

PORT OF STOCKTON

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September 15, 2020

Mr. Kurt Karperos
Deputy Executive Officer
California Air Resources Board
PO Box 2815
Sacramento, California 95812

RE: Response to August 24, 2020, Letter

Dear Deputy Executive Officer Karperos:

Thank you for your letter dated August 24, 2020, regarding the potential impacts of Port of Stockton (Port) terminal projects on the neighboring communities, especially the Assembly Bill (AB) 617 identified environmental justice communities. The Port's Director of Environmental and Public Affairs holds an active position on the AB 617 Working Group Steering Committee. The Port understands and shares the California Air Resources Board's (CARB's) concern about our neighboring communities. In cooperation with CARB, the San Joaquin Valley Air Pollution Control District (SJVAPCD), U.S. Environmental Protection Agency, City of Stockton, and the community, the Port is striving to take action to go beyond regulatory requirements, putting in place a suite of actions to identify and reduce environmental impacts from Port operations, promote community engagement and education, and provide economic opportunities. Several of these actions are already in progress; others are in the planning stages and will be launched in the near future as outlined in this letter.

Regarding comments about recent California Environmental Quality Act (CEQA) projects, the Port adequately assesses and discloses environmental impacts through the CEQA process. The Port understands the importance of health risk assessments (HRAs) and has completed several HRAs as part of CEQA analyses in the past few years where warranted by project emissions, including the Eco-Energy Liquid Bulk Receiving Terminal and Contanda Renewable Diesel Bulk Liquid Terminal Development projects. The Port is currently developing an HRA for the Lehigh Southwest Stockton Terminal Project, and will consider the results of this HRA as part of the decision of whether to approve or deny the project. Further, the Port will continue to complete HRAs and consider their results as part of the decision-making process for projects where the potential impacts merit that level of analysis. While CEQA remains a tool to address project

impacts and engage the community the Port believes a holistic approach will better address impacts to neighboring communities, enable local voices to be heard, and ensure the Port remains an important economic hub for the region, as outlined further in this letter.

Air Quality Monitoring and Emissions Reductions

The Port is developing longer-term plans and strategies to better understand and reduce the quantity of emissions related to its development. As part of this effort, to better understand Port-wide impacts, plan for future project criteria, and comply with AB 617 goals and the Port's responsibilities in assisting CARB with the Community Air Protection Program, the Port is conducting a Port-wide criteria pollutant and greenhouse gas emission inventory. Starcrest Consulting, LLC, has been retained to perform the inventory. The Technical Working Group for the emissions inventory includes Port representatives and technical experts, including stakeholder agency representatives from the U.S. Environmental Protection Agency and SJVAPCD. The Port has also invited Cory Parmer of CARB to join the Technical Working Group. The Port is eager to work with CARB on the Port-wide emissions inventory and welcomes the opportunity to invite other CARB representatives to join the Technical Working Group.

In addition, the Port will work with the community, regulatory agencies, and technical experts to develop criteria for determining approval of proposed tenant development projects. These criteria—a step exceeding necessary impact screening and mitigation—will help the Port ensure new projects are in line with its commitment to environmental sustainability, and offering an opportunity for community engagement, well before the projects reach the stage of CEQA analysis and public review.

The Port is also working with tenants, CARB, and SJVAPCD to repower and/or retrofit their existing cargo handling equipment with lower emissions engines for improved air quality. Projects that have resulted in direct emissions reductions, demonstrating the beginning of the Port's longer-term emissions plans and strategies, include the following:

- Replacing four older gasoline powered trucks with new zero-emission electric vehicles for use on docks and implementing more than 30 electrical vehicle charging stations
- Acquiring two zero-emission, multi-use DANNAR mobile power sources fitted with forklift, scissor lift, and dump capabilities
- Working in tandem with the Ports of Long Beach and Oakland, the Port was awarded grant funding as part of CARB's Zero- and Near-Zero Emission Freight Facilities Program to receive 34 forklifts from XL Lifts, a company specializing in zero- and near-zero-emissions forklifts
 - In addition to these units, a zero-emissions railcar mover has been ordered and is scheduled to arrive in late 2020.

Additionally, the Port voluntarily committed to making annual incremental improvements across seven applicable resource categories, through the largest eco-accountability program in the maritime industry. As a participant in the International Green Marine Environmental Program, the Port conducts a thorough audit and analysis of all environmental policies, programs, and projects. The results of the annual audits are thoroughly analyzed by an accredited and approved third-party

verifier before they are submitted to the Green Marine Secretariate. The Port continues to make incremental improvements and receive annual Green Marine environmental certification (currently rated Level 5 in Spill Prevention and Environmental Leadership) and remains committed to complying with and improving in all areas that Green Marine assesses (including Greenhouse Gas Emissions, Pollutant Air Emissions, and Community Impacts, among others). To learn more about the Port's results from this program, visit our website at <https://www.portofstockton.com/green-marine/>.

Community Outreach Initiatives

The Port has a plan for improving community outreach efforts, which will foster a better understanding of the community's needs and, in return, help the community understand the Port. This plan begins with the creation of two community engagement groups. The first group, already formed, comprises representatives from the Port, the Port's community outreach experts, and environmental managers from the Port's business partners and tenants. This group has been formed to improve communication between the Port, business partners, and tenants; identify information gaps; facilitate opportunities for collaboration, cooperation, and problem solving; and define key strategies to reduce emissions and improve air quality through advancing technologies at the Port. The second engagement group, the Environmental Justice Task Force, is currently being formed to amplify local voices. It will comprise representatives from the Port, the Port's community outreach experts, members of the community, environmental justice groups, and local organizations. The Catholic Charities of the Diocese of Stockton, STRIVE Giving, and PUENTES have already expressed interest in joining this group, and the Port will reach out to a wide range of other community groups, including the Stockton community AB 617 Steering Committee, to ensure this task force has a diverse representation of the Stockton community. This group is being formed to create a communication channel between concerned citizens, community groups, environmental justice organizations, and the Port, thus establishing a strategic network with opportunities for enhanced communication, cooperation, collaboration, and transparency.

The Port is also in the process of rebuilding its website and other outward-facing communications, with the assistance of community outreach experts. The Port's new website will be much easier to use and navigate, making Port information much more accessible to the public. The new website will also give members of the public the ability to easily submit comments, questions, and complaints about the Port, and for the Port to track those submissions and resolutions over time to better understand the concerns of the public.

The Port looks forward to engaging with members of the community, CARB and other regulatory agencies, environmental justice groups, local organizations, and other interested parties. The Port is committed to environmental stewardship and ensuring that its decision-making processes consider the health of affected communities.

Sincerely,


Richard Aschieris
Port Director

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