



air pollution control district
SANTA BARBARA COUNTY

March 7, 2023

Angela Csondes
Manager, Marine Strategies Section - California Air Resources Board
1001 I Street
Sacramento, California 95814
[Electronically submitted to ShorePower@arb.ca.gov]

Re: Comments on the At Berth Regulation - Interim Evaluation Report

Dear Ms. Csondes,

Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to comment on the Interim Evaluation Report (Report) for the 2020 Control Measure for Ocean-Going Vessels At Berth (At Berth Regulation). Even though Santa Barbara County does not have a large port that has to comply with the At Berth Regulation, the Report touches on various topics and strategies to reduce emissions from Ocean-Going Vessels (OGVs), which affect air quality in our District.

OGVs make up an increasingly large portion of California's NOx emission inventory and significantly impacts all coastal communities. Emissions from OGVs make up approximately 66% of the NOx emission inventory in Santa Barbara County. To achieve attainment of the health-based ozone standards, it is critical that state and federal actions are taken to reduce emissions outside of the District's regulatory control. Although much progress has been made in Santa Barbara County toward reducing stationary source emissions and reducing the number of exceedances each year of the ozone standard, additional statewide coordination and collaboration is necessary to attain and maintain the ozone standards in the future.

Support for Future Measures to Reduce Emissions from Ocean-Going Vessels

Even though the At Berth Regulation provides substantial emission reduction benefits, the Report acknowledges that OGVs that transit, maneuver, and anchor in and around California's waters continue to impact the health of coastal communities. 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 older, Tier 0 through Tier 2 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 the growing marine shipping sector. CARB should continue to push for federal action to reduce emissions from OGVs, as outlined in the 2022 State Strategy for the State Implementation Plan (2022 SIP) and pursue additional state regulations to reduce NOx and PM emissions from OGVs. The District supports CARB staff's recommendation to explore additional emission-reduction measures from OGVs while in transit, maneuvering, and at anchor in California waters.

Statewide Vessel Speed Reduction (VSR) Program

Locally, the District has been achieving emission reductions from OGVs in transit through the *Protecting Blue Whales and Blue Skies* program. This program is currently a partnership between three California air districts (i.e., Santa Barbara County APCD, Ventura County APCD, and Bay Area AQMD) and other federal, state, and nonprofit entities, and it has been achieving cost-effective emission reductions by

incentivizing OGVs to reduce their transit speed to 10 knots or less within the designated zones.¹ Since the program's inception in 2014 through 2021, it has achieved 526,211 slow-speed miles, reducing more than 2,300 tons of NOx and 76,000 metric tons of greenhouse gas emissions, and it has the co-benefits of reducing the risk of fatal whale strikes and the level of ocean noise. 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 the 2022 SIP.

Recently, Assemblymembers Gregg Hart and Damon Connolly introduced California Assembly Bill 953 to task the Ocean Protection Council — in coordination with California air districts along the coast and in consultation with the federal Office of National Marine Sanctuaries, the U.S. EPA, the U.S. Navy, and CARB — to create a statewide voluntary vessel speed reduction and sustainable shipping program for the entire California coast. AB 953 would build upon the existing *Protecting Blue Whales and Blue Skies* program as well as any other existing local vessel speed reduction programs. The District recommends that CARB support this bill 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.

Control Technologies for Vessels At Anchor and Coordination on Pilot Projects

The District appreciates CARB's efforts to evaluate and provide status updates on the potential at anchor control technologies in the Report. Within the last decade, the City of Santa Barbara has seen increasing levels of cruise ship traffic and anchorages offshore. There are expected to be around 30 cruise ship visits occurring in 2023, with each stay lasting for approximately 10 hours. Since these cruise ships anchor at a location one mile offshore, it is difficult to control the emissions from the auxiliary engines that impact the nearby community. Similar to the mitigation options for the at berth sources that elect not to electrify during their stay, the District recommends that CARB develop mitigation options for the at anchor activities throughout the state to offset these emissions.

In addition, the District encourages CARB to coordinate and implement a pilot project that reduces emissions from cruise ships at anchor. Potential pilot projects could consist of a capture-and-control barge, providing electricity from a barge-based battery bank, or other innovative concepts that would reduce the emissions from the auxiliary engines. Additionally, pilot projects that implement operational changes, such as using electric tenders to transport passengers to shore from cruise ships, could also be considered to reduce near-shore emissions. The District acknowledges that cruise ships can be more difficult to control since they have a higher energy demand and fuel consumption compared to other OGV ship types at anchor, but their engines are a significant concern for the community. Hence, we would appreciate any support that CARB can provide to help mitigate the emissions and protect the health of our community.

Sincerely,



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Air Pollution Control Officer

¹ www.bluewhalesblueskies.org/