

California Air Resources Board
1001 I Street,
Sacramento, California 95814
Via Electronic submittal

April 30, 2020

**Re: SUPPORT FOR PROPOSED CONTROL MEASURE FOR OCEAN-GOING
VESSELS AT BERTH**

Introduction

Environmental Health Coalition (EHC) is a 40-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

Support for New Requirements for Roll On Roll Off Ships

EHC strongly supports the California Air Resources Board's proposed Control Measure for Ocean-Going Vessels ("OGVs") At Berth ("At Berth Regulation"). We work in freight impacted communities including the west National City community, which is the residential neighborhood closest to the National City Marine Terminal.

West National City is an Environmental Justice community that ranks near the top of CalEnviroScreen overall and in the top 95% for diesel PM. It is one of the communities in the AB 617 Portside Environmental Justice Communities area. It is the poorest area of a poor city, with some 41% of families in poverty. National City has the highest age-adjusted rates of asthma emergency department visits of any city in the region, as well as the highest rates for children and seniors. National City also had the region's highest rate of death from pulmonary diseases in the most recent year, 2017.

West National City residents live adjacent to the National City Marine Terminal, which imports almost half a million vehicles each year. According to the Port of San Diego, one of every 10 imported cars on the road in the United States came in through National City. Audi, Bentley, Chrysler, Fiat, Ford, GM, Hino, Honda, Hyundai, Isuzu, Itochu, Lamborghini, Mitsubishi Fuso, Porsche, Toyota and Volkswagen are all processed through the National City Marine Terminal (NCMT) by Pasha Automotive Services, the terminal operator.¹ Car Carrier ships, or RoRos,

¹ <https://www.portofsandiego.org/maritime/terminals>

make up a large majority of the ships that visit this terminal.

The most recent Port of San Diego air emissions inventory² confirms the importance of reducing emissions from car carriers at berth in National City. That 2016 inventory broke out Ocean Going Vessel emissions by ship terminal, by ship type, and by mode. What it found was the following.

- Looking at San Diego ship terminals, the National City Marine terminal, where the car carriers dock, generates the most emissions of all pollutants including diesel PM, NOx, SOx, and GHG.
- Breaking out emissions by ship type, the car carriers or RoRos generate more Diesel PM, PM2.5, SO2, and NOx than container, bulk, general cargo, and cruise ships **combined**, and almost half the Greenhouse Gases.
- Looking at emissions by mode, hoteling generates more of the emissions from OGVs than any other mode.

Support for 15 Day Changes

The 15 day changes proposed by staff strengthen the rule, and EHC supports the changes. The new 2024 compliance schedule for RoRos will achieve the RoRo emission reductions a year earlier than previously proposed, which is particularly important for the neighborhoods downwind of the car import terminal in National City.

Support for Mitigation Fund in Port Impacted Communities

We support the establishment of a mitigation fund to be used in communities impacted by uncontrolled emissions. We request that the mitigation fund language be amended to require an annual report to the public on how the mitigation funds are being spent.

Support for Inclusion of Bulk Carriers in the Future

We also support continuing assessment of the feasibility of including bulk and general cargo carriers in future iterations of the rule. These ships comprise a significant portion of cargo ship calls to San Diego ports each year, and this number is projected to grow as the Tenth Avenue Terminal intensifies its use.

Conclusion

In sum, hoteling by car carriers at the National City Marine terminal is the single most important target for reducing emissions from ships in San Diego. The proposed new rule, which regulates RoRo ships at berth starting in 2025, is important for reducing ship emissions in National City.

² <https://pantheonstorage.blob.core.windows.net/environment/2016-Maritime-Air-Emissions-Inventory.pdf>

We urge adoption of the proposed control measure for vessels at berth. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Joy Williams". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Joy Williams
Research Director