

Date: February 8, 2008

To: Attendees, January 30, 2008 Port of Oakland Maritime Air Quality Improvement Plan Task Force Meeting

From: Scott McCreary and Rebecca Bryson CONCUR, Inc.

Re: Key Outcomes Memorandum – January 30, 2008 Port of Oakland Maritime Air Quality Improvement Plan Task Force Meeting

Below is a summary of the January 30, 2008, MAQIP Task Force Meeting. This summary provides a listing of the primary issues raised during the discussion. It is not intended to serve as a meeting transcript.

BACKGROUND:

This fifth meeting of the MAQIP Task Force was convened at the Harbor Facility Meeting Room at the Port of Oakland. Over 65 Task Force members and their alternates attended the meeting, as well as Port, California Air Resources Board, and Bay Area Air Quality Management District staff, Port technical consultants, and interested members of the public. The meeting was facilitated by CONCUR, Inc.

All meeting materials and handouts referenced in this document are available on both the CONCUR and Port of Oakland websites:

- CONCUR website: <http://www.concurinc.com/portofoakland/>
- Port of Oakland website: http://www.portofoakland.com/envirom/prog_04c.asp

BRIEFINGS AND UPDATES:

Omar Benjamin, Executive Director, made some introductory remarks and then Richard Sinkoff, Acting Director Environmental Programs and Planning Division, gave a presentation on the Task Force's accomplishments to date and the next steps in the MAQIP process.

Key questions and follow-up items:

- A Task Force member asked about the relationship between the comprehensive truck management plan and the MAQIP. Richard replied that the list of initiatives related to trucking will be harmonized and made internally consistent with the comprehensive truck management but that they are separate initiatives. Omar added that the goal is to roll out the program in the spring. It was noted that it would be useful to have a TF presentation on the Plan once finalized.
- There were several questions from Task Force members about whether the Port would invite some Task Force members to help draft the MAQIP. Richard noted that the Port would like to use public involvement but has a concern about the practicability and efficiency of this approach.
- Another Task Force member noted her understanding that the Stakeholder Involvement Plan stated the intent that the TF would be responsible for determining the content and the Port for approving it. She noted that while the stated goal for today's meeting is to get input, it is not clear what happens to those recommendations once made. She asked for a clear feedback

loop on if/how recommendations are incorporated and a clearer explanation of how this process links to the I-Bond funding process.

- Several Task Force members asked about how the MAQIP will get integrated with the ongoing process of prioritization and selection of projects and other on-going work at the Port.
- Richard Sinkoff responded that Port staff intends to use the comments from today's meeting to help inform revisions to the process the Port has laid out. The Port envisions meaningful continuity of public participation moving forward. In terms of the report-out process, the Port will confer with CONCUR. In terms of ongoing port projects/activities and I-Bond funding, the Port has already made substantial financial and other commitments in the area of trucking and emission reductions, and the Port will need to be quick in securing early funding. The aspiration is that the MAQIP will provide all parties with a master framework to help stabilize and harmonize what is by nature a very dynamic process and provide a way of evaluating new projects and proposals.
- A Co-Chair asked whether an operational/cultural shift inside the Port will come out of this process. Omar Benjamin replied that the cultural shift has already started. Adoption of the MAQIP is one aspect of that shift and in the meantime the Port has already been moving ahead to create change. Another Task Force member added that the Task Force process itself is evidence of the cultural shift.
- A member of the public noted that the proposed plan differs from a traditional air plan in that traditionally a plan outlines clear goals and objectives first which informs the selection of specific initiatives. She also suggested that as the MAQIP is implemented, it will be important to have leadership at the Port and on the facilitation team that is grounded in environmental justice and public health and has a history of West Oakland. She also noted that the truck management plan be integrated in the MAQIP as well.
- One Task Force member pointed out the urgency to secure the I-Bond monies. She also commented on the tension between having an efficient process and having a participatory process, and recommended that the Port err on the side of participatory. She added that if the TF only sees the document in April without having an indication and discussion of how the Task Force recommendations have been incorporated before then, the schedule could be delayed.

