

Bob Phipps  
11-7-5

Statement to CARB Board Members  
MCE Regulation Amendments - September 22, 2011

Madame Chairman, ladies and gentlemen of the Board. My name is Bob Phipps, I work with Bettendorf Trucking in Arcata, CA, and I have a few brief comments regarding the Rural Low Throughput Port of Humboldt Bay as it fits into these proposed Amendments.

First, on behalf of Humboldt Bay stakeholders, I wish to extend our recognition and appreciation for the dedication and hard work of your Mobile Cargo Equipment staff. Regarding the economic and air quality realities of Humboldt Bay we have all been impressed by staff's efforts to hear all the facts, verify conditions with onsite investigation, weigh the options, and come to a fair proposal for our compliance. In their Report discussing these Proposed Amendments, Staff notes several important points regarding the Port of Humboldt Bay and how our conditions are so different from Los Angeles, Long Beach, Oakland and the other Ports that this law was designed to address. Allow me to briefly touch on a few of the key points staff recognizes.

\* Humboldt Bay is an isolated small port in the northwest corner of the state. We are a captive air basin with minimal PM challenges and full compliance with NOx standards. Our local North Coast Air Quality District has been an advocate for us and a strong supporter of Staff's proposed changes from an air quality standpoint.

\* We are a small population community separated from the rest of California by mountain roads and substantial distance. We lost our railroad connection in 1998. We could not economically compete with other California ports even if we wanted to.

\* Our economy remains primarily forest products based and this historically drove local port activity with shipments of pulp, wood chips, and logs. The recession saw collapse of this economy, particularly due to the west coast housing market, and we have seen the permanent closure of our pulp mill (taking 200 jobs with it), the closure of several area saw mills, and the downsize of remaining mills. While we are now seeing small scale recovery, port activity will likely never regain 2005 levels. Staff notes that our shipping tonnage dropped from 800,000 tons in 2005 to 90,000 tons in 2009. As a comparative land based measure, in 2006 Bettendorf Trucking hauled 120 chip truck loads per day into the port area but by 2010 daily loads had dropped to 15.

\* Staff notes that our forest products industry is seasonable with activity occurring between May and October and is also an industry with year-to-year production changes. As a result, the approximately 20 pieces of port equipment work part time only and total emissions are noted to be less than 1% of emissions produced in Los Angeles or Long Beach in 2011.

As the following speakers will note, our port operators have worked to comply with the law and to restart at least some port activity. Our tonnage, and thus our emissions, will remain well below past levels for some time and success is not guaranteed. Recognizing this, Staff has proposed Amendments that provide economic relief and yet still achieve desired emission improvements for our community in a realistic time frame. This process has been the result of a "win-win" approach to these objectives and Staff is to be recognized for their efforts. We urge the Board to adopt the Rural Low Throughput Port revision that Staff has proposed. Thank you very much for your attention.