

**Coalition For A Safe Environment
California Kids IAQ
Community Dreams
EMERGE
Wilmington Improvement Network
San Pedro & Peninsula Homeowners United
NAACP- San Pedro-Wilmington Branch # 1069
St. Philomena Social Justice Ministry**

December 15, 2021

South Coast AQMD

Su: Marine Port Committee Meeting 12-15-2021
Re: Public Comments

Dear Committee Members:

We the undersigned organizations respectfully submit our public comments for your consideration. We also wish to state for the record that it is inappropriate for this committee to deny public comment on each agenda item which occurred at this meeting. Public members were denied a second public comment on the second agenda item or time was cut off.

Agenda Discussion #1

1. Quantifying the impact is not straight forward due to complex atmospheric chemistry etc. does not prevent the estimation of emissions because you can measure ship emissions at-berth, at-anchor and at-sea. Also do not forget that ship emission increase as the ship ages.
2. Although you identify NOX, SOX and PM emissions that are actually numerous other chemicals in smaller quantities that are also being releases that you have not acknowledging, identifying, quantifying and mitigating for their environmental and public health impacts.
3. Although the ships are at-anchor further out does not mean the air pollution has disappeared it is still contributing to significantly greenhouse gases which still impacts our local environmental and public health.
4. Ports have refused to include in their Terminal EIRs to include schedules for hiring truck drivers, purchasing trucks and purchasing chassis.
5. The increase in ships at Ports is absolutely No Surprise every big box retailer and on-line retailer has posted the increase in sale practically only since last year. The Ports did absolutely nothing to research, plan and readjust their support services.

Agenda Discussion # 2

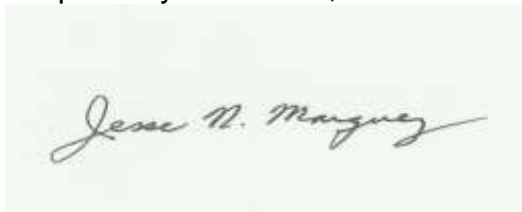
6. I wish to refresh everyone's memory absolutely No One requested an MOU at the beginning. Meetings records can validate that. It was AQMD's staff who brought it up at the last minute for the first time, AQMD staff has insisted that it be kept on the table and AQMD Management and Staff has done everything to delay moving forward with an ISR.
7. The Ports proposed reduction of 1-2 tons a day is a joke, when it is a fact that each ship releases 2-3 tons of air pollution per visit.
8. The Ports are not capable of providing clean electric shorepower for every ship at dock because they have not designed and built terminals to accommodate all types of ships power locations. You cannot use the excuse that the Governor or President has issued an executive order waiving the requirements for using shorepower due to rolling blackout or any other reason during summer when there is an alternative to electric shorepower.
9. There is a CARB approved Ship Emissions Capture & Treatment technologies which actually captures more emission than shorepower. The problem is that Ports and Terminal Operators have refused to buy one. The AEG AMECS has been approved for categories and classes of ships.
10. The public expects the ports to be in 100% turn-over compliance of trucks by 2030 not still be in the phasing in.
11. The public expects the ports to be in 100% turn-over compliance of CHE by 2035 not still be in the phasing in.
12. It is the Ports and Terminal Operators responsibility to establish an Implementation Phase-in Schedule with a supporting Implementation Purchasing Budget.
13. The CFASE publishes almost monthly a ZE Survey of ZE Vehicles and Equipment which discloses that ZE technologies exist for 90% of all vehicles and equipment today.
14. The Port of Los Angeles uses for their evaluations of the life of truck as 7 years. So to the public that means the trucks turnover is also 7 years.
15. The public is also aware that trucks and CHE are capital equipment and a Tax Write Off. So companies make more profit yearly. New Zero Emission Trucks and Equipment are more profitable over their life than diesel fuel.
16. The Public does support the contribution of funds from various programs such as the Cap & Trade, Prop 1B, Container Tariffs/Fees and other Penalty Fees.
17. Zero Emission Ships are already being built. Years ago I spoke to ship builders and ship engine manufacturers at a trade conference and they told me that they would build anything the customer requests.
18. The missed opportunity SCIG project reference only occurred because BNSF refused to incorporate all available, feasible and cost-effective zero emission technologies and emission capture and treatment technologies.
19. If AQMD approves an unsupported public MOU you must prepare an EIR to comply with CEQA.

20. EJ Organizations and our Supporters volunteer to write an ISR for AQMD and for the public and can deliver it by the end of January, if AQMD staff finds the task to be overwhelming.

21. The Ports have held no public meeting and no public process to seek public comment on an ISR or MOU, which means that there is no public transparency, no social justice for EJ Communities and environmental racism continues.

For any additional information or questions Jesse N Marquez is the principal contact.

Respectfully Submitted,

A handwritten signature in black ink on a light green background. The signature reads "Jesse N. Marquez" in a cursive script.

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Modesta Pulido
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