June 20, 2013

To: Admiral Robert J. Papp, Jr.
   Commandant, U.S. Coast Guard

   Bob Persciape
   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 Persciape, 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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Clerk of the APCD Board:

Louis D. Van Mullem, Jr.
Santa Barbara County
Air Pollution Control District

Page two
June 20, 2013
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