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Chief Executive Officer

December 4, 2019

Chair Mary Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

SUBMITTED ELECTRONICALLY

RE: Proposed Control Measure For Ocean-Going Vessels At Berth

Dear Chair Nichols,

The Bay Planning Coalition (BPC) is a non-profit organization with over 150 members representing a broad range of industries who collectively advocate for strong economic growth while protecting the environmental sustainability of the San Francisco Bay Region. BPC appreciates the opportunity to comment on the Proposed Control Measure For Ocean-Going Vessels At Berth (Proposed Control Measure). BPC fully supports CARB's efforts to improve air quality but is concerned that the Proposed Control Measure lacks the requisite feasibility and cost-effectiveness analyses. Specifically, BPC's concerns and recommendations are as follows:

- The Proposed Control Measure should analyze and demonstrate technological and financial feasibility. We support comments by WSPA, PMSA, and other groups that requested a feasibility evaluation study for technology alternatives prior to setting an implementation schedule for specific vessel classes. Feasibility evaluations would ensure thorough analysis of all relevant factors (e.g., safety concerns, technology availability, vessel class certifications, local land use permitting, cost-effectiveness, etc.) and ensure emission reductions are real and achievable. BPC encourages CARB to continue to work with stakeholders (i.e. ports, refineries, agencies, and others) to conduct the applicable feasibility studies, especially in the identification, validation and review of assumptions and data as a precursor to developing a new Proposed Control Measure.
- Comments submitted by the Bay Area Air Quality Management District (BAAQMD - November 26, 2019) refer to the Dredged Material Management Office (DMMO) as an example of interagency collaboration that could speed up the proposed implementation schedule. BPC welcomes interagency collaboration between CARB, Air Pollution Control Districts, and other relevant regulatory bodies that would result in real efficiencies. While the DMMO has resulted in efficiencies related to the issuance of reoccurring dredging permits, as a stakeholder in the DMMO development process, BPC understands that it took a significant

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amount of time and resources to successfully establish and manage that inter-agency forum. To create a similarly effective forum that ensures consideration of all key decision criteria in implementing the Proposed Control Measure, BPC believes that work to align key agency decision makers should take place before adopting any implementation schedule. Since this work has not yet begun, it may be unrealistic to expect meaningful impacts on the currently proposed implementation schedule. If CARB takes the step of organizing an inter-agency group to accelerate implementation of the Proposed Control Measure, BPC would appreciate the opportunity to contribute its expertise and perspective on how to make such an inter-agency forum as effective as possible.

Once again BPC and its members appreciate the opportunity to comment on the proposed rule. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,



John A. Coleman
Chief Executive Officer