

August 19, 2004

Mike Chrisman
Secretary of Resources
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Terry Tamminen
Agency Secretary
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95812

Subject: Comments on "California Ocean Resources Management: A Strategy for Action"

Dear Secretary Chrissman and Secretary Tamminen,

The Santa Barbara County Air Pollution Control District appreciates the opportunity to review and comment on the California Resources Agency's draft, "California Ocean Resources Management: A Strategy for Action."

The draft provides an excellent opportunity to outline the future actions needed to protect and preserve California's ocean environment and coastal resources. As I understand it, this draft serves as an update to the California Ocean Strategy ("California's Ocean Resources: An Agenda for the Future") developed in 1997, and is to assess what changes have occurred since that publication. The stated goal of this draft is to, "...address the challenges faced by California to protect and manage its watersheds, marine resources, water quality, world-class recreational beaches, and the ocean dependent economic uses that depend on these resources."

There is one major pollution source impacting our ocean and coastal environment that is overlooked in this draft – large ocean-going vessels. These vessels transport goods along the coast and are increasing in number, size, and the air pollution they generate. We have developed detailed emission inventories for the vessels that frequently use our ocean's resources and we see a steady increase in transits and associated air pollution emissions. When we forecast emissions (oxides of nitrogen) out to 2020, we find the disturbing fact that the increases expected in shipping emissions will virtually nullify all the gains we've made in reducing emissions from our onshore sources through local, state, and federal clean air programs.

The majority of these vessels are foreign flagged and powered by large (Above 30-Liter per cylinder -- EPA Category 3) 2-stroke engines that burn the dirtiest of diesel bunker fuels. As a result, these vessels create an enormous amount of air pollution within California's coastal waters. In fact, the California Air Resources Board (CARB) has determined that the air pollution created by these vessels impacts the air quality of coastal and inland regions, regardless of the presence of a port. We believe that air quality is an important California (coastal as well as inland) resource, it should be identified as such in your report, and

marine shipping emissions should be identified as a source for future reductions to improve and preserve the quality of this resource.

The following comments should be addressed in your report to support the inclusion of air quality as a California coastal resource:

1. Under Recommendation 1 of the draft, the need for federal action is presented in terms of ocean policy. There is also a need for federal action to reduce emissions from these ocean-going vessels. Currently the U.S. has yet to ratify IMO's MARPOL Annex VI, Prevention of Air Pollution from Ships. Annex VI was ratified by the minimum, 15th required state in the spring of 2004 and will come into effect on May 19, 2005.

It is important for the U.S. to ratify Annex VI to show a commitment to enforce the Annex. Through Annex VI, areas around the world may be identified as Sulfur (SO_x) Emission Control Areas (SECA) within which ships must either use a cleaner fuel (1.5% sulfur) or use an exhaust gas cleaning system that will reduce SO_x emissions. There is talk among the western coastal states of applying for designation as a SECA. Ratification of the Annex should be the first step taken in this process and federal action is needed to expedite the ratification process.

2. Federal action is also needed to strengthen EPA's regulations on Category 3 marine engines to set stricter emission limits that go beyond those required by Annex VI, set stricter fuel sulfur limits, and expand the rule to cover both foreign and domestic vessels.
3. Recommendation 3 states the need for an economic analysis of the benefits from the ocean and the coast. Ocean-going vessels play an important role in international trade and are dependent on ocean resources for their operation. Therefore international trade should be included in this economic analysis.
4. The Management of Economic Uses and Infrastructure section of the draft identifies some of the challenges faced by the ports, harbors and maritime industries. Operations in these areas should be evaluated and efforts should be made to reduce their emissions through the use of cleaner fuels or after-treatment devices.

We appreciate the opportunity to review and comment on this draft document and hope that you will consider including air quality as a coastal resource. This resource is in danger of deteriorating with the current and expected increases in foreign trade. If you have any questions or comments please feel free to contact Anthony Fournier, of my staff, at 805.961.8874.

Sincerely,

Tom Murphy, Manager
Technology and Environmental Assessment

cc: Terry Dressler, APCD
Ron Tan, APCD
Anthony Fournier, APCD