



Mr. Andre Freeman, Manager  
Freight Policy Section  
Freight Transportation Branch  
Transportation and Toxic Division  
California Air Resources Board (CARB)

sent via email to [freight@arb.ca.gov](mailto:freight@arb.ca.gov)

February 25, 2020

**Subject: Comments on “Concept Paper for the Freight Handbook”**

Dear Mr. Freeman,

Thank you for the opportunity to comment on CARB’s “Concept Paper for the Freight Handbook” dated December 12, 2019. CARB is developing a Freight Handbook as a resource for freight facility owners and operators, local decision makers and community advocates with a focus on warehousing, distribution centers and cold storage facilities. The Port of Oakland offers these comments:

1. **Encourage Freight Facilities at Ports:** The Freight Handbook addresses three land use scenarios for freight facilities and distance from sensitive receptors such as residences, schools and health care facilities. While discouraging siting warehouses near sensitive receptors, CARB should encourage freight facilities close to ports and rail yards.
2. **Discourage Indirect Source Rules at Ports:** The Handbook states that CARB supports air district Indirect Source Review rules at freight facilities. An Indirect Source Rule is a growth-punishing regulation that would discourage investments by port tenants who are already highly regulated, compliant and compete with other U.S. and Canadian ports for cargo.
3. **Coordinate Vegetated Barriers with the State Water Resources Control Board:** The Handbook suggests vegetated walls or other barriers that separate facility operations from sensitive receptors. Note that statewide storm water quality regulations require vegetation/post construction storm water controls that can also serve as vegetated barriers. Perhaps CARB and the State Water Resources Control Board can coordinate on design.
4. **Maximize Voucher Funding:** Equipment owners are more likely to take advantage of vouchers available from HVIP and CORE rather than other financial incentives programs that require destruction of existing equipment, calculation of cost effectiveness, etc.

Mr. Andrea Freeman  
CARB  
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If you have any questions or comments please contact Tracy Fidell, Port Associate  
Planner/Scientist at 510-627-1134 or [tfidell@portoakland.com](mailto:tfidell@portoakland.com).

Sincerely,



Diane Heinze, Environmental Supervisor  
Environmental Program & Planning