



Local Union 569

San Diego and Imperial Counties



INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

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December 4, 2019

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814
Via Electronic submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: PROPOSED CONTROL MEASURE FOR OCEAN-GOING VESSELS AT BERTH

On behalf of over 3,300 members of the International Brotherhood of Electrical Workers (IBEW) Local 569, I write in support of the Control Measure for Ocean-Going Vessels at Berth. Not only will enacting this rule reduce vessel emissions and improve air quality, it will create new electrical work opportunities. We urge the California Air Resources Board (CARB) to adopt this regulation and move forward with its implementation as soon as possible.

As the American Lung Association noted in their recent "State of the Air" report, California has some of the most polluted air in the nation. If we are to avert the worst impacts of a climate disaster and improve air quality, we must drastically reduce emissions across all sectors of our economy. This proposed regulation is critical to reducing these emissions within the maritime and goods movement industries. Additionally, here in San Diego, some of our most vulnerable communities are impacted by dangerous pollution from these vessels. This proposed regulation is vital to improving air quality in neighborhoods and environmental justice communities around the Port here in San Diego and other Ports across our state.

By enacting this rule, we expand the universe of vessels subject to regulation and provide opportunities for our local workforce to participate in the infrastructure upgrades required to achieve these goals, a win-win for public health and our economy.

For all the reasons stated above, we strongly support the Proposed At Berth regulation, and urge CARB to implement the rule as soon as possible, and certainly no later than January 1, 2021.

Sincerely,

Jeremy Abrams
Business Manager/ Financial Secretary