



February 28, 2020

Chair Mary D. Nichols  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

VIA EMAIL: [freight@arb.ca.gov](mailto:freight@arb.ca.gov)

RE: Concept Paper for the 2020 Freight Handbook

Dear Chair Nichols:

The San Diego Unified Port District (District) is pleased to provide feedback on the Concept Paper for the 2020 Freight Handbook (Handbook).

As a leader in goods movement, the District is recognized by the State of California as an engine of commerce, navigation, fisheries, recreation, and economic development. The District's mission is to protect San Diego Bay and its tidelands. It provides economic vitality and benefits the community through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship and public safety.

San Diego ranks fourth out of California's 11 seaports and is the state's largest break-bulk port. The District's diverse businesses support more than 70,000 jobs and \$9.4 billion in economic impact for the San Diego region annually. In the maritime cargo and manufacturing sector, the District supports nearly 25,000 jobs and \$4.3 billion in economic impact. The average annual compensation for maritime related jobs on Port tidelands is over \$62,000 annually.

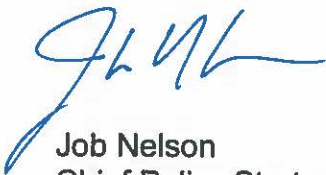
In reviewing the Handbook, the District offers several suggestions to add clarity, promote safety, and provide additional information to benefit users:

- First and foremost, safety should be the ultimate priority in the design of a freight facility. The handbook states (pg. 14) that the California Air Resources Board (CARB) is seeking to strengthen regulations for "charging/fueling infrastructure at freight facilities." A clear and consistent definition of "freight facilities" would guide the consideration of these policies and recognize that charging facilities for over-the-road vehicles – similar to fueling for diesel trucks – belongs in the public sphere, not on controlled-access, space-constrained maritime terminals.

- As a guide, including the background and context of current and proposed regulations governing freight facility equipment and vehicles would help to supplement the handbook. Currently, regulations and funding for Zero Emissions Vehicle (ZEV) related infrastructure shape existing opportunities and inform marketplace implementation. However, consistency is needed to sustain progress and connect the goals to the means that achieve them. For example, SB 350 requires monitoring and data for 5 years, however the vehicles deployed were for 1-year pilot programs. The disconnect creates a disincentive to become an early adopter.
- The District requests that CARB include analysis on how to design or retrofit an existing freight facility to support ZEV applications. Additionally, the Handbook should address the multiple types of activities that exist at a freight facility and describe opportunities and limitations for ZEV. For example, long-range trucking which may occur to and from a freight facility may not be currently applicable for ZEV or needs further support throughout the transportation network in order to work.
- As California begins implementing new freight facilities that can support ZEV equipment and vehicles, collaboration is needed between CARB and partner state agencies to discuss the linkages to the transportation network.

The District continues to work diligently in its role as the steward of the tidelands along San Diego Bay, and trustee for the citizens of California. In doing so, the District seeks creative and innovative solutions in combating climate change. We thank you for seeing the importance of freight in California's future, and seeking input from those involved. If you have any questions, or require any additional information, please feel free to contact my office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Job Nelson".

Job Nelson  
Chief Policy Strategist