



Northwest San Pedro Neighborhood Council

“Your Community Voice”

February 15, 2017

Vilma Martinez, Board President
Dave Arian, Board Vice President
Patricia Castellanos, Commissioner
Anthony Pirozzi, Jr., Commissioner
Edward Renwick, Commissioner
Gene Seroka, Executive Director
Port of Los Angeles,
425 South Palos Verdes Street, San Pedro, California, USA 90731

Ray Regalado
President

Lee Williams
Vice President

Melanie Labrecque
Treasurer

Cynthia Gonyea
Secretary

Dear Executive Director Seroka and Harbor Commissioners:

The **Northwest San Pedro Neighborhood Council (NWPNC)** appreciates Mayor Eric Garcetti, Port of Los Angeles (POLA) Executive Director Gene Seroka, Long Beach Mayor Robert Garcia and interim Port of Long Beach Chief Executive Duane L. Kenagy for working diligently on plans that will help fulfill Governor Jerry Brown’s Executive Order B-32-15, which outlines a statewide Sustainable Freight Action Plan.

Furthermore, **NWPNC** applauds all parties of the Sustainable Freight Advisory Committee in acknowledging the negative health impacts from the port’s pollution and developing the Clean Air Action Plan (CAAP).

Additionally, in light of the current political climate, and recent remarks by Governor Jerry Brown during his 2017 State of the State Speech, **NWPNC** would like to encourage the ports of Los Angeles and Long Beach to strengthen the Harbor Area’s role in advancing the conversation on global climate change.

The **Northwest San Pedro Neighborhood Council** represents stakeholders that are subject to some of the worst air quality in the nation. They deserve cleaner air.

The **Northwest San Pedro Neighborhood Council** supports many of the points addressed in the Ports’ new Clean Air Action Plan that will help to provide our stakeholders with cleaner air and improved health.

That said, the **Northwest San Pedro Neighborhood Council** would advise the following:

1) **Communication & Community Outreach**

- a) Continued investment in local education programs for future port workers.
- b) Create a **CAAP Advisory Board** consisting of representatives from all partners and organizations working together to transform the ports. LADWP, SCAQMD, CalTrans, business and labor partners such as GE, Maersk and the ILWU, ITF, Teamsters, Machinists (IAM), Mechanics, Directors of Environmental Management from both ports, Mayor Eric Garcetti’s office.

- i) CAAP Advisory Board would have quarterly meetings to devise and coordinate team solutions.
- ii) Include direct community engagement with harbor area residents, at least annually. This could be achieved with presentations at neighborhood council meetings.
- iii) Devise a social media workflow as an additional outreach tool to spread word to harbor residents, and/or business stakeholders. This could be especially beneficial if the CAAP Advisory Board desires stakeholder feedback to specific topics.
- iv) As technologies change, active outreach to harbor area residents of emerging technology job skill sets desired from future port workers, and CAAP business partners. The City of Los Angeles could also utilize this outreach forum to recruit talent from the harbor area. **NWSPNC** has a “Pathways to Employment” youth event that could be utilized for this purpose.
- v) Collaboration with labor unions in planning to adapt current (and future) port workers to automation and zero emission technologies, and corresponding maintenance, as such technologies are phased in.

2) Technology

- a) Achievement of zero emissions for trucks that travel shorter distances before 2035.
- b) Incentives and rebates for independent truck drivers that will enable them to switch to zero emission trucks in a financially viable way. (In other words, truckers shouldn't go broke or get pushed out of the market.)
- c) More clearly specified deadlines to reach emission reduction targets for both trucks and port equipment.
- d) Specification of enforcement methods for failure to meet goals.
- e) Transition all lighting technologies to use Light Emitting Diodes.
- f) Prioritize transitioning harbor ships over container ships from older engines to newer engines.

3) Air Quality Monitoring

- a) Provide more oversight of the Ports' real-time air-quality monitoring systems, better maintenance to ensure the accuracy of monitoring equipment.
- b) Urge both Ports to collaborate and conduct independent monitoring for the same pollutants for comparison purposes, which is presently not the case.
- c) Include emissions monitoring of train emissions on port lands and inland railyard facilities.
- d) Provide greater transparency to the public about compliance with measures designed to reduce air pollution.
 - i) Example: The ports of Los Angeles and Long Beach could collaborate on a unified webpage where environmental data for both ports can be accessed.
 - (1) Create a single map which pinpoints all monitor testing locations. Each monitoring stations' data can be selected individually from the map, but also provide a list view of data from all monitoring stations, with tools that allow interested parties to extract the data for their own metric analysis.
 - (2) Direct this idea to the suggested **CAAP Advisory Board (#1-b)**. Representatives from the SCAQMD, air-quality monitoring staff and website technology teams from the ports of Los Angeles and Long Beach could devise

solutions. The CAAP Advisory Board could also **request suggestions** from stakeholders as to how the data could be presented (#1-b-ii, 1-b-iii).

