



March 6, 2023

California Air Resources Board
1001 I Street,
Sacramento, California 95814
Via Electronic submittal

Re: CARB’s Ocean-Going Vessel At Berth Interim Evaluation Report and the Need for Additional Limits on Ship Emissions

To the Air Resources Board:

Having read your Interim Evaluation Report (“Report”) on the Control Measures for Ocean-Going Vessels (OGVs) at Berth (“At Berth Regulation”, or “Regulation”), we have the following recommendations:

1. Implement the At Berth Regulation without Delay or Weakening

While the shipping industry may face challenges in complying with the Regulation deadlines, CARB staff noted no new significant concerns while creating the Report that warranted weakening the At Berth emissions reduction deadlines for regulated OGVs. There are several compliance flexibilities included in the Regulation available to both vessels and port/terminal operators, further justifying the existing emissions reduction deadlines mandated by the rule. CARB estimates that the updated At Berth policy will save 237 Californian lives and yield \$2.31 billion in public health benefits for Californians between 2021 and 2032. We support staff’s recommendation to implement the Regulation without delay and we oppose any efforts to weaken its implementation.

2. Begin Development of a Rule to Reduce Emissions from OGVs in Transit and Require a Transition to Zero-Emission Shipping

The magnitude of emissions from OGVs demonstrates the need to extend measures beyond the At Berth Regulation. California continues to experience some of the worst air quality in the nation, with the South Coast Air Basin and San Joaquin Valley being in extreme nonattainment with the Federal Clean Air Act. This was exacerbated with the recent cargo congestion crisis in 2021, when the Port of Long Beach (POLB) saw record

shipping traffic and associated toxic pollution. CO2 increased by 87% from 2020, and diesel particulate matter went up by 77% from 2020. The Port of Los Angeles (POLA) was even worse, with a staggering 147% jump in diesel particulate matter and a 136% increase in greenhouse gas emissions in 2021 over the previous year.

As part of the rulemaking process, CARB should fully investigate its current emission inventories, as current emission factors may well underestimate low-speed ship emissions. IMO standards certification does not consider engine loads of under 25%, and container ships operating in near shore Vessel Speed Reduction Zones typically operate at loads of 10-25%. OGVs may not be achieving the level of emission reductions they were previously believed to attain.

We recommend the development of a rule that reduces emissions from ships in transit by requiring cleaner engines and fuels, as well as vessel speed reduction (which reduces both emissions and threatens to marine life). The rule should lead to zero-emission shipping by 2040, with significant emission reductions in the near term.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director
Coalition for Clean Air