



May 3, 2021

Chair Nora Vargas
San Diego County Air Pollution Control District
10124 Old Grove Road, San Diego, CA 92131
Via: APCDPublicComment@sdcounty.ca.gov
District1community@sdcounty.ca.gov

***Re: Request for Revision of APCD's 4/19/2021 Maritime Clean Air Strategy (MCAS)
Discussion Draft Public Comments***

Dear Chair Vargas:

We greatly appreciate your efforts with the AB 617 Community Emission Reduction Program (CERP), the Port of San Diego's MCAS and to advance environmental justice and air quality. EHC has reviewed APCD staff's 4/19/2021 comment letter on the MCAS that was submitted to the Port. EHC is urging that the 4/19/2021 APCD comment letter be retracted and revised to provide more consistency with the CERP goals. EHC also recommends that the letter be approved by the APCD Governing Board. Below are EHC's comments and requested revisions.

- **Harbor craft:** As noted in the APCD letter, the newest draft of the proposed harbor craft rule will require renewable diesel for diesel engines in commercial harbor craft, starting in 2023. However, the overall thrust of this rule and CARB effort in general is to transition harbor craft away from diesel. EHC recommends that the Port place a higher priority on making sure there is charging infrastructure that will work for the ferries and the electric tugboat(s). EHC requests that the APCD letter emphasize transition to Zero Emission Vehicles and development of the infrastructure.
- **Shipyards:** The CERP specifies important emission reduction rules for shipyard such as the Air Toxics, VOC and welding rules. These would be helpful to be included in the letter, particularly because this is the Port-related emission source that APCD is anticipating to regulate toxic air emissions more stringently in the future.
- **Vessel Speed Reduction (VSR):** EHC supports the recommendation to incentivize ships to reduce speeds to 10 knots rather than 12. Please provide additional information on how Santa Barbara's successful program helped to reduce speeds to 10 knots.
- **Trucks:** EHC appreciates that APCD is asking the Port to further reduce emissions; however, we believe that APCD should recommend that the Port prepare a comprehensive truck program with quantified goals and timelines that achieve 100% ZEV for short haul drayage trucks 5 years ahead of California state requirements, as referenced in the CERP.
- **CERP consistency:** EHC appreciates that the APCD letter recommends that the Port should consider identifying overall goals for the MCAS that tie with the overall goals of the CERP. However, this seems inconsistent with some of the other APCD comments above

(e.g., trucks, shipyards). EHC would urge that APCD comments be consistent with its “CERP consistency” comment.

Thank you for your time and consideration. Please contact Diane Takvorian/Executive Director at Diane@environmentalhealth.org or Danny Serrano/Campaign Director at dannys@environmentalhealth.org for any additional information.

Sincerely,



Diane Takvorian
Executive Director



Danny Serrano
Campaign Director



Air Pollution Control District Governing Board

Anne Marie Birkbeck-Garcia Enrique Medina
Marcus Bush Esther Sanchez
Sean Elo-Rivera Jack Shu
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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.**