



**TEXAS PORTS  
ASSOCIATION**

July 20, 2009

**Received**  
**JUL 21 2009**  
**Environmental  
Affairs**

Department of Homeland Security  
United States Coast guard  
Mr. Jeffrey Lantz  
Director, Commercial Regulations and Standards  
2100 Second Street, S.W.  
Washington, DC 20593-0001

Dear Director Lantz,

The ratification of MARPOL Annex VI by the US has made it possible for the US to implement the requirements and regulations of Annex VI. Additionally, Annex VI has recently been revised to include amendments that reduce sulfur oxides (SOx), nitrogen oxides (NOx), and particulate matter (PM) emissions further from ocean going vessels. These amendments will allow Emission Control Areas (ECAs) to be designated for SOx, NOx and/or PM.

The Texas Ports Association (TPA) has more than 1,000 port facilities on over 1,000 miles of channel maintained by the US Army Corps of Engineers. Over 473 million tons of cargo are handled by Texas ports, which accounts for approximately one million jobs for Texans and more than \$30 billion in economic impact. Texas ports handle cargo ranging from passengers to crude oil, lumber and paper, steel, agricultural products, consumer goods, chemicals, containers, aggregates, automobiles, construction equipment and strategic military cargo. In addition to being the home of a vibrant commercial seafood industry, Texas ports serve the offshore drilling and recreational boating industries.

The TPA is writing to support the EPA's joint ECA application with Canada and the subsequent inclusion of Mexico submitted to the International Maritime Organization (IMO) in March 2009. The TPA understands that addressing emissions from ocean going vessels in a uniform program amongst all North American ports will not place any individual port at an economic or competitive disadvantage and ensures a level playing field, while maximizing the protection of 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 projections of shipping activity all agree that the volume of shipping will increase in the future.

Wade Battles  
President  
713.670-2453  
wbattles@poha.com

Steve Cernak  
Vice President  
409.766-6103  
scernak@portofgalveston.com

**Members**

Port of Bay City Authority  
Port of Beaumont  
Port of Palacios  
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Port of Houston Authority  
Port Of Orange  
Port of Galveston  
Port of Corpus Christi  
Port of Texas City  
Port of West Calhoun

P.O. Box 2562 - Houston, Texas 77252

The TPA felt it was an appropriate time to express its support for ECAs to the US Coast Guard during IMO's Marine Environment Protection Committee's meeting occurring in London during July 2009. Thank you for the opportunity to express our support as stakeholders in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Wade Battles", with a large, sweeping flourish extending to the right.

Wade Battles

Cc: Steve Cernak  
✓ Dana Blume