

February 7, 2011

## **FEDERAL MARITIME COMMISSION NOTICE OF INQUIRY SOLICITATION OF VIEWS ON THE IMPACT OF SLOW STEAMING**

**The Santa Barbara County Air Pollution Control District is providing comments in response to questions 3 and 4 below.**

### **Questions Directed to All Interested Parties**

1. What are the major benefits and costs associated with slow steaming?
2. To what extent has the slow steaming of services in the U.S. ocean liner trades reduced greenhouse gas emissions?
3. Discuss the likely long-term prevalence of slow steaming and its potential impacts on the economy and/or the environment.
4. How important is slow steaming in the overall effort to reduce emissions of greenhouse gases and other air pollutants arising from ocean liner operations?
5. What data sources are available to measure the economic and environmental impacts of slow steaming?

Santa Barbara County Air Pollution Control District (SBCAPCD) strongly urges the Federal Maritime Commission to take actions to promote slow steaming, which will not only reduce greenhouse gas emissions, but will also improve air quality in our county, and help us to meet air quality standards.

SBCAPCD has documented the contribution of marine shipping to air pollution in our county in our Clean Air Plans since 1994. In fact, emissions of nitrogen oxide (NO<sub>x</sub>), an ozone precursor, from marine shipping in the Santa Barbara Channel currently account for 55 percent of our county NO<sub>x</sub> emissions (human generated) inventory. These emissions overwhelm NO<sub>x</sub> emissions from all other source categories and are projected to account for up to 66 percent of countywide NO<sub>x</sub> emissions (human generated) in 2020 – even taking into account reductions expected through U.S. Environmental Protection Agency (USEPA) and International Maritime Organization regulations. These emissions represent a serious problem for air quality and public health, and threaten our ability to attain ozone standards.

We are currently out of attainment for the California 8-hr ozone standard, and expect to be out of attainment for the revised federal 8-hr ozone standard currently scheduled to be adopted by USEPA in July 2011. In order to meet state and federal standards ozone standards, it is critical that additional NO<sub>x</sub> emission reductions be implemented.

Our review of marine engine data indicates that a vessel speed reduction requirement in the Santa Barbara Channel, from current speeds down to 12 knots, could reduce emissions from large marine vessels by sixty percent or more. Speed reduction results in lower load on the engine, reducing fuel consumption and actual horsepower output, thereby reducing emissions. Speed reduction (i.e., slow

steaming), would have a major impact on reducing NOx emissions. Without this measure, it will be extremely difficult for our county to meet state and federal ozone standards.

Slow steaming would also significantly reduce emissions of other pollutants that affect county air quality, including diesel particulate, sulfur, and air toxics, and would reduce emissions of greenhouse gases which contribute to global climate change. Our Clean Air Plans have focused on ozone and ozone precursors, and so we have not documented the emissions of these other pollutants, however, our documentation of NOx emissions indicates the magnitude of the problem.

As shipping emissions are not under local control, we have limited options to address the problem. We strongly urge the Maritime Commission to promote slow steaming. Slow steaming has international benefits in reducing greenhouse gases and meeting global carbon dioxide reduction targets, but just as importantly it will improve air quality in coastal communities such as ours, and help us to meet air quality standards.