

October 18, 2021

Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Comments on the Proposed 2020 Mobile Source Strategy

Dear Chair Randolph and Members of the Board,

Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board (CARB) Proposed 2020 Mobile Source Strategy. We would like to acknowledge the significant staff work that went into developing this strategy document, and we were pleased to participate in the review process.

Although significant progress has been made in Santa Barbara County towards attaining the state ozone standard, we were unfortunately redesignated, from attainment back to nonattainment, as part of the 2020 State Area Designation process. We are still very proud of the measures that have been implemented locally and statewide, and we are committed to work creatively and collaboratively to attain the state ozone standard in the future. CARB's actions related to mobile sources, as laid out in the 2020 Mobile Source Strategy, are key to successfully achieving that goal.

The District has rigorously followed the triennial air quality plan and update schedule to achieve and maintain the ozone standard by the earliest practicable date, as required by the California Clean Air Act. Right now, we are in the beginning phases of developing a 2022 Ozone Plan, which will serve as our roadmap to meet this goal. Similar to California's Mobile Source Strategy and State Implementation Plan (SIP) efforts, our 2022 Ozone Plan will evaluate the effectiveness of existing measures, assess whether additional measures are necessary, and will also include a discussion of mobile sources. Local rules have been adopted, implemented, and enforced to expeditiously attain the State ozone standard. While emissions from stationary sources make up 12% of the total ozone precursor emissions in Santa Barbara County, it is imperative that our local efforts are well supported by CARB's steadfast actions to reduce emissions from mobile sources that are outside of the District's regulatory control.

Importance of Near-Term Reductions

We appreciate the emission reduction potential that zero-emission equipment offers in the long-term; however, near-term measures are needed today to help regions reduce harmful air pollution and reach attainment of the health-based standards. Mobile sources (on-road and off-road) contribute to the majority of precursor emissions. The District continues to secure funding and implement grant and incentive programs that achieve voluntary emission reductions for sectors outside of our regulatory control. In addition to the State's efforts to promote zero-emission mobile source technologies and expand the needed infrastructure, it is important for CARB to continue to focus on near-term emission reductions focused on fleet turnover and cleaner emission standards for off-road equipment, harbor craft vessels, forklifts, and agricultural engines. While zero-emission technologies are the ultimate goal, a lot of the advancements for both on and off-road applications are still under-development, and not yet fully penetrating the market. During this time, it is also important to secure near-term emission

reduction strategies that will help regions reach the health-based air quality standards to protect public health.

Near-Term reductions: Ocean-Going Vessels

One very important point to highlight is the need for both near-term and long-term strategies related to Ocean-Going Vessels. Ocean-Going Vessels traveling in the waters offshore of California and visiting California's ports make up an increasingly large portion of California's ozone precursor emission inventory. Cleaner fuels have reduced particulate matter emissions from this source category, but these vessels are still equipped with some of the dirtiest engine technologies. Due to a slow turnover rate in this industry, cleaner vessel engines are not expected for a decade or more. Coastal air districts are under rigid timelines to reduce ozone precursor emissions to attain state and federal ozone standards. Long-term strategies for this sector, such as cleaner engines and zero-emission technologies, are discussed in Chapters 5 and 6 and summarized in Tables 11 and 14 of the 2020 Mobile Source Strategy. However, a successful near-term strategy has been overlooked.

The "Protecting Blue Whales and Blue Skies" program, a partnership between three California air districts and other federal, state, and nonprofit entities, has been achieving cost-effective emission reductions for several years now by incentivizing Ocean-Going Vessels to reduce their transit speed to 10 knots or less.¹ This strategy greatly reduces fuel usage and combustion pollutant emissions such as nitrogen oxides, particulate matter, and greenhouse gases. The air district partners in this program have highlighted the program's success with CARB staff at numerous meetings and workshops, including the 2020 Mobile Source Strategy workshops and with the South Coast Air Quality Management District's 2022 Air Quality Management Plan working group for Ocean-Going Vessels.

CARB's draft measures for the 2022 SIP strategy discusses the expansion of regional Vessel Speed Reduction (VSR) programs to all Regulated California Waters to provide near-term emission reductions. A statewide VSR program could provide both the necessary funding and coordination to help reduce the impacts from this growing industrial sector. There are thousands of vessel transits in the Santa Barbara Channel each year, and Ocean-Going Vessel emissions are predicted to make up an increasingly large portion of the District's ozone precursor emission inventory. Consistent with the SIP strategy, CARB's Mobile Source Strategy should include Vessel Speed Reduction so that we continue the success of the existing program and build on that success to achieve even more near-term reductions in ozone precursor emissions statewide.

Voluntary programs are critical to reducing emissions from mobile sources. However, they require significant funding and staff resources. We request your continued support to identify funding that will allow the District to successfully implement our voluntary mobile source programs, achieve our clean air goals, and protect the health of our communities.

Sincerely,



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Air Pollution Control Officer

cc: Richard Corey, CARB Executive Officer
Edie Chang, CARB Deputy Executive Officer

¹ www.bluewhalesblueskies.org/