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June 9, 2023

City of Santa Barbara Harbor Commission
132-A Harbor Way
Santa Barbara, CA 93109

Re: Recommendations for the Future of City of Santa Barbara's Cruise Ship Program

Dear Commissioners:

I submit this letter in advance of the June 15, 2023, City of Santa Barbara's Harbor Commission (Commission) regular meeting. I ask that the letter be included in the public record for any Agenda Item on the Cruise Ship Subcommittee (Subcommittee) activities and distributed to Commissioners prior to the meeting.

Santa Barbara Channelkeeper is a local non-profit organization that works to protect and restore the Santa Barbara Channel and its watersheds. Channelkeeper was founded in 1999 as a program of the Environmental Defense Center. In 2001, we became an independent, 501(c)(3) organization. We have a long-standing history of working for clean water and healthy habitats in the Santa Barbara region through our education, community engagement, monitoring, and advocacy programs.

The Santa Barbara Channel is one of the most biologically productive ecosystems on Earth. Channelkeeper is concerned about the risks that cruise ship traffic through the Santa Barbara Channel has on the magnificent biodiversity and environmental sensitivity of the area.

We are also concerned about the public health and environmental impacts of air emissions of cruise ships transiting to and from, and anchoring off the coast, as well as wastewater discharges from the cruise ships. In December, an engineer with the Santa Barbara County Air Pollution Control District reported to the Subcommittee that a large cruise ship with 3,575 passengers emits 2.2 times more greenhouse gas emissions as the equivalent of more than 1,788 passenger car roundtrips between Los Angeles and Santa Barbara. He also reported that this sized cruise ship emits approximately 150 times more nitrogen oxide (NOx) and sulfur oxide (SOx) pollution than these car trips.

State law prohibits discharges of sewage, greywater, and bilge water within three miles of shore. The U.S. Clean Water Act allows cruise ships to discharge treated sewage and greywater between three and twelve miles from shore. Beyond twelve miles, cruise ships can discharge untreated sewage, greywater, bilge water, and food waste. The monitoring and reporting requirements under the Clean Water Act for cruise ship discharges, especially sewage, are not robust.

The City of Santa Barbara has taken positive steps to address localized environmental impacts of its cruise ship program by securing voluntary commitments with the cruise ship captains aimed at preventing use of the ships' incinerators and the discharge of sewage or greywater within twelve miles of shore. It is a challenge to monitor for compliance. The City relies largely on good faith that ships comply with these commitments.

Last year, Channelkeeper recommended that the Commission establish a subcommittee to involve the public in a review of the City's cruise ship program. We were concerned about the more than 30 cruise ships scheduled to visit Santa Barbara in 2022, which would set an all-time record for cruise ship visits in one year. Approximately 200 ships have visited Santa Barbara since the program's inception in 2002. So, approximately 13 percent (30 of 230) of the visits in the 20-year history of the program were scheduled to occur in one year. We were concerned that the 2022 schedule was a sign of the future. We also thought it was a good time for the City to review how the cruise ship program aligns with other environmental and community goals, such as the commitment to be carbon neutral by 2035.

We applaud the Commission, members of the Subcommittee, and Waterfront staff for undertaking a review of the City's cruise ship program.

For the past several months, Channelkeeper has attended and regularly provided comments to the Subcommittee as it reviewed the City's cruise ship program. There has been a strong, enthusiastic community turn-out and participation at these meetings. The overwhelming majority of those speaking during public comment periods are calling for changes.

At the December Subcommittee meeting, the chair of the Channel Islands National Marine Sanctuary (CINMS) Advisory Council submitted for the public record a letter (CINMS Advisory Council letter) to John Stedman, City of Santa Barbara Harbor Commission Chair and Kristen Sneddon, Chair of the City of Santa Barbara Sustainability Council Committee with several recommendations. I have included the CINMS Advisory Council letter as Attachment 1 to this letter so that it can also be part of this meeting's public record.

Last month, Waterfront Staff presented their recommendations to the Subcommittee. Some of the newly recommended changes, such as not scheduling visits between Memorial Day and Labor Day, during weekends, or on consecutive days, are steps in the right direction. A few Staff recommendations add further requests of cruise ships and lines.

We believe more can and should be included in an updated cruise ship program. We believe there should be a hard cap on the annual number of cruise ship calls. We believe that the ships visiting Santa Barbara should be demonstrating a commitment to install and use advanced technologies that reduce their impacts to marine resources and public health. We support maintaining a Cruise Ship

Subcommittee to provide the public with opportunities for continued engagement in the program. As the Commission and City continue to review the cruise ship program, we believe the City should establish more requirements for cruise ships/lines who make calls to Santa Barbara.

Channelkeeper recommends the City adopt the following improvements to its cruise ship program. **We recommend that these improvements be in place in time to cover cruise ships visiting Santa Barbara for the 2025 spring season.**

- **Reduce and cap the number of cruise ship calls to Santa Barbara to no more than 18 annually.** Channelkeeper recommends a hard cap on the number of cruise ships making calls to Santa Barbara Harbor. Our recommended cap is the average number of cruise ships that visited Santa Barbara between 2010 and 2019 (and similar to the number of visits in 2018 and 2019). According to the Waterfront Department’s staff presentation at the September 22, 2022, Subcommittee meeting, 181 cruise ships visited Santa Barbara during these ten years, for an average of 18 calls per year (see slide).



