August 18, 2009

International Maritime Organization Headquarters
4 Albert Embankment
London, UK
SE 1 7SR

Dear Chairman and Committee Members of MEPC:

The Houston-Galveston Area Council 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, and encourages you to adopt the joint ECA proposal at your March, 2010 meeting (MEPC 60).

H-GAC is an area-wide voluntary association of local governments in the thirteen-county Gulf Coast Planning region of Texas. Our region covers 12,500 square miles and contains more than 5.7 million people. H-GAC is governed by a Board of Directors containing thirty-five local elected officials who serve on the governing bodies of local governments. H-GAC’s mission is to serve as an instrument of local government cooperation promoting the region’s orderly development, and the safety and welfare of its citizens.

The H-GAC region hosts several ports. The two major ports are the Port of Houston and the Port of Galveston. The Port of Houston ranks first in the United States in foreign waterborne tonnage, second in total tonnage, and continues to be one of the largest ports in the world. The Port of Galveston is the main tourist port for the State of Texas. Other notable ports in the H-GAC region include the Port of Freeport, and the Port of Texas City. Despite nationally projected economic downturns, we expect to see a rise in port traffic. We are concerned that this increase may equate to an increase in air pollution.

The H-GAC planning area continues to grapple with significant air pollution issues and is actively working towards improving our, and the Country’s, air quality. 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 the 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 suggest that establishing an ECA for the United States would reduce smog-forming oxides of nitrogen (NOx) emissions by 80% from existing engine emission levels, particulate pollution (PM) by 85%, and sulfur oxides (SOx) by 95%. EPA’s estimated 2020 particulate concentration reductions in the United States with an ECA are as high as 4.8 ug/m³ (micrograms per cubic meter) in some of the most impacted port areas. As a result, the ECA is expected to prevent up to 14,000 premature deaths each year by 2020. The greater Houston area foresees particulate concentration reductions in 2020 could be as high as 1 ug/m³. The expected reductions could be the determining factor to meeting the health-based federal National Ambient Air Quality Standards. Indeed, the emissions reductions garnered from a US ECA could create long-term health and environmental benefits to Houston, as well as to the rest of the nation.

H-GAC also supports the joint application with Canada and the potential for Mexico to join in the future. A uniform program across all North America ports should not place any individual port at an economic or competitive disadvantage, should ensure a level playing field, and should maximize 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.

Sincerely,

[Signature]

A.G. Jamison
Colorado County Judge
H-GAC Chair

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