



Comment Log Display

Below is the comment you selected to display. Comment 1904 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kristopher
Last Name: Hebert
Email Address: raycoroofing.kh@gmail.com
Affiliation:

Subject: Future generations

Comment:

I have only begun to start my 12 year old sons fishing adventures....if boats and fishing are taken away my son and I will not be able to have a bond likeunfather gave me all those years ago....don't ruin father/parent and kid relationships that are built on the water ...FISHING

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:54:17

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Comment 1905 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Brad
Last Name: Tawa
Email Address: Bktawa@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation
Comment:
Stop this idiotic regulation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:55:58

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First Name: Robert
Last Name: Mocny
Email Address: rmcnyhome@gmail.com
Affiliation:

Subject: Stop the strict regulations

Comment:

Please don't take away my children's fishing future!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:57:47

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First Name: Jeffrey
Last Name: Villapando
Email Address: jeffreyvillapando@gmail.com
Affiliation:

Subject: Sportfishing boats

Comment:

These new measures being considered are not going to benefit the environment or clean air you guys have bigger problems other than sport boats and whale watch boats polluting the air if you ever been to the Port of Long Beach you would see the thousands of diesel big rigs who sit in the port idling 4 hours on end waiting to pick up containers coming and going not to mention the ships outside of the harbor backed up sitting here for months blowing all their admissions into the air. It is not fair that sport boats and whale watch boats and other miscellaneous boats are catching the rap for polluting the air when there are much bigger polluters out there other than us. As a sport boat operator I am personally offended by this also it is going to destroy many people's lives including mine as this is my only source of income I use to provide for my family once this takes effect and I no longer have a job because the boat I was running is taken out of operation I don't know what I would do for a living as I've been doing this for over 25 years. Please reconsider and take into consideration the effect it's going to have on thousands of people's lives.

1907.1

1907.2

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:54:53

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First Name: Ruben
Last Name: Arizaga
Email Address: X915motodad@gmail.com
Affiliation:

Subject: Carb passenger boat usage

Comment:

The California way of life and way to support their families is in your hands. Generations have worked to get to where they are and it all can be taken away this November. We the people of California support our friends in the commercial fishing industry and we hope that you do also

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:56:10

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First Name: Kirk
Last Name: Vreeman
Email Address: kvree4@gmail.com
Affiliation:

Subject: chc2021

Comment:

I urge you to vote NO on this bill, the restrictions will end sportfishing in San Diego as most of the boats are of an age that will make it impossible to make the changes without extreme financial hardship. These costs will either be passed onto the customers cutting revenue (because customers are people and have limited resources—more limited now because of ridiculous taxes and regulations) or will bankrupt boat owners. This affects numerous other businesses in and around SD. Consider putting in restrictions for boats built now and in the future.

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Date and Time Comment Was Submitted: 2021-11-03 17:51:53

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First Name: Albert
Last Name: Pellicano
Email Address: alpellicano@roadrunner.com
Affiliation: Avid sportfisherman

Subject: Don't penalize sport fisherman

Comment:

Don't penalize sport fisherman and outdoor sportsmen and some. Who enjoy being out on the ocean. I personally lost a 45 foot sportfishdr because of a burecratic red tape snafu that was supposed to provide funds to repower older vessels with modern fuel efficient engines to be paid off over time and then have the EPA throw a monkey wrench into the mix by making sportfishing unprofitable by limiting prime fishing areas off limits to fish at. Burecratic bullcrap!

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:46:24

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First Name: Jimbo
Last Name: Goldammer
Email Address: jgo1@att.net
Affiliation:

Subject: Harbor Craft Regulation

Comment:

Do not end whale watching and sport fishing with this bad regulation!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:00:17

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First Name: Juan
Last Name: Licon
Email Address: LICONJ@GMAIL.COM
Affiliation:

Subject: Fishing and Whale watching

Comment:

Why don't you state officials worry more about homelessness and drug addictions rather than Our beloved sport of fishing and whale watching for our kids?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:00:07

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Below is the comment you selected to display. Comment 1913 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sara
Last Name: Kirillov
Email Address: Sarakirillov@gmail.com
Affiliation:

Subject: Vote no!

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:02:39

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First Name: Joseph
Last Name: Kleitman
Email Address: joseph@shmana.com
Affiliation:

Subject: AGAONST PROPOSED: Vessel repowering regulations

Comment:

Dear sirs,

I write in opposition to the CARB proposals to require recreational and sport commercial vessels to repower or cease operations.

This is BAD public policy. Removing this very small targeted set of internal combustion engines will have a miniscule positive effect on the environment but a tremendously deleterious effect on the public's availability to our oceans. 1914.1
1914.2

I urge you to set these draconian proposals aside until more realistic solutions present themselves.

Thank you,
Joseph Kleitman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 17:57:55

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First Name: Lani
Last Name: Lee
Email Address: Lani.lee@gmail.com
Affiliation:

Subject: NO to CARB

Comment:

Please keep our fishing industry continue to use the vessels they currently have and stop this requirement from moving forward. There'll be lots of people that will loose their only income thus adding to already bad economy.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:02:03

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First Name: David
Last Name: Nash
Email Address: dnashoasis@aol.com
Affiliation: 909-614-8600

Subject: Fishing regulations

Comment:

the regulations that are purposed are crazy and will ruin the fishing industry... please do not pass these crazy new laws.. David Nash

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:03:42

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First Name: Nancy
Last Name: Sturm
Email Address: nancysturm@hotmail.com
Affiliation:

Subject: please dont pass this bill

Comment:

we are retired and our only enjoyment comes from going salmon fishing - It really may be time to leave sf if you pass this bill We have taken all our guests fishing and on the small boat tours

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:04:43

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First Name: Mike
Last Name: Goss
Email Address: Mskh@sbcglobal.net
Affiliation: California Angler

Subject: Stop before it Starts please!

Comment:

This will crush small business owners that promote our outdoors will generations of family's and friends that live and learn out doors and made it great. There are better things to manage and control when it comes to pollutants like the ships that come through from other countries that don't have the emissions or the controls that we do. The science does not reflect the responsible people of this country and it will cause more harm than what people can afford as a small business. Look at the photo in San Francisco I took just a month ago of a Chinese cargo ship just idling in the South Bay. I don't live in the city, I just came to visit and I could see the Flume cloud for miles and miles. I work in an industry that self monitors so it sticks out to me as a problem not the Whale watchers and sportsman boats. I drove down where I could read the name of the ship so I know it was a foreign ship. Fix that first please....

