



**Ventura County
Air Pollution
Control District**

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**Michael Villegas
Air Pollution Control Officer**

June 16, 2010

Mary Nichols, Chair
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Re: Ventura County Air Pollution Control District (VCAPCD) staff comments on Proposed Amendments to the Regulations to Reduce Emissions from Diesel Engines on Commercial Harbor Craft Operated within California Coastal Waters and 24 Nautical Miles of the California Baseline (Agenda Item: 10-6-2)

Dear Ms. Nichols:

VCAPCD staff is pleased to support the California Air Resources Board (CARB) proposed amendment to the Commercial Harbor Craft Regulation, which would require emission reductions from crew and supply vessels. Due to their heavy use out of ports in Ventura County to service offshore oil platforms, these engines remain one of the most important unregulated source of air pollution in Ventura County and the wider South Central Coast Air Basin. Emission reductions from these vessels are critical to our efforts to attain state and federal air quality standards.

Over 22 percent of the crew and supply vessels in California operate offshore of Ventura County and Santa Barbara County. Crew and supply vessels operating in Ventura County have significant emission impacts, generating an estimated 140 tons per year of NOx and over six tons per year of diesel particulate matter, a toxic air contaminant.

CARB staff reports that the cost effectiveness of the proposed emission reductions is \$2,700 per ton of NOx reduced. This cost effectiveness is very attractive, better than the cost effectiveness guideline adopted by the VCAPCD Board of \$18,000 per ton of NOx reduced. Low emission engines are readily available and feasible for use in these vessels.

Thank you for the opportunity to provide this letter of support. If you have any questions about these comments, please feel free to call either myself at 805/645-1440 or Chris Frank, P.E., Air Quality Engineer, at 805/6451409.

Sincerely,

A handwritten signature in black ink that reads "Michael Villegas".

Michael Villegas
Air Pollution Control Officer

- c. Board Members, California Air Resources Board
James Goldstene, California Air Resources Board