4) Health Risk Assessments

- a) Include an outline of scientific data collection methods and improved / more thorough health reporting for CAAP 2017.
 - i) Example: The CAAP's 2010 San Pedro Bay-wide Health Risk Assessment (HRA) failed to provide evidence of any significant reduction in public health impacts or public health improvement.
NWSPNC urges the Ports to provide a Public Health Baseline as a data control point so that all data collected from that point forward will prove or disprove CAAP public health improvements in Harbor Area residents.
 - ii) Example: The CAAP's current proposal to reduce residential cancer risk from Port-related DPM emission "by 85%." The HRA fails to disclose what types of cancers are seen in Harbor Area residents. The HRA also does not list the specific types of cancers that are related to DPM exposure. **NWSPNC** urges the Ports to disclose past cancer studies and documentation. This information should be included in the Public Health Baseline data by reference.

5) Mitigation

- a) Mitigate ship emissions more by using Advanced Maritime Emission Control System (AMECS), or similar technologies.
- b) Explore additional biological methods (phytoremediation) to mitigate environmental contaminants. There is growing evidence that plants and trees are successful in removing a wide variety of toxins (such as NO_x, SO₂, arsenic, mercury, heavy metals) from air, water, soil. This form of mitigation could potentially assist in fulfilling or exceeding Port compliance of the California Coastal Act.
- c) Mandate a Container Tariff and Bulk Product Metric Ton Tariff sufficient to mitigate environmental and public health impacts.

6) Performance Measurements, and Auditing

- a) Create a methodology of audits and measurements, as well as an outline of what actions will be taken if goals aren't being met.

7) Fossil Fuels, Biofuels, Zero Emission & Emerging Technology

Fossil fuel technologies have negative externalities which significantly impact air quality throughout the L.A. Basin. Some identifiable impacts are in the form of measurable leaks from equipment failures, undetected smaller leaks in aging infrastructure, and routine flaring of excess gas from oil wells. Societal impacts are in the form of health care costs and environmental remediation that invariably are subsidized by governments, or directly by the residents of the L.A. Basin.

The ports can take an active role in making fossil fuel technologies reflect their true costs. The Clean Air Action Plan mentioned implementing a fee structure on polluting trucks; the highest fees will be on the most polluting trucks and there will be no fees for zero emission trucks.

- a) The **NWSPNC** suggests the majority of these fees should be paid by the corporations and businesses that utilize these trucks to move their goods, not truck drivers.
- b) The fee structure strategy will be especially effective at incentivizing companies and individual drivers if it becomes standard with other ports. We encourage you to work with other ports at the state, national, and international level to adopt similar policies.

Additionally, even if biofuels are renewable, engines powered by biofuels still produce greenhouse gases and toxins.

- c) The **NWSPNC** encourages the ports of Los Angeles and Long Beach to move away from biofuel technologies.
- d) The **NWSPNC** supports both ports using existing biofuel technologies, such as biodiesel, as a short term solution to help phase out more current technologies. But encourages the ports to phase out biofuels for zero emission technologies by 2035.

8) Port Expansion and its Impact on Emission Reduction Quotas

The **Northwest San Pedro Neighborhood Council** realizes the ports have expansion goals that include larger ships that carry more freight, additional freight transport infrastructure, which results in increased traffic. This poses a further challenge in meeting emission reduction goals. The **NWSPNC** urges the ports of Los Angeles and Long Beach to maintain or exceed emission reduction quotas as they strive to develop the Port for the next century.

The **Board of the Northwest San Pedro Neighborhood** requests a response by April 14, 2017 from the Port of Los Angeles regarding compliance by the Port of Los Angeles regarding its participation with the **NWSPNC** in cleaning up the air at the Port of Los Angeles. Also, **NWSPNC** requests the Port of Los Angeles keep the **NWSPNC** Board and the **NWSPNC** Port and Sustainability Committees informed of evaluations and proposed actions by the Port of Los Angeles in striving to maintain a cleaner LA Port.

We look forward to your response.

Sincerely,



Ray Regalado, NWSPNC President
On behalf of NW San Pedro Neighborhood

CC:

Chris Cannon, Chief Sustainability Officer, Director of Environmental Management
Port of Los Angeles, 425 S. Palos Verdes Street, San Pedro, CA 90731

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

Los Angeles Mayor Eric Garcetti
200 N. Spring St. Room 303 Los Angeles, CA 90012

Los Angeles Councilman Joe Buscaino
200 N. Spring St. Room 410 Los Angeles, CA 90012

Governor Jerry Brown
State Capitol, Suite 1173 Sacramento, CA 95814

Janice Hahn, Supervisor, 4th District
LA County Board of Supervisors
505 S. Centre, San Pedro, CA 90731

Central San Pedro Neighborhood Council
1840 S. Gaffey Street, Box 212, San Pedro, CA 90731

Coastal San Pedro Neighborhood Council
1840 S. Gaffey Street, Box 34, San Pedro, CA 90731

Wilmington Neighborhood Council
544 N Avalon Blvd, Wilmington, CA 90744

