

Bechtold, Bradley@ARB

From: ARB Clerk of the Board
Sent: Thursday, June 25, 2020 1:54 PM
To: Bechtold, Bradley@ARB
Subject: FW: Brief Comments on Informational Update on Control Measure for Ocean-Going Vessels At Berth

From: Giles Pettifor <GPettifor@portofh.org>
Sent: Thursday, June 25, 2020 1:49 PM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: Brief Comments on Informational Update on Control Measure for Ocean-Going Vessels At Berth

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Dear Clerk of the Board,
We encountered technical issues and were unable to submit our comments through the web interface. Please find those brief comments below, thank you

Dear CARB Board Members,

We appreciate the opportunity to comment on this draft of the Proposed Control Measure for Ocean-Going Vessels At Berth, and have submitted comments over the past two years including our last comment in April 2020. We join our fellow ports and various statewide partners to encourage the California Air Resources Board (CARB) to consider the delay the implementation dates of some the proposed timelines included in the rule. The main reason for this request are the substantial and material changes impacting our industry resulting from the COVID-19 pandemic and ensuing economic recession that have drastically altered our operational capabilities and circumstances. These impacts have rendered the hypothetical future estimates of emissions and cargo growth predictions, upon which the proposed control measures are based, drastically inaccurate. More time is needed to understand how the economic fallout from the COVID-19 pandemic affects California ports, the automobile and RoRo industry, and the abilities of the industry to fund the required infrastructure to implement the proposed regulations. For example, the Port of Hueneme has experienced a 35% reduction in cargo revenue and a 75% reduction in automobile cargo tonnage since the onset of the COVID-19 pandemic. Over the next year, most predictions estimate a 20% reduction in the global automobile industry and thus we anticipate seeing a correlated reduction in RoRo vessel calls. We need more time to see the impacts of how this pandemic and economic recession alter our industry.

Historically and in the present, the Port of Hueneme has been in full support of statewide emissions reductions and has been implementing a comprehensive Clean Air Plan since 2013, including the installation of a \$15 million shorepower system for container vessels. Shorepower, along with fuel regulations, have helped reduce the emission of diesel particulate matter from Port operations by more than 80% since 2008! Just last year, the Port took initiative to fund and install the only reference grade air quality monitors in our air basin. This installation will enable the calibration of various smaller monitors for use in the community and to share data with our local VCAPCD (the Ventura County Air Pollution Control District). Last year, in partnership with the Coalition for Clean Air, the Port also was the founding host of the first-ever Clean Air Day for Ventura and Santa Barbara Counties. The Port is also being proactive in building infrastructure on-dock (partially funded by CARB's ZANZEFF Grant) to power a new generation of zero emission cargo handling equipment, including an electric hybrid crane. All of these efforts are part of the Port's pursuit of a more equitable, decarbonized, zero emission future.

However, the costs for the new infrastructure required by the proposed regulations will be shouldered by the Port of Hueneme alone, as we are both the Public Port Authority and terminal operator. The Port is a State Special District, not a wealthy multinational corporation as previous commenters have suggested. The scale of the investments needed to comply with the proposed rule are so significant that in the revenue-limited environment we are in due to the pandemic, it will be extremely challenging to meet the proposed timelines in the draft rule. With this in mind, we ask that the CARB Board consider the unprecedented downturn of the global economy and their role in the upcoming economic recovery for our community as they review the proposed deadlines of these new regulations. The Port of Hueneme is the fourth largest employer in our County, and is devoting significant resources to comply with the current regulations while keeping thousands of workers employed during this unprecedented time. We hope that the State will ensure sufficient funds are available to assist willing, enthusiastic partners like the Port of Hueneme in achieving the investment needed to clean the air we all breathe.

Best Regards,
Giles Pettifor
Environmental Manager of the Port of Hueneme

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