

March 7, 2023

Angela Csondes
Manager, Marine Strategies Section - California Air Resources Board
1001 I Street
Sacramento, California 95814
[Electronically submitted to ShorePower@arb.ca.gov]

Re: Comments on the At Berth Regulation - Interim Evaluation Report

Dear Ms. Csondes,

The Monterey Bay Air Resources District (MBARD) appreciates the opportunity to comment on the Interim Evaluation Report (Report) for the 2020 Control Measure for Ocean-Going Vessels (OGVs) At Berth (At Berth Regulation). Although MBARD does not have any large ports that would be subject to the At Berth Regulation, recently the Superintendent of the Monterey Bay National Marine Sanctuary (NMS) announced that they will implement voluntary vessel speed reduction (VSR) in that entire Sanctuary, starting May 1, 2023.

OGVs make up an increasingly large portion of California's NOx emission inventory and significantly impact all coastal communities. To maintain the attainment of health-based ozone standards, it is critical that state and federal actions are taken to reduce emissions outside of MBARD's regulatory control. Statewide coordination and collaboration are necessary to attain and maintain these ozone standards in the future.

Support for Future Measures to Reduce Emissions from Ocean-Going Vessels

Even though the At Berth Regulation provides substantial emission reduction benefits, the Report acknowledges that OGVs that transit, maneuver, and anchor in and around California's waters continue to impact the health of coastal communities. Coastal air districts are under rigid timelines to reduce ozone precursor emissions to attain state and federal ozone standards, and we cannot wait for the natural attrition of older, Tier 0 through Tier 2 engines. Even though there may be challenges in regulating the OGV source category due to the need for federal and international support, it is imperative to reduce the impacts of the growing marine shipping sector. CARB should continue to push for federal action to reduce emissions from OGVs, as outlined in the 2022 State Strategy for the State Implementation Plan (2022 SIP) and pursue additional state regulations to reduce nitrogen oxide (NOx) and particulates matter (PM) emissions from OGVs. MBARD supports CARB staff's recommendation to explore additional emission-reduction measures from OGVs while in transit, maneuvering, and at anchor in California waters.

Statewide Vessel Speed Reduction (VSR) Program

Recently, Assemblymembers Gregg Hart and Damon Connolly introduced California Assembly Bill 953 to task the Ocean Protection Council — in coordination with California air districts along the coast and in consultation with the federal Office of National Marine Sanctuaries, the U.S. EPA, the U.S. Navy, and CARB — to create a statewide voluntary vessel speed reduction and sustainable shipping program for the entire California coast. AB 953 would build upon the existing Protecting Blue Whales and Blue Skies program as well as any other existing local vessel speed reduction programs. MBARD recommends that CARB support this bill to pursue a statewide VSR program so that we continue the success of the existing program and build on that success to

achieve even more near-term reductions in ozone precursor emissions statewide. As mentioned earlier, the Monterey Bay NMS will be implementing voluntary VSR on Mat 1, 2023.

Control Technologies for Vessels At Anchor and Coordination on Pilot Projects

MBARD appreciates CARB's efforts to evaluate and provide status updates on the potential of anchor control technologies in the Report. MBARD anticipates that up to 20 cruise ships may visit Monterey in 2023, with each stay lasting for approximately 10 hours. Since these cruise ships anchor just outside Monterey Harbor, it is difficult to control the emissions from the auxiliary engines that impact the nearby community. Similar to the mitigation options for the at-berth sources that elect not to electrify during their stay, MBARD recommends that CARB develop mitigation options for the at-anchor activities throughout the state to offset these emissions.

In addition, MBARD encourages CARB to coordinate and implement a pilot project that reduces emissions from cruise ships at anchor. Potential pilot projects could consist of a capture-and-control barge, providing electricity from a barge-based battery bank, or other innovative concepts that would reduce the emissions from the auxiliary engines. Pilot projects that implement operational changes, such as using electric tenders to transport passengers to shore from cruise ships, could also be considered to reduce near-shore emissions. MBARD acknowledges that cruise ships can be more difficult to control since they have a higher energy demand and fuel consumption compared to other OGV ship types at anchor, but their engines are a significant concern for the community. Therefore, we would appreciate any support that CARB can provide to help mitigate the emissions and protect the health of our community.

Sincerely,



Richard A. Stedman
Air Pollution Control Officer