KEY DELIBERATION ITEMS:

Revised Emissions Reductions Goals for MAQIP (Port)

Delphine Prevost, Port of Oakland, then briefly reviewed several updates to the proposed emission reduction goals since the Dec 14th meeting. She explained that the revised goals being presented incorporate several new regulations promulgated since December 2007. In addition they reflect the Port's thinking that much of the focus between now and 2012 will be on accelerating implementation of existing regulations. So while the goals proposed for 2012 may not reflect as much of a "stretch" as those for 2020, the intent is that early emissions reductions will yield earlier benefits. In addition, the goals 2020 represent a quantitative stretch beyond what the regulations will provide – particularly in terms of on and off-shore PM. She reiterated that the Port's overarching goal is an 85% reduction in local health risks from seaport PM emissions.

Key questions and follow-up items:

- When asked whether the proposed offshore reductions goals for 2012 were based on current regulations, Delphine Prevost confirmed that they were. One of the shipping representatives noted that the International Maritime Organization will be making a

presentation about emissions reductions via cleaner fuels and other strategies within a week. As part of that discussion, the EPA has proposed some significant reductions in ship emissions (SO_x - 90% reduction and 20% reduction in NO_x in 2012). He noted that while the future status of those proposed regulations is unclear, they do offer some nearer term reductions from off-shore sources.

- A Task Force member asked for clarification as to whether the numbers presented represent aspirational goals or rather, practical projections/forecasts based on emissions reductions from the regulatory requirements that all California Ports are required to meet. It was explained that the goals presented for 2012 characterize the projected emissions assuming all the current regulations are met, whereas the goals presented for 2020 reflect both the projected emissions if all current and expected regulations are met, plus reductions from additional actions above and beyond the regulations. However, the Port also reiterated the intent for early implementation, which provides benefit but cannot be captured quantitatively in the 2012 goal. Jean Roggenkamp noted that from the Air District's viewpoint, the 85% reduction by 2020 is a very solid goal and that it is also reasonable to focus the 2012 goals on early compliance, which is extremely important in terms of reducing health risks sooner.
- CARB staff posed a question about the Port's assumptions regarding the State regulations on ships. Port staff noted that the Port had not included the projected reductions from State regulation on ship main engines for the year 2012 because of the challenges inherent in applying state regulation to international ships. CARB staff noted that lease agreements could require international ships to obey requirements equivalent to State regulations and suggested that the Port look into this option
- Another Task Force member asked about the working assumptions used to generate the projections and resulting goals for 2020 and what assumptions were made about applying for and receiving potential I-Bond or Carl Moyer funds to reduce emissions. He suggested that those assumptions be made clear in the plan if possible. In that way, Task Force members can understand better what actions are anticipated above and beyond the regulations and analyze what could happen if more (or less) funding was secured than was expected. Delphine Prevost noted that the Port intends to put that kind of information into the plan to the extent possible/applicable.
- There was an additional suggestion to ensure the goals directly relate to health risk and a concern that the current assumption of a "1:1" relationship between emissions reductions and health improvement might not be accurate. He suggested creating a 3rd geographic category for the goals in addition to the on/near shore goals and the off-shore goals. The third category would focus on projected emission reductions located directly in the West Oakland community. His understanding is that CARB has divided the HRA assessment into 3 similar categories. CARB staff noted that the 1:1 assumption is a fairly good assumption based on their experience. CARB staff also noted that the HRA breaks down the expected health risk reductions by source category, which may be useful information for the Port to incorporate when it becomes available (expected for late March). Delphine Prevost noted that if the HRA shows the reduction ratio to be much different than the Port's analysis, the Port will adjust it as appropriate and that irrespective of this issue, the goal is an 85% reduction.
- EPA staff then suggested that it might be helpful for the Port to have a risk assessor involved early on in drafting the MAQIP – even before the HRA is released. Delphine Prevost noted that the Port has been working closely with CARB on their analysis and wishes to wait for the HRA release before considering such an action.
- Another Task Force member asked why the Port was not including expected reductions from the main ship engine regulation and how the port-related truck emissions on residential streets could be included. Delphine Prevost stressed that the Port is a significant proponent of the main ship engine rule. In terms of incorporating truck emissions, any efforts to have cleaner trucks at the Port would also result in cleaner trucks on the streets, to the extent that Port-related trucks are traveling on those secondary roads.
- There were several concerns raised about the 2012 +2% increase under PM and whether it was appropriate to have an increase as a "goal". The Port emphasized that the projections

show PM and NO_x increasing in the next 5 years and the regulations go a long way in minimizing the increase. Again, the emphasis is on early compliance.

