

CALIFORNIA ASSOCIATION OF PORT AUTHORITIES

1510 14th Street, Sacramento, CA 95814 (916) 444-7158 Phone (916) 447-4947 Fax

MEMBERS

Humboldt Bay Harbor District
Port of Hueneme
Port of Long Beach
Port of Los Angeles
Port of Oakland
Port of Redwood City
Port of Richmond
Port of San Diego
Port of San Francisco
Port of Stockton
Port of West Sacramento



OFFICERS

Kristin Decas
President
Dianna L. Baker
Treasurer
Tim Schott
Executive Director

September 10, 2016

George Isaac
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Re: Interim Comments on the Feasibility Study of Shore-Based Ballast Water Reception and Treatment Facilities

Dear Mr. Isaac:

On behalf of the California Association of Port Authorities (CAPA), which is comprised of the state's eleven commercial publicly owned ports, we appreciate the opportunity to provide written comments on the recently presented interim work product related to the preliminary Feasibility Study of Shore-Based Ballast Water Reception and Treatment Facilities in California. You may recall that Dylan Porter, Port of Long Beach staff, provided oral comments on behalf of CAPA and the Port of Long Beach at the meeting on August 30th in Long Beach, California. These written comments are substantially similar to those made by Mr. Porter on August 30th and are intended to provide additional clarity. For purposes of this letter, we have limited our comments to **Task 3: Retrofitting of Ports and Wharves** and **Task 4: Shore-Based BWT and Storage**.

General Comments

- The costs presented in the draft appear to be low and may not adequately consider related environmental and regulatory requirements. Environmental contamination and documentation, regulatory permits, possible seismic code requirements, etc. that could drive up costs should be further explored.
- Lost opportunity costs need to be fully explored and explained. Lost opportunity costs include not only the loss of port revenue during construction, but other costs as well, including the potential long-term loss of revenue related to the use of scarce maritime operations areas for treatment and treatment-related facilities.

- The dock-side location of complicated connections and piping appears to be a key concern identified in this Task. It is important to recognize that at modern ports, docking locations change due to ship size trends, shifts in terminal boundaries, the configuration of simultaneous ship calls, etc. These are difficult issues we have been faced with in our efforts to provide shore power facilities to vessels over the last few years and should be carefully considered in this feasibility study.
- We ask that the study look closely at the feasibility of using vessel pumps to convey the ballast water from vessels to treatment facilities as this may be extremely difficult or infeasible. The cost and availability of related shoreside power to operate pumps should be further explored as well, as should additional energy requirements and possible related costly electric infrastructure.

Port of Oakland

- The number of ballast water exchanges at TraPac at the Port of Oakland – only two in 2015 – with a total volume of 7,500 cu. meters, is minimal, suggesting that cost-effectiveness should be further explored and considered.
- The illustrated waste water treatment plant appears quite large (8 acres), and would be difficult to locate on or near a terminal.
 - The treatment plant appears to be open, which could be problematic given the shoreline bird population which could dip in to grab (then drop) non-native clams or other potentially invasive species, thereby defeating the purpose of the facility;
 - Removal and disposal of residual sludge would be another potentially costly operating cost of the system that should be further explored.
- Figure 14 appears to assume inclusion of land for treatment related purposes that currently includes a public park covered by a public access deed restriction.

Port of Long Beach

- The proposed facility appears to have been sized for treatment of ballast water from two terminals. The feasibility study needs to look at the costs and area required to construct and operate a treatment facility that could treat ballast water from all vessel calls at the Port of Long Beach and Port of Los Angeles, or consider the costs and available land to construct multiple smaller treatment facilities. Significant increases in the number of barges/tugs and landside tank capacity will need to be reviewed as well.
- A major concern that does not appear to have been studied is related to operational permitting. Specifically, who would be responsible for operating and permitting treatment facilities and would the treated ballast water be allowed to be discharged into the bay, given the various regulatory limits currently placed on discharges into the port complex?
- In Task 3, Section 3.5, please review the discussion related to the location of the SA Recycling facility. There are two SA Recycling facilities in the overall port complex. One is

located in the Port of Los Angeles, and the other is located in the Port of the Long Beach. The location referred to in Task 3 appears to be the Port of Los Angeles Facility. However, Task 3 refers to this location as Berth T118, which is SA Recycling's Port of Long Beach Facility. Please review and clarify Task 3 and Task 4 accordingly.

We greatly appreciate the opportunity to provide these comments and look forward to continuing to work with you as the study continues. If you have any questions or concerns, please don't hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Schott', with a long horizontal flourish extending to the right.

Tim Schott
Executive Director