December 9, 2019

*Submitted via email to* [*cotb@arb.ca.gov*](mailto:cotb@arb.ca.gov) *& Submitted via website at* [*https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ogvatberth2019&comm\_period=A*](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=ogvatberth2019&comm_period=A)

Chair Mary Nichols

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Chairperson Nichols:

TraPac, LLC (“TraPac”) appreciates the opportunity to provide comments on the California Air Resources Board’s (“CARB”) Proposed Control Measure for Ocean-Going Vessels at Berth (“At Berth Regulations”), released October 15, 2019, and its accompanying Draft Environmental Analysis (“Draft EA”), released October 1, 2019. TraPac has terminals located in the State of California in Los Angeles and Oakland. The TraPac Los Angeles terminal is an automated container terminal located in the Port of Los Angeles at berths 136 thru 147. TraPac remains the leader in emission reduction with the lowest levels of all terminals in the Port of Los Angeles.

Currently 100% of vessels that call at TraPac Los Angeles use AMP or an equivalent technology to reduce harmful pollutants and greenhouse gases. TraPac has made strategic investments in technology to continue to improve environmental protection. As a company, TraPac looks forward to continuing to work with CARB to reduce emissions in California.

With regard to the proposed regulation, TraPac has comments in the following areas:

1. **The Percentage of Vessels**

TraPac welcomes the proposed increase in the industry requirement to 100% of container vessels. As a terminal already held to this standard and having proven it is achievable with customer co-ordination, we believe this is a good enhancement.

**2. Plug In/Unplug Time.**

We do not agree with the proposed time limit for plug and unplug at one hour each and timed from ready to work after customs clearance to plug in on arrival and then unplug to pilot on board for departure.

First no management, labor or port electrician should be placed in the situation where they are “watching the clock” when the work involves handling 6,600 volts and the process requires due care to avoid damage and injury. Getting this wrong may result in life changing outcomes.

Second how will the industry react when multiple ships are planning similar arrival or departure times to meet the one-hour requirement? If vessels are competing for the same tug and/or pilot resources who will decide which vessel is compromised?

Our recommendation is to mandate that each vessel shall plug/unplug as best practical to minimize non emission reduction hours and to use port data to collaborate towards improvement. CARB and/or the port authorities may then engage with vessel operators or terminals using real data to address consistent outliers, to allow best practice sharing and to drive continuous improvement.

1. **Reporting**

All of the data currently used to calculate the plug in/unplug time comes from the Port of Los Angeles. A Port of Los Angeles electrician is party to each plugin and unplug. The Port of Los Angeles also controls the Port pilots and track pilot boarding times. As the Port of Los Angeles has been tracking this data for years it does not make any sense for TraPac to duplicate these efforts. As discussed in outreach meetings with CARB, adding the ability to have an authorized agent for reporting purposes will help reduce duplication of efforts and become a single source of data management.

TraPac remains a committed partner with the goal of reducing emissions. We look forward to your consideration of our comments.

Regards,

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