

October 21, 2020

Ariel Fidely
California Air Resources
Board Air Quality Planning
and Science Division
1001 I Street
Sacramento, CA 95814

Submitted electronically to: MSS@arb.ca.gov

**SUBJECT: COMMENTS ON THE 2020 MOBILE SOURCE STRATEGY WORKSHOP
DISCUSSION DRAFT**

Dear Ms. Fidely,

The Port Long Beach (Port) appreciates the opportunity to submit comments on the Workshop Discussion Draft of the 2020 Mobile Source Strategy (MSS) dated September 30, 2020. The Port is committed to further reductions in mobile source emissions associated with goods movement. As such, we believe the 2020 Mobile Source Strategy is critical to the implementation of emission reduction measures Statewide and will help the Port achieve the emission reduction targets identified in the Port's 2017 Clean Air Action Plan Update.

The Port recognizes that CARB staff are under time pressure to complete the MSS by the end of the calendar year 2020 as mandated by State Bill 44. However, the ambitious scenarios outlined in the MSS do not include specific measures to achieve the aggressive fleet turnovers. Without clearly identified assumptions and associated implementation measures, it is difficult to consider how the scenarios could be achieved. Two, notable examples include:

- ***Ocean-Going Vessels:***
The MSS evaluates emission reductions resulting from a scenario where Tier 0, Tier I, and Tier II ocean-going vessels (OGVs) are replaced with Tier III vessels by 2031. The Port shares CARB's recognition that OGV emissions are substantial and significant measures are required to achieve the State's health risk goals. As CARB staff are aware, OGVs are a global fleet, with decades-long lifespans and extremely high cost of replacement. Since 2012 the Port has offered financial incentives to vessel operators that deploy Tier II and Tier III vessels to the Port. Despite these efforts, in 2019, the percentage of Tier III OGVs that called the Port was 0.4 percent. This example highlights the difficulty associated with affecting international vessel deployment decisions. Without plausible implementation measures, the OGV scenario in the MSS may not be achievable and may distract from other, more viable planning alternatives.
- ***Locomotives:***
Similar to OGVs, locomotives typically operate nation-wide, and have long useful lives and a high cost of replacement. The MSS analyzes a scenario wherein all Tier 0, Tier 1, and Tier 2 line-haul locomotives are phased out by 2031. The Port acknowledges

that the scenario's fleet transition would have a significant impact on locomotive emissions. However, without measures that will achieve the fleet turnover analyzed in the MSS it is not clear that the turnover can be achieved.

Because of the lack of detail the Port is concerned the Discussion Draft of the MSS is not an actionable planning tool. The Ports thank CARB staff for their active engagement to date regarding mobile source emissions and their consideration of the comments contained in this letter. Port staff members are available should CARB want to discuss the MSS and these comments.

Please feel free to contact Leela Rao at leela.rao@polb.com with any questions or concerns regarding this letter.

Sincerely,



Matthew Arms
Director of Environmental Affairs and Planning