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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



November 17, 2021

Chairperson Liane Randolph
California Air Resources Board
1001 I Street
Sacramento, CA

Re: Support for Proposed Amendments to the In-Use Commercial Harbor
Craft ATCM

Dear Chairperson Randolph:

Thank you for the opportunity to comment on the proposed amendments to the Airborne Toxic Control Measure for Commercial Harbor Craft. The proposed requirements build on the success of the existing control measure through upgrades to the cleanest diesel engines, requiring the use of renewable diesel, the installation of diesel particulate filters where feasible, the introduction of zero emission propulsion systems on ferries, and extending compliance requirements to all harbor craft. The new requirements will assist in lowering cancer risks and other health issues caused by exposure to diesel particulate matter in shoreline neighborhoods, will help the Bay Area reach and maintain the Federal and State ambient air quality standards, and continue moving us in the right direction for achieving needed greenhouse gas (GHG) reductions. The Bay Area is the home base and operating area for a third of the commercial harbor craft in California, as such we strongly support these amendments and Air District staff urges the Board to adopt them.

The Air District has been partnering over the past twenty years with owners of commercial harbor craft to install cleaner engines. This cooperative effort achieved significant reductions of criteria and toxic pollutants and brought many vessels into early compliance with the current regulation. Yet, as we learned during the development of the Community Emissions Reduction Plan for West Oakland, harbor craft continue to be a main source of toxic emissions. The proposed amendments, combined with funding for early compliance, will deliver critically needed pollution reduction.

We commend CARB staff for proposing that slow-speed, short-run ferry services transition to zero emission operations. This is a crucial step in transitioning harbor craft with frequent near-shore operations to zero emissions. Because the development of zero emission propulsion systems for harbor craft is developing rapidly, we urge CARB to direct staff to provide a technology update in 2023 and recommendations for future amendments to the In-Use Commercial Harbor Craft control measure.

The Air District is committed to supporting CARB's efforts by providing early compliance assistance, assisting the development of zero emission propulsion systems, and coordination with our AB 617 communities. We recommend that priority for engine upgrades be given to the fishing fleet, while support for zero emission propulsion systems focus on tugs and dredges. In addition, we encourage CARB to support efforts in the State budget process to provide incentive funding or other financial mechanisms to encourage early transition and support market development. The existing strong collaboration between CARB and local Air Districts is a proven means for efficiently deploying commercially available zero emission technologies; the growing partnerships between the AB 617 communities, CARB, and local Air Districts provides a means for ensuring equitable funding in areas where early compliance is critically needed. Maintaining and enhancing these partnerships should be a key part of any State financial assistance program for harbor craft.

In closing, I would like to again express my appreciation CARB staff's efforts to reduce impacts from commercial harbor craft. I look forward to our ongoing collaboration.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO

JPB:VE:GN

cc: Members, BAAQMD Board of Directors
Richard Corey, Executive Officer, CARB