



425 S. Palos Verdes Street Post Office Box 151 San Pedro, CA 90733-0151 TEL/TDD 310 SEA-PORT www.portoflosangeles.org

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Executive Director

May 1, 2020

Richard Corey
California Air Resources Board
Clerk's Office
1001 I Street
Sacramento, CA 95814

(VIA ELECTRONIC SUBMITTAL)

Dear Mr. Corey:

SUBJECT: 15-DAY CHANGES TO THE PROPOSED CONTROL MEASURE FOR OCEAN-GOING VESSELS AT BERTH

The Port of Los Angeles appreciates its partnership with the California Air Resources Board (CARB) in the development of programs to reduce emissions from heavy duty sources. While we have joined our colleagues at the Port of Long Beach in a letter to provide comments to the proposed control measure for ocean going vessels at-berth, we would like to provide this additional letter to emphasize some important issues we hope you are considering in your rulemaking process.

As you know, our Clean Air Action Plan (CAAP) has been very successful at reducing emissions from sources that operate in and around the ports. A key part of the success of the CAAP has come from working with our tenants and customers to advance technology in the area of emission reduction. One of the most important technologies that has led to notable emission reductions has been the development of technology to plug ships into shore power while at berth. This process, which we refer to as plugging in to Alternative Maritime Power, or AMPing, was pioneered at the Port of Los Angeles, and we have invested over \$200 million to see its expansion across our port. Based on our early involvement in the development of this technology and our belief in its efficacy, we support CARB's effort to expand the use of shore power to include greater numbers and more ship categories beyond what is covered by the current state rule.

Importantly, increased use of shore power will require greater commitment by the stakeholders, including ports, to invest in infrastructure and equipment to increase the control of at-berth emissions. This will also require coordination with CARB to ensure expansion of the use of shore power can be implemented expeditiously and cost-

effectively. We look forward to working closely with you in the development of a control measure for ocean going vessels at-berth and we offer you the following thoughts:

- **Reassessment** – We recognize we are facing an unprecedented public health crisis, which has and will continue to have significant adverse economic impacts. In light of this, we recommend a mechanism that allows for a timely reassessment of the regulation and greater flexibility in the event that economic conditions warrant it.
- **Technology Development** – Shore power technology is more compatible with some ship categories than others. Of particular concern are safety and operational limitations that exist for tanker ships. We hope your rulemaking process will allow for assessment of the feasibility of use of shore power, and any alternatives, for the tanker and roll-on-roll-off (RoRo) ship categories before actual plug-in requirements go into effect. We would like to be partners with you in the consideration of technologies for these new ship categories as you work through your regulatory process.
- **Enforcement** – There are two issues we would like to work with you on regarding enforcement. First, as you contemplate 100% compliance requirements, we would like to work with you on determining a level of compliance that is operationally feasible (i.e., accommodates unanticipated circumstances) without triggering noncompliance. Second, once regulatory requirements go into effect, we would like to work with you to ensure accountability is appropriately allocated, whether this be facilitating installation of infrastructure or actual emissions reductions.
- **Adaptive Management** – We hope your regulatory process will include “check-ins” or other types of assessment steps that can allow the various stakeholders to be a part of the implementation process, and assure that the steps envisioned can be implemented.
- **Funding** – Installation of shore power infrastructure is very expensive and we hope the state can help support this program with appropriations for the development, purchase and deployment of this technology.

I want to thank you for the opportunity to engage on this important rulemaking process. Please feel free to contact me with any questions or concerns regarding this letter.

Sincerely,



EUGENE D. SEROKA
Executive Director