

March 11, 2014

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2100 2<sup>nd</sup> Street, SW  
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Washington, DC 20593

Kerri-Ann Jones  
Assistant Secretary  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520

Dear Administrator McCarthy, Admiral Papp and Assistant Secretary Jones:

On behalf of the National Association of Clean Air Agencies (NACAA), we write to urge you and your respective agencies to continue to vigorously oppose any efforts to delay implementation of the International Maritime Organization (IMO) Tier III nitrogen oxide (NO<sub>x</sub>) emission standard for Category 3 oceangoing vessels. NACAA is the organization of air pollution control agencies in 42 states, the District of Columbia, four territories and 116 metropolitan areas. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the United States. These comments are based upon that experience. The views expressed in this document do not necessarily represent the positions of every state and local air pollution control agency in the country.

We are particularly concerned by an IMO proposal to delay implementation of the Tier III standard by five years, from 2016 to 2021. The Tier III standard, adopted by the IMO in 2008, requires an 80-percent NO<sub>x</sub> emission reduction from Category 3 oceangoing vessels built in 2016 or later and operating in designated Emission Control Areas (ECAs) around the world, including ones covering most of the North American coasts as well as Hawaiian and Caribbean waters. The IMO will consider final action on the proposed delay, recommended last year by Russia, at a meeting scheduled for

later this month. We note that there is no reason for any delay as the technologies to meet the standard are available for implementation in 2016.

Worldwide implementation of the Tier III NO<sub>x</sub> standard in 2016 is essential to fulfill the intent of protecting public health and the environment in areas affected by ship emissions. In the U.S., implementation of the Tier III standard in 2016 is critical to the efforts of areas throughout the country to achieve and maintain federal health-based air quality standards for ozone and fine particulate matter (PM<sub>2.5</sub>) in a timely manner. This includes coastal areas and port cities, as well as many areas that are well inland and still adversely affected by ship emissions that drift in from the nation's coasts. In fact, the U.S. Environmental Protection Agency (EPA) has indicated that although coastal states would experience the greatest reductions in ozone and PM<sub>2.5</sub> levels as a result of the Tier III standards, every one of the 48 continental states would experience some reduction in ozone and PM<sub>2.5</sub> from new ships meeting the Tier III NO<sub>x</sub> standards in the North American ECA.

EPA has also estimated that the total emission reductions that will result from using cleaner marine fuels and engines in U.S. ECAs will prevent up to 14,000 premature deaths annually by 2020 and up to 31,000 premature deaths annually by 2030. In addition, EPA projects that without the ECA NO<sub>x</sub> standards, Category 3 ships will grow to be the largest source of NO<sub>x</sub> emissions nationally in 2030 – greater than cars and trucks combined – representing nearly 40 percent of total annual NO<sub>x</sub> emissions from all U.S. mobile sources and close to 20 percent of NO<sub>x</sub> emissions from all U.S. sources of any kind, with the share of NO<sub>x</sub> emissions from ships in some U.S. port cities likely to be far higher.

NACAA urges EPA, the U.S Coast Guard and the U.S. Department of State, on behalf of the United States, to continue their steadfast support of the IMO Tier III NO<sub>x</sub> standards, including implementation of the standards around the world in 2016 as scheduled, and to work to defeat efforts within the IMO to delay these important standards.

Sincerely,



Nancy L. Seidman  
(Massachusetts)  
Co-Chair  
NACAA Mobile Sources and Fuels Committee



Barry R. Wallerstein  
(South Coast Air Quality Management District)  
Co-Chair  
NACAA Mobile Sources and Fuels Committee