



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