

**Coalition For A Safe Environment
California Kids IAQ
Community Dreams
EMERGE
American Legion Post # 6
Wilmington Improvement Network
San Pedro & Peninsula Homeowners Coalition
NAACP- San Pedro-Wilmington Branch # 1069
California Communities Against Toxics
California Safe Schools
Del Amo Action Committee
Action Now
St. Philomena Social Justice Ministry
Comite Pro Uno
350 South Bay Los Angeles
Frack Free LA County
West Long Beach Association
Philippine Action Group for the Environment
Carson Environmental Commission Member**

August 27, 2020

California Air Resources Board
Clerks Office
1001 I Street
Sacramento, CA 95814
916-322-5594
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Su: Public Hearing To Consider Proposed Control Measure for
Ocean-Going Vessels At Berth
Agenda # 20-8-1

Re: Public Comments In Support of Proposed Control Measure for
Ocean-Going Vessels At Berth With Requests

Dear CARB Board Members:

The Coalition For A Safe Environment and et all signatory organizations submit these joint public comments on the Proposed Control Measure for Ocean-Going Vessels At Berth Rule Amendments.

We represent a broad base coalition of port community organizations in California and we support the Proposed Control Measure for Ocean-Going Vessels At Berth Rule Amendments with the following requests:

1. CARB Create an Emission Control Technology Certification Program. The use of arbitrary non-standardized industry methods Executive Orders is not acceptable.

- a. Standardized Application process
- b. Standardized Review Process
- c. Verification that Applicant owns patents or rights to technology(s).
- d. Standardized Test Validation Procedures/Format
- e. Standardized Approval Process
- f. Ability to Approve a Subclass

Example 1.

Approval of ZE Class 8 On-Road Short Haul Trucks vs waiting years for Combination Long Hall Truck approval

Example # 2.

Approval of Ship Emissions & Treatment Technology for specific ship categories

- g. Standardized Validation Approval Letter/Certificate

2. CARB Approved Emission Control Strategy (CAECS) must be transparent with Public Participation

- a. Clearly Defined Program
- b. Must include Goals, Objectives, Measurable Metrics
- c. Transparency in decision-making
- d. Public review of all data developed in the certification process
- e. Public Investigation Request Procedure

3. Control Measure for Ocean-Going Vessels Include At-Berth, At-Ancor In Port and At-Ancor Outside Breakwater

4. That All Ship Categories Be Included By 2022 And Implemented by 2025.



**Evaluation of the
Advanced Maritime
Emissions Control
System (AMECS)**

AMECS Demonstration
at the Port of Long
Beach, California

Table 22. Emissions Reduced per Vessel

| Vessel Type | PM ¹ ton/yr | NOx ton/yr | VOC ton/yr | TOTAL ² ton/yr | SOx ³ ton/yr |
|------------------|---------------------------|---------------|---------------|------------------------------|----------------------------|
| Auto Carrier | 135.8 | 72.7 | 2.4 | 210.9 | 70.2 |
| Bulk | 42.3 | 22.9 | 0.8 | 65.9 | 21.6 |
| Container Ship | 242.0 | 135.0 | 4.5 | 381.5 | 117.4 |
| General Cargo | 34.7 | 17.2 | 0.6 | 52.5 | 19.8 |
| Passenger | 386.7 | 197.4 | 6.2 | 590.3 | 164.9 |
| Reefer | 194.8 | 106.8 | 3.6 | 305.2 | 97.3 |
| Roll-on/Roll-off | 102.7 | 61.1 | 2.0 | 165.8 | 44.5 |
| Tanker | 237.2 | 74.4 | 2.8 | 314.4 | 197.0 |

¹ Moyer weighting factor of 20 was applied to the PM emissions reduced.

² Total emissions only include PM, NOx, and VOC for cost effectiveness calculations.

³ SOx emissions reduced is provided in this table for informational purposes only.

5. **We Do Not Want CAPCOA To Be A Remediation Fund Administrator, CAPCO is Unqualified and Has No Experience.**
 - a. CARB be the Administrator or
 - b. A Qualified Mitigation Non-Profit Foundation such as the Harbor Community Benefit Foundation in San Pedro in Southern California and the Rose Foundation in Oakland in Northern California are qualified to administer this Remediation Fund.
6. **We Want All Ports & Terminals To Have Specific Compliance Requirements In The Regulation. TIE's and VIE's are unacceptable and are only industry compliance delay tactics.**
7. **We Want No Extension Of Originally Proposed Dates Or Times Compliance Requirements**
8. **CARB Staff has Proposed No or Inadequate Enforcement, Penalties or Sanctions for Non-compliance**

For additional information the primary contact is Jesse N Marquez for these public comments.

Respectfully Submitted,



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