

(R-89-1947)

RESOLUTION NUMBER R- 273260

ADOPTED ON APR 17 1989

WHEREAS, the U.S. Department of the Interior has issued draft rules governing emissions of air pollutants from offshore oil drilling; and

WHEREAS, these rules would permit emissions that could adversely impact the quality of California's air; and

WHEREAS, the Interior Department is requesting comments on the proposed rule by April 17, 1989; and

WHEREAS, San Diego will submit an air quality plan in 1991 which will state how the region will decrease emissions by 5% a year until the clean air standards are met; and

WHEREAS, if there is oil drilling off the San Diego coast which is not tightly controlled by federal regulations, the air quality impacts could adversely affect the implementation of this plan; and

WHEREAS, the Southern California Association of Governments and the Air Pollution Control Districts in Southern California have developed a review of the draft regulations, a copy of which is attached hereto as Attachment A; and

WHEREAS, the federal rules guarantee little or no protection to California's air quality and should be vigorously opposed;

NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, that this Council, for and on behalf of the people of San Diego and

Southern California, does hereby oppose the U.S. Department of Interior's draft rules governing emission of air pollutants for offshore oil drilling.

APPROVED: JOHN W. WITT, City Attorney

By Jack Katz
Jack Katz
Senior Chief Deputy

JK:smm
04/10/89
Or.Dept:Council-Struiksma
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CITY OF SAN DIEGO
SAN DIEGO, CA

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REVIEW OF THE
DEPARTMENT OF THE INTERIOR
DRAFT AIR POLLUTION RULE
OFFSHORE OIL DEVELOPMENT

- The draft air pollution rule is substantially weaker than current rules for most California coastal air pollution districts. The rule totally ignores Federal EPA and California ARB mandates to greatly tighten existing air quality regulations along the coast of California. The rule fails to resolve the large discrepancies between EPA and DOI requirements implementing the Clean Air Act.
- Pollution allowed under the draft rule will interfere with or, potentially, prevent coastal air pollution districts from complying with Federal EPA mandates to attain clean air standards.
- The draft rule will impede economic growth as onshore industries are required to institute more costly pollution control measures to compensate for unregulated or unmitigated offshore pollution.
- The excessive MMS discretion to waive or relax air quality control requirements will result in unresolvable controversy over project design and ensure endless disputes over the development of offshore oil and gas resources.
- Virtually all anticipated exploratory drilling will proceed unmitigated under the draft rule. Pollution in excess of 1,000 tons per year of oxides of nitrogen would be allowed without mitigation from drilling ships and support vessels offshore each and every air basin. This is equivalent to adding over 125,000 cars to each air basin (meeting 1988 emission standards), each traveling over 10,000 miles a year on coastal roadways.
- Virtually all offshore construction emissions would proceed unmitigated under the draft rule. For an average two platform project, emissions from construction of platforms and pipelines (including support vessels) can exceed 620 tons of oxides of nitrogen in a single year. These emissions can recur in every area where platform construction occurs. This is equivalent to adding 77,500 cars (meeting 1988 emission standards), each traveling 10,000 miles a year on coastal roadways.
- For areas not currently meeting federal ozone standards, the draft rule allows almost twice the level of pollution from oil production to go unmitigated than is allowed by most onshore air pollution districts. For platforms offshore of Los Angeles, over 3 to 4 times the pollution would be allowed without mitigation compared to that currently allowed by the South Coast Air Quality Management District.

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ATTACHMENT A

- For areas currently meeting the federal ozone standard, the draft rule allows 100 tons of oxides of nitrogen and 100 tons of reactive hydrocarbons from every platform to go unmitigated.
- The detailed methodology in some areas of the rule is highly misleading, as all clean technology requirements (such as Best Available Control Technology and Electrification) can be dismissed as "not applicable" or "inappropriate" by the MMS on any given project.
- The draft rule completely disregards the pollution from marine vessels cruising back and forth to the platforms. This can be the single largest source of offshore pollution and this pollution would go unmitigated under the draft rule.
- The draft rule fails to specify minimum data collection requirements essential to quantifying annual pollution levels from offshore operations. Furthermore, there are no requirements in the rule to monitor actual ambient air quality levels.
- The rule lacks the necessary enforcement provisions to ensure implementation of air quality regulations. EPA has developed literally hundreds of enforcement and procedural documents to regulate air quality, yet the Department of Interior has few (if any) guidelines to implement this air quality rule.
- Contrary to the statements in the preamble published with the rule, the rule makes no attempt to comply with the requirements of the California Clean Air Act. This Act mandates that pollution levels be reduced to meet health based standards.
- DOI provides no evidence supporting weaker air quality rules than those required by coastal onshore air pollution districts.
- The rule guarantees little or no protection of California's air quality and fails to satisfy the requirements of the Outer Continental Shelf Lands Act or the federal Clean Air Act. The rule should mandate the same air quality protection measures as required by onshore coastal air pollution districts.

NOTE: Comments must be submitted to the Department of the Interior by April 17, 1989. Comments should be mailed to Department of the Interior, Minerals Management Service, 12203 Sunrise Valley Drive, Mail Stop 646, Reston, Virginia, 22091, Attention: Gerald D. Rhodes.

AQPLAN/RULECORR/LISTING
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CITY OF SAN DIEGO, CA

APR 17 1989

Passed and adopted by the Council of The City of San Diego on.....
by the following vote:

Council Members	Yeas	Nays	Not Present	Ineligible
Abbe Wolfsheimer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ron Roberts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gloria McColl	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H. Wes Pratt	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ed Struiksmā	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
J. Bruce Henderson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Judy McCarty	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bob Filner	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mayor Maureen O'Connor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

AUTHENTICATED BY:

MAUREEN O'CONNOR
Mayor of The City of San Diego, California.

(Seal)

CHARLES G. ABDELNOUR
City Clerk of The City of San Diego, California.

By *Ellen Board*, Deputy.

Office of the City Clerk, San Diego, California	
Resolution Number R 273260	Adopted APR 17 1989



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