

April 10, 2021

Larry Hofreiter, AICP
Program Manager, Planning
Port of San Diego
3165 Pacific Hwy
San Diego, CA 92101
Via: MCAS@portofsandiego.org

Re: Environmental Health Coalition's (EHC) Comments on the Draft Maritime Clean Air Strategy (MCAS)

Dear Mr. Hofreiter:

We greatly appreciate your efforts to coordinate the draft MCAS and to advance environmental justice and air quality. EHC has reviewed the Port's Draft MCAS and, while we appreciate the expressed intent of the MCAS, it is not sufficient as currently written to attract millions in grants and economic development, quickly transition towards a clean and modern port, and significantly improve the Portside communities' public health and air quality.

The MCAS must reflect the direction from the Board of Port Commissioners. Chairman Michael Zucchet said, "The Port is committed to being a leader in cleaner air for our communities. At the start of the year, I made it clear that air quality and climate change issues will be important drivers in any effort, project or major deal we pursue and support over the next decade...". Moreover, the Board, during its 2/11/2021 hearing, emphasized their expectation for the Port to lead in emission reduction efforts, to improve public health, to develop goals that are **Specific, Measurable, Achievable, Relevant and Time-bound** (S.M.A.R.T), and to develop legal tools needed to implement the MCAS goals, as part of the strategy. During the AB 617 MCAS subcommittee meeting on 2/16/2021, Commissioner Naranjo recommended that the goals should also incorporate an "I" for Inclusive and an "E" for Equitable thereby requiring the goals to be S.M.A.R.T.I.E but this is not reflected in the draft MCAS either. Unfortunately, the draft MCAS fails to meet the Board's direction on each of these accounts.

In short, the draft MCAS is not nearly aggressive enough to result in significant emission reductions or public health benefits. Many of the goals/objectives are not S.M.A.R.T.I.E., the public health, ZEV, charging infrastructure, and funding goals EHC proposed for the Port's consideration are not included at all, and there is no information as to the specific legal tools needed to implement the MCAS. In an effort to summarize our primary recommendations, EHC is requesting that the draft MCAS be revised to incorporate the following:

1. **Vision Statement.** Incorporate the following vision statement into the MCAS: *Vision Statement: The MCAS is an ambitious plan with Specific, Measurable, Achievable, Relevant, Time-bound, Inclusive, and Equitable (S.M.A.R.T.I.E.) goals and strategies that go above and beyond local, state and/or federal requirements in an effort to reduce air*

pollution emissions, improve air quality and public health and transition the Port of San Diego towards a modern and green port.

2. **Public Health Goal.** Incorporate a S.M.A.R.T.I.E. MCAS goal and strategies that reduce diesel particulate matter and toxic air contaminants (TAC) to achieve significant reduction in cancer risk. Specifically, by 2026, the estimated cancer risk from maritime operations is no higher than the following at any offsite location: 15 cancers/million from Port maritime operations (diesel) and 10 cancers/million from each Port tenant (diesel & other TACs); by 2031, the cancer risk is no higher than the following at any offsite location: 10 cancers/million from Port maritime operations (diesel).
3. **ZEV Goal.** Establish a S.M.A.R.T.I.E. MCAS goal that requires drayage trucks servicing the Port to be 100% ZEV at least 5 years ahead of the California state requirements. Develop a **Clean Trucks Program** by the end of 2021 with a clear, phased plan and strategies to transition to 30% ZEV by 2023 and 100% ZEV by 2030.
4. **Charging Infrastructure Goal.** Incorporate a S.M.A.R.T.I.E. MCAS goal for ZEV medium duty/heavy duty truck charging infrastructure in Portside, by specified dates, with four sites operational by January 2024 as well as the following:
 - a. Have infrastructure planning complete by June 2022,
 - b. Have infrastructure in place by 2024 for the Port Shuttle Program,
 - c. Collaborate with SANDAG, stakeholders, and residents to locate regional sites that benefit the Portside Community by June 2022, and
 - d. Work with SANDAG, SDGE, and stakeholders to build the sites by 2024.
5. **Funding Goal and Legal Tools to Implement MCAS.** The MCAS program needs to include new fees and ordinances and other legal tools to implement the MCAS goals.

Thank you for your time and consideration. Please contact Diane Takvorian/Executive Director at Diane@environmentalhealth.org or Danny Serrano/Campaign Director at dannys@environmentalhealth.org for any additional information.

Sincerely,



Diane Takvorian
Executive Director



Danny Serrano
Campaign Director

CC:

Board of Port Commissioners
National City's City Council
Barrio Logan CPG