



# **JUNEAU COMMISSION ON SUSTAINABILITY - WORK SESSION AGENDA**

**January 18, 2023 at 12:00 PM**

**Zoom Webinar**

---

<https://juneau.zoom.us/j/83248132409> Meeting ID: 832 4813 2409;

Or Phone +1 253 215 8782 US (Tacoma) +1 346 248 7799 US (Houston)

**A. CALL TO ORDER**

**B. LAND ACKNOWLEDGEMENT**

**C. ROLL CALL**

**D. APPROVAL OF AGENDA**

**E. PUBLIC PARTICIPATION**

**F. AGENDA TOPICS**

1. CBJ Building Energy Efficiency & HVAC Upgrade – Nate Abbott (CBJ)

2. JCOS Comments on EPA Grants to Reduce Air Pollution in Ports – Steve Behnke (JCOS)

**G. INFORMATION ITEMS**

**H. COMMITTEE MEMBER / LIAISON COMMENTS AND QUESTIONS**

**I. NEXT MEETING DATE**

3. Regular Meeting - February 1, 2023 12 PM @ZOOM

4. Monthly Work Session - February 15, 2023 12 PM @ZOOM

5. Regular Meeting - March 1, 2023 12 PM @ZOOM

**J. ADJOURNMENT**

ADA accommodations available upon request: Please contact the Clerk's office 36 hours prior to any meeting so arrangements can be made for closed captioning or sign language interpreter services depending on the meeting format. The Clerk's office telephone number is 586-5278, TDD 586-5351, e-mail: [city.clerk@juneau.org](mailto:city.clerk@juneau.org).

**From:** [Steve Behnke](#)  
**To:** [Denise Koch](#)  
**Cc:** [Dianna Robinson](#); [Gretchen Keiser](#)  
**Subject:** DRAFT JCOS comments on Grants to Reduce Air Pollution in Ports  
**Date:** Monday, January 16, 2023 6:04:52 PM  
**Attachments:** [Grants to Reduce Air Pollution at Ports \[60102\] Request for Information.docx](#)

---

**EXTERNAL E-MAIL: BE CAUTIOUS WHEN OPENING FILES OR FOLLOWING LINKS**

---

Hi Denise,

Attached are the draft comments on the new EPA grant program -- Grants to Reduce Air Pollution in Ports.

They've been reviewed by several members of the Energy Committee, and we request that the full JCOS approve them at the Wednesday, Jan. 18 meeting.

They are due by COB on Jan. 18, and can be submitted as an attachment to an online form at: <https://www.regulations.gov/commenton/EPA-HQ-OAR-2022-0874-0001>

Here is background on the RFI:  
([Transportation Programs \[60101, 60102\]](#)).

<https://www.epa.gov/inflation-reduction-act/questions-regarding-oars-implementation-inflation-reduction-act#Transportation>

Let me know if you have any questions.

-Steve



### Juneau Commission on Sustainability

(907) 586-0800

[jcos@juneau.org](mailto:jcos@juneau.org)

[www.juneau.org/engineering-public-works/jcos](http://www.juneau.org/engineering-public-works/jcos)

155 S. Seward Street • Juneau, AK 99801

### Comments Regarding Grants to Reduce Air Pollution at Ports (Docket ID No. EPA-HQ-OAR-2022-0874)

The Juneau Commission on Sustainability appreciates this opportunity to comment on the RFI for Grants to Reduce Air Pollution at Ports. The Commission is a nine member body appointed by the City and Borough of Juneau Assembly to advise it on matters relating to community sustainability.

The following comments are informed by several years of experience in seeking funding to meet community climate and renewable energy goals by improving air quality and reducing carbon emissions at the Port of Juneau:

1. How can EPA structure this program to reduce air pollution in port communities and accelerate long-term trends to decarbonize the nation's ports?

The program should support local community efforts that have significant impacts in reducing air pollution and carbon emissions while highlighting and demonstrating approaches that can have broader reach in other communities or associated industries. It should give strong weight to the availability of carbon-free sources of energy in order to meet program goals.

2. How do you see the Inflation Reduction Act ports program complementing other programs (e.g., at EPA and the Department of Transportation) that can support efforts to reduce emissions at ports? What funding gaps can this program fill (e.g., specific zero emissions technologies or related planning support)?

The program should specifically include consideration of shore power for cruise ships. Shore power for cruise ships falls through the cracks of existing grant programs such as the DOT's RAISE and PIDP. While on their face, the provisions in these programs regarding local air quality and GHG emissions seem appropriate, each of them has requirements that in practice exclude consideration of shore power for cruise ships – for example the requirement for a high rating for safety criteria in the RAISE grant, and the limitation to freight in the PIDP grants.

3. The Inflation Reduction Act ports program can fund the development of climate action plans as well as zero emissions port technology, equipment and related planning and permitting. How would you like to see the action plans and infrastructure funding work together? Should they be sequenced or combined?

At a minimum, the program should require that applicants demonstrate how the funding proposal fits into a community or regional climate action plan.

4. What types of zero-emission port technologies or related planning support do you see as most critical for delivering emissions reductions?

Shore power for cruise ships is an increasing need and opportunity for improving air quality and reducing GHG emissions in a number of ports. In the absence of shore power, cruise ships run diesel generators for many hours of the day while berthed, often in downtown areas or near population concentrations. The decarbonization of port-related shore traffic, such as buses for moving tourists, provides another major opportunity for reducing emissions.

5. What do you see as the biggest hurdles to transitioning to zero-emission port equipment?

The program should consider the state of readiness and preparation in affected industries to make effective use of zero-emission port equipment and should support and reinforce industry trends toward policies and technologies for decarbonization. Most cruise ships on the West Coast, and almost all planned cruise ships, are equipped for shore power. But funding to provide for dock shore power, like funding for electric charging infrastructure, is needed to allow industry to implement zero-emission policies.

The program should include consideration of local planning efforts to address supply chain delays for key electrical infrastructure, which can be a significant barrier.

6. How can we help ensure this program addresses concerns of near-port communities and advances environmental justice?

Standards for identifying and incorporating the interests of affected communities and environmental justice should be flexible enough to reflect local geographic and demographic conditions. In many port communities there are concentrations of underserved and minority communities that are not captured in census statistics. The program should accommodate these local conditions.

Consideration should be given to reducing the burden and costs of grant preparation and administration to ensure that small communities and tribes can effectively compete for funding. A sliding scale of standards for smaller awards and simpler projects would help ensure that these organizations can compete and make the funding go farther.

Thank you for considering these comments.

Sincerely,

Gretchen Keiser  
Chair, Juneau Commission on Sustainability