

November 15, 2021

Liane M. Randolph, Chair California Air Resources Board 1001 I Street Sacramento, CA 95814

RE: Support for the Commercial Harbor Craft Regulation

Dear Chair Randolph:

We are writing in support of the California Air Resources Board's (CARB) proposed draft Commercial Harbor Craft (CHC) Regulation because it achieves much needed air pollution reductions and protections for our communities, especially for port communities, and encourage the CARB to set more ambitious standards. We urge the Board to prioritize the health of frontline communities by adopting a robust commercial harbor craft rule this year that will bring zeroemission harbor craft to California ports.

Eliminating diesel emissions must continue to be a priority for the Board. Our communities are still forced to breathe diesel particulate matter (diesel PM), even though the National Institute for Occupational Health and Safety first identified diesel PM as a potential carcinogen over 30 years ago, and CARB designated diesel PM as a toxic air contaminant over 20 years ago.

In areas surrounding the San Pedro Bay, Oakland and San Diego Ports, harbor craft constitute one of the top three sources of cancer risk because of diesel particulate matter exposure. The continued exposure to toxic diesel PM in our communities is unacceptable; the proposed regulation to reduce toxic diesel PM emissions from CHC is a good first step, but CARB must do more. While diesel must eventually be eliminated entirely, we understand that zero emission technology is not yet available for all of the vessel types. Although the proposed regulation does not achieve the full health protection we demand, it is a step in the right direction and we will be looking for CARB to do more as technology advances.

While we understand there are concerns regarding the economic impacts on various businesses throughout the State, those costs can be passed along to end users and are dwarfed by the monetized benefits the State will realize through implementation of the regulation. As noted in CARB's Standardized Regulatory Impacts Assessment, the avoided negative health outcomes are valued at over **\$5.25 billion, 2.5 times the conservative estimates of costs associated with the regulation.** It is also important to note the scale of the emission reductions the proposed regulation will



achieve, which, over the lifetime of the regulation, are the equivalent to driving approximately 246,000 class 8 diesel trucks from Los Angeles to Sacramento every day for an entire year.

CARB has an opportunity to shift the State's marine sector towards zero-emissions, in line with the global technological shift we are seeing. Electrification for marine vessels is now considered a proven technology. Just last week, we saw the first US hydrogen fuel cell-powered, electric-drive ferry launch right here in California at the San Francisco Bay and more soon to follow. As is evident from the rapid advancements in this technology, the proposed regulation provides the regulated community plenty of time to comply.

CARB must continue to push for maximum emission reductions that are technically and economically feasible. The health of our communities depends on it. We urge the Board to adopt and implement as robust a CHC regulation as soon as possible, and continue to track development of zero emission technologies for later regulatory updates.

Sincerely,

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PHILIP Y. TING Assemblymember, 19th District

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CRISTINA GARCIA Assemblymember, 58th District

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AL MURATSUCHI Assemblymember, 66th District

ISAAC BRYAN Assemblymember, 54th District

ASH KALRA Assemblymember, 27th District

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ROBERT A. WIECKOWSKI Senator, 10th District





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KEVIN MCCARTY Assemblymember, 7th District

RICHARD BLOOM Assemblymember, 51st District