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December 1, 2021

CHIEF, TRANSPORTATION AND TOXICS DIVISION  
CALIFORNIA AIR RESOURCES BOARD  
1001 I STREET  
SACRAMENTO, CA 95814

Re: Port Plan Section 93130.14(b)

To whom it may concern:

The Port of Benicia is a privately owned AMPORTS facility and is operated by the Benicia Port Terminal Company with 90 feet wide deep-water pier with 2400 feet of wharf space and draft of 38feet MLLW capable of berthing 3 vessels at one time.

**(3) Port plan information.**

The port operator shall include in its port plan a discussion of necessary infrastructure modifications needed to reduce emissions from ocean-going vessels at a terminal, such that each terminal at the port is capable of meeting compliance requirements by the implementation dates listed in Table 1 in section 93130.7 of this Control Measure. For each strategy implemented at a berth, the plan must include all of the following:

**(A)** Identification and description of which strategy each applicable terminal will use for compliance;

Benicia Port Terminal is planning to use Capture-and-Control Technology as the one offered by STAX Engineering emissions control systems for at berth roll-on roll-off vessels through a barge-based or mobile land-based unit.

**(B)** Identify any equipment purchases and/or construction that are in progress or must still be completed to reduce emissions;

No CAPEX investment is needed since service will be provided by a third party under nominal hourly fees.

**(C)** Provide schedule for installing equipment and/or any necessary construction projects;

Equipment will be ready to provide services by January 1<sup>st</sup>, 2025.

**(D)** Identify terminals where equipment will be used;

Benicia Port Terminal.

**(E)** Listing of each terminal with geographic boundary coordinates;

Benicia Port Terminal.

Latitude / Longitude: 38.04279°/-122.1369°

**(F)** Specify any port specific berthing restrictions; and

Vessels en route to Benicia Port Terminal proceed northward from San Francisco Bay up a marked channel, through San Pablo Bay, and into the Carquinez Strait. Vessels must pass under the Richmond-San Rafael Bridge (center span vertical clearance 185 ft at MHW) as they enter San Pablo Bay and under the Carquinez Interstate Route 80 fixed Highway Bridge (north span clearance 146 ft at MHW, south span clearance 134 ft at MHW) as they enter the Carquinez Strait. Certain areas in the San Francisco and San Pablo Bays have been designated by the USCG as Regulated Navigation Areas (RNAs) and vessel operators should be familiar with the restrictions placed on vessels transiting these areas. One particular RNA of note is Pinole Shoal Channel, a 600 feet wide constricted waterway located at the northeast end of San Pablo Bay. The channel is currently restricted to vessels with a draft greater than 20 feet, or towboats with tows drawing more than 20 feet. Vessels of 1600 gross tons or more must avoid any meeting, crossing, or overtaking situations while transiting this waterway. Vessel operators should also verify water depth before transiting this area.

**(G)** List the division of responsibilities between the terminal and the ports for enacting the infrastructure required by each terminal's plan.

Benicia Port Terminal will be responsible to enact this plan.

**(4)** All port plans shall be signed by the applicable port's Responsible Official under penalty of perjury and are subject to verification by CARB staff. The division of responsibilities between the terminal operator and the port must be signed by the terminal's Responsible Official under penalty of perjury.

Respectfully

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