

**Comment 1 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association in California

Subject: Health Comments on Mobile Source Strategy

Comment:

Please see the attached letter from health and medical organizations in re: Mobile Source Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-2020moblesourcestrat-UztVNlw8UW5VJ1A4.pdf'

Original File Name: Health Group comment on MSS 9.30.21.pdf

Date and Time Comment Was Submitted: 2021-09-30 14:38:21

No Duplicates.

## **Comment 2 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Ellen

Last Name: Kennedy

Email Address: ellen.morrison.kennedy@gmail.com

Affiliation:

Subject: California Needs a Ramping Up EV Requirement for Rental Cars

Comment:

California is a pacesetter for low and zero emission transportation nationwide with the highest number of privately registered electric vehicles (EVs) in the country. Recognizing the serious impact that gas-powered transportation has on air quality and climate change, the state has mandated that as of 2035 all new cars and passenger trucks sold must be zero emission. Still, there is no policy to spur rental car fleets to go electric in the next fifteen years. Why is this important? Because "rental car companies are the largest purchasers of cars and trucks in the United States," so there is significant potential to influence future buyer behavior. After all, customers who rent a car "are 55% more likely to purchase a new vehicle within six months of their rental." Thus, California needs to mandate a minimum percentage, ramping up over time, for electric vehicles in rental car fleets to help introduce more used EVs into the market, encourage EV adoption, and clean up the air we breathe.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-2020moblesourcestrat-WjFWNQdoBThWNVQw.docx'

Original File Name: Kennedy\_Ellen\_policy\_memo.docx

Date and Time Comment Was Submitted: 2021-10-08 14:05:00

No Duplicates.

### **Comment 3 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Laki  
Last Name: Tisopulos  
Email Address: laki@vcapcd.org  
Affiliation: Ventura County APCD

Subject: Comments on the 2020 Mobile Source Strategy  
Comment:

October 18, 2021

California Air Resources Board  
Liane M. Randolph, Chair  
1001 I Street  
Sacramento, CA 95814

Electronically submitted at  
[https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=2020moblesourcestrat&comm\\_period=N](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=2020moblesourcestrat&comm_period=N)

SUBJECT: Comments on the 2020 Mobile Source Strategy

Dear Chair Randolph:

Thank you for the opportunity to review and comment on the California Air Resources Board (CARB) 2020 Mobile Source Strategy. As the governmental local air agency responsible for regulating air emissions in Ventura County, we wish to submit the following comments.

Ventura County is classified as a serious nonattainment area for the 2015 National Ambient Air Quality Standard (NAAQS) for Ozone and as a nonattainment area for the California Ambient Air Quality Standard for Ozone. In order to attain the state and federal standards and realize the public health benefits those standards provide, reductions in emissions of the ozone precursors reactive organic compounds (ROC) and nitrogen oxides (NOx) are required. While the Ventura County Air Pollution Control District (VCAPCD) is responsible for regulation of stationary sources of air pollution in its jurisdiction, VCAPCD relies on our partners at CARB and the United States Environmental Protection Agency to regulate and reduce emissions of ozone precursors from mobile sources.

As a coastal community, a large portion of the emissions of NOx from mobile sources is attributed to ocean-going vessels (OGV) that transit the nearshore waters off the Ventura County coastline, including those OGV visiting the Port of Hueneme. VCAPCD has no authority to regulate OGV emissions. However, the 2020 Mobile Source Strategy under consideration by CARB does consider OGV emissions and CARB has demonstrated authority to regulate emissions from OGV in the California coastal waters by adopting the regulation "Fuel Sulfur and Other Operational Requirements for

Ocean-Going Vessels within California Waters and 24 Nautical Miles of the California Baseline" on July 24, 2008.

CARB is currently reviewing and revising the OGV emissions inventory and VCAPCD supports that effort to improve the understanding of OGV emissions off the California coast. This will help VCAPCD understand the impact of OGV emissions on its air quality and the importance of reducing emissions from this source.

VCAPCD requests CARB consider additional actions to reduce emissions from OGV. VCAPCD was encouraged by CARB's adoption of a Control Measure for Ocean-Going Vessels At Berth that expands the regulation to include additional vessel types and visits, as well as additional ports and terminals. However, more must be done.

Many OGV, especially container ships and those carrying mobile equipment such as cars, trucks and off-road equipment (roll-on, roll-off or RoRo vessels), travel at speeds in excess of 15 knots through the Santa Barbara Channel and in the western approach to the San Pedro Bay ports of Long Beach and Los Angeles. Prevailing winds carry NOx emissions from OGV onshore in Ventura County as well as other coastal communities including Los Angeles and Orange Counties, which are classified as an extreme nonattainment area for the 2015 ozone NAAQS.

