

Brian Vahey  
The American Waterways Operators

Members of the Committee, my name is Brian Vahey and I'm with the American Waterways Operators, the trade association for the tugboat, towboat, and barge industry.

I'm writing to discuss our members' concerns with LD 1532, An Act to Protect Maine's Air Quality by Strengthening Requirements for Air Emissions Licensing. The bill would establish licensing fees and other requirements for "vessels at anchor" and I wanted to discuss that in a little more detail.

AWO members are active in Maine waters. They conduct ship assist and fueling operations and transport vital commodities to Maine ports; and our members are poised to make additional investments in Maine operations in the future, most notably in support of offshore wind energy projects. Regardless of the work our members are doing, they are committed to limiting their emissions. Towing vessels are equipped with state-of-the-art engines that meet EPA emissions requirements and our tank barges are equipped with vapor control equipment. Additionally, our members do not conduct loading operations in Maine waters, further reducing the likelihood of emissions. In short, our members take great pains to reduce and even outright eliminate the impact of their work on the local environment.

It is for this reason that our members are concerned with Rep. Morales' bill to reduce emissions by subjecting vessel operators to fees and further administrative burdens when they are at anchor. In truth, AWO members do not anchor in Maine very often, and when they do it is both at very brief intervals and largely for safety reasons (for example waiting for better weather to begin their transit south). On the rare occasion that towing vessels need to anchor, they produce little-to-no emissions while doing so: their engines are off and with the exception of a small, on-board generator, there is no other running equipment.

Rep. Morales' bill seeks to address her concerns with emission levels in her district by casting a very wide net and with seemingly little consideration for the actual emissions contributions from the various industries that her bill would impact. Indeed, it is not even clear how towing vessel operators would need to comply with the bill given the sporadic and infrequent nature with which it would apply to them. We urge the Committee to vote against this bill.