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April 27, 2018

Dr. Philip Fine
Deputy Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dear Dr. Fine,

On behalf of FuturePorts, I am writing to express our concerns regarding South Coast Air Quality Management District's (SCAQMD) Proposed Rule 1410, and opposition to the potential ban of the use of modified hydrofluoric acid (MHF) at California refineries.

FuturePorts was founded in 2005 to fill an advocacy void on issues related to the continued sustainability of our ports, and our members feel a sense of urgency to address issues that hinder growth and lead to increased capital costs or excessive burdens on industry.

FuturePorts' members represent a broad range of goods movement industry businesses that operate throughout the Southern California region. Members range from small to large companies in the goods movement supply chain sector, from engineering and construction companies and their suppliers, to labor, and transportation providers. FuturePorts' members have a vested interest in the affordability and reliability of fuel supplies in Southern California and throughout the state, which are threatened by Proposed Rule 1410.

Mr. Gordon Schremp, Senior Fuel Specialist at the California Energy Commission (CEC), provided a detailed analysis of Proposed Rule 1410 to the Working Group that found the potential for devastating economic impacts. Mr. Schremp estimates that a ban could decrease local supply of gasoline for at least two years, as the two refineries that use MHF are responsible for 25% of the region's fuel supply. In light of the CEC information, FuturePorts is concerned this would negatively impact our regional economy—hurting ports, airports and the trucking industry that the Los Angeles Basin relies on to keep goods and services moving.



We urge you to analyze the potential grave economic harm for Southern California's ports, commuters, working families and regional economy as noted by the CEC when implementing PR 1410.

Sincerely,

A handwritten signature in black ink that reads "Marnie Primmer".

Marnie Primmer
Executive Director
FuturePorts
CC: Michael Krause
CC: Susan Nakamura