

Attachment B

**Supplemental
Responses to Comments**

on the

Environmental Analysis

Prepared for the

**Proposed Amendments to the
Commercial Harbor Craft
Regulation**



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California Air Resources Board – Proposed Amendments to the Commercial Harbor Craft Regulation

Nearly all of the comments provided today raise issues that have previously been submitted and considered by staff. Specifically in regard to environmental comments received we have already provided you with comprehensive responses to those comments in our Response to Comments on the Draft Environmental Analysis, which include comments submitted again today. Staff has not identified any new significant information in the comments submitted today that have not already been addressed.

Staff would, however, like to provide an additional response to the comment letter submitted today from Clean Fuels Alliance America and California Advance Biofuels Alliance. While the letter does not identify a significant environmental effect of the regulation, it states that the responses we provided to comments 3196-1 and 3196-2 in the Response to Comments document appear to have been based on misconceptions and misunderstandings regarding the R99 proposal. Specifically the letter states that the proposed R99 requirement would result in fewer PM emission reductions versus R80/B20.

Staff believes the responses provided for comments 3196-1 and 3196-2 in the Final EA Response to Comments document reflect the most recent information and accurately reflect the reductions of PM, NO_x, and lifecycle GHG benefits that would be achieved by the proposal to require use of R99 or higher blends of renewable diesel. We are aware that there may be some PM reductions from an R80/B20 blend compared to R99 or greater, but those potential benefits must be weighed against the potential relative NO_x increases from the biodiesel in the blends, in addition to other performance concerns (see response to comments 3235-4 in the Final EA Response to Comments document). There is no other diesel fuel blend than R99 or higher that provides a greater amount of NO_x reductions, and as outlined in our staff presentation, there is a shortfall on the NO_x reductions needed to meet goals of the State SIP Strategy. Comments regarding PM reduction benefits from use of B80/B20 do not indicate that a significant environmental effect would be caused by the proposed Regulation.

In addition to achieving less NO_x reductions, use of blends of biodiesel by more than 5 percent would not comply with the standards for CARB diesel according to ASTM D-975. The Proposed Amendments require use of verified diesel emission control strategies verified pursuant to 13 CCR 2700-2711 et seq, which requires additional analysis and testing for use of alternative diesel fuels, such as biodiesel. Use of biodiesel could also conflict with requirements of vessels that travel internationally or into international waters, such as the MARPOL ANNEX VI Regulation 18 requirements that require testing to ensure no increases in NO_x emissions.