



November 15, 2021

Chair Randolph and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically

RE: 21-12-6: Proposed Amendments to the Commercial Harbor Craft Regulation

Chair Randolph and members of the Air Resources Board,

The undersigned submit these comments regarding agenda item 21-12-6: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft Regulation. Due to the cumulative and disproportionate impacts on already overburdened communities living near the Port of Stockton (POS) in San Joaquin County and port communities across California, we urge the California Air Resources Board (CARB) to strengthen the Commercial Harbor Craft rule and expedite the transition to zero emissions for all commercial harbor crafts. Tugboats, also known as towing vessels, are currently the most common vessel type at the Port of Stockton, and are one of the largest emitting categories of commercial harbor craft for fine particulate matter (PM 2.5).¹ It is essential to improve health and quality of life for portside communities that CARB require all harbor crafts, including tugboats, to be zero emissions as expeditiously as possible.

The Port of Stockton is the 4th largest port in California, and is located in census tract 6077000801. According to CalEnviroScreen 4.0, the POS ranks in the 99th percentile for pollution burden, with surrounding census tracts falling between 96th to 100th percentiles. Diesel pollution from sources related to the POS, numerous stationary sources, as well as major transportation corridors such as Interstate 5 and Highway 4 significantly impact surrounding neighborhoods. Idling ships along with the associated railroads, trucking facilities, warehouses and other freight and goods movement infrastructure concentrate deadly diesel particle pollution in these neighborhoods. Chronic exposure is associated with decreased lung function, exacerbated asthma impacts, and increased cancer risks due to the different substances contained within diesel emissions².

¹ California Air Resources Board (CARB). 2021. "CHC Fact Sheet: Tugboats (Towing Vessels)" <https://ww2.arb.ca.gov/resources/fact-sheets/chc-fact-sheet-tugboats-towing-vessels>

² CARB. 2021. "Overview: Diesel Exhaust and Health". <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>

CARB staff has stated that concentrations of diesel particle pollution can reach communities up to an estimated 50-mile radius inland.³ With the proposed expansion of the Port of Stockton, community health impacts will likely worsen from the additional emissions from commercial harbor crafts and other sources. CARB expressed concern regarding the POS expansion and “the Project’s potential public health impacts, the lack of mitigation measures presented in the DEIR, the omission of statutory considerations that address the disproportionate impacts of air pollution on disadvantaged communities, and the absence of information related to public outreach.”⁴

Eliminating emissions from harbor crafts, especially tugboats, will benefit the health and quality of life of people living near the POS. As it stands, CARB’s current draft harbor craft rule misses the opportunity to fully embrace this technology transition and provide much-needed emissions reductions. CARB must maintain its commitment to disadvantaged communities like south Stockton to reduce cumulative impacts by expediting the transition to zero-emissions technologies for commercial harbor crafts. This step is critical for protecting the health of Valley residents living near the Port of Stockton, and for portside communities across the state.

Sincerely,

Dr. Catherine Garoupa White, Executive Director
Central Valley Air Quality Coalition

Matt Holmes, Environmental Justice Director
Little Manilla Rising

Mariah Looney, Campaign Coordinator
Restore the Delta

³ CARB. 2021. “Appendix G: Health Analysis: Proposed Amendments to the Commercial Harbor Craft Regulation”. Figures G-9 and G-10 pp. 44-45,
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/chc2021/appg.pdf>

⁴ CARB. CARB. 2020. “Comments on Draft Environmental Impact Report (DEIR) for the Lehigh Southwest Stockton Terminal Project (Project), State Clearinghouse No. 2019100510”.
https://files.ceqanet.opr.ca.gov/256569-3/attachment/eLYMhEkYqLrwbhEu0SGv05nq5wFyPfl_Gdj9FiyDJz8m8e6zlrbsQijLUViGdRJfCG3H7IaUqTu4jWpx0