

December 21, 2007

To: Bryan Wood-Thomas, Associate Director
Office of Transportation and Air Quality
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue NW, Mail Code: 6401A
Washington, DC 20460

From: Twenty Members of the United States West Coast Collaborative Marine
Vessel and Ports Sector

Dear Mr. Wood-Thomas:

We are writing to you today as members of the United States (U.S.) West Coast Collaborative, Marine Vessel and Ports Sector, a public-private partnership to reduce diesel emissions. We wish to express our strong support of the United States position on proposed amendments to the air pollution regulations in Annex VI of the MARPOL convention. This proposal (submission reference IMO, 2007b) was submitted to the sub-committee on Bulk Liquids and Gases (BLG) on 9 February 2007, at the 11th session of the BLG (BLG/11/5/1). Implementation of stricter international standards is critical for the protection of the health of citizens in coastal regions across the globe and for the orderly expansion of international global trade transported by marine vessels. It is critically important to have international rules in place that are sufficient to meet the needs of all areas of the United States and Canada impacted by marine vessel emissions.

We support the U.S. position because it sets stringent performance criteria for ship emissions while also providing flexibility. The proposed standards may be met by switching to distillate fuels, use of appropriate technology, or a combination of both. The U.S. approach also provides necessary flexibility in establishing the geographic scope of areas with more stringent emission controls, which will allow for appropriate tailoring of the control areas based on different risk factors.

The World Shipping Council (WSC), the Pacific Merchant Shipping Association (PMSA), the California Air Resources Board, the American Association of Port Authorities, many individual port authorities and regulatory agencies, and community and labor organizations have all endorsed the U.S. proposal to IMO. We believe that if IMO does not address ship emissions in a rapid and effective manner, responsible local, state, and national governments, will inevitably need to, and are poised to impose unilateral requirements to reduce emissions. It is extremely important for IMO to act now to assure a consistent international set of clean air requirements for ships engaged in international commerce.

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In conclusion, we strongly support your efforts to complete the work necessary to adopt these amendments as quickly as possible to MARPOL Annex VI and the NOx Technical Code. The IMO can, and should establish a cohesive and consistent global regulatory framework for ship emissions. We hope you will seize this unique opportunity where industry, ports, environmental organizations, and regulatory agencies are aligned in moving forward for the common good.

If we can be of any assistance to you as IMO moves forward, please contact us. You can find more information regarding the Marine Vessels and Ports Sector of the West Coast Collaborative at: <http://www.westcoastdiesel.org/wkgrp-marine.htm>.

With deepest respect:

Dennis McLerran, Executive Director
Puget Sound Clean Air Agency

Jack P. Broadbent, Executive Officer/Air Pollution Control Officer
Bay Area Air Quality Management District

Dana Way, President and CEO
Catalyst Energy Inc.

Richard Stedman, Chair, Board of Directors
Clean Air Northwest

Stephen Gerritson, Executive Director
Commuter Challenge

John Garrett, Sales Manager Emissions
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Dr. Anatoly Mezheritsky, P.Eng., President
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Andrew Ginsburg, Air Quality Administrator
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T. L. Garrett, Vice President
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San Joaquin Valley Air Pollution Control District

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

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