Report Out from the Interagency Meeting (Jean Roggenkamp)

Jean Roggenkamp made a brief presentation on the results of the January 11th Interagency meeting. She explained the matrix of agencies regulations and the agencies' initial take on the List of Potential Initiatives. She also explained 3 recent initiatives that had been put forward by the Air District (and Port) for early CARB funding. She noted that if TF members wanted to provide additional support for these measures, there is a public workshop in Sacramento on February 15 and that the CARB Board Meeting, where the decision will be made will be held on February 28 (agenda can be found at <http://www.arb.ca.gov/board/ma/2008/ma022808.htm> and it is item 8-2-7). She also requested specific comments from TF members in writing on the interagency matrix itself by February 21st so that the agencies could review it in time for their early March meeting. TF members to submit to Rebecca Bryson at CONCUR by COB 2/15.

Key questions and follow-up items:

- The matrix was very well received by Task Force members. Some members noted that it would be very helpful to prepare a second matrix that links funding opportunities and the timing for grant application to potential qualifying initiatives from the List of Potential Initiatives.
- It was also noted that a final column could be added to the matrix indicating the percent reduction in air emissions the regulation was expected to contribute.
- In response to question on participation by the Mayor's office staff, it was noted that Miguel Bustos attended the meeting. It was also recommended that BCDC be invited to the next meeting and any other relevant agencies be asked to contribute to the matrix. Jean agreed to follow up with BCDC.
- A Task Force member strongly suggested the agencies be at the table when the plan is drafted.

Public Comment:

A member of the public asked if the CARB letter sent to the Port, dated 1/7/08 was in the meeting packet - it was not, but it was handed out during the meeting. CARB was asked to summarize the letter; Mr. Dan Donohoue of CARB indicated that CARB would like to see more commitment to specific actions in the MAQIP (e.g. selecting the top 6 initiatives from the work team's effort) and emphasized the importance of early actions so that health benefits can be achieved as early as possible.

There was also a question about the derivation of where the forecasted 2% increase in PM comes from - more dredging, cargo, building increase, or other sources. The Port confirmed that the projections encompass all operational emission sources, but would check on the inclusion of recently calculated construction emissions for 2005 as they relate to emission projections and the HRA.

Another member of the public made several requests/recommendations. He requested first that CARB prepare 2 memos on (1) forecasting the completion dates and status of HRA and (2) CARB's view on how the HRA can/should be applied to development of the MAQIP, what some early actions should be and how that relates to the funding cycle. He also asked the interagency work group if they would be willing to participate in and support the drafting of the plan. Finally, he requested that the Air District to provide some information/support to Port tenants/businesses

to help them write grant proposals for I-bond funding.

Proposed Revisions to the List of Potential Initiatives and Introductory Statement

Rebecca Bryson of CONCUR, along with Carrol Harris on behalf of the railroads and Bill Aboudi on behalf of the truck industry reviewed some of the key changes to the List of Potential Initiatives and corresponding Introductory Statement. Both Carrol and Bill explained the rationale for the proposed revisions and how those revisions made the list more usable to the industry members. They both voiced support for incorporating the list as revised.

Key questions and follow-up items:

- One of the Co-Chairs asked about the meaning of the Introductory Statement which states that actions “may be taken” and noted that it is important for the Port to clarify that some of the actions will be implemented. Richard Sinkoff noted that the port's view is that the List is a working compendium of possible actions that may be taken. The Port does not see this as a laundry list but as a substantive work product that has a place in the MAQIP to guide policy and decision-making and the Port intends to make a good faith effort to implement these.
- Another Co-Chair recommended this section be clearly linked to the Screening Criteria used and pointed out the importance of having the screening criteria nearby for people interested in selecting/initiating a potential initiative.
- Another Task Force member asked for clarification on what actions are being committed to, and recommended having some language that clarifies this point. She also noted that section 6.4.3 of the MAQIP Table of Contents talks about which initiatives have been selected and suggested that there needs to be a clearer process on (1) how those are being selected, (2) if/how the list is being used and (3) who is making those decisions. She also queried whether feasibility was an overriding factor even though feasibility is not one of the screening criteria. Delphine Prevost responded that in terms of the entity making the selection, it depends – sometimes it will be the Port, sometimes industry. Delphine noted that technological practicability was one of the criteria, but that formal feasibility (legal, economic, and technological) analyses will need to be performed by the implementing party in the future.
- Several Task Force members requested that the plan include goals and targets in the April draft.
- It was also acknowledged that while industry had the primary responsibility for selecting/initiating initiatives, it would be important for there to be broader input when possible on those decisions to help create more of a strategic approach.
- Another TF member emphasized the importance of having sufficient resources/expertise at the table to draft a solid plan. He specifically called on the Port and Air District to collaborate if possible.
- There was another question about the relationship of the MAQIP to securing I-bond funding. Port staff noted that to the extent that the Port does its own early implementation actions and helps its tenants do early implementation, the Port and its business partners will be seeking I-bond funding. For other types of actions, if money is available, the Port will go after it and other sources of funding will have to be solicited.
- Finally, a Task Force member suggested that there must be some middle solution between not having the Plan be too prescriptive and yet having some commitments contained therein.

