

Harbor Safety Committee

of the San Francisco Bay Region

Mandated by the California Oil Spill
Prevention and Response Act of 1990

November 20, 2005

Clerk of the Board
California Air Resources Board
1001 'I' Street, 23rd Floor
Sacramento, CA 95814

**Re: Proposed Emission Limits for Auxiliary Diesel and Diesel-Electric Engines
on Ocean-going Vessels Within California Waters**

Dear Sirs:

The proposed Air Resources Control Board regulations for emission limits were recently brought to the attention of the San Francisco Harbor Safety Committee (HSC). The Committee was established by state legislation in 1991 to make recommendations to prevent maritime accidents in the Bay Region. The twenty-member HSC is composed of a wide group of the maritime community, including the Port authorities, state and federal government, recreational boaters, and an environmental representative. San Francisco Bay is the fourth busiest port in the nation relative to oil shipments, so we are vitally concerned with safety.

The HSC Navigation Work Group met on October 25, 2005 with two representatives of the Air Resources Board to discuss the pending regulations relative to the safe operation of ships. The concerns of the Work Group were forwarded to the full Harbor Safety Committee for discussion at our regular monthly meeting of November 10.

After discussion, the San Francisco Harbor Safety Committee unanimously voted as follows:

"While the Harbor Safety Committee takes no position on endorsing the regulations, the Committee urges the Air Resources Board to address two safety concerns:

1. That the regulation include a safety clause allowing the Captain or Operator of the vessel to revert to the previous fuel oil if the ship develops maneuvering problems after changing to low sulphur fuel oil. Many maritime regulations have a safety or seaworthy clause for the Captain or Operator. For example, the ballast water regulations have such a clause in Public Resources Code Section 6, Section 71203.
2. That the regulation include a "phase-in" period for implementation. This will allow time to notify all affected vessels and give them an opportunity to fine tune their change-over procedures. Many regulations have a phase-in period.

The Committee further offers its assistance to the Board in acting as a 'sounding board' for proposed regulations that may impact safe vessel operations, particularly in confined waters such as San Francisco Bay."

Thank you for your consideration.



Joan Lundstrom, Chair
San Francisco Harbor Safety Committee

Cc: Peggy Taricco, Manager, Technical Analysis Section, California Air Resources Board

Lisa Curtis, Acting Administrator, Office of Spill Prevention and Response

Captain William Uberti, U.S. Coast Guard Captain of the Port

Commander Gordon Loebel, U.S. Coast Guard Waterways Management

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