 90210

Comment from Devin O'Brien re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:46:29 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Devin O'Brien 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Devin
Last Name: O'Brien
Email: devindaniel@gmail.com
ZIP Code: 90807

Comment from Jason Takaki re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:45:50 +0000
From: Mandy Xu <mxu@icgworldwide.com>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Jason Takaki 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Jason
Last Name: Takaki
Email: jasontakaki@gmail.com
ZIP Code: 90806

Comment from John Smith re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 20:13:57 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from John Smith 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: John
Last Name: Smith
Email: irascible.kitty@protonmail.com
ZIP Code: 90804

Comment from john bradford re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:47:42 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from john bradford 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: john
Last Name: bradford
Email: jbradford@gmail.com
ZIP Code: 90804

Comment from Juliette Carrillo re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 23:32:01 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Juliette Carrillo 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Juliette
Last Name: Carrillo
Email: juliette.a.carrillo@gmail.com
ZIP Code: 90806

Comment from MARICELLA CARDONA re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:47:05 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from MARICELLA CARDONA 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: MARICELLA
Last Name: CARDONA
Email: maricella.cardona@gmail.com
ZIP Code: 90732

Comment from Monique McCollam re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:49:13 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Monique McCollam 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Monique
Last Name: McCollam
Email: momc7@cox.net
ZIP Code: 90731

Comment from Rebecca Coleman re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:46:10 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Rebecca Coleman 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Rebecca
Last Name: Coleman
Email: rebeccaalissacoleman@gmail.com
ZIP Code: 90807
Phone: 562-682-3695

Comment from Roberto Carneiro re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:48:51 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Roberto Carneiro 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Roberto
Last Name: Carneiro
Email: robmcarneiro@gmail.com
ZIP Code: 33139
Phone: 310-733-7998

Comment from Rochelle Serna re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:46:47 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from Rochelle Serna 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: Rochelle
Last Name: Serna
Email: rochelle.serna@gmail.com
ZIP Code: 90731
Phone:

Date: 20170827
Time: 120021
IP: 184.181.116.249

Comment from William Brown re: CAAP - We Need Clean Air NOW

Time: Mon, 28 Aug 2017 17:49:30 +0000
From: ACT Now LA <info@actnowla.org>
To: "caap@cleanairactionplan.org" <caap@cleanairactionplan.org>
Subject: Comment from William Brown 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. Let's use the most advanced technology now to lower emissions and clean our air.

First Name: William
Last Name: Brown
Email: uokbill2@gmail.com
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Comment on CAAP-Act TODAY ! You CAN SAVE THE LIFE OF A CHILD!

Time: Tue, 29 Aug 2017 05:46:26 -0700
From: Carole Grover <csgrover34@gmail.com>
To: caap@cleanairactionplan.org
Subject: Comment on CAAP-Act TODAY ! You CAN SAVE THE LIFE OF A CHILD!

Sent from my iPad lawmakers-clean our air Now! before YOUR child or grandchild has life threatening breathing problems!

LA/LB Clean Air Action Plan

Time: Tue, 29 Aug 2017 17:00:55 +0000
From: "Scott M. Jones" <scott.jones@gensteam.com>
To: "CAAP@cleanairactionplan.org" <CAAP@cleanairactionplan.org>
CC: John Berge <jberge@pmsaship.com> , Chris K <chris.k@gensteam.com> , "Mike Hubbard" <mike.hubbard@gensteam.com>
Subject: LA/LB Clean Air Action Plan
Attachments: msg-28667-124.html (5k)



There is a very large segment of the maritime trade in the LA/LB area that is not appreciated nor adequately publicly represented in comparison to the container trades. The segment is the bulk and breakbulk business that are large users of labor and terminal space in the joint harbor complex. Their business is not fancy. They don't bring in the hottest athletic shoes, electronics or auto parts. They do not serve Walmart, Best Buy or the retail trades in general. They bring steel products, automobiles, aggregates, oil, base chemicals, lumber and all the other myriad items that serve the industrial needs of LA/LB AND the entire Southwest United States. You have a duty to consider the impacts of your draconian, 100% capture, proposal on the infrastructure that exists to support millions of jobs and lifestyles.

Electrification of all berths will not work for these trades. The vast majority of vessels that serve them trade worldwide, are hired by the voyage and will not be equipped to plug in. They are not dedicated vessels to an owner occupied terminal complex a la MAERSK. They operate in a fundamentally different manner than the Liner trades. That is why they are called the TRAMP trades. Therefore they will be forced to utilize the bonnet system which creates a host of problems. First, it is highly likely that these systems are NOT 100% efficient. Second, many of these vessels require line haul shifting along the berth multiple times. Detaching and reattaching the bonnet systems (do not believe for second that real world work rules will not require same) every time a shifting must occur is obviously detrimental to the operation and increases risk to the detriment of safety.

The tanker trades have even greater concern with the electrification requirement of berths for obvious reasons. Sparks and tankers do not mix. Given the bonnet systems being unlikely to achieve 100% recovery what reasonable choice is left? Shall we row the ethanol cargoes ashore that are needed to meet the automobile fuel standards?

There are the ridiculously low cost estimates in your projections. We have seen so many examples of final costs compared to the blue sky preliminary estimates within the harbor complex that this issue is beyond dispute. There is also the FACT that the alternate technologies that are counted upon as a magic wanted are not even developed let alone proven.

Lastly, if enacted as envisioned by the politicians, there will be a massive diversion of cargo away from Southern California. For the cargo that remains there will be a large increase in expense and a very large loss of jobs and taxes as a result. Emissions will in fact increase due to greater demand for trucking to bring cargo in to the basin. GHG emissions from vessels diverting to other North American ports will INCREASE far more than the incremental savings envisioned.

You have a duty to consider more than gamed up computer modeling being used to justify a political end. Emissions are down in the harbor area over 90% in the last 15 years. This effort at stomping out the last 10% from a segment of industry that is politically weak and not understood by you, basis your proposal, is counterproductive and just plain wrong. This needs a scalpel, not a meat axe.

May you see the light.

Regards, S.M. Jones