

May 9, 2006

The Honorable Ted Stevens
United States Senate
522 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Daniel K. Inouye
United States Senate
722 Hart Building
Washington, D.C. 20510

Subject: Support letter for favorable and expeditious processing of the implementation language required for US ratification of Annex VI, "Prevention of Air Pollution from Ships," of the International Maritime Organization (IMO) MARPOL international convention for the prevention of marine pollution from ships

Dear Senator Stevens and Senator Inouye,

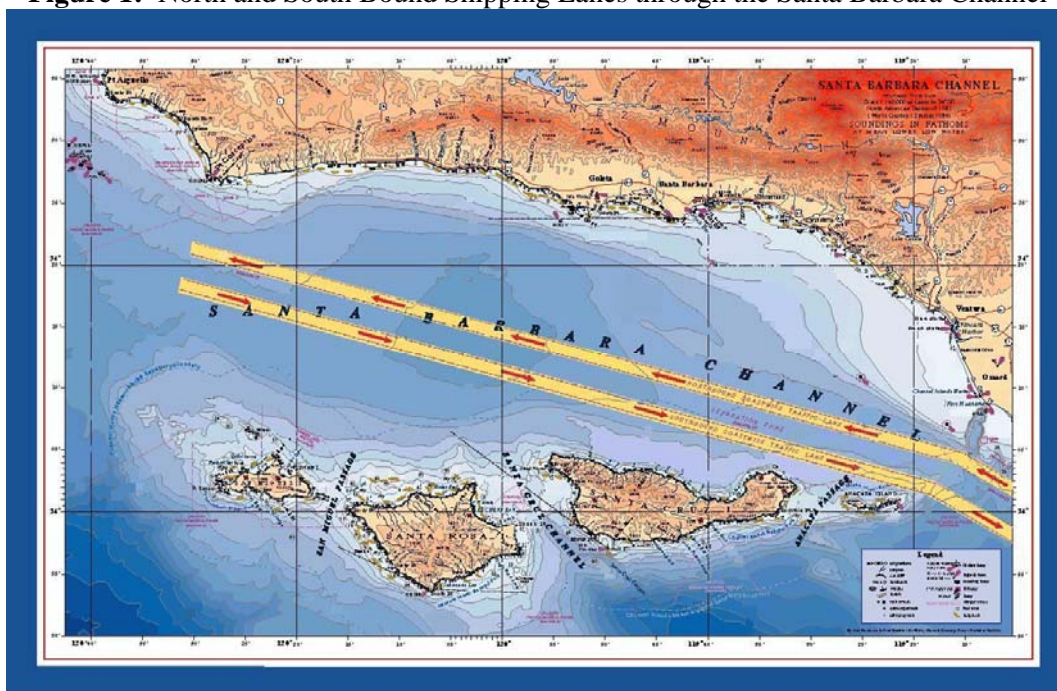
The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide support for the favorable and expeditious processing of the implementation language required for US ratification of Annex VI, "Prevention of Air Pollution from Ships." On May 15, 2003 the President sent Annex VI to the Senate for review and on April 7, 2006 the Senate Committee on Foreign Relations provided its advice and consent for ratification of the Annex (Treaty 108-7). The supporting implementation language for Annex VI was submitted to the Speaker of the House of Representatives in October of 2005 by the US Coast Guard as is currently pending review and approval.

Although Santa Barbara County does not have a port, the county has 130 miles of coastline that are heavily traveled (about 19 transits per day in 2005) by ocean-going vessels. Given the location of the Santa Barbara Channel Islands, large ships are often traveling and emitting pollutants along the North and South bound shipping lanes just ten to fifteen miles off our coastline (See figure 1). According to detailed emissions inventories conducted for APCD's 2001 and 2004 Clean Air Plans, large ships going through the Santa Barbara Channel produce almost one-third of the precursors to ozone air pollution in Santa Barbara County, almost as much as all the on-road Oxides of Nitrogen (NOx) and Reactive Organic Compounds (ROC) emissions from cars, trucks and buses combined. By 2020, these emissions are projected to make up over half of the emissions of ozone precursors in the County. While some of the air pollution from ships is dispersed before it reaches shore, the magnitude of these emissions is of concern for onshore air quality.

Favorable and expeditious processing of the implementation language is an important step in reducing emissions from ships operating in US waters. Several of the emissions measures currently specified under Annex VI are widely considered weak and not consistent with the current state of engine and emission control technologies. The entry into force of the implementation language will make the United States a party to Annex VI and will therefore allow the US to be a part of the negotiations discussing possible amendments to strengthen the Annex. These negotiations have already begun and the IMO is

scheduled to hear the recommendations from the assigned sub-committee (IMO MEPC Sub-committee on bulk liquids and gases) in 2007.

Figure 1: North and South Bound Shipping Lanes through the Santa Barbara Channel



Map Courtesy of Fred Gamble, Channel Crossings Press

One of the most important amendments being considered is the applicability of emission standards to in-use vessels. The current regulatory language only applies to vessels built or significantly modified after 2000. Given the fact that ship engines have a design life on the order of decades, this potential modification to Annex VI will allow for real, potentially significant and near-term emission reductions from ship engines. In 2005, 72 percent (1,059 vessels) of all vessels transiting the coast of Santa Barbara were operating under flags of nations that are a party to Annex VI. These vessels also accounted for 72 percent (about 10,800 tons of NO_x) of all NO_x emissions emitted in Santa Barbara waters from marine vessels in 2005. The inclusion of emission standards for in-use vessels will provide emission reductions from nearly three quarters of all the vessels traversing our coastline. The favorable and expeditious processing of the implementation language will give the United States a seat at the negotiating table and a voice for amendments strengthening the emissions standards in order to best protect the port communities, and coastal regions of the United States from the harmful effects of marine emissions.

Please feel free to contact me if you have any questions regarding the contents of this letter.

Sincerely,

Terry Dressler

Air Pollution Control Officer
Santa Barbara County Air Pollution Control District

cc: **Senator Barbara Boxer**
United States Senate
112 Hart Senate Office Building
Washington D.C. 20510

Senator Dianne Feinstein
United States Senate
331 Hart Senate Office Building
Washington, DC 20510

Congresswoman Lois Capps
United States House of Representatives
1707 Longworth House Office Building
Washington D.C. 20515