

June 20, 2013

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Clerk of the APCD Board:

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To: Admiral Robert J. Papp, Jr.

Commandant, U.S. Coast Guard

Bob Perciasepe

Acting Administrator, U.S. Environmental Protection Agency

Dr. Kerri-Ann Jones

Assistant Secretary of State, U.S. Department of State

Re: Retain Original Deadline of 2016 for NOx Standards in the North American Emission Control Area

Dear Commandant Papp, Acting Administrator Perciasepe, and Assistant Secretary Jones:

The Santa Barbara County Air Pollution Control District (District) Board of Directors is concerned about the recent action by the International Maritime Organization (IMO) Marine Environment Protection Committee proposing a delay of five years for the implementation of nitrogen oxides (NOx) standards in Emission Control Areas, including the North American Area. We understand the U.S. delegation voted against the proposed delay, but delegations from other countries prevailed.

The Committee will take final action on this item in March of 2014, and we urge the U.S. delegation to vigorously oppose the proposed delay and pursue retention of the original deadline of 2016.

NOx is a precursor to ozone and Santa Barbara County does not attain the California state standard for ozone, and only attains the federal ozone standard by a slim margin. Large ships are a major source of NOx in our county. Without regulatory authority over these ship engines, the District relies on international regulations to achieve reductions from this huge source of NOx emissions. We urge you to make forceful efforts to retain the original deadline of 2016.

We are sending copies of this letter to a number of individuals, see list next page. Thank you for your consideration.

Chair, Air Pollution Control District Board



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Letter from Santa Barbara County Air Pollution Control District Board of Directors to the U.S. Delegation to the International Maritime Organization

CC:

U.S. Congresswoman Lois Capps

U.S. Senator Barbara Boxer

U.S. Senator Dianne Feinstein

Jeffrey Lantz, Director of Commercial Regulations and Standards, U.S. Coast Guard

Evan Bloom, Director of Office of Ocean and Polar Affairs, U.S. Department of State

Bill Charmley, Director, Assessment and Standards Division, Office of Transportation and Air Quality, U.S.

Environmental Protection Agency

Rear Admiral Paul A. Sohl, Commander, Naval Air Warfare Center, Weapons Division, U.S. Navy Stephanie Altman, Attorney Advisor, Office of General Counsel, National Oceanic and Atmospheric Administration

Mary Nichols, Chair, California Air Resources Board

Richard Corey, Executive Officer, California Air Resources Board

Brad Poiriez, President, California Air Pollution Control Officers Association

Joseph Cox, President & CEO, Chamber of Shipping of America

J. Christopher Lytle, Executive Director, Port of Long Beach

Geraldine Katz, Ph.D., Executive Director, Port of Los Angeles

Lee Kindberg, Director, Environment, MAERSK LINE/ Maersk Agency USA