



**Air Pollution Control District Governing Board**

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Consuelo Martinez

April 19, 2021

Maggie Weber  
Port of San Diego  
Maritime Clean Air Strategy  
3165 Pacific Highway  
San Diego, CA 92101

Re: Maritime Clean Air Strategy (MCAS) Discussion Draft Public Comments

Dear Ms. Weber,

The San Diego Air Pollution Control District would like to commend the Port of San Diego for the time and effort invested in the creation of the comprehensive Maritime Clean Air Strategy (MCAS). Further, APCD appreciates the Port's participation in the Community Air Protection Program (AB 617) and its collaboration with the Portside Community Steering Committee in the development of the Community Emissions Reduction Plan (CERP) and its mission to reduce pollution exposure in the Portside Communities.

Thank you for the opportunity to provide feedback on the Maritime Clean Air Strategy Discussion Draft. APCD staff has reviewed the report and enclosed you will find our comments for your consideration.

Once again, we appreciate your partnership in ensuring that we all work collectively to improve the air quality in the region.

Respectfully,

A handwritten signature in blue ink, appearing to read "R. Reider".

Robert Reider, Interim Air Pollution Control Officer  
San Diego County Air Pollution Control District

Cc: Domingo Vigil, APCD Deputy Director  
Kathy Keehan, APCD Supervising air Resource Specialist

## APCD COMMENTS ON MARITIME CLEAN AIR STRATEGY (MCAS)

- **The Port of San Diego (POSD) should consider the potential for utilizing or incentivizing the use of renewable diesel for commercial harbor craft and freight locomotives as a transitional emission reduction strategy prior to replacement with zero or near-zero emission equipment.**
  - The California Air Resources Board (CARB) is proposing to require that all commercial harbor craft switch to renewable diesel with upcoming regulation amendments. POSD could potentially make it available to vessels ahead of regulatory requirements.
  - The freight rail section of the MCAS primarily focuses on strategies to replace switcher locomotives operating in/around the POSD with different technologies but doesn't assess renewable diesel as a potential option to further reduce criteria and greenhouse gas GHG emissions as a transitional, low-cost emission reduction strategy prior to eventual replacement with zero or near-zero emission equipment.
  
- **POSD should consider providing more clarity for how the shipyards plan to reduce emissions in the future, both voluntarily and to comply with CARB/SDAPCD rules and regulations.**
  - The MCAS discusses what the shipyards have done to reduce emissions to date. However, more information may be necessary to describe what additional actions each shipyard is committing to doing in the future. Those commitments are currently limited to three measures that are well under way already as commitments made in Phase I of the CERP for AB617.
  - Additional information for how each shipyard is planning to comply with future (and possibly more stringent) CARB regulations could also be useful for inclusion, as it would give the surrounding communities a better sense for when cleaner and lower-emitting equipment might be purchased or required by regulation. Such information could also identify potential incentive funding opportunities in advance of regulatory requirements.
  
- **POSD should consider including elements of Santa Barbara's Vessel Speed Reduction (VSR) program into the VSR program at POSD for Ocean Going Vessels (OGV).**
  - The existing (and proposed future changes) to the VSR program at POSD encourage vessels to reduce speeds to 12 knots and additionally seek a higher compliance rate.
  - However, Santa Barbara's VSR program incentivizes OGV to reduce speeds to 10 knots. Substantial emission reductions occur the slower an OGV sails, and such a speed reduction could make speeds consistent around the state.

- **POSD should consider language to clarify the intent of “FND Goal 3 – Enter into a Memorandum of Understanding (MOU) with the San Diego Air Pollution Control District (SDAPCD) to administer CARB Funding to help fund ZE/NZE Trucks and/or Cargo Handling Equipment.” If the intent is to bring additional CARB funding to the region and partner with SDAPCD to administer additional projects, we encourage POSD to increase the target of TRK Objective 1B to more than 10% reduction in DPM and NOX emissions.**
- **POSD should consider identifying overall goals for the MCAS that tie with the overall goals of the CERP.**