

To the Commission:

There have been many advances in technology for propelling ships and conserving fuels and especially in emissions. And anything using 2007 ships as a reference point is way off. It is still true that ships are a significant source of emissions.

I think a maritime highway inland on the Sacramento River could be quite useful. One area possibly not in consideration a few years ago when the talk started is the so-called cold chain, which moves agri and food products in refrigerated or cooled containers. The cold chain is getting a lot of attention now, and I would think the ag interests in the central valley would be interested if they could export or move to the bay area on suitable vessels. I am not sure how much container traffic could come in from Oakland. Who wants to ship there? It's not a huge manufacturing area, nor is it a high retail population concentration. There are some inland warehouse complexes; Cordelia, Tracy, and some others inland, some of which might handle imports. One would still need to truck from Stockton or Sacramento.

I think the whole idea got hurt by Stockton's bankruptcy. Most ports need a strong governmental involvement and possibly some financial backing. The entrepreneur ship owners who started the idea were not prepared to raise the sums necessary to fit out the port terminals to handle the cargoes efficiently. And the city could not provide the money. There isn't anyone else, because without some guarantees, private financing would not play. They would need to see evidence of real sustainable traffic to invest. Cash flow. With the uncertainty of how much cargo, and no track record, they will not invest the sums needed. You need a big player who sees the vision.

It is also true that on dock tremendous improvements in energy usage and emissions control have been made. There is more to do, but the shipping interests are very much aligned and supportive of efforts. But the facilities have to be there to power the ships while in port. They have to run their systems, and keep the cargo that isn't being dropped off in good shape for the next port. More investment.

We don't know how long slow steaming will be the norm. One alliance at least is now contemplating a high speed service in addition to their 'normal' slow steaming service. Apparently some cargo consigners want faster service.

When I went to the port of Rotterdam, where they use inland shipping on rivers a lot, a big issue was getting berth space for the river barges along with the big container ships. There was a big scheduling problem, and so it was not so efficient as they would like to move the containers from the big ships to the barges and lighters. Quay space and its location also impacts the handling and moving time for the containers while ashore. You can't just take them off and drop them on. Similar problems would exist in Oakland. Nothing that could not be resolved with some investment and some planning, but it would take enough volume for it to make sense to tackle the problem.

I think I mentioned that in the EU they are struggling to increase inland water container traffic from 30-some percent to 40-some. And they have a long and stable history of inland water cargo transport, with substantial players and large inland population centers with manufacturing.

Best Regards,

Bruce Hartman PhD

Email: bruce@ahartman.net or bruce@hartman.bz

Mobile or Text: [510-710-3177](tel:510-710-3177)

Website: <http://drbrucehartman.net> Blog: <http://mymaritimeblog.wordpress.com>

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