



December 6, 2007

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California Air Resources Board
1001 I Street
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**SUBJECT: PROPOSED REGULATIONS TO REDUCE EMISSIONS FROM
DIESEL AUXILIARY ENGINES ON OCEAN-GOING
VESSELS WHILE AT BERTH AT A CALIFORNIA PORT**

Dear Air Resources Board Members:

Thank you for the opportunity to come before your Board in support of the adoption of the Proposed Regulation to Reduce Emissions from Diesel Auxiliary Engines on Ocean-Going-Vessels while at Berth at a California Port. The Port of Los Angeles (Port) understands the need for this regulation as ocean-going vessels are a major contributor of nitrogen oxides and diesel particulate matter at the Ports, which poses health risks both locally and within the basin. The Port fully supports the California Air Resources Board's effort to reduce emissions from the ocean-going vessel fleets that call at California Ports.

The Port would first like to commend your staff for the hard work in developing this regulation. We appreciate all the outreach and opportunity to participate in writing of this proposed rule, and look forward to future collaboration on the implementation of this proposed Regulation.

The Port of Los Angeles has been a leader in shore power implementation, installing the first shore power infrastructure for the China Shipping Terminal in 2004 and the NYK Terminal this year. In addition, the Port has implemented an aggressive shore power retrofit program to comply with the measures committed to in the San Pedro Bay Ports Clean Air Action Plan (CAAP) by 2011. The proposed rule will build on our initiative to implement shore power, which will assist tenants with compliance deadlines.

The Port is confident that the environmental ingenuity created as a result of this regulation will help reduce a significant amount of emissions and provide for an emerging economic sector for California. There are some concerns however that need to be considered as we move forward:

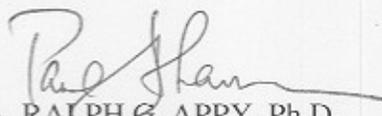


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- IMO/ISO Standardization. The Port requests that CARB works with foreign and domestic ports, terminals, and shippers to help standardize the shore power connectors, voltages, and related cable management systems. This will help ensure that terminals and vessels will standardize shore power systems in the Pacific Rim ports and beyond.
- CEQA Environmental Clearances. Infrastructure improvements may require CEQA environmental clearances resulting in longer lead times to construct major shore power and alternative compliance infrastructure.
- Alternate Compliance. Vessels that cannot use shore power must implement an alternative control technology. Alternative compliance to grid-based power systems have been used for demonstration purposes only. At this point no technology has been demonstrated to meet the proposed emission reductions outlined in the proposed regulation.

Again, we would like to thank you for the opportunity to provide comments on the regulation and look forward to continue working with you as this regulation is implemented. If you have any questions, please feel free to contact Carter Atkins or my staff at (310) 732-7649.

Sincerely,


RALPH G. APPY, Ph.D.
Director of Environmental Management