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August 27, 2020

Mary Nichols
Chair of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Heather Arias
Division Chief, Transportation & Toxics Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Richard Corey
Executive Director
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Bonnie Soriano
Branch Chief, Freight Activity Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Comments on 20-8-1: Public Hearing to Consider Proposed Control Measure for Ocean-Going Vessels At Berth

Dear Chair Nichols, Executive Director Corey, Division Chief Arias, and Branch Chief Soriano,

Thank you for working with us to achieve emission reductions of more than 80% over the past 10 years at our Port with cutting edge ZEV technologies. We look to your leadership continue to foster even greater results.

For this purpose, today, we join many of our fellow ports, labor, and stakeholders to ask that this new at-berth policy be driven through consensus built data, embracing science and assessing the very real economic impacts. We ask that the 2 year interim review of this regulation include a data driven analysis from an industry respected economist jointly chosen by you, the Board, and the maritime industry, together to ensure certification and shared trust in the data and impacts they conclude.

We also ask you to commit to identifying a specific funding sources. Our genuine desire to clean our air, depends on access to significant funding. Projects range in the very high millions and our annual port budget cannot absorb these costs alone. This is especially critical as we face so much economic hardship with the pandemic and so many jobs at stake. We were just informed our project proposal to capture air emissions from RoRo vessels, a technology which this very regulation calls for, would be technically ineligible for Carl Moyer and VW Mitigation funding.

We were further informed that we are precluded from this funding as we are not in a disadvantaged community (DAC) according to the CalEnviroScreen 3.0 Map, even though we reside in the most challenged area in Ventura County facing 26% poverty and are within just a mile of the



CalEnviroScreen 3.0 Map designation. We respectfully request you help us secure this funding with waivers and/or other potential solutions.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'Cam Spencer'. The signature is written in a cursive, flowing style.

Cam Spencer
Public & Government Relations Manager
The Port of Hueneme
Oxnard Harbor District