Attachment: www.arb.ca.gov/lists/com-attach/2201-chc2021-UGZcPgczJDABPIJh.png

Original File Name: 6D5393C4-CE68-4E02-AE7C-4413A0B5054A.png

Date and Time Comment Was Submitted: 2021-11-03 17:51:39

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First Name: Greg
Last Name: Finch
Email Address: Finch433@hotmail.com
Affiliation:

Subject: Sportfishing

Comment:

Fishing on a boat is something that I look forward to every spring, early, mid and late summer. I'm able to fish about 4 or so times a year. I wish I can go more but just can't afford to. If the fishing fleet is taken or seriously compromised then I won't be able to go at all. Please don't take these opportunities away from us. Please! Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:01:00

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First Name: James
Last Name: Clark
Email Address: Jclark7006@gmail.com
Affiliation:

Subject: Sport fishing Boats

Comment:

Please do not pass any legislation that will force current boat owners to be unable to use their boats due to implication of technology constraints that make no sense prevent boat owners from making a living, preventing sportsmen access to the oceans and will not make that much difference.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:06:19

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First Name: Jeff
Last Name: Brown
Email Address: Jeffdbrown88@yahoo.com
Affiliation:

Subject: Ridiculous Regulations

Comment:

Please vote no on the regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. It is not ok to put in regulations that will put 100s of family owned small businesses out of business. Absolutely not ok. I hope you make the right decision. If you don't, people's livelihoods are on you. How about you worry about regulating China and India? I'm pretty sure we don't even cause 10% of the air pollution that the rest of the world produces yet we are the ones that lose our livelihoods.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:05:35

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First Name: Colin
Last Name: Caskey
Email Address: colincaskey94@gmail.com
Affiliation:

Subject: Marine Emissions

Comment:

I am strongly opposed to any restrictions placed on California sportsman activities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:06:54

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First Name: Janis
Last Name: Green
Email Address: ifishy1@aol.com
Affiliation:

Subject: Commercial Harbor craft regulatins

Comment:

I can't believe you are considering shutting down the sport fishing industry and putting all of these families out of business. It is unconscionable that this has come this far. There is no options fo them to comply and these hardworking citizens deserve better. Please do the right thing and postpone this to a future time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:01:26

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First Name: Van
Last Name: Blanton
Email Address: van1561.vb@gmail.com
Affiliation:

Subject: Save iur rights to fish

Comment:

Its not right that you should be able to take the living rights and the entertainment rights away by making it illegal for the boats to work and supply fun for we as AMERICANS. STOP THIS NOW

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:08:45

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First Name: Sandra
Last Name: Vegerano
Email Address: snady41@aol.com
Affiliation:

Subject: Sport fishing

Comment:

A person dear to me loves fishing and the joy it brings to him...I would hate to have this legendary sport be stopped for the wrong reasons

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:09:29

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Comment 1926 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Charles K
Last Name: Bird
Email Address: ckbird@gmail.com
Affiliation:

Subject: Do not MAKE CHANGES IN LAWS THAT WILL DESTROY SPORTFISHING

Comment:

Please!

DO not change the laws governing sportfishing. The proposal will
KILL sportfishing which is a vital recreational pursuit in CA. and
destroy the sportfishing industry in CA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:11:29

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Comment 1927 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jeffrey
Last Name: Britton
Email Address: brittonja@cox.net
Affiliation:

Subject: chc2021 Proposed Amendments to the Commercial Harbor Craft Regulation
Comment:
VOTE NO!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:12:58

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First Name: Gary
Last Name: reasoner
Email Address: gcreas1@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation chc2021

Comment:

The proposed changes to the regulation are detrimental and will in effect make it more difficult for the average working man to enjoy a day on the water. Any changes made need to be made over an extended period of time to give the sport fishing industry time to make adjustments without undue burden. This area does not need to be targeted with so many other larger areas of concern exist.

Gary

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:07:52

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Comment Log Display

Below is the comment you selected to display. Comment 1929 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Wallace
Last Name: Den Herder
Email Address: dodddenherder@aol.com
Affiliation:

Subject: Sport fishing boat regulations

Comment:

I for one am totally against the proposed regulations that will destroy the sport fishing and whale watching industry in California. I fish the costal waters off California and have my entire life. This year was the first year that my son was able to fish with me as I did with my father and he did with my grandfather. That this state would even consider enacting regulations that would make it impossible for this industry to continue I find disgusting. You should all be ashamed of yourself.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:05:01

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Comment Log Display

Below is the comment you selected to display. Comment 1930 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Josabio
Last Name: Viloría
Email Address: jay.viloría@yahoo.com
Affiliation:

Subject: !!Please keep the family tradition alive!!

Comment:

My family has been coming to vacation here from Arizona for the past 40 years and have always gone day deep sea fishing. We love it and it would break all our hearts of we were no longer able to afford to option to enjoy fishing in the great state.

Thank you for your time

Josabio viloria II

Attachment: www.arb.ca.gov/lists/com-attach/2213-chc2021-ATIUYAc3ADEGN1Ix.jpeg

Original File Name: 821B7C4D-6E89-4B5E-93E7-BA98205434E8.jpeg

Date and Time Comment Was Submitted: 2021-11-03 18:13:08

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Comment Log Display

**Below is the comment you selected to display.
Comment 1931 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Frank
Last Name: Martinez
Email Address: Frank169martinez@gmail.com
Affiliation:

Subject: Fishing
Comment:
Don't mess with what makes California great

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:16:41

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Comment Log Display

Below is the comment you selected to display. Comment 1932 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Thomsen
Email Address: farmboyone@yahoo.com
Affiliation:

Subject: Don't destroy sportfishing and sightseeing

Comment:

Stop destroying everything by making things so expensive it's unfeasible to stay in business. Do not force overbearing legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:12:58

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Comment Log Display

Below is the comment you selected to display. Comment 1933 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Carrillo
Email Address: robcarriilo2000@hotmail.com
Affiliation:

Subject: Save Sportfishing
Comment:
Please vote no!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:17:08

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Comment Log Display

Below is the comment you selected to display. Comment 1934 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Guillermo
Last Name: Martinez
Email Address: guillermom15@gmail.com
Affiliation:

Subject: CARB

Comment:

Please do not do this. Our charter boats depend on this and it it not fair. We love going on them and supporting a small family business. It it their life line and teaches our youth about preservation of the wild life. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:17:36

