

December 6, 2022

California State Lands Commission  
100 Howe Avenue, Suite 100 South  
Sacramento CA 95825

*Submitted electronically via [cslc.commissionmeetings@slc.ca.gov](mailto:cslc.commissionmeetings@slc.ca.gov)*

**Subject: PMSA Comments - 2023 Biennial Report on the California Marine Invasive Species Program. December 9, 2022, Item 68.**

The Pacific Merchant Shipping Association (PMSA) appreciates the opportunity to comment on the California State Lands Commission (SLC) 2023 Biennial Report on the California Marine Invasive Species Program (MISP) (Report). PMSA is an independent, not-for-profit association focused on global trade and represents owners and operators of U.S. and foreign-flagged commercial vessels operating at U.S. West Coast ports. These vessels are regulated by MISP regulations and pay the vessel fee which funds MISP activities.

Firstly, PMSA has greatly appreciated the collaborative relationship we have long held with SLC staff on invasive species, including ballast water and biofouling. As with the previous biennial reports, the 2023 Report is comprehensive and includes valuable data. The continued increase in compliance by members is significant, including 99.7 percent of compliant ballast water discharges and a 94 percent compliant rate for reporting requirements, up by 6 percent. The scientific methodology SLC applies to its MISP efforts is also appreciated.

The 25 percent vessel inspection requirement for all vessels arriving at California ports, as specified in the Marine Invasive Species Act (MISA), proves difficult to achieve, as SLC staff report a 23 percent inspection rate, recognizing that some vessel calls are impractical. As compliance is continuing to rise and already at a high rate, and many low priority vessels are inspected, it is recommended that SLC implement a prioritization inspection program and amend the MISA legislation text, as has been previously suggested by PMSA. Staff resources would be better devoted to targeted deployment to high-priority vessels. The combined risk assessment model (CRAM) pilot is applauded, and staff are encouraged to formally implement it as a program, pending further demonstration.

Further, PMSA supports staff recommendation number 2, an amendment to MISA regarding the current biennial reports to be updated on a triennial basis, especially as quarterly vessel data updates are now made public. Stakeholders may seek more micro level details from time

to time, such as vessel type specific details, but as long as data can be secured through staff, a triennial report should suffice.

PMSA looks forward to continuing to engage and work collaboratively with SLC, including on the future efforts to amend the MISA enforcement process. Should there be any issues, please do not hesitate to contact PMSA.

Respectfully,

A handwritten signature in cursive script that reads "Jacqueline M. Moore". The signature is written in black ink on a light-colored background.

Jacqueline M. Moore  
Vice President