



SAN PEDRO & PENINSULA HOMEOWNERS COALITION



March 24, 2022

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

RE: Comments on the Proposed Amendments to Commercial Harbor Craft Regulation

Dear Chair Randolph and Members of the Board,

On behalf of the undersigned organizations, we respectfully submit this comment in support of the California Air Resources Board’s proposed amendments to the Commercial Harbor Craft regulation (Harbor Craft Regulation). We strongly urge the Board to adopt the Harbor Craft Regulation, which will alleviate the health harms imposed on portside communities in California.

Harbor craft, which emit high levels of diesel particulate matter (DPM), nitrogen oxides (NOx), and other pollutants, are a growing source of air pollution in California. In March 2018, CARB staff proposed amending this rule in recognition of the increased health risks that harbor craft impose on portside communities.¹ By adopting this rule, CARB will reduce harmful cancer-causing emissions from harbor craft, which is set to become one of the largest contributors of near-source cancer risk around California ports.² The rule will also provide emission reductions of nitrogen oxides and fine particulate matter necessary to put the State on track to attain state and federal air quality standards.

¹ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Initial Statement of Reasons, II-2 [hereinafter ISOR].

² *Id.*, II-2, II-3.

I. The Rule Will Significantly Reduce Pollution and Provide Health Benefits to Impacted Communities.

CARB must adopt this rule to reduce the disproportionate pollution burdens borne by portside communities in California. Most harbor craft in California continue to operate on diesel engines and spew dangerous air pollution including DPM and NOx. Short- and long-term exposure to NOx increases the risk of developing respiratory and cardiovascular disease, cancer, and premature death.³ Long-term exposure to DPM increases the risk of lung cancer, chronic respiratory and cardiovascular diseases, decreased lung function in children, lung cancer, and premature death.⁴

Harbor craft imposes significant harms to port communities throughout California. For example, harbor craft are currently one of the top three contributors of diesel pollution around the San Pedro Bay Ports. Diesel pollution from harbor craft alone drastically increases the risk of cancer for communities living near the Ports of Los Angeles and Long Beach and even inland communities more than 50 miles from the coastline.⁵ Absent reductions from this rule, harbor craft will become the largest contributor of near-source cancer risk and the largest seaport emissions source at the San Pedro Bay Ports next year.⁶ Portside communities in Stockton, West Oakland, and San Diego also experience elevated health risks from harbor craft emissions and have identified pollution from harbor craft as an area of concern.⁷

The proposed rule will reduce cumulative statewide emissions from 2023 to 2038 by approximately 1,610 tons of fine particulate matter, 1,680 tons of diesel particulate matter, and 34,340 tons of nitrogen oxides.⁸ These emission reductions will provide significant health benefits to nearby communities and throughout the state. Statewide, the proposed rule will prevent 531 premature deaths, 236 asthma emergency room visits, and 161 hospitalizations for respiratory and cardiovascular illnesses.⁹ Much of these benefits will be realized in areas with high harbor craft activity, such as the South Coast and San Francisco Bay Area. In addition to alleviating the health harms in our communities, the rule will also provide emission reductions necessary for nonattainment areas, such as the South Coast Air Basin and San Joaquin Valley Air Basin, to meet federal and state air quality standards.

II. The Rule Provides Necessary Direction for a Zero-Emissions Transition

We appreciate that the proposed rule will result in significant, much-needed emission reductions. To achieve further reductions and ameliorate the health impacts associated with harbor craft pollution, this sector must move towards zero-emissions technology. Importantly, the Harbor Craft Regulation also represents a monumental first step in transitioning this source category to zero-emissions.

We applaud staff for setting zero-emission targets for short-run ferries and new excursion vessels in this rule. We appreciate that CARB will conduct biennial technology reviews beginning in 2024, and strongly support the inclusion of zero-emission technology requirements for all categories of commercial harbor craft as a contingency measure. We also appreciate the direction to evaluate the use of contingency measures to advance more zero-emissions harbor craft in places like the South Coast Air Basin and San

³ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Standardized Regulatory Impact Assessment, 16 [hereinafter SRIA].

⁴ ISOR, II-4; SRIA, 15.

⁵ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Appendix G: Health Analyses, G-61 [hereinafter App. G].

⁶ SRIA, 15.

⁷ ISOR, I-30; SRIA, 24.

⁸ ISOR, VI-4.

⁹ App. G, G-61.

Joaquin Valley, which have terrible air quality. Given the rapid technological developments in this sector, CARB should continually evaluate the state of technology and update its rules as needed to accelerate the transition to zero-emissions harbor craft.

The Harbor Craft Regulation is vital to protecting the health of Californians, particularly our portside communities. We urge CARB to adopt the proposed Harbor Craft Regulation, a critical public health measure that will reduce harmful pollution in overburdened port communities and help California achieve its air quality goals. Thank you for your consideration of these comments.

Sincerely,

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