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Comment Log Display

Below is the comment you selected to display. Comment 1935 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Sperry
Email Address: RYANSPERRY007@GMAIL.COM
Affiliation:

Subject: Please keep sportfishing boats running

Comment:

To whom it may concern

Please do not impose these regulations on our sportfishing family in California. This industry employs so many and is such a large part of my local community. These regulations would have detrimental affects to many of my family and friends. It will also put a lot of people out of work and close countless businesses. It will also take away from anglers and future anglers because these changes will make boats that are still running unaffordable for the average person(which most anglers are). Thank you for your time and again please allow to keep these boats running how they currently are so they fishing community can continue to be a thriving business not only for local communities, but for the state of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:13:35

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Comment Log Display

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First Name: Darryl
Last Name: Dietz
Email Address: darryldietz@yahoo.com
Affiliation:

Subject: vote no on regulations

Comment:

CARB please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:19:10

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First Name: Brian
Last Name: Peterson
Email Address: petersb1@yahoo.com
Affiliation:

Subject: chc2021

Comment:

Eliminating ocean going diesel vessels will do little to nothing to negate the impact of carbon in our region and planet. It will, however, adversely effect the lives of many businesses and those seeking recreation. Diesel trucks and pickups still travel the roadways with considerable emissions to the atmosphere. Factories are still spewing carbon daily to satisfy the needs of the buying public. Start there first. This proposal provides very little bang for the buck.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:10:58

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Below is the comment you selected to display. Comment 1938 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: vince
Last Name: abe
Email Address: vinceabe@cox.net
Affiliation: none

Subject: Sports fishing and whale watching Air Regulations proposal

Comment:

Please "grandfather in" existing vessels until they need to be replaced instead of outlawing them!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:16:21

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Below is the comment you selected to display. Comment 1939 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: chris
Last Name: teske
Email Address: cd_teske@yahoo.com
Affiliation:

Subject: November 19, 2021, Could Mark the End for Sportfishing and Whale Watching Boats
Comment:

CARB: vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:20:07

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Below is the comment you selected to display. Comment 1940 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Soldavini
Email Address: fishhfly@yahoo.com
Affiliation: Fisherman

Subject: Small fishing

Comment:

Do not jeopardize the fisherman who are small business. Instead go after the big polluters. That would be doing your job!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:19:59

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Comment Log Display

Below is the comment you selected to display. Comment 1941 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Winnett Jr
Email Address: usmc1one@gmail.com
Affiliation:

Subject: Please Do Not Destroy California Sport Fishing

Comment:

I'm 67 years old. My father introduced me to deep sea fishing when I was eight years old. It's been in my blood ever since. I'm begging you not to pass regulations that will destroy California's sport fishing industry by implementing engine mandates that will instantly make it unaffordable for middle class people to continue enjoying ocean fishing. In fact, the proposals I've heard that are being considered are in reality, unobtainable with the current state of engine emissions technology. So there won't be any boats to fish on for anyone, regardless of their income. Please..... don't do this.

Thanks,
David K Winnett Jr
Retired Fleet Manager, City of Torrance
Captain, USMC (Ret.)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:16:14

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Comment Log Display

Below is the comment you selected to display. Comment 1942 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Leong
Email Address: longfin54@gmail.com
Affiliation:

Subject: Rising cost of sport fishing

Comment:

How much further does the fishing industry have to suffer? These unreasonable and unfounded technologies will surely put this industry out of business...the cost of a fishing trip is astronomically expensive already, so senior citizens like myself are forced to find some other means of affordable recreation...please save an already untenable situation.....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:19:22

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Below is the comment you selected to display. Comment 1943 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Yosh
Last Name: Sakai
Email Address: ysakai8344@gmail.com
Affiliation: Individual sports fishing

Subject: CARB

Comment:

Please do not kill California's sports fishing industry by requiring technology changes that are not feasible economically. Your regulations will put several hundred people out of business along with all the other dependent businesses such as restaurants and dock workers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:14:41

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Below is the comment you selected to display. Comment 1944 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ed
Last Name: Matibag
Email Address: matibagedwin@gmail.com
Affiliation:

Subject: Please Vote No on regulations

Comment:

CARB,

please do vote yes on regulations that rely on technology that 1) not available, 2) econoloilcally feasible to boat owners that are involved in sportfishing and passenger harbor crafts . My family request several times a year to do sportfising, whale watching and leasiure cruises. Propsed regulations would force many of these types of boats out service and put hard working small business owners out of business. My dollars that I spend in California passenger harbor craft and sportfishing operations would cease to be spent in California

Thanks

Ed Matibag

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:21:49

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Comment Log Display

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Comment 1945 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Richard
Last Name: Caperon
Email Address: richard_caperon@yahoo.com
Affiliation:

Subject: Fishing
Comment:
Please don't.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:26:25

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Comment Log Display

Below is the comment you selected to display. Comment 1946 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randy
Last Name: Rogers
Email Address: rogersrand@gmail.com
Affiliation:

Subject: Killing sport fishing & families

Comment:

Please do not kill sportfishing with your crazy new regulations
people need to be able to access the ocean for enjoyment and food

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:24:19

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Comment Log Display

Below is the comment you selected to display. Comment 1947 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Morris
Email Address: pmorris4345@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

California Air Resources Board

Board Members

Having been a long time recreational fisherman, and have enjoyed the experience with both my son and grandson. I find it extremely unfortunate that the CARB board has found it necessary to put a fleet of recreational sportfishing business's and ancillary operations out of business. Please hold off on this decision until an alternate solution can be found. There is no technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts.

Respectfully,
Paul Morris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:11:22

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Comment Log Display

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Comment 1948 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jane
Last Name: Kemp
Email Address: kemp2607@yahoo.com
Affiliation:

Subject: Commercial and harbor boats
Comment:
Please find a better way

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:24:06

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First Name: John
Last Name: Cameron
Email Address: thsoaks@yahoo.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

These regulations are a direct threat to family businesses and outdoor tourism and future access to offshore fishing and marine life. Fishing participation rates will decline and so will fishing license sales that fund critical offshore and inland conservation and fishery programs. The programs are essential to environmental sustainability and access to plentiful fish.

