

January 29, 2009

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE, Room PL-401  
Washington, DC 20590-0001

**REGARDING:** Docket ID No. MARAD-2008-0096  
America's Marine Highway Program; Interim Final Rule

The Santa Barbara County Air Pollution Control District is pleased to submit the following comments on the Maritime Administration's (MARAD) Interim Final Rule on America's Marine Highway Program.

Santa Barbara County, California has 130 miles of coastline that are heavily traveled (about 19 transits per day in 2005) by ocean-going vessels mostly heading to or from the ports of Long Beach, Los Angeles and Hueneme. Given the location of the Santa Barbara Channel Islands, large ships are often traveling and emitting pollutants along the North and South bound shipping lanes just ten to fifteen miles off our coastline. A majority of these ships are foreign flagged, are powered by engines large enough to be considered power plants, burn the dirtiest fuel available, and are virtually unregulated in terms of their air pollution emissions.

According to the detailed emissions inventory developed for APCD's 2007 Clean Air Plan, large ships going through the Santa Barbara Channel currently produced close to one-half of the oxides of nitrogen (NO<sub>x</sub>) emissions in Santa Barbara County, which is more than all of the on-road NO<sub>x</sub> emissions from cars, trucks and buses combined (See Figure 1). Due to increasing cargo volumes, these emissions are projected to make up close to three-quarters of the NO<sub>x</sub> emissions in the County by 2020.

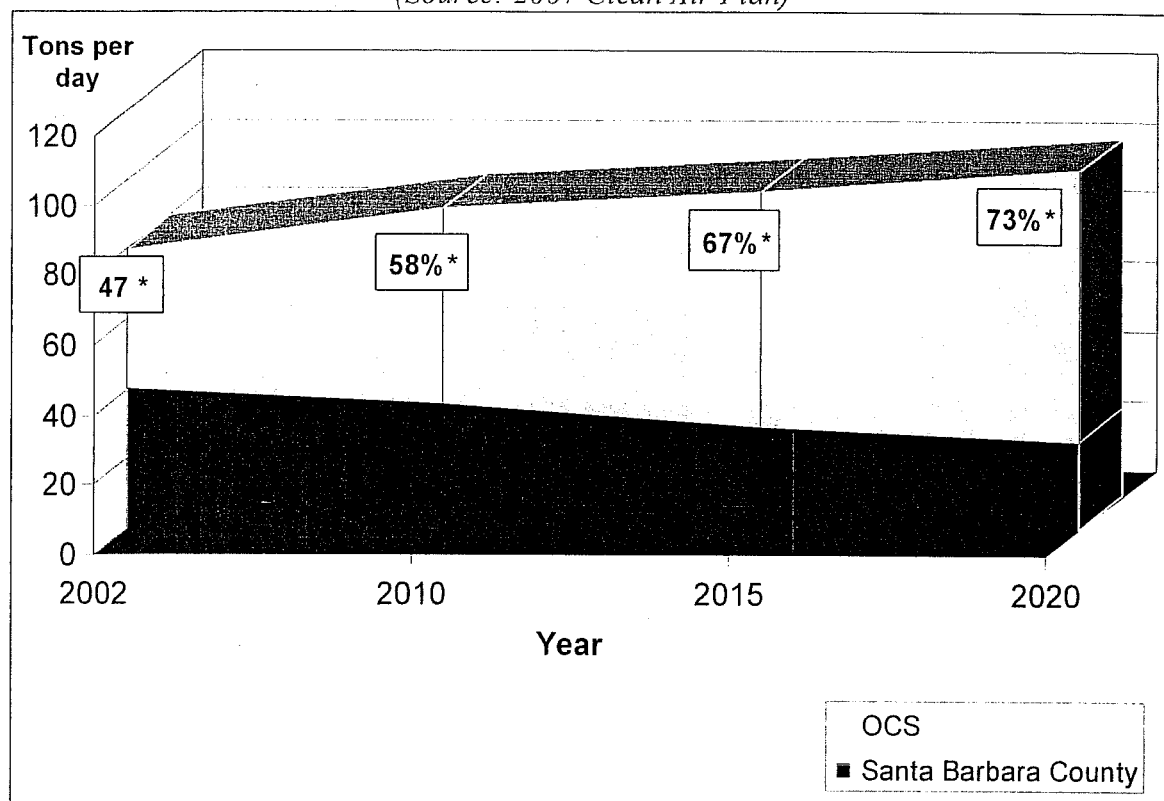
As a result of these alarming trends, the APCD has been very active in efforts to reduce marine shipping emissions. We have partnered with MARAD, USEPA, the California Air Resources Board and other local air districts in funding an effort to demonstrate the feasibility and cost-effectiveness of retrofitting an in-service ocean-going vessel with emission control equipment. We have urged the U.S. Senate Foreign Relations Committee to ratify MARPOL Annex VI, Regulation for Prevention of Pollution From Ships. We have filed Citizen Suits against EPA for its failure to adopt standards regulating air pollution from Category 3 marine vessels as required by Section 213 of the Clean Air Act and 40 CFR §98.4(a)(2)(ii).

Additional vessel traffic resulting from implementing the marine highway corridor concept can only exacerbate our air quality situation and interfere with our mandated duty to attain and maintain federal and state ambient air quality standards. We also believe the Environmental Assessment portion of the proposed notice of rulemaking is woefully inadequate and that a complete programmatic environmental impact statement for the proposed followed by corridor-specific EISs need to be prepared. These documents must also examine measures to mitigate the resulting additional air pollution.

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**Figure 1: Santa Barbara County and OCS NO<sub>x</sub> emissions forecast including marine vessels**  
*(Source: 2007 Clean Air Plan)*



\* Percentage of total NO<sub>x</sub> emissions from Other Mobile Sources – Foreign and US Ships-in transit.

In closing, while that Marine Highway Program has potentially positive economic benefits, it remains to be determined whether positive environmental benefits will also accrue as a result of its implementation. If you have any questions, please contact Ron Tan at 805-961-8812.

Sincerely,

Terry Dressler  
 Air Pollution Control Officer  
 Santa Barbara County Air Pollution Control District

cc: TEA Chron  
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