

July 18, 2016

Dear CAAAC members:

Re: Transmittal of Draft Recommendations on EPA Ports Initiative

On behalf of the Mobile Sources Technical Review Subcommittee (MSTRS), I am pleased to present draft recommendations from the Ports Initiative Workgroup for your consideration. EPA asked this Workgroup for advice on (1) how to effectively measure air quality and GHG performance of ports and/or terminals within ports, and (2) design elements for an EPA-led voluntary program to improve environmental performance as goods move through ports. The draft recommendations are the result of almost two years of deliberation among the diverse interests represented on the Workgroup.

MSTRS received the Workgroup's report for review on June 2, 2016. EPA contacted MSTRS members in advance of the presentation to MSTRS on June 16, 2016 to solicit comments and questions to better structure the presentation and discussion. At the meeting on June 16, MSTRS members commented that the report was comprehensive, clear, and informative. There was an active discussion during which many members raised comments and voiced opinions about how to address the charge. Members felt the points they raised were captured in the report and did not request any major edits. Members voted unanimously to forward the report to CAAAC with only minor edits. Members also voted to provide this cover note reinforcing certain points discussed within the report.

MSTRS members discussed the need for EPA to prioritize resources in a way to achieve air quality and public health improvements. They noted that the recommendations include a large number of elements. While all elements would be valuable, they stressed the importance of focusing on ultimate air quality and public health impacts.

MSTRS members also emphasized that the program should demonstrate continuous improvement in air quality and public health and associated reductions in human exposure to pollution. They felt the program should have clear benchmarks and quantifiable goals, like those discussed in section 2.2.3 of the report. They stressed the importance of measurement, noting that in order to assess continuous improvement, stakeholders need to conduct inventories to better understand emissions sources. They agreed that the three general steps outlined in the Roadmap example discussed in sections 3.1 and 10.2 – assess; plan and implement; monitor, adjust, and enhance – were valuable.

For a successful program, MSTRS members noted the importance of addressing the diversity of port situations and tailoring EPA assistance to support best practices, communications, and community engagement that is appropriate to local conditions and Port Authority capacity. They also felt that ongoing engagement with key stakeholders and tribes during implementation will be critical. The program will also need to provide clear value propositions for ports to ensure participation.

Five recommendations in the report are marked with asterisks to indicate differing Workgroup member opinions on the details of those recommendations. The Workgroup chose to discuss those differing points of view to inform EPA's program development. MSTRS members discussed the importance of EPA continuing to investigate and explore these important recommendations.

Finally, MSTRS members wanted to note the importance of EPA moving quickly to begin implementing this important voluntary program. There was a strong sentiment that EPA should not "let the perfect be the enemy of the good". MSTRS members suggested that EPA could get started by prioritizing work with certain ports based on, for example, exposure levels, growth, size, community involvement, and Port Authority capacity. They noted that there is a great deal of learning to be done, and early actions are needed on the ground to build capacity, reduce air pollution, and improve public health.

We encourage the CAAAC to finalize these recommendations and forward them to the Administrator.

Thank you,


Drew Kodjak, ICCT, MSTRS Co-Chair