

November 18, 2005

Clerk of the Board
Air Resources Board
1001 I Street, 23rd Floor
Sacramento, California 95814

Subject: Rulemaking to consider the adoption of proposed regulations to reduce emissions from auxiliary diesel engines and diesel-electric engines operated on ocean-going vessels within California waters and 24 nautical miles of the California baseline.

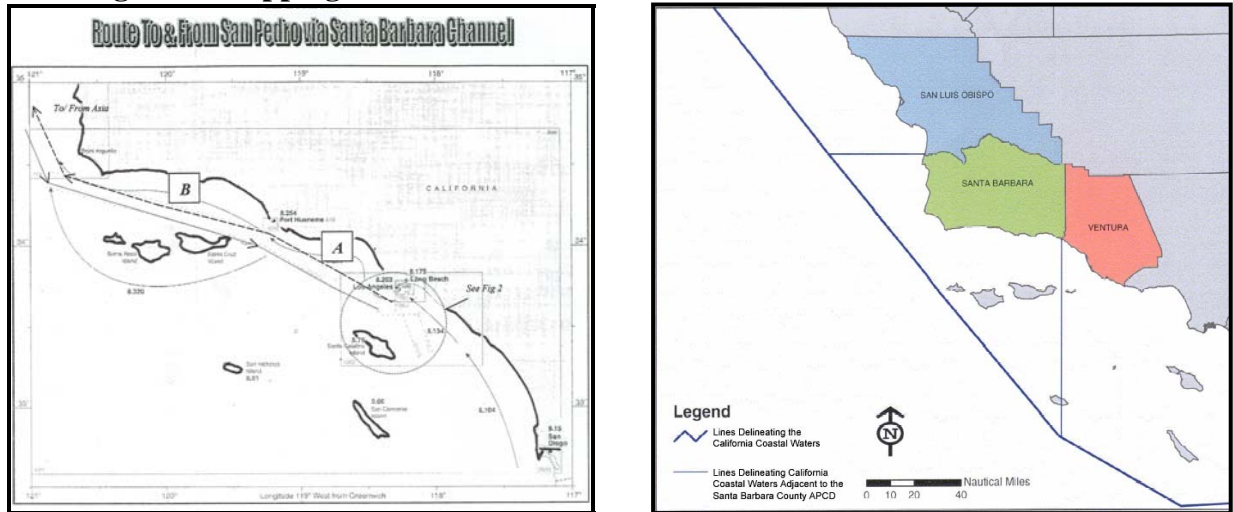
As the Air Pollution Control Officer for the Santa Barbara County Air Pollution Control District, I appreciate the opportunity to review and comment on a proposed rulemaking that your Board will be considering on December 8, 2005. The cleaner fuel requirements of the rule will reduce emissions from marine auxiliary diesel engines on ocean-going vessels while in port and within 24 miles from the coast. This rule is an opportunity to obtain significant emission reductions from sources that have historically been difficult to regulate, and emit large amounts of pollutants. I fully support the proposed rule as it will help reduce emissions from sources that threaten the air quality of both port and coastal communities in California.

The proposed regulation is consistent with the California Air Resources Board's (ARB) State Implementation Plan (SIP), the ARB Diesel Risk Reduction Plan and is in line with the objectives established by the joint agency (ARB and California Business Transportation & Housing Agency) Goods Movement working group created by the Governor earlier this year. The Phase I report produced by this working group, finalized in September 2005, identifies ocean-going vessels as "the largest and most challenging emissions source" in the goods movement chain. Failure to approve this rulemaking effort will further weaken a goods movement environmental mitigation strategy that is already struggling to keep up with a growth in goods being transported throughout the state which is forecast to triple or quadruple in the near future.