Presentations from Industry on Potential Initiatives Being Implemented

There were four presentations from industry TF members: Robert Rodriguez, GSC Logistics, John Berge, PMSA, Carrol Harris on behalf of the railroads and Ellen Johnk on behalf of the Bay Planning Coalition. Robert described a recently launched informational campaign to inform owner-operators about upgrades, compliance, and grant opportunities. He also spoke about the

trucking industry's commitment to achieve emissions standards prior to CARB deadlines and a new program to only expand operations with owner/operators who are in compliance.

John summarized the stringent regulations being promulgated and how the shipping industry sees early implementation of regulations as the biggest opportunity for emission reductions. He noted that there does not seem to be a big window of opportunity for getting funding for early implementation. He asked the CARB staff if they had done calculations on how much lead time is required before the regulation becomes a requirement and how that affects the timing of incentive funding. CARB responded that they had not done those calculations. Jean Roggenkamp noted that if you go on Air District website and click grants/incentives, there is information available. In addition, there are staff people who are available to answer questions – both at the Air District and at CARB.

Carol spoke about what rail is doing to meet existing regulations and to go beyond. Ellen Johnck reported that the Bay Planning Coalition has committed funds to do more inventory/data gathering region-wide, which they could contribute to a regional planning effort.

Key questions and follow-up items:

- One TF member asked whether actions could be taken to address the container yards, which are now distributed around the Bay Area. He recommended that they be consolidated on the Army Base if possible.
- Another TF member asked what, if any, grant funding was used to provide incentives for all the upgrades the industry speakers presented. He asked whether having incentives creates a reason for industry to not upgrade early and wait for the incentive, i.e. if you upgrade too early you lose out on the funding. It was explained that no grant funds had been used on those specific measures and that yes, those incentives can create a disincentive as well, but the companies make their own choices.
- Another industry representative emphasized the importance of taking into account the lead time for early implementation. For example, on the cold ironing project, something like cabling can take as long as 12 months.
- A Co-Chair asked whether there is a planning process in place to determine how to supply grid power. Port staff responded that they are looking into the possibility of grid power, along with other options, recognizing that grid power is very expensive at Oakland.
- Another TF member noted how useful it would be to have the same type of document as the agency matrix that focuses on funding and shows which Initiatives would be eligible for what types of funding. He noted that on the trucking side they are really influenced/affected by other parties - they can't commit to using biodiesel until someone provides the station/infrastructure to do it on a bigger scale, and the same is true with other technologies – a coordinated approach is needed.
- Another TF member asked whether the Port had started to develop a Plan for using cleaner fuels and solar power on site.
- Finally, a member of the public noted that as the Plan gets developed and actions begin being proposed, the Port should have a clear game plan of how to communicate with affected community members.

SUMMARY OF NEXT STEPS:

Responsible Party	Action	Timeline
Task Force Members and Alternates		
Task Force members	Task Force Members to provide additional written comments on the following three topics covered in the Participatory Exercise and provide to CONCUR by Feb 15: (1) On-going Stakeholder Group and Compliance/Monitoring/Adaptive Management, (2) Refining/Prioritizing the List of Potential Initiatives, and (3) Process for Applying for I-Bond and Other State/Regional Funding	February 15
Task Force members	Task Force Members to provide written suggestions for text edits or clarification on the Interagency matrix and provide to CONCUR by Feb 21	February 21
Agency Task Force members	Interagency members to (1) review the List of Proposed Initiatives to identify promising candidates and (2) develop a second matrix of and potential funding available.	Mid-march
Task Force Members	Prepare for April meeting by reading available materials in advance of the meeting.	In advance of April meeting
Port staff, Co-Chairs, and CONCUR		
CONCUR	• Finalize and distribute Key Outcomes Memorandum.	Week of Feb 4
Port	• Port to draft MAQIP for review comment by TF	Mid-March
Port/Co-Chairs/CONCUR	• Port, Co-Chairs and CONCUR to discuss options for incorporating public input in the document	Mid-Feb
Co-Chairs/CONCUR	• Port, Co-Chairs and CONCUR to discuss options to review draft MAQIP with the TF	Mid-Feb