Please find a better way. Work with these small businesses to find a path forward that benefits Californians, fisheries, and the environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:21:38

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First Name: Don
Last Name: Miller
Email Address: millerscave@hotmail.com
Affiliation: None

Subject: "CHC2021 Save Our Boats"

Comment:

I Urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:29:31

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Comment Log Display

Below is the comment you selected to display. Comment 1951 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Gruber
Email Address: mgruber169@yahoo.com
Affiliation: Lawyer

Subject: Sportfishing fleet

Comment:

Please don't go down this road, you can't win. Please stop wasting tax payers money.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:27:27

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**Below is the comment you selected to display.
Comment 1952 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ron
Last Name: Love
Email Address: Ron_love_34@yahoo.com
Affiliation:

Subject: Sportfishing

Comment:

Do not over regulate this industry. It's a must to work with all sportfishing operations on how they can improve their negative imprint through education, technology and goal committed improvements towards zero imprint.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:13:02

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First Name: Scott
Last Name: MacIntyre
Email Address: Scottymac4homes@aol.com
Affiliation:

Subject: Be smart

Comment:

More rules & regulations are not only destroying our economy but are destroying our country as well. We're mad as hell, putting people out of business is not going to help

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:31:35

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Comment Log Display

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First Name: Dixon
Last Name: Edgerton
Email Address: Noxid007@aol.com
Affiliation:

Subject: Sport fishing boats

Comment:

Please refrain from imposing the proposed unreasonable restrictions on the sport fishing and whale watching fleet. The amount of pollution saved is really not worth the money and is so minor compared to all the other sources.
Might as well try to ban diesel trucks from the ports!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:32:51

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Comment Log Display

Below is the comment you selected to display. Comment 1955 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Belitski
Email Address: bbelitski@yahoo.com
Affiliation:

Subject: Please save our pass time

Comment:

We are stewards of the ocean and activists for the climate. Please do not kill our passion with silly regulations. An alternative measure is surely available

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:36:57

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Comment Log Display

Below is the comment you selected to display. Comment 1956 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Heath
Last Name: Clark
Email Address: Clarkfamily1222@sbcglobal.net
Affiliation:

Subject: Fishing

Comment:

Do not put these boats out of business. The state can not afford to loose another business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:37:11

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Comment Log Display

Below is the comment you selected to display. Comment 1957 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Butler
Email Address: bfbutler@hotmail.com
Affiliation:

Subject: Commercial Fishing Boats

Comment:

Hello, I have been fishing on commercial fishing boats all of my life. The experiences I gained were life changing as well as the memories. Please do not amend the harbor craft regulations and take away our next generations chances for the same experiences and memories. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:36:45

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Comment Log Display

Below is the comment you selected to display. Comment 1958 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kenneth
Last Name: Childers
Email Address: kennethchilders@yahoo.com
Affiliation: none

Subject: CA Sport Fishing

Comment:

Well, we can see what your over-reaching green policies are doing to shipping and delivery industries. You are way too premature in attempting to force a technology that is not readily available yet on the populace. You as a board need to get a grip on reality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:37:34

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Comment Log Display

Below is the comment you selected to display. Comment 1959 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Antone
Last Name: Lahr
Email Address: surferforever88@yahoo.com
Affiliation:

Subject: Vote no

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:39:06

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Comment Log Display

Below is the comment you selected to display. Comment 1960 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Casey
Last Name: Addy
Email Address: caseyaddy@gmail.com
Affiliation:

Subject: Sensical approach to address climate crisis

Comment:

Dear members of CARB,

As an ecologist I understand the dilemma ahead of us to address the climate crisis we are facing. Asking the sportfishing fleet to change practices is reasonable and should be done, but only when the technology is available to make economic sense; without putting hundreds of millions of dollars in revenue and the livelihoods of thousands at risk. Sportfishing and/or whale watching is about being on the ocean to further discover our world. To end that would not only be detrimental to boat owners and crews, but to those of us who need that mental break in our lives. Please take a reasonable approach in addressing our air resources and climate crisis. Thank you for your time.

1960.1

1960.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:31:51

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Comment Log Display

Below is the comment you selected to display. Comment 1961 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Raymond
Last Name: Boetger
Email Address: Rboetger53@gmail.com
Affiliation:

Subject: Please protect sportfishing

Comment:

To whom it may concern,
My name is Raymond Boetger. I am a 33 year old Navy Veteran. I have been fishing on the ocean for about 10 years now. From my first trip on the ocean, I have been in love with the sport. I was very surprised to learn that sport fishing boats were at risk for being shut down due to policies that are being recommended. The ramifications of these implementation policies will have so many deep impacts. Small family businesses that have served the community for years will close or be forced to double their prices. Communities that have bonded over fishing will be separated. The collateral damage will have a rippling effect for a lot of people. The risks in these policies far exceed the benefit. Please reconsider your policy and allow sportfishing operations to continue serving the community. I have earned a Masters of Science degree and would be more than happy to provide insight in any way. Please reach out to me if I can contribute to this discussion in any way.

Respectfully and sincerely
Raymond Boetger

1961.1

1961.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:26:01

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Comment Log Display

Below is the comment you selected to display. Comment 1962 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ethan
Last Name: Olsen
Email Address: ethan.olsen@yahoo.com
Affiliation:

Subject: Let them live

Comment:

Let the humble fishing fleets of California survive. Come on now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:42:58

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Below is the comment you selected to display. Comment 1963 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: Hua
Email Address: Kvhua@yahoo.com
Affiliation:

Subject: Fishingboat

Comment:

Please support our sports fishing boats/ crew.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:42:56

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Comment Log Display

Below is the comment you selected to display. Comment 1964 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Moises
Last Name: Velasco
Email Address: moisesvelasco1993@yahoo.com
Affiliation:

Subject: SportFishing

Comment:

Hello, Hope your doing well. Just wanted to give you a brief story of what sport Fishing has Done for me. It helped me grow as an individual. Helped with the drug addiction and makes me have a passion for a sport and for Mother Nature.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:44:38

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Comment Log Display

Below is the comment you selected to display. Comment 1965 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Roy
Last Name: Schroer
Email Address: roy.schroer@gmail.com
Affiliation:

Subject: Fishing Boats

Comment:

Please don't destroy the Long Range Sportfishing industry by imposing regulations that will put the boats out of business in California. I have enjoyed numerous trips to San Diego and out on the boats. You will harm many families and businesses by forcing this upon the existing fleet, and take away my reason for visiting San Diego.

1965.1

I will just fly to Mexico instead, where you know the old boats are likely to go and continue to operate. You won't be forcing retirement of the boats, just moving them south of the border, so no environmental gains will be made - but you will be exporting the business of the boats, fish processing, hotel business, restaurants, etc. to Mexico if that is your objective. Think this through!!!

