

September 19, 2008

Mr. Dan Donohoue
Chief, Emissions Assessment Branch
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Regarding: Marine Vessel Speed Reduction Program

Dear Mr. Donohoue:

I am writing you to comment on the California Air Resources Board's proposed Marine Vessel Speed Reduction program. While we believe that the proposed program can result in emission reductions in a buffer zone, we are concerned that Santa Barbara County would experience increased emissions from vessels sailing at higher speeds outside the buffer zone to make up for any "lost time".

Santa Barbara County has 130 miles of coastline that are heavily traveled (about 20-transits per day in 2006) by ocean-going vessels mostly heading to or from the ports of Long Beach, Los Angeles and Hueneme. Given the location of the North and South bound shipping lanes, these large ships often emit pollutants 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.

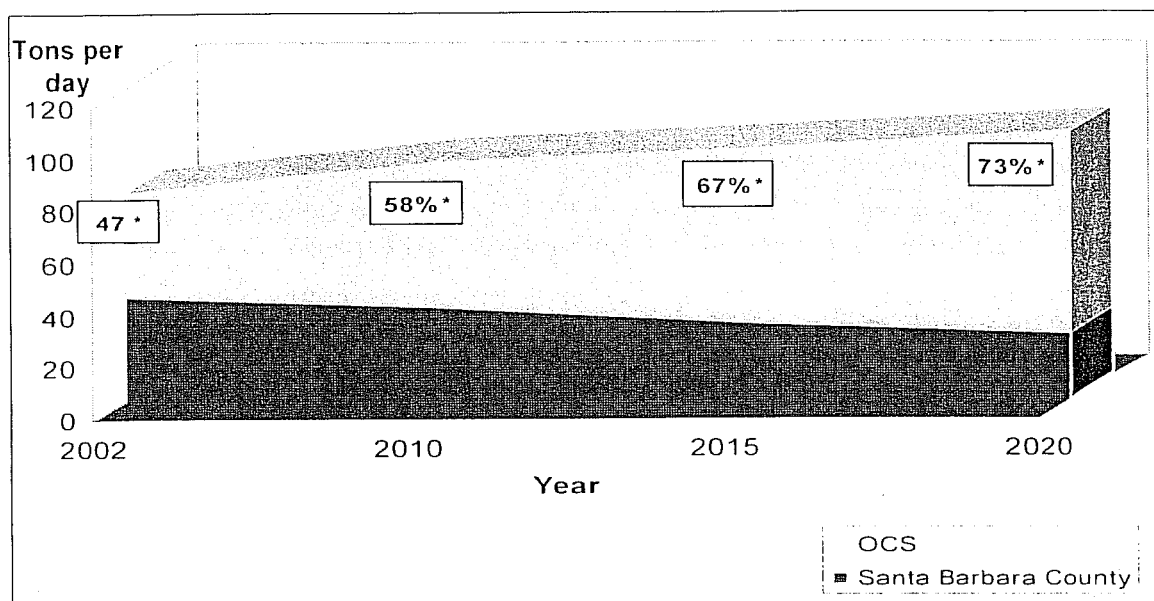
According to the detailed emissions inventory developed for APCD's 2007 Clean Air Plan, large ships going through the Santa Barbara Channel currently produce close to one-half of the oxides of nitrogen (NO_x) emissions in Santa Barbara County, which is more than all of the on-road NO_x emissions from 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_x emissions in the County by 2020. The magnitude of these emissions is of concern for onshore air quality and could threaten our ability to attain and maintain the ambient air quality health standards.

Since 2001, Santa Barbara County has undertaken numerous efforts to reduce marine vessel emissions. These include (1) participation in and funding of an ongoing multi-agency effort to retrofit an in-service ocean-going vessel with emission control equipment and (2) being a party to two lawsuits challenging USEPA's failure to adopt standards to control air pollution from Category 3 marine vessel diesel engines.

ARB's proposed Vessel Speed Reduction (VSR) Plan will provide health benefits by reducing excess cancer risks for Californians living within the buffer zones of 24 and 40 nm. However, as most of Santa Barbara County lies outside these buffer zones (particularly the 24 nm zone), we are concerned that vessels subject to ARB's VSR and transiting our coastline will increase speed (over their normal cruising speed) to make up for "lost time". These increased speeds would result in higher emissions that would adversely impact Santa Barbara County.

Figure 1: Santa Barbara County and OCS NO_x emissions forecast including marine vessels



* Percentage of total NO_x emissions from Other Mobile Sources – Foreign and US Ships-in transit.

While we laud ARB's marine vessel emission reduction strategies such as the VSR, we caution that any such measures must not have unintended consequences that would also increase emissions directly offshore of Santa Barbara County. If you have any questions regarding these comments, please call Tom Murphy at (805) 961-8857.

Sincerely,

Terry Dressler
Air Pollution Control Officer