



South Coast Air Quality Management District

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Office of the Executive Officer
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June 17, 2011

Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Mr. Goldstene:

SCAQMD Staff Support for the Proposed Amendments to the
Regulations for Fuel Sulfur and Other Operational Requirements for Ocean-Going
Vessels within California Waters and 24 Nautical Miles of the California Baseline

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide its support of the California Air Resources Board (CARB) staff proposed amendments to the Ocean-Going Vessel Clean Fuel Regulation to extend the regulatory boundary further off shore. As you are aware, ocean-going vessel emissions are among the largest contributors to the ozone and fine particulate air quality problems in the South Coast Air Basin. The SCAQMD staff fully support the continued clean-up of marine fuels in order for the region to attain federal ambient air quality standards. We strongly believe that the proposed amendments will address the issue of those ocean-going vessels traveling outside of the current 24 nautical miles definition.

Relative to the CARB staff proposed delay of the use of a 0.1% sulfur content marine fuel from 2012 to 2014, we understand the concerns and issues associated with the availability and use of the lower sulfur content fuel. As such, we urge CARB to closely monitor the availability of the 0.1% fuel and encourage the use of such fuel as early as possible, but no later than 2014. In addition, it is essential that the anticipated International Maritime Organization (IMO) Emissions Control Area (ECA) fuel sulfur

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standards be implemented on schedule, since the emissions analysis for the proposed delay relies on the ECA standards.

In conclusion, we urge the CARB Board to adopt the amendments at its June 23, 2011 meeting. If you have any questions about these comments, please feel free to call me or Mr. Henry Hogo, Assistant Deputy Executive Officer – Mobile Source Division, Science and Technology Advancement, at 909-396-3184.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry R. Wallerstein". The signature is fluid and cursive, with a large initial "B" and "W".

Barry R. Wallerstein, D.Env.
Executive Officer

CSL:HH: RP