1965.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:39:15

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First Name: Samuel
Last Name: Camarillo
Email Address: samcam13@gmail.com
Affiliation:

Subject: Sport boat regulations

Comment:

I want to confirm a NO vote on implementing harsh new regulations for sport fishing boats. Many are my friends that will probably not be able to afford it, not to mention the loss of revenue from offshore fishing California would lose out on
Thank you for your time
Sam Camarillo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:47:43

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Comment Log Display

Below is the comment you selected to display. Comment 1967 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: Long
Email Address: Longlifefishing@gmail.com
Affiliation:

Subject: Passenger fishing vessel emissions

Comment:

This is not even a drop in the bucket. Allow many more years to convert engines

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:51:03

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Comment Log Display

Below is the comment you selected to display. Comment 1968 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Vallecillo
Email Address: Ninja9hand0@yahoo.com
Affiliation:

Subject: Annual Family Fishing trip

Comment:

Please please do not do this to these hard workers who provide such family memories! There has to be an alternative way to compromise?
Thanks you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:47:58

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Comment Log Display

Below is the comment you selected to display. Comment 1969 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Blackmun
Email Address: rblackmun@gmail.com
Affiliation:

Subject: No Carb Act

Comment:

- This seems like another attempt to eliminate Sportfishing. My company routinely brings in millions of dollars a year to California, all from fishing and marine activities. All of this income would be eliminated if carb is enforced. If these emitions are so concerning what about the 100 cargo ships sitting off the coast of Los Angeles running on sludge? I am willing to bet 1 of these ships has more emissions than the entire fleet of Sportfishing vessels.

1969.1
- I would suggest that a grandfather clause be put in place to not shut businesses and entire communities down overnight. I would also suggest that the technology actually exist be before we implement the laws on small business owners.

1969.2
- I would suggest that a grandfather clause be put in place to not shut businesses and entire communities down overnight. I would also suggest that the technology actually exist be before we implement the laws on small business owners.

1969.3
- I would suggest that a grandfather clause be put in place to not shut businesses and entire communities down overnight. I would also suggest that the technology actually exist be before we implement the laws on small business owners.

1969.4

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:42:42

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Comment Log Display

Below is the comment you selected to display.
Comment 1970 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Theilen
Email Address: Jefftheilen@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

This amendment is ridiculous maybe instead of punishing small crafts owned by small businesses you should go after the real culprits like these large shipping companies and oil companies! Stop punishing the small guy as this will make no difference to our waterways!!!! Please start looking at the big picture as most of these small businesses put you in the office!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:46:52

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Comment Log Display

Below is the comment you selected to display. Comment 1971 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Douglas
Last Name: Morrison
Email Address: dousgum@yahoo.com
Affiliation:

Subject: Unreasonable regulations.

Comment:

The proposed emission regulations for the commercial sportfishing fleet are blatantly unfair and will create undue hardship for these business people. It will also take away the opportunity to enjoy the ocean by thousands of people, young and old. Please stop this insanity.

1971.1

1971.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:51:07

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First Name: Geoff
Last Name: Andrews
Email Address: geoffdandrews@outlook.com
Affiliation:

Subject: I urge you

Comment:

Hi,

I urge you to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Thanks,
Geoff

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:56:15

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First Name: R
Last Name: Glatt
Email Address: rglatt5150@hotmail.com
Affiliation:

Subject: Please reconsider

Comment:

I enjoy fishing a few times a year and taking my family whale watching on these boat owned by local family businesses. Please reconsider these yet to be determined regulations that could potentially decimate so many business. I simply can't afford to support these businesses as much as I do if massive costs are passed on to the consumers of our state. There has to be room to compromise considering some of the proposed technology does not yet exist.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:52:12

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Comment Log Display

Below is the comment you selected to display. Comment 1974 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kerry
Last Name: Steigerwalt
Email Address: kerry@sevenslegal.com
Affiliation:

Subject: CARB

Comment:

I urge a "No" vote on this proposed legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:00:58

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Comment Log Display

Below is the comment you selected to display. Comment 1975 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Juliana
Last Name: Corcoran
Email Address: julianacorcoran@yahoo.com
Affiliation:

Subject: Please save sportfishing and whale watching!!

Comment:

Please do not let us lose sportfishing or whale watching!!! Those of us who love to fish are asking for you not to make it any more difficult for the owners/operators of the sport fishing companies to provide their services to us!!! Also, the whale watching operators are providing a valuable service to people by stressing how important it is to protect our marine wildlife and to be aware of how our actions can have an impact on their population!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:00:04

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Comment Log Display

Below is the comment you selected to display. Comment 1976 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Frohn
Email Address: davefron45@yahoo.com
Affiliation:

Subject: SPORT FISHING

Comment:

I GO FISHING ON THE ROYAL POLARIS FROM SAN DIEGO EVERY YEAR. THIS WOULD BE A SHAME TO EVERY BOAT IN THE FLEET.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:00:25

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Comment Log Display

Below is the comment you selected to display. Comment 1977 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Angelo
Last Name: Aneste
Email Address: aaneste@hotmail.com
Affiliation: Sport Fisherman

Subject: CARB a job killer

Comment:

California needs a pro growth period right now not a job killer bill. Please I count of my fish catches to feed my family fresh meat throughout the year. Without these catches I will be forced to spend my hard earned money in other states or even countries. Every day food supplies in stores are getting smaller and smaller and I know you can't fathom having a freezer full of 75lbs of fish but that's my freezer. If you pass this bill for the 1st time in 15 years I will have no fish and no future of fishing to provide for my family.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 18:56:03

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Comment Log Display

Below is the comment you selected to display. Comment 1978 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Douglas
Email Address: mikeldouglas@cox.net
Affiliation:

Subject: CARB

Comment:

Please consider what the end result of this will be, We are being priced out of everything in this state. Will this also be for the container ships that are pouring into this country with foreign made goods or the thousands of vehicles that come into our country from North and Southern borders. Are all the military vehicles and equipment going to be also upgraded? I have lots of questions to be answered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:07:27

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Comment Log Display

Below is the comment you selected to display. Comment 1979 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Russ
Last Name: Snow
Email Address: rjsnowuk@yahoo.com
Affiliation:

Subject: Removing boats from use.

Comment:

Dear Clerk of the Board,
Once again you have put the Utopia first, discounting people's right to make a living and exist. And typical government fashion , no thought as to how it will effect lives, and at what cost. Your latest, to require new motors for boats for sport fishing or whale watching, motors that technology hasn't built yet! Can you build a motor to power these boats that fits your new scheme? No, you can't . and until you do, these new requirements should be put on hold.

