



November 4, 2005

The Honorable Arnold Schwarzenegger  
State Capitol Building  
Sacramento, CA 95814

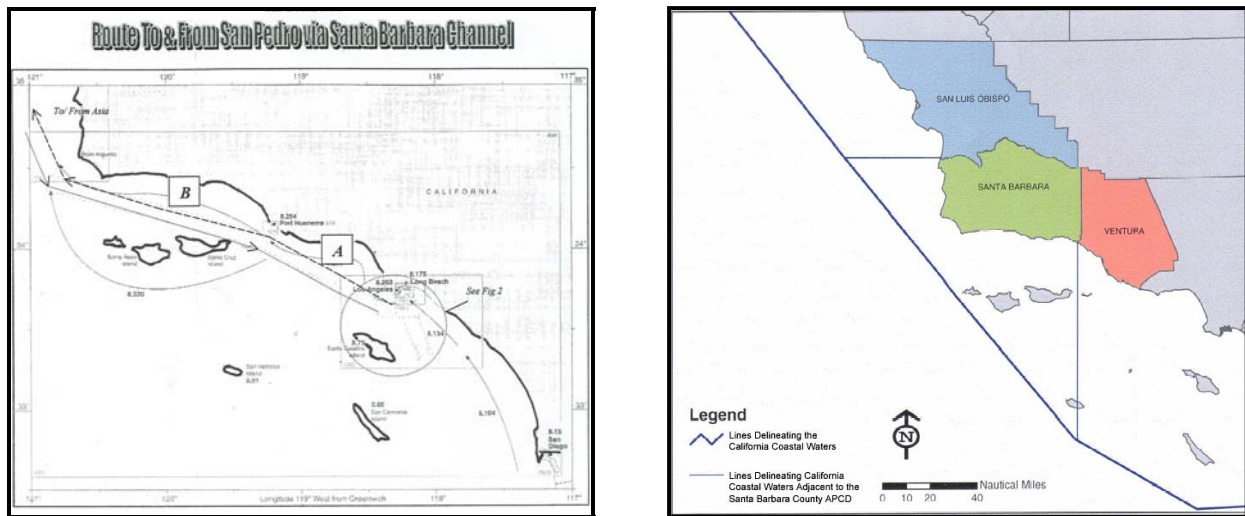
Dear Governor Schwarzenegger,

I want to commend you and your administration for prioritizing goods movement and port related issues and for creating a special "Goods Movement" working group consisting of the California Business, Transportation & Housing Agency (BT&H) and the California Environmental Protection Agency (Cal/EPA). Goods movement is a statewide issue that impacts economic growth, the environment, public health, transportation, and California's quality of life. With the forecasted growth rates in trade volumes, it is imperative that all of these factors be considered in making relevant policy decisions and that any adverse impacts (e.g. environment, transportation, etc.) are mitigated to the fullest extent possible.

