Bechtold, Bradley@ARB

From: ARB Clerk of the Board

Sent: Thursday, June 25, 2020 9:52 AM

To: Bechtold, Bradley@ARB

Subject: FW: Informational Update on Control Measure for Ocean-Going Vessels At Berth

From: Lindy Lavender lindy@eblcmail.org>
Sent: Thursday, June 25, 2020 9:41 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>

Subject: Informational Update on Control Measure for Ocean-Going Vessels At Berth

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On behalf of the East Bay Leadership Council, a regional public policy and advocacy organization representing hundreds of employers across Contra Costa and Alameda Counties, we are supportive of achieving emission reductions in port communities. The mechanism by which we do that is important and must be done in a way that is safe and achieves meaningful, lasting reductions. Unfortunately, the 15-day language has advanced the timelines and put forward "innovative concepts" that can't be meaningfully used to comply with this regulation. This leaves regulated entities in a situation where the only way they can comply with the regulation will be with vessel-based technologies which, at this point, have not been tested for the tanker sector and could result in substantial safety issues. For the safety of our communities, we can't support a rule that fails to establish safe and effective compliance mechanisms. We strongly encourage the board to ensure that this rule can be complied with in a manner that is safe and effective and results in the community reductions we all seek.

Lindy Lavender Policy Director East Bay Leadership Council (925) 246-1880