



September 17, 2024

Assemblywoman Cottie Petrie-Norris, Chair
Petroleum and Gasoline Supply Committee
1020 N Street, Room 408A
Sacramento, California 95814

Re: ABX2-8 (Gipson) At Berth Regulation Delay - OPPOSED

Dear Chair Petrie-Norris,

The undersigned organizations must respectfully take an opposed position to Assembly Bill 8 (Gipson), which delays requirements under the state's At Berth Regulation for tanker vessels. These extensions are unnecessary and would undermine the emissions reduction benefits of the At Berth Rule for California's portside communities.

In California, ocean going vessels are the top source of cancer-causing diesel particulate matter at the Ports of Oakland, Long Beach, Los Angeles, and Richmond. The California Air Resources Board's (CARB) 2020 amendments to the At Berth Regulation include requirements for tanker vessels starting in 2025 at the ports of Los Angeles and Long Beach and 2027 for other ports in the state. The emissions reductions resulting from the rule are projected to **decrease potential cancer risk from ocean-going vessels by [55 percent](#) at the ports of Los Angeles, Long Beach, and Richmond**. CARB estimates that the rule will save 237 lives, yield \$2.31 billion in public health benefits, reduce NOx emissions by 17,500 tons and carbon dioxide equivalent (CO2e) emissions by 356,000 metric tons.

If adopted, AB 8 would delay tanker vessel requirements by two years for all regulated ports. This delay is unnecessary, as shore power is a CARB-approved emissions control technology that may be used by any regulated vessel or terminal to comply with the rule. According to CARB's [Interim Evaluation Report](#), shore power is already in use to control tanker vessel emissions at Pier T at the Port of Long Beach with no safety issues. We are also starting to see the development of zero-emission tankers: Asahi Tanker successfully built two [all-electric tankers](#) in 2023.

In addition, ports have received a significant amount of funding for shore power. For example, the [California State Transportation Agency Port and Freight Infrastructure grants](#) included \$383,346,997 for the Port of Long Beach, part of which will be used to design, build, and demonstrate shore power at the Tesoro LBT and T2 terminals to mitigate tanker emissions.

Moreover, the existing rule has flexibility if there are delays in implementing emissions control technologies.

In conclusion, we must respectfully oppose ABX2-8 which undermines the emissions reduction benefits of the At Berth Regulation by delaying requirements for tankers. Given that these vessels represent **[50 percent](#) of statewide at berth diesel PM2.5 emissions and 70% of visits to Richmond Port**, it is crucial for California's portside communities that CARB remain able to implement the At Berth Rule without delay.

Sincerely,

Teresa Bui
Climate Policy Director
Pacific Environment

Gracyna Mohabir
Clean Air & Energy Regulatory Advocate
California Environmental Voters

Christina Scaringe
California Climate Policy Director
Center for Biological Diversity

Robert M. Gould, MD
President
San Francisco Bay Physicians for Social Responsibility

William Barrett
Senior Director | Nationwide Advocacy,
Clean Air
American Lung Association

Fernando David Márquez Duarte
Policy Researcher
People's Collective for Environmental Justice

Suzanne Hume
Educational Director and Founder
Clean Earth 4 Kids

Michele Canales
Western States Policy Advocate
Union of Concerned Scientists

Luis Martinez
Campaigns Organizer
Fossil Free California

Caroline Bonfield
U.S. Policy Manager, Shipping Emissions
Ocean Conservancy

Peter M Warren
Spokesman
San Pedro & Peninsula Homeowners Coalition

Janet Gunter
Communications Administrator
San Pedro Peninsula Homeowners United, INC.

David Diaz
Executive Director
Active San Gabriel Valley

Bill Magavern
Policy Director
Coalition for Clean Air

Faraz Rizvi
Policy and Campaign Manager
Asian Pacific Environmental Network

Regina Hsu
Senior Attorney
Earthjustice

Eli Lipmen
Executive Director
Move LA

Bobbi Jo Chavarria
Acting Director
Sierra Club California

Laura Deehan
State Director
Environment California

John Kaltenstein
Deputy Director
Friends of the Earth

Joel Ervice
Associate Director
**Regional Asthma Management &
Prevention (RAMP)**

Ellie Cohen
Chief Executive Officer
The Climate Center

Katelyn Roedner Sutter
California State Director
Environmental Defense Fund

Victoria Rome
California Government Affairs Director
Natural Resources Defense Council

Janet S. Johnson
Co-Coordinator
Sunflower Alliance

Dan Ress
Senior Attorney
**Center on Race, Poverty & the
Environment**

Cc: Assemblymember Gipson
Members, Petroleum and Gasoline Supply Committee