



Comments regarding 2026 CARB Roadmap to Reduce Air Toxics

Submitted by: Port of San Diego Ship Repair Association (PSDSRA)

Dear California Air Resources Board Members and Staff,

On behalf of the Port of San Diego Ship Repair Association (PSDSRA) and its Environmental Health & Safety (EHS) Subcommittee, we respectfully submit the following public comments on CARB's Draft 2026 Roadmap to Reduce Air Toxics.

Our members represent critical national-security shipbuilding, repair, maintenance, and industrial support operations that directly sustain the U.S. Navy's Pacific Fleet readiness and the regional economy. As CARB evaluates future air toxics policies, it is essential that regulatory frameworks 1) properly characterize and contextualize public health risks from vital industrial sectors such as ship repair, 2) apply neutral, data-driven decisions with best available emissions data from stationary sources, and 3) that CARB's health risk modelling methodology incorporates real, measured health outcomes of communities across the State to either confirm or invalidate expected model outcomes.

Summary of Requested Actions

The Port of San Diego Ship Repair Association respectfully requests that CARB:

1. Remove the Draft Roadmap statement regarding shipyards and elevated airborne toxic metals exposure or provide additional context with support from updated, validated data apart from the source documentation referenced.
2. Incorporate strong feedback processes in risk modelling methodology updates to control unconscious biases and avoid potential mischaracterization of risk sources.
3. Recognize the experience and environmental stewardship of those in the ship repair industry and commit to formal engagement with our representatives prior to initiating any regulatory development affecting this sector.
4. Consider the ship repair industry's strategic impacts to San Diego's regional economy, critical support of national security, and feasibility of implementing future actions from new air toxics policy development.

Concern Regarding the Roadmap's Reference to Shipyards

The Roadmap includes one explicit reference to shipbuilding and shipyard operations within the section “Metal Processing” stating that San Diego Portside residents experience elevated airborne toxic metals from shipbuilding and shipyard operations and that the “Portside Community Emission Reduction Plan calls out the need to understand and address the elevated cancer risk in this community.”

For clarification, the 2021 Portside Community Emission Reduction Plan (CERP) does not recognize shipyards as disproportionate emitters of airborne toxic metals, nor are metals characterized as significant contributors to potential excess health risks within the community. The CERP specifically states, in reference to available monitoring data within the community, “...for the long-term non-cancerous risk, all three sites showed that the average concentrations of the metals are below their reference exposure level as determined by the CA Office of Environmental Health Hazard Assessment (OEHHA)...”

Similarly for cancer risk, CARB's 2023 Air Toxics Modeling and Risk Assessment for the Portside Community in San Diego, CA (assuming model emission year 2017) estimated that airborne toxic metals from all sources, including stationary facilities and the shipyards, accounted for less than 1 percent of the overall estimated cancer risk. Furthermore, the CARB assessment attributed more than half of the risk from metals to sources that originated outside of the Portside Community. While additional monitoring data is warranted to calibrate modeling assumptions from EMFAC and CEPAM, it is well established that diesel particulate matter and combustion-related volatile organic compounds are the predominant risk drivers in the Portside Community (factoring approximately 99% of the cumulative cancer risk).

In the absence of other supporting information, we are concerned that a misstatement such as this in the Draft Roadmap will introduce disproportionate weighting to shipyards in forthcoming changes to facility emissions inventories, cumulative risk assessments, and emerging toxic evaluations.

Risk of Unintended Targeting in Future Regulatory Phases

The Draft Roadmap proposes multiple program expansions that, without a robust feedback process linked to documented public health outcomes, could misattribute excess health risks to shipyards. Relevant Roadmap elements include:

- The rebuild of the statewide toxics inventory and expansion of required reporting (CTR/EICG),
- Development of cumulative exposure and cumulative risk assessment methodologies using conservative (health protective) assumptions at each step,

- Enhanced consideration of EJ community-identified concerns to guide CARB action and prioritization, and use of screening tools such as CalEnviroScreen, and,
- Expansion of metals-related air toxics controls and evaluations.

We strongly believe that public health outcomes should be CARB's primary metric for evaluating at-risk populations throughout the state and measuring progress in achieving environmental equity.

For example, in San Diego County, comprehensive datasets of age-adjusted emergency room visit and hospitalization rates for respiratory illnesses such as asthma, chronic obstructive pulmonary disease, and lung cancer from the County Health and Human Services statistic unit suggest counter intuitive trends on the most-impacted communities in the region.

From 2011 to 2024, the data suggest that regions without significant stationary source emissions such as Southeastern San Diego, Lemon Grove, and Lakeside have higher cumulative respiratory-related burdens than some AB617 recognized communities. We also note that these public health datasets account for toxic air contaminants not yet identified and facility emissions not yet recognized by APCD or CARB. Examples such as these demonstrate the risk of allowing public opinion to encourage overestimation of cumulative public health burdens from high-visibility operations, as communities in real need of additional resources may be missed.

Importance of Current, Accurate, Comprehensive Data and Early Engagement with the Ship Repair Industry

For decades, the ship repair industry has implemented advanced emissions controls, best-available technologies, and enforceable environmental management practices under the San Diego Air Pollution Control District and federal DoD/Navy contracts.

The shipyards and related facilities have mature environmental management systems, comprehensive emissions inventory processes, and extensive experience with industrial processes and their associated impacts to air quality.

As such, we encourage CARB to include PSDSRA and utilize our collective expertise and insights as part of cumulative risk evaluations of the Portside Community, sector-specific emission factor evaluations, and determination of new available control technologies.

Recognition of Shipyards as Critical Infrastructure

Because shipyards support essential defense operations, regulatory approaches must be balanced with operational and national-security constraints. We ask that CARB

incorporate “critical infrastructure operations” considerations when developing prioritization criteria within the Toxics Decision Framework or cumulative risk methodologies.

We appreciate CARB’s work to modernize air toxics protections and welcome the opportunity to participate constructively in the scientific and regulatory processes ahead. The ship repair industry is committed to environmental stewardship, continuous improvement, and transparent collaboration with regulators and community stakeholders.

Thank you for the opportunity to comment.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gordon Rutherford". The signature is fluid and cursive, with the first name "Gordon" written in a larger, more prominent script than the last name "Rutherford".

Gordon Rutherford
President
Port of San Diego Ship Repair Association