

March 3, 2008

The Honorable Senator Barbara Boxer
Chairman, U.S. Senate Committee on Environment and Public Works
U.S. Senate - 410 Senate Dirksen Office Building
Washington, DC 20510-6175

**RE: Support for Federal Legislation: Marine Vessel Emissions Reduction Act of 2007 -
Senate (S 1499) / House (HR 2548)**

Dear Senator Boxer:

On behalf of NESCAUM (Northeast States for Coordinated Air Use Management), I am writing to express support for the Marine Vessel Emissions Reduction Act of 2007 - *Senate (S 1499) / House (HR 2548)*. NESCAUM is an association of state air pollution control agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. This legislation will help to ensure that domestic and foreign-flagged marine vessels utilizing ports in the United States will significantly reduce their air pollution. The legislation will require the use of cleaner-burning, lower-sulfur marine fuels and will apply more stringent emissions standards to marine vessel engines.

Air pollution around the Ports of Long Beach and Los Angeles recently has received considerable attention from the public health community, but the problem is not simply confined to southern California. Using annual import and export tonnage moved by ocean-going vessels as a surrogate to gauge the extent and growth of air pollution around seaports, it is readily apparent that the Northeast faces a problem of similar magnitude.

**Growth in Import & Export Tonnage at Selected Seaport Areas
(thousand short tons)**

Seaport Area	2001 Tonnage	2005 Tonnage	Percent Increase from 2001 to 2005
Long Beach/Los Angeles	96,527	110,227	14%
New York/New Jersey	67,267	87,799	31%
Delaware Bay/River	61,860	66,834	8%
Portland (ME)	26,449	28,193	7%
Boston	12,430	15,159	22%
Providence/Fall River	3,920	7,851	100%
New Haven/Bridgeport	4,336	4,882	13%
Portsmouth (NH)	3,873	4,498	16%

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The above table shows that the aggregate tonnage of goods movement at northeastern ports exceeds that of the principal southern California ports and the northeastern growth rates are comparable to or far in excess of southern California's. Clearly a comprehensive national program is needed to address this growing air pollution problem.

Under current international standards, large marine vessels are substantial sources of air pollution. Ocean-going marine vessels burn bunker fuel that has an extremely high sulfur content, averaging around 27,000 parts per million (ppm). In contrast, U.S. law requires, or soon will require, most engines in the U.S. burning distillate fuels to use fuels that meet a fuel sulfur standard of no more 15 ppm.

The high sulfur content of marine bunker fuel, its inefficient combustion characteristics, and the absence of stringent engine emission controls cause marine engines to be one of the most significant unregulated sources of air pollution, particularly around major seaports. Studies relied upon by the U.S. Environmental Protection Agency in establishing National Ambient Air Quality Standards show that exposure to air pollutants of the types released from large marine engines increases the risk of death as well as visits to hospitals, physicians, and emergency rooms, and exacerbates respiratory illnesses, including asthma. Absent new regulations, marine vessel emissions are only expected to increase over the next 10 to 20 years with the continued growth in goods movement and cargo throughput at U.S. ports.

The U.S. currently has a proposal consistent with the S 1499/HR 2548 legislation before the International Maritime Organization (IMO). We are aware of and encouraged by recent actions of the IMO's Subcommittee on Bulk Liquids and Gases to advance the U.S. proposal to the IMO's Marine Environmental Protection Committee. There is no guarantee, however, that the proposal will become the international standard. We believe that favorable actions to advance the S 1499/HR 2548 legislation will further send the message to the IMO that the U.S. is serious about controlling air pollution from these unregulated sources, and can spur the IMO to complete similar action at the international level in a timely manner.

If you have any questions or comments, please contact Eric Skelton of my staff at (617) 259-2028.

Sincerely,



Arthur N. Marin
Executive Director

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Cc: Hon. Hillary Rodham Clinton (NY)
Hon. Susan M. Collins (ME)
Hon. Christopher J. Dodd (CT)
Hon. Judd Gregg (NH)
Hon. Edward M. Kennedy (MA)
Hon. John F. Kerry (MA)
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NESCAUM Directors