



South Coast  
Air Quality Management District

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November 26, 2019

CARB Board Members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Proposed Control Measure for Ocean-Going Vessels At Berth

Dear Honorable Board Members:

Thank you for the opportunity to comment on CARB's Proposed Control Measure for Ocean-Going Vessels At Berth. South Coast AQMD staff appreciates CARB staff efforts in developing this proposal which would implement one of the key measures of CARB's 2016 SIP Strategy. I urge the CARB Board to adopt the proposed regulation without any delay and I would like to offer the following comments in support of the proposal.

As you know, South Coast Air Basin (Basin) is facing a daunting challenge to meet the upcoming deadlines for attaining federal ozone standards requiring significant NO<sub>x</sub> reductions. NO<sub>x</sub> emissions need to be reduced by 45% and 55% beyond all existing regulations by 2023 and 2031, respectively, to meet these standards. Aggressive regulations, advancements in technologies and innovative solutions as well as coordinated efforts among all stakeholders, at local, state and federal levels are needed to achieve these reductions. Ocean-Going Vessels (OGVs), combined with harbor craft, will be the largest source of NO<sub>x</sub> emissions in our Basin in 2023. Therefore, it is absolutely essential to maximize both early and long-term reductions from OGVs through both regulatory programs and incentive measures to help achieve our attainment deadlines.

The proposed At Berth Regulation would achieve much needed NO<sub>x</sub> reductions from OGVs at berth by requiring higher compliance rates for previously regulated vessels (i.e., container, cruise, reefers) and also expanding the requirements to two additional vessel types - tankers and roll-on roll-off (RORO) vessels. We fully support the January 2021 compliance date for container ships, cruise ships and reefers and inclusion of other vessel types. However, given the urgency to achieve significant NO<sub>x</sub> reductions by 2023, South Coast AQMD staff would like to offer the following suggestions for your consideration:

#### RORO Vessels

Under the proposed regulation, RORO vessels will be required to comply with the rule requirements by January 2025. RORO vessels accounted for 7% of all calls at the Ports of Los Angeles and Long Beach in 2018 and they will also be responsible for about 7% and 9% of at-berth NO<sub>x</sub> and DPM emissions in 2023, respectively. Since the operational power requirements of these vessels are similar to container vessels and currently approved control technologies can be utilized for this vessel type, we request that CARB consider accelerating the compliance date for ROROs at the Ports of Los Angeles and Long Beach to January 2023.

#### Technology Demonstration and Certification

In order to accelerate deployment of new or improved control technologies for tankers (with a 2027 compliance date for POLA/POLB) and to identify feasible technologies for other vessel types not subject to control requirements under the proposed regulation, expeditious development and demonstration of these technologies will be critical. Robust funding coupled with a streamlined certification process is key to the success of these demonstration projects. Given the significant contribution of OGV emissions, funding for demonstrating OGV technologies has been limited compared to other mobile sources (e.g., heavy-duty trucks). Therefore, we request that CARB allocate additional funding to identify, develop, demonstrate, and certify these technologies. We suggest a more coordinated effort among our agencies, U.S. EPA, technology providers and the ports for these projects and we are fully committed to support these efforts.

#### New Incentive Programs

While the proposed At Berth Regulation would achieve substantial emission reductions, there are still opportunities for additional reductions. Development of new and innovative OGV incentive programs will be critical for achieving near-term reductions through early compliance for regulated vessels and through voluntary actions by non-regulated vessels. The accelerated development and certification of new technologies will be the key in implementing these new incentive programs and achieving early reductions. We fully support these efforts and offer our assistance to CARB in this area.

Technology Assessment

Although the proposed regulation includes an interim evaluation of technologies for regulated vessel types, we recommend that CARB also consider conducting a technology assessment for other vessel types excluded from control requirements under the proposed regulation (e.g., bulk, general cargo vessels) by 2022 to better identify and evaluate cleaner technologies for these vessel types. Left unchecked, these vessels will represent a larger share of emissions in the future.

Again, South Coast AQMD staff strongly supports the adoption of the Proposed At Berth Regulation. Achieving reductions from OGVs will be essential in meeting the ozone attainment deadlines in the Basin. We are fully committed to continue to work collaboratively with CARB staff to develop and implement other innovative programs for reducing emissions from OGVs.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Natri", with a stylized flourish at the end.

Wayne Natri  
Executive Officer