



The Office of Vince Ryan  
County Attorney

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July 7, 2009

Marine Environment Protection Committee (MEPC), 59<sup>th</sup> Session  
International Maritime Organization (IMO) Headquarters  
4 Albert Embankment  
London, UK  
SE 1 7SR

Dear Chairman and Committee Members of MEPC:

Harris County Attorney's Office submits this letter in support of the joint US-Canada application for an Emissions Control Area (ECA) for the coastlines of the United States and Canada.

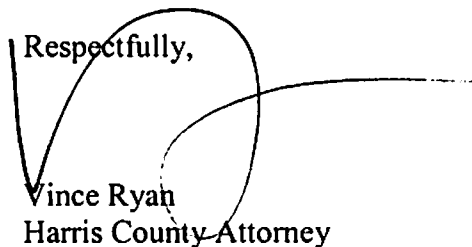
Harris County is the fourth largest county in population in the United States and home to the Port of Houston Authority which is ranked first in the United States in foreign waterborne tonnage and second in the country in total tonnage. As port traffic is projected to increase with growing commerce, air pollution from large ships such as oil tanks and cargo ships is expected to follow a similar trajectory.

Harris County continues to grapple with significant air pollution and is actively working towards improving the County's air quality. To that extent, we applaud the IMO and member states for the recent amendments to MARPOL Annex VI that will implement more rigorous emissions standards for large ocean-going ships and provide for the creation of Emission Control Areas. We believe strong international standards are the most effective way to control emissions from ocean-going ships; and will play a key role in reducing harmful air emissions into our region.

Specifically, we support a US ECA because of the significant public health and environmental benefits it will create as demonstrated by EPA modeling (Source: power point presentation by Byron Bunker, Center Director of EPA's Office of Transportation and Air Quality, Wednesday, December 17, 2008 at EPA Region 9). The EPA's findings indicate that establishing an ECA for the United States would reduce smog-forming oxides of nitrogen (NO<sub>x</sub>) emissions by 80% from existing engine emission levels, particulate pollution (PM) by 85%, and sulfur oxides (SO<sub>x</sub>) by 95%. EPA's estimated 2020 particulate concentration reductions in the United States as a result of an ECA are as high as 4.8 µg/m<sup>3</sup> (micrograms per cubic meter) in some of the most impacted port areas; and as a result, the ECA is expected to prevent up to 8,300 premature deaths *each year* by 2020. And in Houston, particulate concentration reductions in 2020 could be as high as 1 µg/m<sup>3</sup>; and these expected reductions could mean the difference between meeting and not meeting health-based federal National Ambient Air Quality Standards. Indeed, the emissions reductions garnered from a US ECA would create long-term health and environmental benefits to Houston, as well as to the rest of the nation.

We also support the joint application with Canada and the potential for Mexico to join in the future. A uniform program across all North American ports will not place any individual port at an economic or competitive disadvantage and ensures a level playing field, and maximizes the protection of public health and the environment. A large comprehensive program will help push international shipping toward cleaner engines and fuels faster than a collection of disparate programs. This is especially important because of the projected increase in marine shipping volume. We also support a strong and unified international program because the majority of ships that call on our ports are foreign-flagged.

Thank you for your consideration of the US ECA and for your leadership in helping to raise the fuel standards for all ships, resulting in improved air quality and public health benefits.

Respectfully,  
  
Vince Ryan  
Harris County Attorney