



May 19, 2021

Mr. David S. Kim  
Secretary  
California State Transportation Agency (CalSTA)  
Via Email: [capti@calsta.ca.gov](mailto:capti@calsta.ca.gov)

RE: Comments on the draft Climate Action Plan for Transportation Infrastructure (CAPTI)

Dear Secretary Kim:

The Port of Long Beach appreciates the opportunity to review and comment on the draft Climate Action Plan for Transportation Infrastructure (CAPTI).

At the Port, also known as the Green Port, implementation of key programs, such as the Green Port Policy and Clean Air Action Plan (CAAP), have resulted in significant emission reductions related to port operations. According to the Port's 2019 Air Emissions Inventory Report, diesel particulates have decreased 88%, sulfur oxides are down 97%, smog-forming nitrogen oxides have decreased 58%, and greenhouse gas emissions reductions were 19% compared to the 2005 baseline.

The Port updated the CAAP in 2017 to set goals toward advancing near-zero and zero emission operations, and ultimately fully zero emissions by 2035. Many of the components of the CAAP are in alignment with the State's Executive Order. It is estimated that CAAP funding needs from 2020 to 2035 will range between \$12.6 to \$14 billion for demonstration, infrastructure, and equipment. State funding programs would accelerate the deployment of additional zero emission drayage trucks in and around California ports, significantly reducing criteria air pollutant and greenhouse gas emissions that disproportionately impact disadvantaged communities.

Additionally, as the second-busiest container seaport in the United States, the Port typically handles trade valued at more than \$200 billion annually and supports 575,000 jobs in Southern California and 2.6 million jobs in the U.S. As we work to ensure the state and nation's maritime commerce continues to move through the unprecedented impacts of the COVID-19 pandemic, the Port of Long Beach remains committed to reducing air quality impacts associated with goods movement.


We support the holistic framework of the CAPTI to improve public health and prioritize equity while aligning state transportation investments with climate goals. Below are our comments for your consideration:

- We recommend the CAPTI document consider the need for highway safety and bottleneck improvements in addition to Zero Emission (ZE) infrastructure.
- When discussing rail, we request clear differentiation between freight rail and passenger rail. Freight rail improvements provide goods movement benefits, especially for long-distances and discretionary cargo destined outside the region, including benefits related to climate change and environmental justice.

- As ZE regulations, directives and guidance are deliberated, it is important to take into consideration the feasibility, mileage range, charging time, affordability, and commercial availability of ZE technology and equipment.
- When looking to finance the initiatives and programs set forth in the draft CAPTI, we request that additional funds be allocated to supplement existing and new programs instead of reallocating already strained financial resources.
- Finally, when considering the multiple agencies involved in the CAPTI, the need for a systems perspective is key. A project-level approach alone will not suffice.

Thank you again for the opportunity to comment on the draft CAPTI. We look forward to continue engaging with you and your team as the plan is developed and eventually implemented. Please do not hesitate to contact Theresa Dau-Ngo, Acting Director of Transportation Planning, at [theresa.dau-ngo@polb.com](mailto:theresa.dau-ngo@polb.com) or Matt Arms, Director of Environmental Planning, at [matthew.arms@polb.com](mailto:matthew.arms@polb.com) should you have any questions or if we may be of any assistance.

Sincerely,



Mario Cordero  
Executive Director