

Comment Letter #91



October 17, 2022

Chair Benoit and Members of the Board
Governing Board
South Coast Air Quality Management District ("SCAQMD")
Cob@aqmd.gov

Re: Revised Draft 2022 Air Quality Management Plan (Draft Plan)

Dear Chair Benoit and Members of the Board:

We would like to thank the **South Coast Air Quality Management District (SCAQMD)** for soliciting public comments on the Revised Draft 2022 Air Quality Management Plan (Draft Plan). We remain deeply concerned that the plan as drafted remains far too weak to address our present air pollution and climate crises.

Pacific Environment is a California headquartered non-governmental organization that has earned permanent consultative status at the International Maritime Organization (IMO), the United Nations entity that sets international shipping law. We are committed to working on shipping decarbonization in the Pacific Rim, with a focus on the San Pedro Bay Ports. Through our Ship It Zero corporate pressure campaign with Stand.Earth, we led support for the Ship It Zero resolutions in Los Angeles, Long Beach, and Minneapolis, calling on major importers to transition to 100% zero emission ships by 2030.

Thank you to staff for all the hard work they have done on this report. We urge SCAQMD to set a more aggressive target on eliminating climate and air pollution from marine vessels, and to identify specific actions that can rapidly phase out short-lived climate pollutants, which not only will help leverage and accelerate climate mitigation, but which also will have significant health benefits for local populations.

As was extremely clear from the recently released Intergovernmental Panel on Climate Change's (IPCC) [AR6 report](#), rapidly reducing short-lived climate pollutants is the only pathway to keep to 1.5°C of global warming by mid-century. Already, we are seeing the catastrophic impacts of climate change around the world. Summer 2021's historic heatwaves in the U.S. Pacific Northwest and British Columbia, causing over 800 deaths, were previously projected to occur less than once in 10,000 years.

This summer 2022, we saw historic flooding in Pakistan, submerging more than one third of the country underwater and killing over 1,700 people. These floods too were an extreme climate event, previously projected to occur less than once in a century. Here in Southern California, our

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region suffered one of the worst smog seasons in decades, and the South Coast Air Basin remains in extreme nonattainment with the federal Clean Air Act.

One of the main culprits contributing to climate change and poor air quality are fossil-fueled ships. Most ships currently burn heavy fuel oil, the cheapest, most dirty and deadly fossil fuel containing asthma and cancer-causing air pollutants, including nitrogen oxide, sulfur oxide, and particulate matter. As a result, port-adjacent neighborhoods, including West Long Beach, experience eight years shorter life expectancy than the Los Angeles County average.

The California Air Resources Board (CARB) conducted an [emissions analysis](#) that found that fossil fuel pollution from 2021 cargo ship congestion at San Pedro ports has caused:

- An increase in NOx emissions equivalent to **5.8 million passenger cars in South Coast**, and
- An increase in particulate matter (PM) emissions equivalent to ***100,000 big rig trucks (or “Class diesel trucks”) *per day***

Last year, the Port of Long Beach saw record shipping traffic and associated toxic pollution. CO2 increased by 87% from 2020, and diesel particulate matter went up by 77% from 2020¹. The Port of Los Angeles was even worse, with diesel particulate matter 143% more than 2020 and CO2 increased by 136%².

Given the urgent climate and health risks, we are urging SCAQMD to make the following revisions to the Draft Plan:

Set Strong Emissions target for Commercial Marine Ports in alignment with 1.5 degrees

We agree with SCAQMD’s statement that “the only viable pathway to achieve the required NOx reductions is through widespread adoption of zero-emission technologies across all stationary and mobile sources.”

We urge SCAQMD to set strong emission reductions targets for the Commercial Marine Ports and work with CARB in support of a zero-emissions-by-2040 standard for all vessel categories. In the interim, set clear mandate to allow only Tier 3 main engines visits to San Pedro ports by 2025. For more actions the SCAQMD can take now, we recently released a policy report that lists actions that ports and subnational governments can take to reduce emissions from ships: [Ports Playbook for Zero-Emission Shipping](#)

There is record funding available for ports to combat transition port infrastructure to zero emissions: in California, there’s \$1.2 billion for Port and Freight Infrastructure Program under CalSTA, of which 70% is dedicated to San Pedro Ports. At the federal level, there’s \$3 billion for EPA to reduce air pollution at ports under the Inflation Reduction Act. Funding is available to modernize berths for container ships and for shore power requirements and use it to clean up pollution from the ports.

Accelerate At-Berth Requirements for Tanker Vessels

¹ [Port of Long Beach 2021 Air Emissions Inventory Report](#)

² Port of Los Angeles [2021 Inventory of Air Emissions](#)

We urge SCAQMD to require an acceleration of the implementation of the tanker vessels at-berth shore-power requirements beyond what is required by CARB, to take effect in 2024, not the 2025 schedule, given the outside impact it presently has in Long Beach port. We are starting to see the development of zero emission tankers: Asahi Tanker announced that it would build [two of the world's first zero-emission electric propulsion tankers](#)³, that are expected to be completed consecutively from March 2022 to March 2023. As we wait for that market to mature, in the meantime, tankers should be forced to use shore-power by 2024 to achieve earlier health and environmental benefits.

Set Zero Emission standards for Commercial Harbor Craft by 2035

Harbor boats are **one of the top three cancer risks** for Californians living near the ports of Los Angeles and Long Beach. CARB adopted the nation's first standard on zero emission ferries this year but other harbor crafts can still remain on diesel engines.

SCAQMD should commit to zero emission harbor craft by 2035. CARB has proposed NOx and ROG emissions reductions for the relevant nonattainment areas in the relevant years, including SCAQMD. One way to achieve Nox and Rog emission reduction is to require commercial harbor craft in those areas be 100% zero emissions by 2035, in line with [California Executive Order N-79-20](#).

In the face of climate emergency, SCAQMD should not allow an entire new generation of harbor craft vessels to be designed for diesel power. New zero emission technologies are being developed every day:

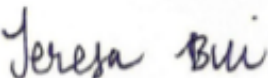
- [e1 Marine | News | World's First Methanol-Fuelled Towboat To Launch In 2023](#)
- [New battery hybrid tugboat design developed for U.S. market - Marine Log](#)
- [TECO 2030 Is Leading A Project Group That Will Build A Hydrogen-Powered High-Speed Vessel For The Port Of Narvik \(fuelcellworks.com\)](#)

Thank you for your consideration of these comments. Future generations will be grateful for your decisive climate action during the 2020's, the most decisive years of world climate history.



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Pacific Environment

³ [The World's First Zero-Emission Electric Tankers In Japan \(intelligentliving.co\)](#)



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