- **Require that visiting ships have Advanced Wastewater Treatment Systems (AWTS) installed.** Over the past 20 years, cruise lines have improved their wastewater practices by installing advanced wastewater treatment systems on new ships. Monitoring data from the State of Alaska shows that these systems improve the condition of the effluent as compared to traditional Marine Sanitation Device (MSD) technology, which is required to be used by the International Maritime Organization (IMO) and the U.S. Environmental Protection Agency. According to the Cruise Line Industry Association, 78 percent of the cruise ship

fleet of Association members has AWTS installed and 100 percent of the new ships on order are set to have AWTS.

Most ships in the cruise lines that visit Santa Barbara are already equipped with AWTS. Thus, a requirement that cruise ships must have AWTS installed would not significantly shrink the number of ships visiting Santa Barbara. It would, however, prevent ships that still use outdated technologies from visiting Santa Barbara, and help to reduce the risks associated with wastewater discharges in the Channel.

- **Prohibit cruise ships with scrubbers from visiting Santa Barbara.** Cruise ships have traditionally burned heavy fuel oil or bunker fuel, which are some of the dirtiest fuels and result in significant emissions of sulfur oxide (SO_x) air pollution. In 2020, the IMO announced standards to lower sulfur emissions throughout the marine shipping industry, including cruise ships. California has established even stricter sulfur emissions standards, and ships are required to comply by using cleaner burning fuels. Outside California, however, the same ships that visit Santa Barbara are legally allowed to comply with IMO standards by using “equivalent” compliance measures instead of shifting to cleaner fuels. The cheapest way for cruise ships to do so is to install devices known as scrubbers in their exhaust stacks. The use of scrubbers has increased in the shipping industry over the last several years.

Scrubbers use seawater to spray down exhaust in smokestacks, resulting in the accumulation of highly acidic and toxic scrubber sludge containing heavy metals and polycyclic aromatic hydrocarbons (PAHs) that accumulate in the ocean food web. U.S., Canadian, and IMO regulations allow for ships to dump scrubber sludge directly to the ocean. Studies have demonstrated that scrubber discharge has damaging effects on marine ecosystems.

Santa Barbara should lead by example and avoid doing business with ships that pollute our oceans and marine ecosystems with toxic scrubber waste, thereby creating incentives for the cruise industry to commit to the use of cleaner burning fuels and investments in hybrid technologies.

- **Expand the voluntary Vessel Speed Reduction (VSR) Zone, urge ships to reduce speed to 10 knots or less when in this zone, and track how cruise ships adhere to these voluntary speed reduction measures.** The National Oceanic Atmospheric Administration, working with the U.S. Coast Guard and U.S. Environmental Protection Agency, issues requests for large vessels transiting off southern California, Monterey, and San Francisco to reduce speeds to 10 knots or less. These speed reductions are recommended to decrease the risk of ship strikes with endangered blue, fin, and humpback whales, reduce ocean noise, reduce greenhouse gas emissions, and improve public health protections. In 2023, the agencies expanded the southern California Zone to include more areas of the Santa Barbara Channel.

To be consistent with federal agencies’ voluntary speed reduction issuances, Channelkeeper recommends that the City modify the City’s voluntary 12-mile VSR request in its Captain’s

agreement to include the recently expanded voluntary VSR zone and specify speed reduction to 10 knots or less in this VSR zone. In addition, we recommend that City staff review transit data to track how well this recommendation is being followed and consider this information on program participation as it negotiates future cruise ship visits and schedules.

- **Phase in the required use of at-anchor emissions control systems when these technologies become feasible.** When anchored offshore, cruise ships run auxiliary engines to provide electrical power to the ship. This produces emissions of sulfur dioxide (SO₂), nitrogen oxide (NO), and particulate matter (PM). Channelkeeper recommends that as technologies to control at-anchor emissions are developed, they be required for cruise ships visiting Santa Barbara.
- **Prioritize ships that have capacity to plug into shoreside electricity.** One way to significantly reduce air emissions is for ships to plug into shore-power when at port since land-based energy sources are typically cleaner than auxiliary engines. In 2020, the California Air Resources Board updated its At-Berth Regulation requiring cruise ships to plug into shore-power when at port. However, Santa Barbara is exempt from this regulation. Nevertheless, Channelkeeper recommends giving prioritization to ships equipped with plug-in technology to support the move within the industry to upgrade its fleet with this advanced technology.
- **Prioritize cruise lines with the best environmental and public health compliance records.** Channelkeeper recommends that Waterfront staff regularly review enforcement data as it develops its schedule and prioritize ships that have the lowest number of environmental violations, penalties, and fines and the least number of violations in inspections by the Center for Disease Control Vessel Sanitation Program.
- **Maintain the Cruise Ship Subcommittee.** Channelkeeper recommends that the Commission keep the Subcommittee in place to allow Commissioners an opportunity to provide ongoing advice on the cruise ship program and cruise ship schedules, and to allow for further public engagement. The Subcommittee would also provide a forum to periodically review the City's cruise ship policies to update measures based on evolving industry technology. We recommend that the Subcommittee meet two to three times per year.

Thank you for considering these recommendations for improving the City's cruise ship program.

Sincerely,



Ted Morton
Executive Director

Attachment 1: Channel Islands National Marine Sanctuary Advisory Council letter to John Stedman, City of Santa Barbara Harbor Commission Chair and Kristen Sneddon, Chair of the City of Santa Barbara Sustainability Council Committee (November 18, 2022)