VCAPCD is a founding member of the Protecting Blue Whales and Blue Skies (PBWBS) partnership providing incentives to ships to reduce speeds while traveling in the near-shore areas in Southern California and the San Francisco Bay area. Reducing ship speeds to 10 knots or less greatly reduces emissions due to the reduced power needed to overcome drag. While this incentive program has been very successful at reducing OGV speeds and emissions, the incentive program does not have reliable funding and is therefore not a reliable source of future emissions reductions.

The PBWBS program has demonstrated that OGV owners and operators will slow down for modest incentives and ozone precursor emissions from transiting OGV can be reduced in a cost-effective manner. Data from the PBWBS program indicate container and RoRo vessels traveled a total of 304,572 nautical miles (nm) in the PBWBS Southern California vessel speed reduction (VSR) zone during the program period from May 15, 2020 through November 15, 2020. OGV participating in the PBWBS program traveled 151,267 nm at reduced speeds in the VSR zone, resulting in reductions of 3.37 tons of NOx per day. If all container and RoRo vessels reduced speeds to 10 knots or less in the VSR zone, estimated NOx reductions would be approximately 6.5 tons of NOx per day. If all other OGV, such as bulk carriers and tankers, also reduced speeds NOx emissions would be reduced even more.

VCAPCD considers the implementation of OGV speed restrictions in California coastal waters a reasonably available control measure (RACM) as described in the federal Clean Air Act (CAA). According to the CAA, a potential control measure is considered "reasonably available" and must be implemented if it would advance attainment by at least one year, either alone or in combination with other reasonably available control measures. For the 2008 ozone NAAQS, NOx reductions of two tons per day were considered sufficient to advance attainment by one year. For the 2015 ozone NAAQS, the incremental NOx reduction needed to advance attainment in Ventura County by one year has not yet been determined. However, based on the data collected during PBWBS incentive program, NOx emission

reductions from OGV of 6.5 tons per day will likely be sufficient to advance attainment in Ventura County by at least one year.

While the cost-effectiveness of OGV speed restrictions is yet to be determined, please note that the cost-effectiveness of the PBWBS incentive program in 2020 was approximately \$500 per ton of NO<sub>x</sub> reduced.

VCAPCD recommends CARB consider a speed limit of 10 knots for OGV as a RACM for Ventura County. Speed restrictions are technically and economically feasible as demonstrated by the PBWBS incentive program. Photochemical modeling will undoubtedly show the resulting reduction in NO<sub>x</sub> emissions will advance attainment of the 2015 ozone NAAQS in Ventura County by at least one year. Staff believes that CARB has the authority as demonstrated by the successful implementation of the OGV Fuel Regulation. As RACM, such a control measure must be implemented per the federal CAA. It is also clear that reducing the speed of OGV is the only realistic method of obtaining near-term emissions reductions from this source category.

I appreciate your consideration of these comments. Our agency is available to help CARB staff evaluate the proposed measures. If you have any questions, you may reach me at 805-303-4005.

Sincerely,

DR. LAKI TISOPULOS, P.E.  
Air Pollution Control Officer

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-2020moblesourcestrat-VyFQNViyV3RRNAhs.pdf>'

Original File Name: VCAPCD Comment on CARB 2020 Mobile Source Strategy signed.pdf

Date and Time Comment Was Submitted: 2021-10-13 13:02:19

No Duplicates.

**Comment 4 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: truck retirement proposal from 13 groups

Comment:

see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-2020moblesourcestrat-USUCdgB0U2NSPwhX.pdf'

Original File Name: truck retirement proposal from 13 groups 9.8.21.pdf

Date and Time Comment Was Submitted: 2021-10-13 16:07:14

No Duplicates.

**Comment 5 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Jennifer

Last Name: Tendick

Email Address: jennifer@calcog.org

Affiliation: CALCOG

Subject: CALCOG Comments on Mobile Source Strategy

Comment:

Thank you to the California Air Resources Board for hearing this item and accepting our attached comments. We appreciate the continued work of staff and partnership.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-2020moblesourcestrat-zQ9JQXaxESgGXN8k.pdf>'

Original File Name: CALCOG\_MSS\_Comments\_Oct2021\_signed.pdf

Date and Time Comment Was Submitted: 2021-10-15 17:09:31

No Duplicates.

