

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

March 21, 2022

Re: CARB’s Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation (CARB 3/24/22 Board Meeting Agenda #22-5-1) – Letter of Support with a Request for Stronger Requirements

Dear Chair Randolph and Members of the Board:

Environmental Health Coalition and the undersigned members of the AB 617 Portside Steering Committee support the CHC Rule amendments (i.e., inclusion of additional CHC vessel categories to in-use requirements, more stringent low use requirements for harbor craft operating near disadvantaged communities, requirements for zero emission (ZE) for short run ferries and new excursion vessels). The Rule amendments will contribute important air quality and health benefits for San Diego communities most exposed to harbor craft emissions. We thank staff for their hard work on the Rule and for bringing it forward. However, additional amendments must be incorporated into the Rule to reduce stranded assets scenarios for CHC owners/operators and to more aggressively transition vessel categories to ZE to help to offset the public health crisis in the state’s most vulnerable communities.

The proposed Rule requires CHC owners to invest in new diesel engines that will become stranded assets, while failing to set forth a pathway to transition these vessels to ZE. In addition, CHC is a significant emission source in Portside Communities. According to estimates included in the final version of the Portside Community Emission Reduction Plan (CERP), CHC accounts for over half, 53%, of diesel particulate matter from off-road sources, and 47% of the NOx.¹ This translates into a large portion of health risk. CARB modeling done for the CERP determined that **84% of the weighted cancer risk from toxic air contaminants is from diesel PM.**² **Of that 84%, 78% is from Off Road Sources.**³ And, according to the Port of San Diego’s December 2021 draft Health Risk Assessment (HRA), diesel emissions from CHC represent about 28 percent of the cancer risk to the Portside community of Barrio Logan.⁴ CHC also generates large volumes of greenhouse gases. A 2016 Port of San Diego emissions inventory found that CHC is the **single largest source of greenhouse gas emissions** from Port related sources – larger than ocean going vessels within San Diego Bay.

Accordingly, we urge the Board to direct staff to include the following amendments to the Rule:

¹ <https://www.sdapcd.org/content/dam/sdapcd/documents/capp/cerp/Portside-Environmental-Justice-CERP-July-2021.pdf>, p.40.

² <https://www.sdapcd.org/content/dam/sdapcd/documents/capp/cerp/Portside-Environmental-Justice-CERP-July-2021.pdf>, p.55.

³ Ibid.

⁴ https://pantheonstorage.blob.core.windows.net/environment/20211202_MCAS_Health_Risk_Assessment_Summary_Report_Draft.pdf

- Set all ferries, tugboats, dredges, and barges on an electrification pathway right now and require full electrification by 2035. The Port of San Diego already has embarked on this transition, with a fully electric Crowley Marine tugboat due to arrive in San Diego by early 2023.
- Include a technology re-opener in rule language to revisit ZE options as the commercial market for these technologies matures.
- Establish greater incentives to transition diesel tugs to ZE with prioritized assistance to single tug owners and small tug fleets.

In conclusion, we urge CARB to make its CHC Rule as close as possible to requiring absolute zero emissions as soon as that is feasible. Californians, the nation, and the world are facing interrelated existential public health, racial justice, and climate crises. The technology to create ZE CHC is well on its way to achieving 100% zero-emissions by 2035, and it would be a mistake for CARB to endorse a continuation of diesel-powered vessels during the decade of urgent climate and clean air action.

Sincerely,

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Portside Steering Committee

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