SCAQMD Comment:

Ocean-going vessels (OGV) are expected to be the largest source of NOx emissions in the South Coast Air Basin in 2023, our ozone attainment deadline, despite existing CARB’s regulations and voluntary measures implemented by our local ports.  Also, there are no near-term projections for deployment of Tier 3 vessels to our region.  Therefore, emission reductions from existing vessels visiting our ports (particularly frequent callers) through retrofit technologies and strategies are critical for our attainment demonstration.  SCAQMD staff strongly supports further demonstration and development of OGV retrofit and control technologies, many of which were included in your draft technology assessment.  Although your assessment provides a comprehensive evaluation of the current state of the technologies, many of these retrofit technologies are yet to be fully optimized for commercial applications or adoption by vessel operators.  We see the need to go to the next step and conduct additional research and demonstration work to address some of the potential technical or operational issues (e.g., optimization, fuel penalty).  SCAQMD staff would welcome opportunities for collaboration and funding support from CARB and other stakeholders for such projects.  Once these technologies are further optimized and commercially become available, incentive programs could be implemented to encourage vessel operators to adopt these technologies and strategies as well as to bring the cleanest vessels to California ports, including the Ports of Los Angeles and Long Beach. These incentive programs, especially if offered through multiple U.S. and even foreign ports, would complement CARB’s existing regulations and ports’ current programs in achieving the much needed NOx reductions from this sector in the next few years.