CARB Board Members;

Thank you for allowing the general public and vessel owners/operators the opportunity to voice our opinion on the proposed modifications to the CHC proposal.

Jacobsen Pilot Service is a Pilot Service that handles ship traffic in the Ports Of Long Beach and portions of Los Angeles. Two of the busiest ports in the nation. Partnered with the Port Of Long Beach, “The green Port”, Jacobsen Pilot Service is committed to operating as clean and efficiently as safe to do so. With that being said, we have a couple of comments that we’d like to share.

Within the last 5 years, JPS has designed and built 2 new Tier 3 compliant, <600kw, Pilot Vessels. This was compliant with CARB’s guidelines at the time. There was not a Tier 4 engine available with that engine rating. These new vessels replaced our existing Tier 2 Pilot Vessels. The option of a Tier 4 system would’ve meant building a larger vessel, installing a larger engine that would’ve consumed a substantially greater quantity of fuel, and a complete rebuild of our infrastructure.

Respectfully, deciphering the CHC guidelines is quite an undertaking to say the least. With all this being said, this leads us to our comments. The response I’ve received and uncovered in the guidelines simply states that if a Tier 4 engines exists with the same rating and duty cycle, the engine needs to be replaced. Again, respectfully, It appears you’ve based this requirement on limited research. The Cal Maritime report surveyed 1 Pilot Vessel, (Tier 2 >600kw engines), and mentioned that Tier 4 options were available with “substantial reconfiguration”. The time frame the board is proposing for these system installations is not feasible or safe. Speaking with a few of the major players in the Marine engine industry, a majority of them stated that they have not begun to design or create a Tier 4 marine engine <600kw because there was no need under the guidelines for such an engine. My point being is that some of the major marine engine manufacturers are still under the impression <600 kw marine engines are under compliance. So what you’re asking of the Tier 3 compliant owner/operators to do, is to install an unproven piece of machinery that requires a “substantial reconfiguration” of the vessel in a time frame that is simply not attainable. The safety factor alone should be enough for the board to step back and reevaluate what they are asking the marine industry to do. For a Pilot Boat organization, Long Beach (JPS) for example, we rely on 2 Pilot Boats. One is a duty boat and one is down for maintenance. What we would need to do to comply with the new regulations is to acquire funding, new stability tests from a naval architect and acquire the untested Tier 4 <600 kw engines. That leads us to our next comment. Taking these boats out of service one at a time, for months on end, for the “substantial reconfiguration” and engine install, which in turn would have us relying on one vessel to carry the workload of one of the busiest Ports in the world, has the potential to disrupt a world economic hub.

What we are asking of the board is to give the Tier 3 compliant, <600kw, operations more time for a marine Tier 4 compliant engine to be developed and tested before being required. We at Jacobsen Pilot Service are committed to working with CARB to ultimately achieve a zero emission goal in a responsible and safe pathway. We appreciate your time and consideration.

Respectfully,

Dan Kennedy

Dan Kennedy

Jacobsen Pilot Service

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