



Ventura County
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Control District

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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=2020mobilesourcestrat&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 extreme nonattainment areas 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.

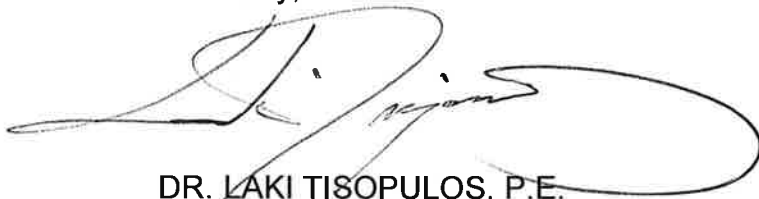
VCAPCD considers the implementation of OGV speed restrictions in California coastal waters a reasonably available control measure (RACM) as described in the federal Clean Air Act (CAA). According to the CAA, a potential control measure is considered "reasonably available" and must be implemented if it would advance attainment by at least one year, either alone or in combination with other reasonably available control measures. For the 2008 ozone NAAQS, NO_x reductions of two tons per day were considered sufficient to advance attainment by one year. For the 2015 ozone NAAQS, the incremental NO_x 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, NO_x 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_x 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_x 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 805-303-4016.

Sincerely,

A handwritten signature in black ink, appearing to read "Laki Tisopoulos", written over a large, stylized, looping flourish.

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

