



June 27, 2006

Maureen Middlebrook, President,  
Golden Gate Bridge, Highway and Transportation District  
And Board of Directors  
P. O. Box 9000  
Presidio Station  
San Francisco, CA 94129-0601

Re: New Fast Ferry and Air Pollution Standards

Dear President Middlebrook and Directors,

Please accept this letter as follow-up to the comments I made at the June 23, 2006, Golden Gate Bridge, Highway and Transportation District board meeting r

I was encouraged to hear at the board meeting the statement by the district's attorney that the new vessel and its environmental impacts would be reviewed under both federal and state environmental processes (NEPA and CEQA). This will provide an avenue for the public to be involved in the process. However, if the district wants to fully protect human health and the environment, it must go farther than the minimal environmental mitigation that might be required under these environmental laws.

The reason is that air pollution standards for marine engines lag far behind that for transit buses, diesel trucks and cars. The air pollution standards for marine engines of the size needed for the new 499-passenger vessel don't take effect until 2007 (EPA Tier II). In fact, emissions increase on a per passenger basis when commuters switch from cars and buses to fast ferries. So it is conceivable that if the ferry is fast-tracked and contracted out by the end of this year, that it could be built with uncontrolled diesel engines that are hundreds of times more polluting per passenger than other modes (California Air Resources Board, "An Emissions Evaluation of Proposed High-Speed Ferry Service Compared to Other Transportation Modes," March 2002). As you probably know, diesel exhaust has been designated a cancer-causing agent by the State of California. The state is committed to reducing diesel emissions throughout the state by 75 percent by 2010 and 85 percent by 2020 in order to meet federal air standards and to protect the public from exposure to diesel exhaust and its health effects.

I was also encouraged to hear several directors including Supervisors McGoldrick and Sandoval voice support for establishing a protective air emissions standard at least as strong as the Water Transit Authority standard for the new vessel. I believe that such an approach will receive support from local cities and counties, as well as at the state level, based on the fact that the WTA's standard was authorized by the State of California through legislation authored by Senator Don Perata.

The bridge directors may also want to be aware that the California Air Resources Board is now undergoing a rulemaking process that will require all existing ferries and other harborcraft to upgrade engines to at least the new federal standards, but probably beyond. In addition, the US EPA will be advancing a new rulemaking sometime in the future to tighten emissions standard on new engines (Tier III).

With all these developments in mind, I hope you will agree that it would be in the best interest of the District, its passengers and the residents of Marin and the greater Bay Area to adopt strict emissions standards that go beyond current legal engine standards for the new fast ferry. Bluewater Network looks forward to being a partner in the process to set these standards.

Please feel free to contact me if you would like to discuss further or receive documentation about ferry engine emissions and standards. Also, I request that the Bridge District Board provide me with notice of any actions, agenda items, board meetings, public meetings or other activities related to the new fast ferry.

Sincerely yours,

Teri Shore  
Clean Vessels Campaign Director

Cc: Celia Kupersmith, General Manager  
James Swindler, Deputy General Manager, Ferry Division