



*The Port of Long Beach*

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BY \_\_\_\_\_

April 30, 2003

Cynthia Marvin  
California Air Resources Board  
1001 I Street  
Sacramento, California 95812

Subject: Comments on the Draft 2003 SIP Measures

Dear Ms. Marvin:

26-A-1

The Port of Long Beach (Port) appreciates the opportunity to comment on the Draft 2003 State Implementation Plan Measures (SIP). We look forward to working with you and your staff to ensure that the final version is based upon the best applicable data and analytical techniques and that the measures ultimately proposed represent the best possible combination of feasibility and cost-effectiveness. I am confident that, by working together, the port industry, the California Air Resources Board (CARB), South Coast Air Quality Management District (District), and the United States Environmental Protection Agency (EPA) can achieve significant reductions in port-related emissions.

The Port has concerns with two of the measures that compose the mobile source element of the SIP, MARINE-3 and MARINE-4. The Port is concerned that MARINE-3 is based on potentially infeasible operational changes in the port industry, while at the same time claiming potentially unachievable emission reductions, as much as 17.6 tons per day of NOx reductions by 2010. The feasibility of cleaner fuels is questionable given the international nature of shipping and ship design. We understand that marine architecture is moving toward a mono-tank design that would preclude a ship from carrying multiple fuels. Also proposed under this measure is cold-ironing. However, the feasibility of vessels using shore-side power in San Pedro Bay is still very uncertain and may only be applicable in a limited number of instances. The Port has begun a new study of the feasibility of cold-ironing to determine the applicability of cold-ironing given changes in technology and operations over the past 15 years. We suggest the CARB meet with shipping lines to clarify these issues prior to pursuing this measure. For these reasons, we request that the CARB review and revise proposed measure MARINE-3, in order to ensure it includes achievable emission reductions based on the best available information. The Port is also concerned that given the magnitude of the claimed emission reductions and the speculative nature of the control measures contained in MARINE-3, CARB may find itself in the midst of a new consultative process that could drag on for years.

PRESIDENT'S "E" AND "E-STAR"  
AWARDS FOR EXCELLENCE IN EXPORT



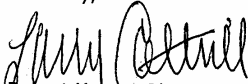
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(cont.)

MARINE-4 targets land-side port operations for emission reductions and includes strategies such as alternative fuels, retrofit controls, and electrification. Unfortunately, little detailed information is included to assess the impacts to the maritime industry. With that in mind, we ask the CARB to work with the maritime industry to ensure that only feasible, cost-effective, and state-wide measures are implemented. In addition, the Port is also concerned that the port industry not be singled out for regulation and that controls are placed across industries operating similar fleets, duty-cycles, or on-road and off-road equipment.

The Port is committed to working with the CARB through its Maritime Air Quality Working Group to identify opportunities to reduce port-related emissions, and continues to work with the CARB to implement the Voluntary Vessel Speed Reduction Program and conduct a vessel retrofit demonstration project. In addition, the Port of Long Beach has adopted an Air Quality Improvement Plan that targets all port-related emissions. We believe that by working together the Port and CARB can continue to identify and deal with these difficult-to-control sources.

Sincerely,

  
Robert Kanter, Ph.D.  
Director of Planning

TAJ:s

cc: Catherine Witherspoon, California Air Resources Board  
Wayne Nastri, Environmental Protection Agency  
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Zorik Pirveysian, South Coast Air Quality Management District  
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Marc MacDonald, Pacific Maritime Association  
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