

**American Lung Association in California – Bay Area Clean Air Task Force – Breathe California – Friends of the Earth – Natural Resources Defense Council – Sierra Club – Union of Concerned Scientists**

June 23, 2010

Chairwoman Mary Nichols and Board Members  
California Air Resources Board  
Headquarters Building  
1001 I Street  
Sacramento, CA 95814

**Re: Support for Amendments to Harbor Craft Regulation (Agenda Item 10-6-2)**

Dear Chairwoman Nichols and Members of the Board:

We write on behalf of American Lung Association in California, Bay Area Clean Air Task Force, Breathe California, Friends of the Earth, Natural Resources Defense Council, Sierra Club, and Union of Concerned Scientists to support ARB staff's proposed regulatory amendments to reduce harmful air emissions from additional categories of harbor craft including barges, dredges, and crew and supply vessels. We believe that the proposed amendments to the 2007 harbor craft regulation should be adopted by the Board at its upcoming June 24<sup>th</sup> meeting so as to provide maximum health benefits to California residents, especially those living in impacted communities near ports.

Presently, adverse health effects related to harbor craft emissions are significant as these vessels tend to operate and emit close to shore. Diesel emissions from harbor craft operating within California waters, including those from crew and supply vessels, are responsible for 90 premature deaths; 2,400 cases of respiratory illness; and 16,000 lost work days every year. In the Bay Area, emissions from crew and supply craft amount to seven tons of particulate matter (PM) and 187 tons of nitrogen oxide (NO<sub>x</sub>) every year, and pollution levels from these craft are even more substantial along the South Coast and Ventura County. Vulnerable populations that are affected by harbor craft emissions include children, the elderly, low-income communities, and communities of color.

This proposed amendment would, importantly, serve to close a gap in regulatory coverage for certain categories of harbor craft. And, over the life of this new measure 220 tons of PM and 3,900 tons of NO<sub>x</sub> would be eliminated from crew and supply vessels alone.

Moreover, the proposed amendments to the harbor craft regulation are cost effective. The PM and NO<sub>x</sub> cost-effectiveness figures for crew and supply vessels as well as barges and dredges are comparable to that for vessels dealt with in the original harbor craft regulation, such as ferries and tugboats.

For the reasons provided in this letter, the above-referenced organizations support the proposed amendment as an effective means by which to protect the California environment and better

safeguard the health of its residents from harmful marine vessel pollution, and we urge the Board to adopt the measure.

Thank you for considering our comments.

Sincerely,

John Kaltenstein  
Marine Program Manager  
Friends of the Earth

Diane Bailey  
Senior Scientist  
NRDC

Don Anair  
Senior Vehicles Analyst  
Union of Concerned Scientists

Andy Katz  
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