



MARINE EXCHANGE OF THE SAN FRANCISCO BAY REGION

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March 23, 2026

The Honorable Lauren Sanchez
Chair, California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Subject: Integrating Maritime Risk Assessment into California Clean Air Rulemaking

Dear Chair Sanchez,

California leads the nation in maritime clean air policy. The San Francisco Harbor Safety Committee (HSC) supports the State's zero-emission goals and believes California can advance environmental progress and human safety together while setting an international standard.

The HSC identifies maritime risk before accidents occur. Maritime operators, labor, engineers, port authorities, regulators, and the U.S. Coast Guard work together through the committee. This structure gives CARB a ready forum to test proposed rules against real-world maritime operations before they reach the fleet.

California can achieve zero-emission maritime operations without putting lives at risk if safety and operability shape clean air rules from the beginning. The HSC recommends a practical step: integrate maritime risk assessment into clean air rulemaking before agencies finalize regulations.

Clean air rules reshape vessel design, shipboard systems, shoreside infrastructure, and daily operations. When agencies develop regulations without early maritime input, they introduce avoidable risk and complicate implementation. Working with the HSC allows CARB to identify hazards, test feasibility, and design risk controls early.

Testimony before the National Transportation Safety Board after the collapse of the Francis Scott Key Bridge involving the MV Dali reinforced this point. The NTSB warned that emissions-driven system changes can create operational hazards when agencies do not evaluate safety alongside environmental compliance.

Recent accidents involving emissions-capture barges in Southern California highlight a familiar concern: new technology can introduce operational risk when agencies move forward without a full safety review. California has seen this before. Regulators required exhaust control systems on tugboats, ferries, and other harbor craft before fully evaluating vessel stability and fire risk.

After CARB imposed diesel particulate filter requirements, a U.S. Coast Guard District Commander raised safety concerns in a formal letter to CARB, including fire hazards and feasibility challenges. Safety reviews followed implementation rather than guiding design and development.



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The HSC recommends a direct approach:

- Use the HSC as a standing risk-assessment forum during clean air rule development.
- Engage maritime operators and labor before agencies finalize requirements.
- Evaluate scenarios to identify hazards created by new equipment and procedures.
- Build training and risk controls into policy from the start.
- Verify safety and emissions outcomes after deployment.

HSC does not seek delays. We reject cost or inconvenience as reasons to slow environmental progress. California must not trade human safety for clean air gains. The public deserves both.

California can demonstrate that strong clean air regulations protect communities and the mariners who keep the transportation system functioning every day. The HSC stands ready to support CARB with operational expertise, structured risk assessment, and a shared commitment to safe and sustainable progress.

Sincerely,

Scott Humphrey

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