NEXT TASK FORCE MEETING

The next MAQIP Task Force meeting is tentatively scheduled for April, 2008. Confirmation of the meeting date, time and location will be announced once a venue is reserved. The purpose of this meeting will be to review and provide comment on the draft MAQIP. If you would like to propose an item for possible inclusion on the agenda, please transmit your suggestion to contact CONCUR or the Co-Chairs well in advance of the April meeting. Similarly, if you have a brief document that links to one of these agenda items, please contact CONCUR in advance of the meeting.

First Cut: MAQIP Task Force Member Suggestions on the Next Steps in the MAQIP Planning and Implementation Process

Recorded at a brainstorming session at the January 30, 2008 MAQIP meeting

Background Note: The format of this deliberation was a “round robin”, in which CONCUR facilitators posed the organizing questions, and then suggestions were entertained from Task Force members, rotating around the table. This first cut list is not “aggregated”; that is, we listed suggestions individually and in this version, have not attempted to group similar recommendations.

Topic A. Composition/structure/processes for on-going stakeholder group and mechanisms for effective compliance/oversight/adaptive management

Questions to Consider

1. What do you see as the key elements/components of the MAQIP going forward, and what will it take to ensure those elements/components are effective?
2. What 3-5 functions/responsibilities/tasks do you think an on-going stakeholder group needs to have, and how would this be expressed as a purpose statement?
3. Do you envision one stakeholder group with collective responsibility for these tasks, or a stakeholder process with multiple working groups? What types of people, representative groups, and skill sets would be most useful?
4. What monitoring/oversight/accountability mechanisms are key to ensure actions are being taken in a voluntary MAQIP, and what methods are recommended to quantify/verify outcomes, and adjust as needed to achieve the expected emissions reduction?
5. What are some potential pitfalls/key concerns about such a process for consideration to ensure effective MAQIP implementation?

Task Force Members' Responses

1. On-going Stakeholder Group

- Recommend having one overarching Stakeholder Group with several working or sub-groups focused on specific areas.
- Create issue-specific work teams to support the stakeholder group similar to the structure used by the NW Ports. Potential working group categories include: ocean-going vessels/cargo handling.
- Use the Long Term Management Strategy (LTMS) for dredged material as a point of reference for an implementation/stakeholder model. This process involved three groups (LT/ST actions, science, funding) and then distribute leadership among agencies so that actions get taken and no one organization is overburdened.
- Ensure that the on-going stakeholder group has a special sanction or authority to establish its authority.
- Ensure that the on-going stakeholder group has committed funding and staffing to continue on into the future; allow for facilitation as needed.
- Speed of implementation is key; the stakeholder group can and should be a forum for business to vet/refine selected initiatives, but it should not slow down the implementation process. Rather it should serve as a vehicle to help actions get taken.
- Ensure there are agency representatives in the Stakeholder Group who have the professional authority to take enforcement action when appropriate

- Beware the focus on penalties/enforcement in the Plan
- Use the on-going stakeholder group to facilitate connection to other related projects and planning efforts.
- Include and encourage scientific and technical experts in the planning process.
- Convene at least one meeting (or more) in west Oakland community, to make the process more accessible to all interested parties.
- Promote internal coordination among interest groups.
- Recognize that the activities of the on-going Stakeholder Group such as refining the list/clarifying actions are complex and technical. Perhaps it would be valuable to have fewer meetings but longer, more focused work group meetings so that people can go more in depth into the issues.
- At each stakeholder meeting, participants should be briefed on what new regulations and actions have occurred since the last meeting so that people have sufficient context for decision-making.