Marine Auxiliary Diesel Engine Rule

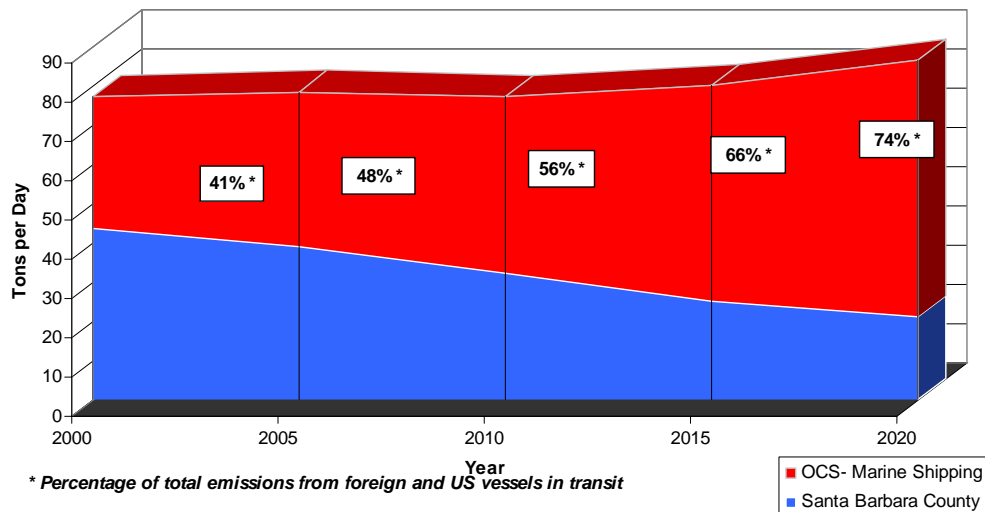
While the port communities are the most visible receptors of pollutants emitted by ocean-going vessels, they are not the only areas affected. In 1983 ARB defined a boundary for California Coastal Waters (CCW), within which pollutants emitted offshore will be transported onshore. Figure 1 shows both the shipping lanes offshore of Santa Barbara County and the CCW. The CCW boundary for Santa Barbara County is about 25 miles offshore at its shortest distance, and therefore includes activities in both shipping lanes (5-20 miles offshore).

Figure 1- Shipping Lanes and CA Coastal Waters off the Santa Barbara Coast



In 2004, our ocean-going vessel emission inventory (both main and auxiliary engines) showed that the Santa Barbara coastline was transited 7,207 times resulting in 14,744 tons of oxides of nitrogen (NO_x – a precursor to ozone formation) and 1,174 tons of PM. Currently, ocean-going vessel emissions produce approximately 40 percent of the NO_x emissions generated in Santa Barbara County. By 2020, we expect over 13,000 transits with over 31,600 tons of NO_x and 1,915 tons of PM. This expected increase is forecast in our 2004 Clean Air Plan (see Figure 2) and shows that without significant emission controls ocean-going vessels will make up 74 percent of the total NO_x emissions generated in Santa Barbara County by 2020.

Figure 2- Santa Barbara County NO_x Emissions



Even without a major port in Santa Barbara, the ARB estimates (See Table 1) that auxiliary diesel engines on ocean-going vessels passing through Santa Barbara waters in 2004 emitted: 1,080 tons of NO_x, 98 tons of PM and 715 tons of SO_x. The proposed regulation's cleaner fuel

requirements would reduce 65 TPY of NO_x, 74 TPY of PM and 572 TPY of SO_x during the first phase of the regulation (1/1/07-12/31/09). The second phase of the regulation (1/1/2010 +) would reduce an additional 7 TPY of PM, and 114 TPY of SO_x emissions. The calculations shown in table 1 are likely underestimated as they assume that the ship traffic observed in 2004 would remain constant into the future and do not take into account the expected increase in ship traffic or ship size.

**Table 1- Santa Barbara Emissions From Ocean-Going Vessel
Aux. Engines & Impact from Proposed regulation**

Emissions Reductions (%)					
2004 Emissions *		HFO to MGO @ 0.5% S 1/1/07 - 12/31/09	HFO to MGO @ 0.1% S 1/1/10 +	Emission Reductions	
				1/1/2007 - 12/31/2009	1/1/2010 +
NO_x	1,080 TPY	6%	6%	65 TPY	65 TPY
PM	98 TPY	75%	83%	74 TPY	81 TPY
SO_x	715 TPY	80%	96%	572 TPY	686 TPY

* From table IV-2 from ARB's Initial Statement of Reasons for Proposed Rulemaking

The proposed rulemaking is an important and necessary step in reducing emissions from ocean-going vessels. If no action is taken to reduce emissions from ocean-going vessels the projected growth in emissions in Santa Barbara County will cancel out all of our expected onshore NO_x reductions and result in greater total NO_x emissions in 2020 than we experienced in the year 2000. This is a significant public health concern for the residents of Santa Barbara County; Therefore, I strongly encourage the ARB Board to approve the proposed marine auxiliary diesel engine rule. Thank you for the opportunity to comment on this important issue. If you have any questions regarding these comments, please contact me.

Sincerely,

Terry Dressler
Air Pollution Control Officer

cc: Catherine Witherspoon, ARB
Peggy Taricco, ARB
Barbara Lee, President CAPCOA
Larry Allen, SLOAPCD
Mike Villegas, VCAPCD