

March 23, 2018

Douglas Thompson
Manager
California Air Resources Board
Carl Moyer/Community Air Protection Funds
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Thompson,

California State University Maritime Academy (CSUMA) would like to participate in the Carl Moyer Program/AB 617 Community Air Protection (CAP) Program funding availability, in an effort to replace one or all of the three Tug Boats/Yard Craft used in the training of Cadets. All three vessels are approaching 70 years in age, and are powered by Tier Two Diesel engines.

Under current program guidelines, full vessel replacement is not ordinarily awarded. However, less environmentally consequential mobile sources of diesel emissions are authorized for replacement. This letter is intended to provide substantive information and recommended program language for consideration by the California Air Resources Board (CARB) staff and Board of Directors that supports full vessel replacement for CSUMA (and other educational institutions). This is based on the program's ability to award funding on a case-by-case basis or by specific authorization allowed through revision of the language in Chapter 7 of the Carl Moyer Program: Marine Vessels 7. The following language changes and modifications are recommended:

Chapter 7, Table 7.1

Current:

"Vessels subject to Commercial Harbor Craft Regulation Schedules for Meeting Tier 2 or Tier 3 Standards (ex: barge, crew & supply, dredge, excursion, ferry, towboat, tugboat) - engine repower, remanufacture, retrofit or new purchase."

Recommended Change:

"Vessels subject to Commercial Harbor Craft Regulation Schedules for Meeting Tier 2 or Tier 3 Standards (ex: barge, crew & supply, dredge, excursion, ferry, towboat, tugboat) - engine repower, remanufacture, retrofit or new purchase, to include full vessel replacement for Educational Institutions where training vessels are utilized as part of the core curriculum."

Chapter 7: Project Types

*Recommended addition of "Project Type 7: **Educational Institution Vessel Replacement.**"*

"When utilized as part of the core curriculum of an Educational institution, Vessels meeting Tier 2 or 3 standards and operating well beyond its effective service life will be considered for full vessel replacement by a new or near new vessel that replicates the function and educational needs of the institution."

In response to the call from CARB for community comment on how to better focus CAP Program funding, the following is provided in support of language and policy modifications:

1. **Significant Impact Area.** CSUMA is located in Vallejo, CA, identified by CARB as a vulnerable community lying within an adverse health impact area directly affected by the adjacent Interstate 80 corridor as well as the Bay Area Refinery Corridor.
2. **Protection of Sensitive Receptors.** Just as with school buses, which the program allows near full-funding for replacement primarily because students ride in buses and are sensitive receptors, CSUMA trains hundreds of Cadets annually on board it's three small craft training vessels, exposing "sensitive receptors" in the same manner as a school bus.
3. **Far More Emission Reduction ROI.** Replacement of a single CSUMA Tug Boat or Yard Craft can represent the equivalent of replacing 72 Heavy duty Trucks (<https://www.dieselforum.org/policyinsider/getting-big-things-done-like-generating-96-000-pounds-of-clean-air>). A single CSUMA Tug replacement is valued at approximately \$5 million, while 72 Heavy truck replacements have an estimated value of \$8 million. Cost per ton for emissions reduction is far lower (40% lower) when replacing a tug, versus the equivalent number of Heavy trucks.
4. **Training the Clean Air Advocates of the Future.** CSUMA's graduates go on to become maritime industry leaders that can or will support the objectives of CARB, based upon what they learn at the Academy. The vessels they train on shape their view and that of the maritime industry about programs and technologies that support the reduction of vessel emissions. CSUMA's current vessel inventory does not currently provide this learning environment.

5. **Cost Sharing Barriers to Entry.** Current cost sharing policies represent a significant barrier to entry into the program. CSUMA is a small university, with limited resources, but with worldwide reach and influence. Vessel replacement cost share of as little as 15%, represents a significant cost that the University will likely not be able to fund. Full replacement cost is strongly encouraged.
6. **Smart California Balance Sheet Investment.** Much of the funding awarded goes to non-government entities. Award of funding to CSUMA for vessel replacement represents a direct and long-term investment to the assets of the State of California, delivering significant and sustained value to the taxpayers of the State of California far beyond that of an investment in a private entity.

We request that the information provided above be made available to CARB Board of Directors, in anticipation of the April 27, 2018 Directors meeting. On behalf of the California State University, thank you for your consideration and continued efforts to improve the quality of life for all Californians.

Should you have questions, please do not hesitate to call me at (562) 951-4090 or Aaron Klemm, Chief, Energy & Sustainability at (562) 951-4122, aklemm@calstate.edu.

Sincerely,



Elvyra F. San Juan
Assistant Vice Chancellor

ESJ:AK:cf

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