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PMSA Highlights Necessary Changes to Clean Air Action Plan

LONG BEACH, CALIF. – In its official comment letter to the ports of Los Angeles and Long Beach, the Pacific Merchant Shipping Association (PMSA) requested the \$14-plus billion Clean Air Action Plan (CAAP) Update focus on commercially available technology supported by national or state emissions standards, coupled with clearly defined mechanisms of implementation that are financially feasible and economically competitive.

PMSA rejects the CAAP recommendations that rely on speculative technology and arbitrary dates without accommodation for the economic realities confronting the ports' tenants and customers, who are all vital to maintaining a strong economy in Southern California.

"The CAAP, as drafted, seeks to transform the technology on the waterfront while ensuring basic operations do not evolve to meet changing demands," said John McLaurin, president of the Pacific Merchant Shipping Association. "It claims to be both fuel and technology neutral but clearly favors one technology and one fuel to the exclusion of others."

"The maritime industry is evolving and will look radically different in a decade. We encourage port staff to update the CAAP to reflect this reality," added McLaurin. "If the ports are going to require tenants and customers to spend tens of billions of dollars on new technology, they must provide greater certainty as to the economic and competitive impacts of their plan."

PMSA's official comments focus on eight aspects of the CAAP:

Competitiveness

The San Pedro Bay complex has experienced no growth (in total volumes) and negative growth (in market share) during the past decade – something no other major gateway has experienced. Give the CAAP's estimated \$14 billion price tag, PMSA asks that the CAAP be analyzed for its impact on competitiveness, develop a competitiveness goal and integrate the goal within the CAAP to boost the competitiveness of this gateway.

Goals of the Clean Air Action Plan

PMSA asks that port officials align the CAAP's measures with the ports' stated goals and not place undue and unnecessary burdens on the maritime industry that only delay and significantly increase the costs of the needed emission reductions.

Cargo-Handling Equipment

PMSA asks that the CAAP include a pathway for both ultra-low emission technologies and electrification options for achieving significant emissions reductions in a cost-effective manner.

Universal Port Truck Appointment System and Mandatory Truck Turn Times

As we have learned from recent experiences, improving efficiency in a single element often comes at a cost of efficiency in other parts of the system. PMSA strongly requests that efficiency measures be removed from the CAAP and that the CAAP affirmatively recommend that these measures be further addressed under the Supply Chain Optimization forum.

Expanded Shore Power

PMSA requests that the San Pedro Bay ports participate in the development of an amended at-berth regulation that takes into account emission reduction, competitive and economic needs of the maritime industry, and that avoids cargo diversion.

Vessel Speed Reduction Program

The draft CAAP proposes to eliminate the financial incentive associated with slowing down within 20 nautical miles (nm) of the ports and focusing on incentivizing speed reduction for the full 40 nm. PMSA is concerned that eliminating the 20 nm incentive will not increase compliance for the 40 nm distance, and would instead recommend maintaining both sets of vehicle speed reduction incentives.

Clean Ship Program

The CAAP proposes to collect higher fees on Tier 0 and Tier 1 vessels calling at San Pedro Bay. PMSA believes this would likely result in no real changes in emissions but higher costs for customers in the short-term. PMSA requests that because the CAAP does not demonstrate that such fees would not reduce competitiveness and would actually result in modified behavior and achieve the intended greenhouse gas emissions reductions goals of the CAAP, that this proposal be eliminated.

The Harbor Commissions for Los Angeles and Long Beach are expected to vote on the CAAP in November.

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[Link to the PMSA comment letter](#)