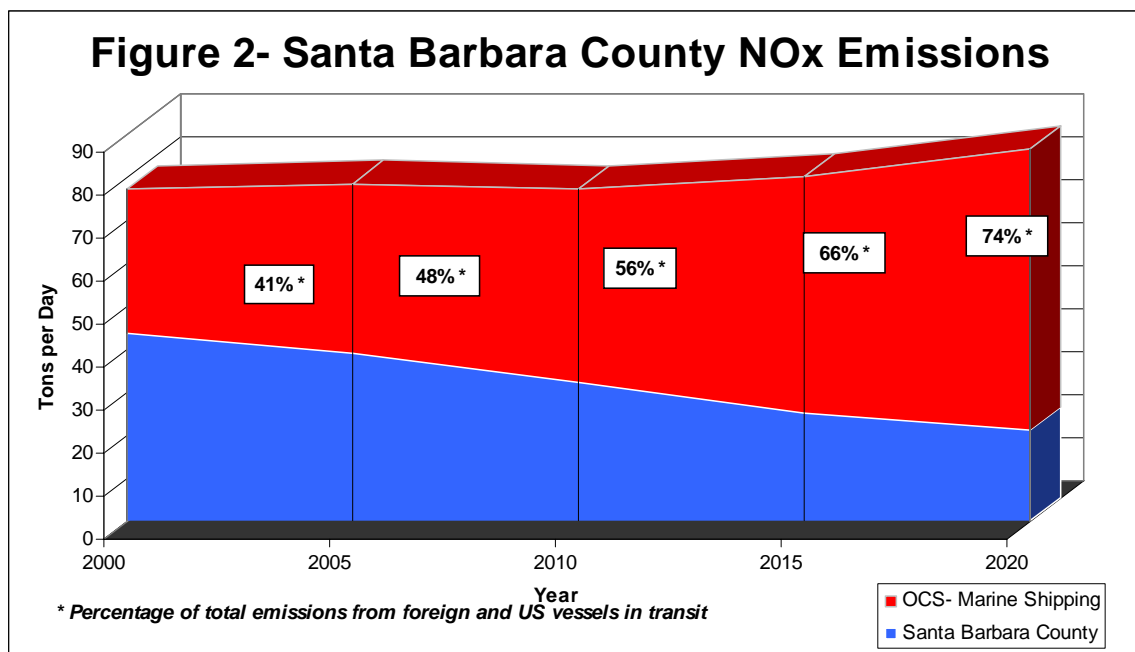
While the port areas are the most noticeable receptor of the trade related pollutants, they are just the beginning of the goods movement chain that emits pollutants, which are transported throughout the state. The air quality section of the working group's Phase I report focuses primarily on port areas, and fails to consider the pollutants emitted before the goods reach the port and after they leave the port areas. Since this is a statewide issue, the associated air quality impacts should be analyzed throughout California and not just the port areas.

Santa Barbara County, like many other areas of California, fails to meet the state's health-based air quality standards for ozone and particulate matter (PM). We do not have port or a rail-yard, nor do we see the type of heavy-duty truck congestion experienced in the port communities. Our main concern regarding the air quality impacts of forecasted trade growth is with the increased ocean-going vessel traffic that transits our coastline along the north and southbound shipping lanes between five to ten miles offshore of our coastline. In 1983 the California Air Resources Board (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. Vessel traffic transiting between a Southern California port (e.g. Ports of Los Angeles, Long Beach or Hueneme) and Asia transits directly through the Santa Barbara Channel at cruising speed, emitting pollutants at a greater rate than when these vessels are at port.

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



In 2004, our ocean-going vessel emission inventory showed that the Santa Barbara coastline was transited 7,207 times resulting in 14,744 tons of oxides of nitrogen (NO<sub>x</sub> – a precursor to ozone formation) and 1,174 tons of PM. Currently, ocean-going vessel emissions produce approximately 40 percent of the NO<sub>x</sub> emissions generated in Santa Barbara County. By 2020, we expect over 13,000 transits with over 31,600 tons of NO<sub>x</sub> 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<sub>x</sub> emissions generated in Santa Barbara County. This projected increased in emissions cancels out all of our expected onshore NO<sub>x</sub> emission reductions and results in greater total NO<sub>x</sub> emissions in 2020 than we experienced in the year 2000. This is a significant public health concern for the residents of Santa Barbara County.



As ocean going vessels are an important part of the goods movement chain, I strongly encourage you to include the air quality and public health impacts of ocean-going vessels transiting in California coastal waters (not just in port areas) into your plan. Your plan should address these impacts and provide for feasible mitigation measures that will result in real, near- and long-term emission reductions. We realize that a majority of these vessels are foreign flagged; however they pose a significant risk to public health, and air quality. In Santa Barbara, our emissions forecast shows that despite considerable future onshore reductions, the growth in shipping volumes and the associated marine vessel emissions will jeopardize our ability to meet and maintain State and Federal health-based air quality standards.

On a homeland security and public safety note, recent geological findings show that the Rincon/La Conchita slide area presents a significant threat to transportation infrastructure as the area is highly unstable and prone to catastrophic erosion. As you plan for the long-term future of goods movement throughout California, it would be prudent to seek solutions that minimize the need for both rail and truck traffic along this very unstable coastal area.

Thank you for the opportunity to comment on this important matter, and I look forward to reviewing the progress and development of the action plan.

Sincerely,

Terry Dressler  
Air Pollution Control Officer

cc: Barbara Lee, President CAPCOA  
Larry Allen, SLOAPCD  
Mike Villegas, VCAPCD