

June 24, 2020

To: California Air Resources Board

c/o Clerk of the Board

1001 I Street

Sacramento, CA 95814

 Re: Proposed Control Measure for Ocean-Going Vessels at Berth

I write on behalf of the Industrial Association of Contra Costa County (IACCC), which represents approximately 50 small, medium-size, and large companies throughout the County. As members of this community, we support achieving emission reductions in port communities. It is imperative, however, that this be done in a way that is safe and achieves meaningful, lasting reductions. As currently proposed, the At-Berth Rule puts these goals at risk.

The IACCC is concerned that the latest proposed revisions have shortened the regulatory timelines without any meaningful data to support this change. This makes the implementation of this Rule, even under an ideal scenario, infeasible due to the time consuming permitting and environmental review processes we have in place throughout our region.

In addition, the new “innovative concepts” provision fails to establish a meaningful alternative path to comply with this Rule. This leaves regulated entities with no proven technologies to comply with the regulation. Moreover, the technologies discussed in support of the Rule have not been tested for the tanker sector and could result in substantial safety issues.

For the safety of our communities, we cannot support a Rule that fails to establish safe and effective compliance mechanisms prior to adoption. We ask the Board to defer adoption of this Rule so that the safe implementation can be thoroughly understood and vetted, and so that the Rule can achieve our mutual goal of safely and effectively reducing emissions.

Your consideration is greatly appreciated.

Sincerely,



Mark Hughes

Executive Director

Industrial Association of Contra Costa County (707) 656-1765

cc: IACCC Board of Directors