Regards, Russ Snow

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:05:25

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Comment Log Display

Below is the comment you selected to display. Comment 1980 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bretta
Last Name: Dalie
Email Address: Bad5670@hotmail.com
Affiliation:

Subject: Fishing boats

Comment:

If the fishing boats get shut down it will be a Domino effect .
Without fishing boat the small markets will go under and the
Restaurants that they supply. The Mechanics that fix these boats
must suffer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:06:41

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Below is the comment you selected to display. Comment 1981 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Donald
Last Name: Frazelle
Email Address: frazelle36@gmail.com
Affiliation:

Subject: Sportfishing regulation

Comment:

I vote a strong NO to the proposed air quality regulations for sport fishing/ whale watching boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:09:21

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Comment Log Display

Below is the comment you selected to display. Comment 1982 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Bonaparte
Email Address: chris@pssagency.com
Affiliation:

Subject: STOP CARB ACT

Comment:

Hello Clerk of the Board,

My name is Chris Bonaparte and I am a 3rd generation Californian. I have been an avid lifelong fisherman within the state and carry a lifetime fishing license. Not only is fishing my life long passion but I know own a sales representative agency based out of CA, Premier Sales Solutions, LLC. We are sales reps within the Fishing and Marine Industry. If CARB passes through various litigations, our sport fishing community will be out of business and no longer exist. During the pandemic, the state saw a massive amount of new outdoors people using the outdoors for the first time. By passing CARB, we will lose future lifelong outdoor people to various states throughout the country. With that goes healthy tax dollars from numerous business revenues from the Sport Fishing Community. Please reconsider this outrageous CARB ACT NOW!

1982.1

1982.2

Chris Bonaparte

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:07:22

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Comment Log Display

Below is the comment you selected to display. Comment 1983 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Larry
Last Name: Perkins
Email Address: Lperkins@jfmcon.com
Affiliation:

Subject: Please stop trying to out companies out of business

Comment:

The over reaching regulations are putting good hard working people out of work. Why is there no happy medium with environmentalist?

Fishing in Southern California has been around for years and now it is threatened by you air quality board.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:04:20

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Comment Log Display

Below is the comment you selected to display. Comment 1985 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brandon
Last Name: Rutschmann
Email Address: brandon.rutschmann@gmail.com
Affiliation:

Subject: Save sportfishing vessels

Comment:

Do not force small business sportfishing boats into bankruptcy with your regulations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:12:07

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Comment Log Display

**Below is the comment you selected to display.
Comment 1986 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: Rodriguez
Email Address: commanderjohn21@gmail.com
Affiliation:

Subject: SAVE SPORTFISHING

Comment:

LEAVE THE SPORTFISHING INDUSTRY ALONE AND THE BOATS . FIND
SOMETHING ELSE TO DISTURB.....!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:13:14

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Comment Log Display

Below is the comment you selected to display. Comment 1987 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randy
Last Name: Perry
Email Address: Randallion57@gmail.com
Affiliation:

Subject: Killing the sport fishing industry

Comment:

Please desist in killing the entire sport fishing industry!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:13:38

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Comment Log Display

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First Name: Damon
Last Name: Roulhac
Email Address: damon_roulhac@yahoo.com
Affiliation: Southbay Anglers Fishing Club and CCA

Subject: Harbor Craft Regulations

Comment:

Fishing is not only a hobby but to many their lively hood. I know there are always rules and regulations to follow to save our planet. But to just shutdown fishing without a real time line or real reasonable solution is not fair. Please reconsider your thoughts and help come up with a real solution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:17:16

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Below is the comment you selected to display. Comment 1989 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sherwin
Last Name: Davidson
Email Address: sherwind@earthlink.net
Affiliation: Private citizen

Subject: Upcoming regulations

Comment:

Please stick to what you know and understand, that shouldn't be too difficult. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:22:10

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Below is the comment you selected to display. Comment 1990 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Zoelle
Email Address: zoulman2@juno.com
Affiliation:

Subject: CHC2021

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

I am a 57 year old avid fisherman from the San Fernando Valley.

-Mr. Steve Zoelle

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:24:01

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Comment Log Display

Below is the comment you selected to display. Comment 1991 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marie
Last Name: Jolly
Email Address: bert2jolly9@yahoo.com
Affiliation: GOLDEN GATE FISHERMANS ASSN.

Subject: Sportfishing

Comment:

I was appalled to see the amount of pollution in the air after the Blue Angels performance. I hardly think sport fishing does that much damage!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:17:03

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Below is the comment you selected to display. Comment 1992 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Lukito
Email Address: chef@thefudbox.com
Affiliation:

Subject: Sport fishing

Comment:

Please do not disrupt the cherished sport fishing boats of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:28:13

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Comment Log Display

Below is the comment you selected to display. Comment 1993 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Trottier
Email Address: stevetrottier@earthlink.net
Affiliation:

Subject: Leave us boaters alone.

Comment:

Do not enact any measures, or whatever you call it against trucking, or boating for personal, business, or public use. Myself and family will be personally affected and CARB will no longer have our support.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:24:20

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Comment Log Display

Below is the comment you selected to display. Comment 1994 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Osberg
Email Address: josberg9@hotmail.com
Affiliation:

Subject: Please leave the sportfishing boats alone

Comment:

Hello CARB,

I am an avid sportfisherman and a Science Teacher here in the Bay Area. Please do not disallow the power plants that make these boats get out after the fish, it would be doing a huge disservice to all of us that can't afford our own boats. If inexpensive technology existed to make these boats run more efficiently with less or zero exhaust I am sure they would all change over. It does not exist. Please don't take away a fantastic resource for regular guys like me to get out on the SF Bay or Pacific Ocean.

1994.1

1994.2

Thank you for your time.

Sincerely,

Jeff Osberg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:26:07

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Comment Log Display

Below is the comment you selected to display. Comment 1995 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alan
Last Name: Maxwell
Email Address: alanmaxconstruction@hotmail.com
Affiliation:

Subject: Over reach

Comment:

Please think this through, these Captains keep their Vessels in good efficient running order because it's how they make their living, there are so many other gross Polluters out there leave the recreational fishing fleets alone. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:26:40

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Below is the comment you selected to display. Comment 1996 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lloyd
Last Name: Harris
Email Address: lloydharris@netzero.net
Affiliation:

Subject: Proposed Regulations

Comment:

Hello,

I would like to urge you to reconsider the proposal to ban diesel engines used by boats in the sportfishing industry, as this will irrevocably harm many that are essentially small business owners. While I understand the spirit of the proposal, and agree that cleaning up our environment is of paramount importance, now is not the time to enact these regulations. Having fought to keep their businesses alive due to the Covid pandemic, to now enact these regulations will definitely put many out of business who simply cannot afford the new technology required. I would hate to raise my kids in a world where access to the ocean is limited by a lack of available boats, and I think this access is essential in motivating the next generation to preserve the environment. Thanks so much for your attention.

