



PO Box 768
San Pedro, CA 90733
office: **310.982.1323**
email: **info@futureports.org**
www.futureports.org

May 19, 2021

David S. Kim, Secretary
California Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Subject: Climate Action Plan for Transportation Infrastructure (CAPTI) Comments

Dear Secretary Kim,

On behalf of FuturePorts, I am writing to express our appreciation for the opportunity to formally comment on the Climate Action Plan for Transportation Infrastructure (CAPTI) draft put forward by the California State Transportation Agency (CalSTA).

FuturePorts is a 501(c)(6) nonprofit advocacy coalition founded in 2005 to help coalesce the Southern California supply chain around the need to both grow the ports and to address the environmental, air quality, and quality of life issues that come with that growth. FuturePorts believes that a vibrant and healthy economic and environmental future for the ports is vital to us all.

FuturePorts shares the common goal of addressing and mitigating greenhouse gas emissions in California. We also note the importance that any approach should be balanced and include ongoing input from all stakeholders in affected industries. While we appreciate the intention and objectives of CAPTI relating to climate change, we are concerned that this plan misses the mark on valuable insight, involvement, and lacks clarity on how many of the provisions of CAPTI will be implemented.

We believe it would be beneficial for CalSTA and its partners to provide additional information and data that supports the CAPTI assumptions, and to develop quantifiable metrics on how to evaluate progress prior to acting on the final plan.

We must emphasize the financial and technological challenges facing ports in their efforts to comply with existing and proposed California Air Resources Board (CARB) regulations, such as existing At-Berth air quality regulations, proposed Advanced Clean Fleets regulations, and draft regulations related to Commercial Harbor Craft. The commercial readiness of technology to comply with these regulations is questionable, and the financial burden facing ports is daunting.

Unequivocally, the supply chain plays an important role in addressing climate change. Emissions from ships, trucks, trains, and cargo handling equipment have been significant contributors to carbon emissions around the world. However, California's freight industry has been driving policy innovation and investments in new technology to curtail greenhouse gas emissions. Recently, the United States Environmental Protection Agency (USEPA) Administrator Michael S. Regan recognized the unparalleled leadership of the ports of Los Angeles and Long

Beach, whose Clean Air Action Plan (CAAP) serves as, “an excellent example of what can happen when port operators work with neighboring communities to develop and implement a robust plan, leading to positive impacts on air quality and emissions,” and noted that, “this trailblazing effort can serve as a model for the rest of country to follow.”

California’s ports are investing hundreds of millions of dollars to pioneer and implement alternative maritime power, zero-emission and near-zero emission cargo handling equipment, drayage trucks, emission capture technology, and digital tools to reduce congestion. Simultaneously, they are imposing vessel speed reduction and other strategies to reduce emissions.

While we understand the state’s desire to reduce VMT as part of reducing GHG emissions, not all state and local roadways have the necessary capacity to support both goods movement and users who have no other mode options for travel today or in the near future. The CAPTI must ensure that roadway capacity enhancement remains a viable option to address such capacity issues where appropriate.

The COVID-19 pandemic has demonstrated that the supply chain is essential to deliver critical medical supplies, food, protective gear, and myriad other products to sustain the nation during a shutdown. During the COVID-19 worldwide pandemic, California ports have met the moment by stepping up to play a critical role in our state’s response and recovery. Our ports have been critical in keeping cargo and essential goods flowing in a time when our country has depended on an efficient supply chain more than ever.

Our concern is that this plan is going to increase the financial burden on our goods movement industry and we recommend that the CTA involves the industry in further discussions and planning. FuturePorts supports policy and investments that address climate change, and we believe implementing a plan that provides economic equity among all communities will better serve California and its people.

We would like to thank CalSTA and its partnering agencies for taking the time to consider our suggestions and we thank the Governor and California leadership for leading the nation in addressing climate change. We look forward to working together to ensure the future climate is clean, our residents are safe, and we have a thriving economy.

Sincerely,



Marnie O. Primmer
Executive Director
FuturePorts