**Comment 6 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Tim

Last Name: Pohle

Email Address: tpohle@airlines.org

Affiliation: Airlines for America

Subject: A4A Comments on CARB Draft 2020 Mobile Source Strategy Dated 09-28-2021

Comment:

Attached please find A4A's Comments on CARB Draft 2020 Mobile Source Strategy (Dated 09-28-2021)

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-2020moblesourcestrat-BmBSPQRrU2FQOgVa.pdf'

Original File Name: FINAL A4A Comments on CARB Draft 2020 Mobile Source Strategy Dated 09-28-2021-filed-10-18-2021.pdf

Date and Time Comment Was Submitted: 2021-10-18 14:03:25

No Duplicates.



**Comment 7 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Molly

Last Name: Pearson

Email Address: pearsonm@sbcapcd.org

Affiliation: Santa Barbara County Air Poll Cont Dist

Subject: SBCAPCD Comments on the 2020 Mobile Source Strategy

Comment:

Attached please find Santa Barbara County Air Pollution Control District's comments on the Proposed 2020 Mobile Source Strategy.

Thank you for your consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-2020moblesourcestrat-qw9GRmN77bVKwwm4.pdf'

Original File Name: SBCAPCD-ltr-to-CARB-2020-Mobile-Source-Strategy.pdf

Date and Time Comment Was Submitted: 2021-10-18 15:35:17

No Duplicates.

**Comment 8 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Nicole

Last Name: Cheng

Email Address: nicole@climateplanca.org

Affiliation: Policy Assistant, ClimatePlan

Subject: Comments on Proposed Mobile Source Strategy for CARB Board

Comment:

Hello:

Please see the attached letter from ClimatePlan and the undersigned organizations.

Thank you for the opportunity to comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-2020moblesourcestrat-WjlRO1I6VWsAZwh8.pdf'

Original File Name: ClimatePlan network\_Mobile Source Strategy .pdf

Date and Time Comment Was Submitted: 2021-10-18 15:28:17

No Duplicates.

**Comment 9 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Mark

Last Name: Nechodom

Email Address: mnechodom@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA Comments on Proposed 2020 Mobile Source Strategy

Comment:

CARB,

Please see our attached comment letter on the Proposed 2020 Mobile Source Strategy. Thank you for the opportunity to comment.

MN

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-2020moblesourcestrat-VyABdFcmADIFXAJh.pdf'

Original File Name: WSPA CARB MSS Comments FINAL 20211018b.pdf

Date and Time Comment Was Submitted: 2021-10-18 16:48:24

No Duplicates.

**Comment 10 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Sasan

Last Name: Saadat

Email Address: ssaadat@earthjustice.org

Affiliation: Earthjustice

Subject: Environmental and Climate Justice Org Comments on Mobile Source Strategy  
Comment:

Please find attached comments on the MSS signed by Earthjustice, East Yards Communities for Environmental Justice, People's Collective for Environmental Justice, Center for Community Action and Environmental Justice, the Los Angeles County Electric Truck and Bus Coalition, and Sierra Club California.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-2020moblesourcestrat-VjAAb1U6WWtXPQhX.pdf'

Original File Name: Final MSS Comments 10-18-21.pdf

Date and Time Comment Was Submitted: 2021-10-18 17:39:08

No Duplicates.

**Comment 11 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: David  
Last Name: Roland-Holst  
Email Address: dwrh@berkeley.edu  
Affiliation: UC Berkeley

Subject: Mobile Source Strategy  
Comment:

Please accept the attached public comment for consideration.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-2020moblesourcestrat-UzBVMgNwVmcLIFMx.pdf'

Original File Name: CARB-BEAR\_Comment on 21-11-2- Public Meeting to Consider the 2020 Mobile Source Strategy.pdf

Date and Time Comment Was Submitted: 2021-10-18 17:40:38

No Duplicates.

**Comment 12 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Janet

Last Name: Whittick

Email Address: janetw@cceb.org

Affiliation: CCEEB

Subject: CCEEB Comments on the 2020 MSS

Comment:

Please find comments from the California Council for Environmental and Economic Balance on the 2020 Mobile Source Strategy. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-2020moblesourcestrat-U2FcalluUzEAKFRI.pdf'

Original File Name: 2021.10.18 MSS final.pdf

Date and Time Comment Was Submitted: 2021-10-18 17:47:12

No Duplicates.

## **Comment 13 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Sophiana

Last Name: Leto

Email Address: sophiana@cariboubiofuels.com

Affiliation: Caribou Biofuels, Inc.