1996.1

1996.2

Lloyd Harris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:18:33

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Comment Log Display

Below is the comment you selected to display. Comment 1997 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jack
Last Name: Hawley
Email Address: gamechanger@aol.com
Affiliation: citizen

Subject: CHC2021 Save Our Boats

Comment:

You are ruining CA. Cut it out!

I will personally be writing the Governor after this! Your Hubris exceeds your authority....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:33:49

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Comment Log Display

Below is the comment you selected to display. Comment 1998 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Sharp
Email Address: fish_90605@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

Please don't ruin our sport fishing and whale watching industry, I haven't taken my grandkids out yet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:34:22

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Below is the comment you selected to display. Comment 1999 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Rugg
Email Address: danrugg1@verizon.net
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft Re

Comment:

Please reconsider this regulation, or at least delay it until the Commercial Boats can make these changes. From what I understand, the technology for them to adhere to this regulation doesn't fully exist yet. Please, for the sake of all that is good, please do not pass this regulation.

Thank you,
Dan Rugg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:33:17

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Comment Log Display

Below is the comment you selected to display. Comment 2000 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregory
Last Name: Avila
Email Address: wrestingmaster_1@yahoo.com
Affiliation:

Subject: Save the memories that last a lifetime

Comment:

Deepsea fishing is not about just catching fish, it's about building memories with your love ones. It's builds memories that will last a life time and also possibly saves lives. My uncle got me into deepsea fishing who was battling a drug addiction. It was an escape for him and I truly believe it help him overcome it. We need to be able to go fishing at an affordable price, we need to be able to continue building memories with our family and friends. Without it suicide and drug overdose will increase. Please save deep see fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:32:08

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Below is the comment you selected to display. Comment 2001 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Darin
Last Name: Heisch
Email Address: Noradarin@aol.com
Affiliation:

Subject: Sportsfishing

Comment:

I am an avid sportsfisherman and all I have to look forward to is fishing. Getting rid of sportsfishing boats would not only be devastating to the boat owners but to those who look forward to fishing. These boats are also helping the economy. So please do not close down sportfishing and whale watching.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:29:07

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Comment Log Display

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First Name: Karl
Last Name: Khoe
Email Address: karlkhoe@hotmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

There has been some progress in the diesel fuel quality. The worst in the world . Due to high sulfur content . No cars could pass In the mean time all diesel cars Shame on your board. Shame that you did not regulate the diesel fuel standard sooner. !!!!

Is this your solution to now? I think you need to explore better special interest options..

Increasing unemployment is not the way.

Karl

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:34:43

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Comment Log Display

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First Name: Dan
Last Name: Shaw
Email Address: danshaw66@icloud.com
Affiliation:

Subject: Sport fishing
Comment:
Enough government harassment!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:39:36

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Comment Log Display

Below is the comment you selected to display. Comment 2004 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michelle
Last Name: Brown
Email Address: Snappydesign@roadrunner.com
Affiliation: Likes fishing

Subject: Sport fishing and whale watching

Comment:

To who in may concern, Don't we have enough pain and misery in Calif? There is no good reason to destroy this lucrative industry and attraction to tourists. It seems that big government is only bent on destruction of jobs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:41:08

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Comment Log Display

Below is the comment you selected to display. Comment 2005 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Belluomini
Email Address: rbell8000@gmail.com
Affiliation:

Subject: Pollution standards for ocean charter boats

Comment:

Please do not require more strict standards for ocean charter fishing and whale watching charter boats. If you want to reduce emissions restrict lawn mowers and bower trimmers and make them electric only for a better way to reduce pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:39:07

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Comment Log Display

Below is the comment you selected to display. Comment 2006 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: DECUIR
Email Address: danabob2001@yahoo.com
Affiliation: Private boater/retired commercial diver

Subject: chc2021 Proposed Amendments to the Commercial Harbor Craft Reg

Comment:

Having worked on the water in Los Angeles Harbor for 25 years I noted a vast improvement in the air and water quality from 1994 to 2019. Regulations on LARGE commercial(tankers, passenger cruise ships, cargo, tugs)are working already and I have seen it first hand in air/water quality and ecosystem improvement. My opinion is that a more gradual phase-out rather than a direct cutoff would better serve all as the conditions are continually improving presently and the affected group is of a MUCH lesser impact than the aforementioned commercial fleet group. Please review the air/water quality stats before making a decision on these amendments. Thank you, Robert DeCuir.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:15:10

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Comment Log Display

Below is the comment you selected to display. Comment 2007 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Catelli
Email Address: Catellir@yahoo.com
Affiliation:

Subject: Bay Area Sportfishing

Comment:

I grew up sport fishing on the bay and the best way to do it is on a sport fishing boat. I would like this to carry on for generations to come.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:44:09

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Comment Log Display

Below is the comment you selected to display. Comment 2008 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: MacAndrew
Email Address: essayons50@yahoo.com
Affiliation:

Subject: Sportfishing-metal boats, new engines regulation

Comment:

Please stop this from taking effect. It will harm a multi-billion dollar industry. I will not be the sportfishing industry alone but all other businesses that support them and the anglers. This "climate-going green" malarkey is just that. This country is one of the cleanest on earth so why are you trying to destroy a good, enjoyable, and solid industry? Environmentalism is a sickness. We should focus on conservation instead. Bottom line, this will put people out of work and since when does that supersede crackpot science?

