



DEPARTMENT OF THE NAVY
COMMANDER NAVY REGION SOUTHWEST
937 NO. HARBOR DR.
SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO:
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Ser N40JRR.cs/0013
June 14, 2011

Ms. Mary Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairman Nichols;

I am writing on behalf of Navy Region Southwest to express our support for the proposed amendments to the Ocean Going Vessel (OGV) Fuel regulation as proposed by your staff. The US Navy has had a long standing concern over moving commercial shipping out of the Santa Barbara Channel for the purpose of air pollution control. Since the 1994 Federal Implementation Plan (FIP), the Measure 13 proposal in the 1994 State Implementation Plan, and last year's OGV regulation, the Navy has consistently expressed strong opposition based on the critical national defense importance of the Point Mugu Sea Range. The Navy's longstanding position is that regulation of shipping in the Santa Barbara Ship Channel would move ships into the Sea Range and threaten its future mission capability. This position has been confirmed by over a year of Marine Exchange data which show up to 60% of ships transiting to/from Long Beach and Los Angeles ports are now cutting through the Sea Range.


As a result of recent military operations, we are now engaged in a multi-pronged effort that requires maintenance of our weapons systems, development of next generation systems, and training of our forces before they go in harm's way. Naval Air Warfare Weapons Division will submit a separate letter discussing these specific mission issues in greater depth.

We are supportive of ARB's staff recommendation to amend the OGV fuel rule and take action to protect the Point Mugu Sea Range as indicated in the Final Statement of Reasons for the initial regulation. While only time will tell whether the proposed changes accomplish our mutual goals of returning ship traffic to the long established Santa Barbara Ship Channel, we agree with ARB staff that it removes the present incentive to leave the channel and transit the Sea Range. The Santa Barbara Ship Channel is the most appropriate location for commercial shipping. In this established route the full spectrum of commercial shipping impacts, from air quality to marine mammals, can be monitored and mitigated. In addition to the national security concerns, there is a strong public interest in vessel regulation that can only be achieved when those vessels are transiting in the established Santa Barbara Ship Channel. Ships traveling through the Sea Range are unregulated.

We ask for ARB's continued commitment to work with all stake holders, for example the Ports of Los Angeles and Long Beach, to take all feasible measures to further support the return of shipping to the Santa Barbara Ship Channel.

Finally, we understand that a number of environmental Non-Governmental Organizations have petitioned the federal government to consider a Vessel Speed Reduction (VSR) in this area. We request that ARB not incorporate VSR in this current regulatory revision. First, it is imperative that the proposed amendment be completed as quickly as possible given the high number of ships transiting the Sea Range. Further, we believe the imposition of VSR in the Santa Barbara Ship Channel would create a new incentive for shipping to again leave the Santa Barbara Ship Channel. Any consideration of VSR should be a separate regulatory action, subject to a full accounting of impacts, and continue to ensure that a route outside the Ship Channel is not incentivized. This would require more complex study and analysis that would delay the much needed OGV fuel amendments.

My point of contact is Randal Friedman who can be reached at (916) 930-5607.

Sincerely,


C. L. STATHOS
By direction

Copy to: Supervisor Ron Roberts
Wade Crowfoot, Governor's Office of Planning and Research
Naval Air Warfare Weapons Division