

From: [Garfinkle, Allen@BOPC](mailto:Garfinkle.Allen@BOPC)
To: [Wong, Alethea@BOPC](mailto:Wong,Alethea@BOPC); [McNeill, Mari@BOPC](mailto:McNeill,Mari@BOPC); [Shepherd, Greg@BOPC](mailto:Shepherd,Greg@BOPC)
Subject: FW: SFBP CARB Extension
Date: Thursday, December 19, 2024 3:16:02 PM
Attachments: [FAB24-148 - SF Bar Pilots E3.pdf](#)

For the January Board meeting ED correspondence report.

Allen Garfinkle
Executive Director

Board of Pilot Commissioners for the Bays of San Francisco, San Pablo, and Suisun
660 Davis Street, San Francisco, California 94111

[REDACTED]
Phone: 415-397-2253

Fax: 415-397-9463

From: Anne McIntyre [REDACTED]
Sent: Thursday, December 19, 2024 2:35 PM
To: Garfinkle, Allen@BOPC [REDACTED]; Millspaugh, Matthew@BOPC
[REDACTED]; Tynan, Karen [REDACTED]; Casey,
Christine@CalSTA [REDACTED]
Subject: SFBP CARB Extension

EXTERNAL EMAIL. Links/attachments may not be safe.

Hi Everyone,

We rec'd notification today that the extension is approved – document attached.

Happy Holidays!

Anne

December 19, 2024

Anne McIntyre
San Francisco Bar Pilots
9 Embarcadero, #119a
San Francisco, California 94111

Dear Ms. McIntyre,

This letter is in response to the application San Francisco Bar Pilots submitted to the California Air Resources Board (CARB) on May 24, 2024, requesting Extension E3 under the Commercial Harbor Craft Regulation (CHC Regulation), as set forth in California Code of Regulations, title 17, section 93118.5. As provided in California Code of Regulations, title 17, subsection (e)(12)(E)3., CARB's Executive Officer (EO) may grant an applicant a single two-year compliance extension, which is renewable, to the compliance date set forth in subsection (e)(12) if the applicant demonstrates compliance with the criteria set forth in subsection (e)(12)(E)3.b.

The application submitted for this extension request is based on the criteria of subsection (e)(12)(E)3.b., which requires the applicant to demonstrate that there are no suitable engines or CARB-verified Level 3 diesel particulate filters (DPFs) that can physically fit within the existing vessel structure, and that no modifications can be made to the vessel structure without compromising its structural integrity or stability, in order to meet the requirements of subsection (e)(12). Additionally, the applicant must demonstrate that removing the vessel from service and replacing it with a newly acquired vessel equipped with compliant engines by the compliance deadline is financially infeasible.

The application submitted by San Francisco Bar Pilots included a study to evaluate the technical feasibility of repowering (replacing) the engines on their three station vessels, including addition of a DPF retrofit once CARB-verified Level 3 marine DPFs are available, indicating that no modifications are feasible to repower and retrofit the vessels. The application also included three years of tax documents and supporting financial information submitted to CARB for financial analysis.

CARB staff have reviewed San Francisco Bar Pilots' request, and the EO has determined that the request meets the criteria in California Code of Regulations, title 17, section 93118.5(e)(12)(E)3. CARB is therefore approving San Francisco Bar Pilots' request for a two-year compliance extension for engines onboard San Francisco Bar Pilots' vessels *P/V California* with Unique Vessel Identifier (UVI) CARB02061, *P/V San Francisco* with UVI CARB02060, and *P/V Drake* with UVI CARB02214. The engines receiving the two-year extensions are listed in Table 1 on the following page.

Table 1: Engines on Pilot Vessels Included in San Francisco Bar Pilots’ E3 Extension Request

Vessel Name	Engine ID	Engine Model Year	Rated Brake-Horsepower	Approved / Denied	Current Compliance Date	Extended Compliance Date
P/V California	Main1	2000	1100	Approved	12/31/2024	12/31/2026
P/V California	Main2	2000	1100	Approved	12/31/2024	12/31/2026
P/V California	Aux1	2000	125	Approved	12/31/2024	12/31/2026
P/V California	Aux2	2000	125	Approved	12/31/2024	12/31/2026
P/V San Francisco	Main1	2000	1100	Approved	12/31/2024	12/31/2026
P/V San Francisco	Main2	2000	1100	Approved	12/31/2024	12/31/2026
P/V San Francisco	Aux1	2000	125	Approved	12/31/2024	12/31/2026
P/V San Francisco	Aux2	2000	125	Approved	12/31/2024	12/31/2026
P/V Drake	Main1	2008	1100	Approved	12/31/2025	12/31/2027
P/V Drake	Main2	2008	1100	Approved	12/31/2025	12/31/2027
P/V Drake	Aux1	2008	125	Approved	12/31/2025	12/31/2027
P/V Drake	Aux2	2008	125	Approved	12/31/2025	12/31/2027

CARB's contractor, the American Bureau of Shipping (ABS), performed a third-party evaluation of the technical feasibility study submitted by the San Francisco Bar Pilots.

ABS determined, and CARB staff agrees with ABS, that it is technically infeasible to repower and retrofit the existing vessels, as no suitable, currently available, Tier 4 engines or compatible DPFs can physically fit into the existing vessel structure.

CARB staff conducted a financial analysis to evaluate the conclusion submitted by the San Francisco Bar Pilots that replacing the three pilot vessels by their compliance dates is financially infeasible. CARB staff used an economic modeling program provided by the U.S. Environmental Protection Agency known as ABEL. This publicly available model uses data from various financial information including three years of tax documents. ABEL then provides an economic analysis and the probability of a company's ability to purchase compliant equipment (if used in the context of regulation implementation).

The ABEL model performs tests to determine a company's cash flow, debt capacity, and other economic indicators. CARB staff's analysis of the financial documents provided by the San Francisco Bar Pilots combined with data from ABEL shows insufficient cash flow to afford the purchase of three compliant vessels by the compliance deadlines referenced in Table 1.

Please note that compliance extensions are not transferable to a subsequent owner upon the sale of an engine or vessel. The applicant may apply for additional two-year extensions no later than 9 months and no earlier than 12 months before the expiration of the prior extension.

For more information about CARB's CHC Regulation, please visit [CARB's CHC Website](#). If you have any questions, please contact the Commercial Harbor Craft team at harborcraft@arb.ca.gov.

Sincerely,

A large black rectangular redaction box covering the signature of Bonnie Soriano.

Bonnie Soriano, Chief, Freight Activity Branch, Transportation and Toxics Division

cc: Tracy Haynes, Staff Air Pollution Specialist, Freight Activity Branch

Babak Pazokifard, Manager, Freight Technology Section

Zhenlei Wang, Air Resources Engineer, Freight Technology Section

Troy Weber, Air Pollution Specialist, Freight Technology Section