

September 12, 2022

Clerks' Office - California Air Resources Board  
1001 I Street  
Sacramento, California 95814

[Electronically submitted at: <http://www.arb.ca.gov/lispub/comm/bclist.php>]

**Re: Comments on the Proposed 2022 State Strategy for the State Implementation Plan**

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 2022 State Strategy for the State Implementation Plan. 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 much progress has been made in Santa Barbara County towards attainment of the state ozone standard, we were unfortunately redesignated, from attainment back to nonattainment, as part of the 2020 State Area Designation process. We were recently notified by CARB staff that Santa Barbara County is being considered for nonattainment-transitional designation based on the last three years of data gathered. While we are proud to see our local air quality trending in the right direction, the toggle between nonattainment, non-attainment transitional, to attainment demonstrates the need for continued coordination with local and statewide efforts to work creatively and collaboratively in order to attain and maintain the state ozone standard in the future. CARB's actions related to the Proposed 2022 State Strategy for the State Implementation Plan 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. Since 1991, the District has adopted or amended more than 30 control measures aimed at reducing emissions from stationary sources of air pollution and to help Santa Barbara County reach attainment of the state ozone standards. Currently, we are in the process to develop and adopt a 2022 Ozone Plan, the tenth triennial update, 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 include a discussion of the various emission sources, evaluate the effectiveness of the existing control measures, and assess whether additional measures are necessary. Many local prohibitory rules have already been adopted, implemented, and enforced to expeditiously attain the State ozone standard. Since emissions from stationary sources only make up 14% of the total ozone precursor emissions in Santa Barbara County, it is critical that our local efforts are well supported by CARB's steadfast actions to reduce emissions from sources that are outside of the District's regulatory control, such as mobile and area sources.

**Near-Term reductions: On-Road and Off-Road Equipment**

We appreciate the emission reduction potential that zero-emission equipment offers in the long-term; however, near-term measures are also needed to help air districts meet regulatory timelines. In particular, we strongly support the continued implementation of programs that achieve accelerated emission reductions, along with the following zero-emission and cleaner combustion strategies:

- Introduction of cleaner Tier 5 diesel engines for off-road equipment in 2029;

- Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation to phase out Tier 0, Tier 1, and Tier 2 engines from 2024 to 2032;
- Amendments to the Commercial Harbor Craft Regulation to phase in Tier 4 engines with diesel particulate filters between 2023 to 2031;
- Transition of fuel-powered forklifts to zero-emission forklifts starting in 2026; and
- The existing requirement of all new small off-road equipment (SORE), primarily lawn and garden equipment, to be zero-emission by 2024.

**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 (OGVs) travelling to California’s ports. These vessels make up an increasingly large portion of California’s ozone precursor emission inventory and significantly impact coastal communities. Due to a slow turnover rate in this industry, OGVs continue to use older, dirtier engines instead of the newer Tier 3 engine technologies. Coastal air districts are under rigid timelines to reduce ozone precursor emissions to attain state and federal ozone standards, and we cannot wait for the natural attrition of these older engines. Even though there may be challenges in regulating the OGV source category due to the need for federal and international support, it is imperative to reduce the impacts from this growing industrial sector.

Locally, the District has been achieving emission reductions through the “Protecting Blue Whales and Blue Skies” program. This program is a partnership between three California air districts and other federal, state, and nonprofit entities, and it has been achieving cost-effective emission reductions for several years now by incentivizing OGVs to reduce their transit speed to 10 knots or less within the designated zones.<sup>1</sup> 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 proposed measures for the 2022 SIP strategy discusses the option of using either an incentive or regulatory measure to implement a Vessel Speed Reduction (VSR) program for Regulated California Waters. The District supports CARB’s measure to pursue a statewide VSR program 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.

**Additional Incentives for Mobile Sources**

The District also continues to implement grant and incentive programs that achieve voluntary emission reductions for on-road and offroad equipment. Voluntary programs are critical to help reduce emissions from mobile sources, especially in disadvantaged and low-income communities. However, these programs 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,



Aeron Arlin Genet  
Air Pollution Control Officer

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<sup>1</sup> [www.bluewhalesblueskies.org/](http://www.bluewhalesblueskies.org/)