

From: [Regan, Rachel@ARB](mailto:Regan_Rachel@ARB)
To: "GPettifor@portofh.org"; [Kristin Decas](#); [Christina Birdsey](#)
Cc: [Csondes, Angela@ARB](mailto:Csondes_Angela@ARB); [Foster, Jonathan@ARB](mailto:Foster_Jonathan@ARB)
Subject: Request for Revisions: Updated Hueneme Port and Terminal Plan
Date: Thursday, August 28, 2025 10:15:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[Revised Port of Hueneme Port Terminal Plan June 2025.pdf](#)
[image003.png](#)

Dear Giles,

Thank you for submitting the updated Port and Terminal Plan ("Plan") on June 5, 2025, on behalf of Port of Hueneme to the California Air Resources Board (CARB). CARB appreciates the updated information on the shore power rebuild project at the South Terminal and the new shore power installation at the North Terminal, as well as the update on procurement of a 2nd capture-and-control barge.

CARB has discussed the **narrow channel issue** described in the Plan during virtual meetings with the Port on September 5, 2024, and May 1, 2025. CARB appreciates the consideration by the Port and the Harbor Safety Committee to anticipate potential scenarios in which emissions control may not be feasible. For the use of exemption or exceptions, however, only CARB can make compliance determinations consistent with the Regulation. Per section 93130.9(d)(5)(M), exceptions should be claimed as part of the vessel visit information submitted to CARB within 30 calendar days of each vessel's departure, which will be subject to CARB review and approval.

For that reason, conclusions that certain situations qualify for exemption or exception are beyond the scope of the Plan, and therefore should be removed. Removing the conclusions from the Plan also ensures it is not confused as compliance with the exemption process under the At Berth Regulation. Please remove the following items to ensure compliance with section 93130.14(c):

- Amendment 1: Remove "exemption" from the title, and remove the final paragraph referencing the terminal safety and emergency event exception which is specified in Section 93130.10(d) of the At Berth Regulation.
- Section 4.1.6: Remove the final sentence referencing the terminal safety and emergency event exception which is specified in Section 93130.10(d) of the At Berth Regulation.
- Section 5.1.7: Remove the final sentence referencing the terminal safety and emergency event exception which is specified in Section 93130.10(d) of the At Berth Regulation.

When resubmitting, please also ensure that the Plan receives an updated signature from the responsible port official. Currently Kristin Decas' signature is dated June 2024, and the Plan is dated May 2025.

CARB is happy to engage further with the Port to learn more about visits impacted by the narrow channel issue and provide compliance assistance.

Please let me know if you have any questions.

Best regards,



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