



April 5, 2018

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

Dear Mr. Douglas Thompson:

California State University Maritime Academy (Cal Maritime) is the leader in professional Maritime Industry Education. It serves in a number of strategic capacities to include shaping Maritime professionals to be the clean environmental advocates of the future. As part of our professional curriculum and operational focus, Cal Maritime continues to promote and develop a culture and curriculum that directly supports environmental stewardship in its students, faculty and staff.

Cal Maritime desires 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 old, and are powered by Tier Two Diesel engines. These vessels currently do not support the Clean Environment focus of the University, nor the State of California. Training vessels such as these can serve not only as mobile maritime training platforms for students, they have the ability to develop and shape a lifelong commitment to clean maritime power systems and practices for future generations of professional Mariners.

As expressed in the California State University Chancellor's Office support letter, on March 23, 2018, under the current program guidelines, full vessel replacement is not ordinarily awarded; however, less environmentally consequential mobile sources of diesel emissions are authorized for replacement. The intent of this letter is to provide substantive information and recommended program language for consideration by the California Air Resources Board staff and Board of Directors that supports full vessel replacement for Cal Maritime and other educational institutions under the program's ability to award funding on a case by case basis or by specific authorization allowed thru revision of the language in Chapter 7 of the Carl Moyer Program.

Cal Maritime fully supports the language revisions proposed by the Chancellor's Office to the current Carl Moyer Program provided in their letter and reiterated below:

CALIFORNIA STATE UNIVERSITY MARITIME ACADEMY

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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 vessel 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 where and how to better focus CAP Program funding, Cal Maritime joins with the CSU Chancellor’s Office in providing the following items in support of language and policy modifications to Section 7 of the Carl Moyer program:

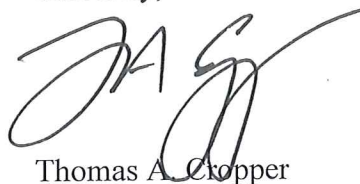
1. **Significant Impact Area.** Cal Maritime is located in Vallejo, CA, identified by CARB as a vulnerable community lying within an adverse health impact area directly affected by the adjacent Interstate 80 corridor as well as the Bay Area Refinery Corridor.
2. **Protection of Sensitive Receptors.** Just as with School buses, which the program allows near full funding for replacement primarily because student ride in buses and are sensitive receptors, Cal Maritime trains hundreds of Cadets annually on board it’s three small craft training vessels, exposing “sensitive receptors” in the same manner as a schools bus.
3. **Far More Emission Reduction ROI.** Replacement of a single Cal 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 CAL MARITIME Tug replacement is valued at approximately \$5Mil, while 72 Heavy truck replacements are estimates an approximately \$8Mil. 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.** Cal Maritime’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. Cal Maritime’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. Cal Maritime is a small university, with limited resources, but a world-wide

Reach and influence. Vessel replacement cost share as little as 15%, represent 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 Cal Maritime is for vessel replacement represent a direct and long term investment the assets of the state of California, delivery significant and sustained value to the tax payers of the State of California, far beyond that of an investment in a private entity

We request that our observations and suggested advice and guidance requested by the CARB as part of the "Community Air Protection program established by AB 617, be made available to CARB Board of Directors in anticipation of the April 27, 2018 Directors Meeting. On behalf of students, faculty and staff of Cal Maritime, thank you for your consideration and continued efforts to improve the quality of life for all Californians.

Sincerely,



Thomas A. Cropper
President

TAC/thc

cc: Mr. Kyle Goff, Air Pollution Specialist, California Air Resources Board
Mr. Aaron Klemm, Chief, Energy and Sustainability, CSU Office of the Chancellor
Ms. Elvyra San Juan, Assistant Vice Chancellor, Capital Planning, Design and Construction
Mr. Franz Lozano, VP Administration and Finance
Mr. Kevin Bertelsen, AVP Facilities and Operations