

February 8, 2008

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The Honorable Barbara Boxer
Chair
Committee on Environment and Public Works
U.S. Senate
410 Senate Dirksen Office Building
Washington, DC 20510

RE: Support for *Marine Vessel Emissions Reduction Act of 2007* (S. 1499/H.R. 2548) and U.S. Proposal to International Maritime Organization for Marine Fuel and Engine Standards

Dear Senator Boxer:

We write to you on behalf of the National Association of Clean Air Agencies (NACAA) – the national association of air pollution control agencies in 53 states and territories and over 165 metropolitan areas across the country – to express our association's support for federal legislative action and international action to curb emissions from domestic and foreign-flagged Category 3 (ocean-going) marine vessels.

Category 3 marine engines emit large quantities of oxides of nitrogen (NO_x) and sulfur oxides (SO_x) – which are precursors to the formation of ambient particulate matter and ozone – as well as toxic particulates. All of these adversely affect the air quality in port cities across the nation, as well as areas downwind of those cities. Studies confirm that exposure to these pollutants causes increased mortality, cancer risks and respiratory illnesses, and substantially increases health costs. For example, in the South Coast Air Basin of California, emissions from Category 3 vessels are responsible for more than half of the region's SO_x and will soon become the area's single largest source of NO_x. The South Coast Air Quality Management District has estimated that marine vessel pollution causes hundreds of premature deaths each year and, further, contributes to cancer risks near ports that are well over 2,000 in a million. Notwithstanding such impacts, emissions from Category 3 marine vessels, such as container ships, are virtually uncontrolled. Moreover, Category 3 vessel emissions are expected to grow since cargo throughput is projected to increase substantially in the coming years.

For these reasons, NACAA supports adoption of the *Marine Vessel Emissions Reduction Act of 2007* (S. 1499/H.R. 2548), which would require domestic and foreign-flagged ships to use cleaner-burning, low-sulfur fuels that reduce health-threatening particulate emissions. The Act will also impose tougher emissions standards for marine vessel engines that will reduce exposure to ambient particulate matter and ozone.

Likewise, NACAA supports the February 9, 2007 U.S. proposal to the International Maritime Organization (IMO) regarding marine fuel and engine standards. If adopted by the IMO, this proposal – which is based on the same substantive fuel and emission standards as S. 1499 and H.R. 2548 – will substantially reduce ship emissions on an international scale.

Meaningful controls on vessel emission – such as those established in S. 1499/H.R. 2548 and proposed by the U.S. to the IMO – will contribute significantly to state and local efforts to attain health-based clean air standards by rapidly approaching federal deadlines. And these controls can be achieved at relatively low cost. Although international action on the regulation of Category 3 marine engines would yield farther-reaching benefits than domestic action alone, history has shown that with the many nations involved in the IMO process, there is no assurance that the IMO will achieve consensus regarding international standards that are sufficient, and timely, to meet the air quality needs of the United States. Therefore, prompt action on S. 1499/H.R. 2548 will send an important message to the IMO that the U.S. is serious about controlling vessel emissions, thus helping to spur IMO action. In addition, it will ensure that, in the event that the IMO does not take sufficient and/or timely action, the U.S. is prepared to move ahead quickly to adopt standards to protect the health and welfare of its citizens.

Action to decisively address the air quality and public health threats posed by emissions from Category 3 marine engines is long overdue. As we continue to observe the IMO process with hopes that it will yield rigorous standards in line with those proposed by the U.S., NACAA is pleased that you and Representative Hilda Solis have proposed legislation to ensure that rules limiting the sulfur content of fuel used by domestic and foreign-flagged ships entering U.S. ports and establishing maximum achievable NO_x, SO_x and particulate emission standards for marine vessel engines will be adopted in the U.S. in the event the IMO does not achieve timely success.

On behalf of NACAA, thank you for your leadership on this important issue. Our association stands ready to work with you and your staff, as well as other stakeholders, to support adoption of this important bill.

Sincerely,



Andrew Ginsburg (Oregon)
NACAA Co-President



Ursula Kramer (Tucson, AZ)
NACAA Co-President