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South Coast
Air Quality Management District
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Office of the Executive Officer
909-396-2100

April 14, 2006

Clerk of the Board
California Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Re: Comments of South Coast Air Quality Management District Regarding California Air Resources Board's *Emission Reduction Plan for Ports and Goods Movement in California*

The South Coast Air Quality Management District ("SCAQMD") staff appreciates the opportunity to submit comments regarding the *Emission Reduction Plan for Ports and Goods Movement in California* (plan), released by the California Air Resources Board (ARB) for public review on March 21, 2006.

SCAQMD staff strongly supports CARB's efforts to develop a comprehensive plan to reduce the impacts from goods movement. Port operations and the related goods movement transportation system are the major source of diesel emissions and health risks from diesel particulate matter (DPM) in the South Coast Air Basin (Basin). The proposed emission reduction plan will, upon implementation, go a long way towards reducing these impacts. We commend the CARB staff on development of the plan and urge the CARB Board to expeditiously move forward with its implementation.

SCAQMD staff has the following comments on the plan for CARB consideration at the April 20 hearing:

- *Emission Reduction Goals.* The plan includes an interim goal to achieve 2001-level emissions by the year 2010. However, emissions under the base-case will decline by 2010 from 2001 levels without implementation of the plan. This is due to emission reduction strategies already adopted, notably those for on-road heavy duty trucks. The plan's goals should reflect implementation of all controls that can be feasibly implemented — not just those that have already been adopted. In this way the public will be able to compare actual progress under the plan against targets based on what can and must be done to clean our air. We therefore suggest that the goals for the plan be amended to conform to the projected emissions levels that will result from plan implementation.

In addition, in order to maintain pressure for reduction of emissions from all source categories, the board should direct staff to attempt to achieve 2001 level emissions by 2010 from each source category. Under the plan, emissions from all source categories except marine vessels would meet this goal. Emissions of sulfur oxides from marine vessels would also meet the 2001 baseline, and emissions of particulates will be close. Nitrogen oxides are a more difficult challenge, particularly emissions from vessel main engines. We urge the CARB board to direct staff to consider every option to expedite controlling those engines, including, a container fee or other mechanism to incentivize and fund controls. We note that there is real urgency (over and above the emissions impacts) to quickly require or incentivize installation of NOx controls on main engines due to the large number of oceangoing vessels currently on order for construction.

- *Health Risk Goals.* The plan should state a goal of achieving acceptable health risks in areas impacted by major facilities such as ports and railyards. The goals currently stated target emission or risk reductions and do not assure that acceptable health risks will be achieved in the vicinity of all such facilities.

- *Plan Implementation.* Approval of this plan must be followed by expeditious development of an implementation plan. SCAQMD staff recommends that a detailed implementation schedule and designation of implementing agencies be specified as soon as possible. The implementation plan should specify adoption of emission control measures by state, regional and local governments to the maximum extent of their authority in order to meet the clean air needs of this state.

- *Potential Need for Additional SIP Measures.* Based on preliminarily analysis of projected carrying capacities for ozone precursors, SCAQMD staff estimates that additional emission reductions may be needed to demonstrate attainment with the federal air quality standards for $PM_{2.5}$ and 8-hour ozone in the South Coast Air Basin. SCAQMD staff looks forward to working with CARB to develop additional needed controls to bridge any gap between the current plan and future SIP needs.

- *Comments on Specific Measures.*

  (1) *Main Engine Fuels.* CARB should seek to create a mandate for the use of fuel containing 0.2 percent sulfur or lower (rather than 0.5% stated in the plan as a potential control measure) in ocean-going vessel main engines, to be implemented as soon as possible. Reducing main engine fuel sulfur content is an extremely important measure from the standpoint of total particulates and sulfur oxides that can be controlled.

  (2) *Vessel Speed Reduction.* We support an expanded vessel speed reduction program that increases the distance in which speed reduction is required from 20 to 40 nautical miles from the ports. Nitrogen oxides emitted out to a radius of 40

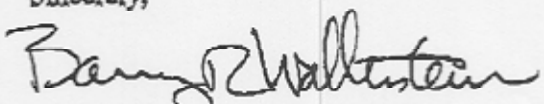
nautical miles from the ports (and beyond) impact the San Fernando Valley and most other portions of the South Coast Air Basin.

(3) *Lowest Emission Technologies / Fuels.* CARB should rely more on strategies to require trucks to use the cleanest commercially available engines, including those powered by alternative fuels (e.g., LNG).

In addition, regarding locomotives, the proposed plan relies on EPA to adopt Tier 3 standards. There is no assurance, however, that EPA will adopt such standards to the level of stringency needed by this state. We recognize that federal law limits state and local authority to adopt emission standards for locomotives, but we urge that the plan provide that state and local governments in California utilize all authorities and mechanisms at their disposal to control emissions from this important category.

Thank you again for the opportunity to provide these comments. We continue to offer our support for CARB's future efforts to implement the plan, and to refine and develop any additional strategies for the goods movement sector that will be necessary to achieve healthful air quality.

Sincerely,



Barry R. Wallerstein, D.Env.
Executive Officer, SCAQMD

Attachment