Subject: Industry Perspective on 2020 Mobile Source Strategy

Comment:

Hello, I'm submitting this comment on behalf of Caribou Biofuels, Inc., a clean energy startup based in Modesto, CA, with hopes of sharing one example of industry perspective on the 2020 Mobile Source Strategy. We hope the State of California and CARB will prioritize the Low Carbon Fuel Standard (LCFS) for in-state biomass to biofuel conversion, not only to decarbonize mobile sources but to more fully recognize California's wildfire risk management and green economic stimulus needs. While historically California's LCFS program has included projects worldwide, it is time to prioritize state initiatives -- those that are happening in CA, generating revenue and jobs for CA, and benefitting CA. Caribou Biofuels is one example of such an initiative; we are developing an innovative gasifier technology that converts waste and biomass into clean biofuels, biopower, and biochar (sequestered carbon that is effective as a soil amendment, for water treatment, etc.). Gasification has an unfairly poor reputation due to past issues with this type of technology. We hope that the 2020 Mobile Source Strategy and other state/CARB initiatives will take a fresh look at gasification -- taking into account the immense advances made -- and consider this technology a supported pathway for carbon sequestration and waste to energy. Currently, our technology is being funded by Cal Fire and we are looking forward to demonstrating our innovative process in CA's forests next summer. Additionally, with the pressing issue of wildfires ravaging the state, we hope to see an expedited approval process and/or multiplier incentive for LCFS projects that involve woody biomass. If you have any questions or would like to discuss these comments further, our team is eager to engage with the state/CARB. Thank you for your consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-10-18 18:08:03

No Duplicates.

**Comment 14 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: Vazken  
Last Name: Kassakhian  
Email Address: Vazken.Kassakhian@sce.com  
Affiliation: SCE

Subject: SCE Comments on 2020 MSS  
Comment:

Please find attached Southern California Edison's comments on the 2020 CARB Mobile Source Strategy. Thank you for the opportunity to provide comments.  
Vazken Kassakhian  
Senior Advisor  
Regulatory Affairs

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-2020moblesourcestrat-UiEFYAZiWFQEYQlm.pdf'

Original File Name: SCE Comments 2020 MSS 10182021.pdf

Date and Time Comment Was Submitted: 2021-10-18 18:13:58

No Duplicates.



**Comment 15 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: J

Last Name: Jordan

Email Address: Non-web submitted comment

Affiliation:

Subject: Emailed Comments from LCJA

Comment:

Please see attached email and comment that were submitted.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-2020moblesourcestrat-Uj8FcANxU19VIAIh.zip'

Original File Name: MSS\_Shared notes\_ltr 10.19.21 LCJA.zip

Date and Time Comment Was Submitted: 2021-10-18 20:28:22

No Duplicates.

**Comment 16 for 2020 Mobile Source Strategy (2020moblesourcestrat) - Non-Reg.**

First Name: SoCalGas

Last Name: Company

Email Address: eloya@socalgas.com

Affiliation:

Subject: SoCalGas Comments on the 2020 Mobile Source Strategy

Comment:

Attached please find SoCalGas Comments on the 2020 Mobile Source Strategy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-2020moblesourcestrat-U7uofsH2QJ9kAGNb.pdf'

Original File Name: SoCalGas-Comments-on-Mobile-Source-Strategy.pdf

Date and Time Comment Was Submitted: 2021-10-18 21:56:20

No Duplicates.

**Comment 1 for 2020 Mobile Source Strategy (2020moblesourcestrat). (At Hearing)**

First Name: Wayne

Last Name: Nastri

Email Address: wnastri@aqmd.gov

Affiliation: South Coast AQMD

Subject: South Coast AQMD Comments on CARB Mobile Source Strategy

Comment:

Good morning,

We are pleased to provide the attached comments on the Mobile Source Strategy on behalf of Executive Officer Wayne Nastri.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-2020moblesourcestrat-BnUBZARkBCZROIM3.pdf>

Original File Name: SCAQMD CARB MSS comments 10-26-2021.pdf

Date and Time Comment Was Submitted: 2021-10-28 08:11:51

No Duplicates.

**Comment 2 for 2020 Mobile Source Strategy (2020moblesourcestrat). (At Hearing)**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation: LCJA

Subject: Supplemental MSS Comments

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-2020moblesourcestrat-VDISO1Y1WWMAalM2.pdf>

Original File Name: Mobile Source Strategy Supplemental Comments (PJ:LCJA).pdf

Date and Time Comment Was Submitted: 2021-10-28 09:19:04

No Duplicates.

**Comment 3 for 2020 Mobile Source Strategy (2020moblesourcestrat). (At Hearing)**

First Name: William

Last Name: Barrett

Email Address: william.barrett@lung.org

Affiliation: American Lung Association in California

Subject: Local Government Commission and American Lung Association comments on MSS  
Comment:

Please see the attached letter on behalf of the American Lung Association and Local Government Commission.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-2020moblesourcestrat-B2sFZFMxU18BZgZq.pdf>

Original File Name: LGC ALA Letter MSS.pdf

Date and Time Comment Was Submitted: 2021-10-28 09:20:01

No Duplicates.