



March 18, 2022

Liane M. Randolph  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, California 95814

*Submitted via CARB Online Portal*

**Re: Proposed Amendments to the Commercial Harbor Craft Regulation**

Dear Chair Randolph:

Thank you for the opportunity to comment on California Air Resources Board's Proposed Amendments to the Commercial Harbor Craft (CHC) Regulations ("Proposed Amendments"). The Bay Area Council, representing over 300 employers around the region, has long advocated for the robust expansion of ferry service and decarbonizing vessels on San Francisco Bay. We are very supportive of the goal of these Proposed Amendments, but remain concerned about the feasibility of meeting these targets. As such, we urge you to approve the alternative compliance plans and technologies that our Bay Area operators have diligently developed in collaboration with CARB staff to meet these greenhouse gas reduction targets in a financially and logistically feasible manner.

The Bay Area is home to some of the world's leading green propulsion technologies and while the Bay Area Council has advocated for their adoption, we also recognize that this transition requires a large upfront capital investment. The Water Emergency Transportation Authority (WETA), which operates the state's largest ferry system, is a national leader in embracing clean vessel technology, including implementing the first passenger vessels in the country to achieve the Environmental Protection Agency Tier 4 standards and reducing an estimated 10 tons of GHG emissions annually. WETA is also in the process of developing zero emission vessels to serve its new Mission Bay and Treasure Island routes in San Francisco. We are committed to continuing to work with WETA to help secure additional federal and state funding to support the electrification of its vessel fleet.

In partnership with CARB, WETA staff has worked throughout the last year to develop an Alternative Control of Emissions (ACE) plan that will shift 50% of their vessel fleet to zero emissions by 2035. We urge you to approve this ACE plan expeditiously following the approval of these Proposed Amendments so WETA can pursue funding opportunities to help decarbonize its fleet. Without this ACE plan, the cost of retrofitting or replacing its vessels to meet these new requirements would cost hundreds of millions of dollars that the transit agency simply does not have, particularly as it struggles to recover from the devastating financial impact of the pandemic.

In addition to the public ferry system, private ferry operators will also need to pursue alternative plans to meet these greenhouse gas reduction targets in a financially feasible manner. Private ferry operators on San Francisco Bay have also worked with CARB staff to identify alternative control technology that could help those operators meet the requirements in a financially feasible way since they are not eligible for public grant opportunities. We urge you to approve these alternative control technologies quickly to ensure that these operators remain in compliance and in business.



Lastly, the San Francisco Bay Pilots have a very unique fleet of pilot boats designed to navigate commercial ships to and from ports in the San Francisco Bay Area, Sacramento, and Stockton. The cost of replacing this small and specialized fleet would be over \$50 million, costs that would have to be passed onto their shipper clients and would risk further disrupting supply chain operations in the Bay Area. We respectfully request that their small existing fleet could be exempted from these requirements and new construction would be subject to the proposed regulations.

Again, we are very supportive of the Proposed Amendments' goal of reducing emissions of vessels in California, but it is imperative that these operators can achieve these goals in a financially feasible way. We respectfully request that you approve these alternative compliance plans to help these fleets meet those goals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Emily Loper', is written over a light grey rectangular background.

Emily Loper  
Policy Director