



San Diego County Air Pollution Control District

November 15, 2021

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*City of San Diego Representative
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Mr. Richard Corey
Executive Officer
California Air Resources Board
P.O. Box 2815, Sacramento CA 95812
Via web portal: <https://www.arb.ca.gov/>

Re: Commercial Harbor Craft Regulation Changes - Support

Dear Mr. Corey,

This letter is to express the San Diego County Air Pollution Control District's (District) support for the adoption of the proposed changes to the Commercial Harbor Craft (CHC) regulation. California Air Resources Board (CARB) staff estimates that the proposed amendments will achieve an 89% reduction in NOx emissions and a 52% reduction in PM2.5 emissions from CHC vessels statewide at full implementation. These emission reductions would result in health benefits for individuals in San Diego County by reducing the incidence of premature death, hospital admissions, and emergency room visits. The proposed amendments will also result in reduced greenhouse gas emissions compared to the current regulation.

The CHC regulation is a key piece of the District's strategy to achieve clean air for all, especially in the Portside Environmental Justice Community. The Portside Community has an exposure risk to diesel particulate matter (DPM) greater than 95 percent of census tracts statewide, according to CalEnviroScreen 3.0, and four of the census tracts in the community are in the 99th percentile for DPM. The recently approved Portside Community Emissions Reduction Plan (CERP) identifies CHC as one of the main contributors of DPM emissions in the community, at 53% of off-road mobile source emissions. The CHC regulation would support the CERP's actions and goals to reduce DPM emissions in this environmental justice community.

Over the past twelve years, the District has provided over \$14 million in incentive funding to repower more than 190 marine engines to achieve early emission reductions ahead of existing regulatory requirements through its implementation of existing incentive programs such as Carl Moyer and the Community Air Protection Program. However, given the timelines and requirements of these proposed amendments, these incentive opportunities

will be very limited in the future, and as such, the financial costs of compliance with this regulation will likely fall to the CHC owners. While it will be difficult for the District to provide substantial assistance to local harbor craft owners or facility owners through the existing incentive programs, the District plans to continue to work with vessel owners to provide incentives for early or extra emission reductions where feasible.

Finally, the District and CARB are currently developing a Memorandum of Understanding (MOU) to provide the District with authority to enforce the CHC regulations. This initiative aligns with the strategies established under the Portside CERP as the CHC regulation is designed to reduce DPM and nitrogen oxide emissions generated from CHC. The proposed MOU can increase compliance rates by expanding the District's presence in the field and promoting local outreach efforts.

The District supports the adoption of the proposed changes to the CHC regulation and looks forward to working in cooperation with CARB to further reduce emissions in the San Diego region.

Sincerely,

Paula Forbis, Interim Air Pollution Control Officer
San Diego County Air Pollution Control District