2. Compliance/Monitoring/Adaptive Management

- Make the reporting process as streamlined and consistent with existing reporting requirements as possible
- Convene periodic stakeholder meetings to review initiatives that were implemented and what the resulting emission reductions were.
- Be specific about what specific reductions are called for in what areas and quantify costs.
- Establish a system for monitoring implementation. Form stakeholder groups to monitor the plan.
- Organize a central reporting hub to provide oversight and report grievances.
- Monitoring is key; will need to integrate/revisit HRA as appropriate.
- Disperse funds in a timely fashion and then establish clear checks/balances on where grant monies are going and whether projects are actually being implemented.
- Report all outcomes in a clear and thorough manner. Allow for sufficient information sharing.

B. Proposed process for refining/prioritizing the List of Potential Initiatives and for selecting/assessing/initiating a specific Initiative

Questions to Consider

1. What do you see as the next steps in refining the List of Potential Initiatives?
2. Which key participants do you see as responsible for refining the list, who possess the knowledge necessary to assess feasibility, and can identify resources to secure grant funding?
3. What are some of the key criteria to consider in selecting/evaluating a specific initiative? Do any existing initiatives clearly fit those criteria?
4. Are there any processes/procedures that could be established by the Port/Task Force to help overcome typical roadblocks, and how can these resources be identified/harnessed?
5. What type of timeframe would you envision this process to take?

Response from Task Force Members

- Spend time refining the list to clarify the concrete action(s) to be taken, however, leave room to accommodate for different strategies and options.

- Make the list more clear and understandable for the general public.
- Establish a rigorous prioritization process; have an industry-specific vetting process to refine the list.
- Set a specific emission reduction goal, disaggregated to the level of each main source category
- Vet the initiatives according to such criteria as cost effectiveness that puts local health benefit forward to get clear on what initiatives would have the most broad-based support.
- Develop standards for new projects.
- The chosen initiatives should have options for competitive business/diverse technologies.
- Be explicit about prioritization and weighting of screening and selection criteria.
- Ensure that the implemented measures include diverse technologies.
- Use on-going stakeholder group as a technology incubator to identify and bring together people from different fields to work together to initiate/implement a specific measure.

Topic C. Process for Applying for I-bond and Other State/Regional Funding

Questions to Consider

1. Which grant opportunities for health risk and emission reduction projects look most promising/appropriate for the Port/MAQIP process and what is the timing for those applications?
2. What steps, if any, have been taken already to apply for that funding?
3. What criteria would you suggest in identifying an initiative or set of initiatives to put forward for a grant application, and do any Potential Initiatives clearly fit those criteria?
4. How can economies of scale/partnerships between source categories/ funding collaborations be fostered/build upon?
5. Who should be involved in putting together/reviewing a grant application and what types of support available from the grant agency? Is anyone here willing to take the lead?

Response from Task Force Members

- Create a matrix of potential grant funding sources that lists the funding entity and the timing for the grant application and key these to what potential initiatives might qualify.
- Establish a user-friendly funding process, esp. accessible to small business. (i.e. establish a clearinghouse (central authority) for funding and grant-writing support, and for general assistance such as grant qualification information.
- Establish a clear plan or process by which the Port will apply for I-bond funds and get clarity of other grant requirements/eligibility.
- Create a central pool of funds for a private sector match (i.e. one example of which is container fees).
- Ask each company to commit to documenting lessons learned as they employ new initiatives so that other companies in their source category can learn from successes and shortcomings.
- Document funding and allow for information sharing; develop a system of checks and balances.
- Search for new opportunities for funding; expand the pie; consider developing a local and broadly supported pool of funds earmarked specifically for West Oakland air quality improvement projects.

Topic D. Additional Suggestions around the Development of the draft MAQIP

Response from Task Force Members

- Foster an ongoing stakeholder process and allow room for participation, input and collaboration, i.e., continued meetings, before the draft is finalized in mid-April.
- Have a process to allow people to be at the table and contribute to the contents of the plan as it is drafted.
- Create a clear process for how interested parties can be involved in what comes out of the Plan.
- Ensure that all the elements in the Checklist distributed in a letter authored by community members are included in the MAQIP.
- Avoid being too prescriptive in the approach; rather be prescriptive in the goals.
- The Plan needs to clarify some initial commitments, while also leaving some flexibility for industry to pursue/explore other options.
- Establish two stakeholder groups: one to help write the plan, drawing from members of professionals that have air quality and public health expertise) and one to be the on-going stakeholder groups.
- The more clear and specific the plan, the less need for stakeholder meetings in the future.
- As a standing practice, Staff reports prepared by Port staff should include what mitigation measures are to be associated with pending actions.