Respectfully,
Peter MacAndrew

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:39:59

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Comment Log Display

Below is the comment you selected to display. Comment 2009 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Moises
Last Name: Martinez
Email Address: Moejoe187@yahoo.com
Affiliation:

Subject: Please do not ban fleet fishing

Comment:

Hello my name is Moises Martinez, I love going on charter boats. If you start banning them because of emissions, you will force a lot of us that own private boats to go out and fish a lot more. I own a old boat and i'm sure it waste more fuel and pollutes more than the charters boats. Also I am a registered smog technician my inspector number is e0151720, so I know a lot about emissions. I've been in the smog industry for 15 years and I know that 70% of the new regulations that carb passes are useless. I see the harm you guys impose to customers all the time, I see people begging me to help them out and I stand there feeling helpless. I can't help them and the laws you guys impose are very harmful to consumers, the ones that benefit are catalyst manufacturers. Saying all this is a example of the harm that banning most charters will cause more harm than good. You guys should go after the huge container ships that pollute a lot more than the handful of charter boats. So please do not ruin the bit of joy that we have, find a better way with cleaning up the enviornment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:40:51

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Comment Log Display

Below is the comment you selected to display. Comment 2010 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harold
Last Name: Janes
Email Address: keith0959@icloud.com
Affiliation: Friends Of Rallo

Subject: Salt Water/Deep Sea Sportboat Fishing

Comment:

To; Clerk of the boar, Governor/Cal. State Assembly
With an honest heart I ask you to reconsider
I urge CARB to vote no on regulations that rely on technology that
is economically unfeasible and has not been tested as safe on
passenger harbor crafts. As boats are removed from service, access
to the sea will be limited and sportfishing will become too costly.

Thank You
Harold Janes
909-215-3342
kjanes0959@icloud.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:43:18

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Comment Log Display

Below is the comment you selected to display. Comment 2011 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Bailey
Email Address: smeltdipping3@gmail.com
Affiliation: None

Subject: Future of sportfishing

Comment:

Please vote no on tech equipment which small business owners of sportfishing boats cannot afford. If any of you on CARB have witnessed a crewed fishing, you would know they work their butts off to make a living serving fishermen. I want .y grandson to experience the joy that I have had on these boats. Thank You, Edward Bailey.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:49:56

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**Below is the comment you selected to display.
Comment 2012 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Cory
Last Name: Cohen
Email Address: corycohen89@gmail.com
Affiliation:

Subject: I am a boat owner

Comment:

I AM NOT OK WITH THIS!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:56:06

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Comment Log Display

**Below is the comment you selected to display.
Comment 2013 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: rafael
Last Name: martinez
Email Address: tac.ralph@icloud.com
Affiliation: Fisherman

Subject: Focus on the REAL PROBLEMS

Comment:

WHY ARE YOU ATTACKING THE SPORTFIHING INDUSTRY???

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:56:56

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**Below is the comment you selected to display.
Comment 2014 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Brian
Last Name: Knott
Email Address: elskel@aol.com
Affiliation:

Subject: Vote No
Comment:
Vote No!
Save our Boats!
Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:57:09

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Below is the comment you selected to display. Comment 2015 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mattheo
Last Name: Rangel
Email Address: noodles1991@sbcglobal.net
Affiliation:

Subject: Save sport fishing

Comment:

Sport fishing is one of my favorite hobbies. I don't fresh water . I work in a very stressful work place and this one of my only escapes. I believe you guys should reconsider. I'm am a conservationist but I think this regulation would hurt California more .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:48:44

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Below is the comment you selected to display. Comment 2016 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Walter
Last Name: Fujita
Email Address: walterf1@verizon.net
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

Hi. My name is Walter and I am a saltwater fishing enthusiast. Fishing is my passion, and there is no where I would rather be than on a fishing boat. I am a high school teacher, so I get to spend most of my summers fishing and working on long range boats out of San Diego.

Please do not take away the activity I love. The restrictions you are proposing are not feasible for sportfishing and whale-watching boats. There are thousands of other types of diesel burning engines that are not being forced to comply to such strict rules about their emissions.

Thank you for listening,

Walter Fujita

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:10:40

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Comment Log Display

**Below is the comment you selected to display.
Comment 2017 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Patrick
Last Name: McNamara
Email Address: theonlybiggin@hotmail.com
Affiliation:

Subject: CARB
Comment:
Save boating!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:00:36

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Comment Log Display

Below is the comment you selected to display. Comment 2018 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Trevor
Last Name: Blackann
Email Address: tblackann@yahoo.com
Affiliation:

Subject: CHC2021 Opposition

Comment:

Hello.

Please add my name as an opponent to the proposed regulations outlined in CH 2021. The Sportfishing and whale watching industry is a critical part of the California economy and way of life. Not only does it provide an affordable means for the "average" person to enjoy the ocean at a reasonable cost, but it is also the source of jobs across multiple industries. The proposed regulations are not scientific and tested and will certainly add costs to the point of driving many boat owners out of business. This will drive the cost of whale watching and Sportfishing through the roof and make California even more geared toward the independently wealthy. The average person will no longer have the means to afford these fun trips.

2018.1

2018.2

2018.3

I am a private boat owner but still see the value of this industry.

Thanks for reading.

Trevor Blackann

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:54:22

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Comment Log Display

Below is the comment you selected to display. Comment 2019 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Justin
Last Name: Hardin
Email Address: Hardinj@cox.net
Affiliation:

Subject: Don't cancel sport fishing

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. This is not only a way if life, an amazing guy fun past time for friends and colleagues.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:04:22

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Comment Log Display

Below is the comment you selected to display. Comment 2020 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Gregson
Email Address: mrgregson22@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

To: Clerk of the Board

I am pleading CARB to vote NO on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. A day of sport fishing is already \$80 or more. Requiring expensive controls on our favorite fishing boats will simply kill the industry, because us fishermen cannot pay higher costs for a day on the beautiful ocean. More fishermen may go out in small boats and get swamped and drown or require a Coast Guard rescue. We love the ocean and want to go out 10 or 20 miles, which is not safe in a small boat.

2020.1

2020.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:53:40

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First Name: Daniel
Last Name: Humble
Email Address: Danielhumble@hotmail.com
Affiliation:

Subject: Diesel law changes

Comment:

Can we please stop with the killing of small business owners, aren't things bad enough.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:05:56

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Below is the comment you selected to display. Comment 2022 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ericka
Last Name: Gray
Email Address: erickalgray@yahoo.com
Affiliation:

Subject: Keep fishing affordable

Comment:

Please keep the ocean affordable and accessible by not enacting regulations that are not affordable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:06:26

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Below is the comment you selected to display. Comment 2023 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dave
Last Name: Ackerman
Email Address: ackydaddy@gmail.com
Affiliation:

Subject: New Rules for Sportfishing Boats

Comment:

Your proposed rules are absolutely ridiculous. And think about their effectiveness. You're not gonna have any kind of significant impact with rules like this. It's a horrible elitist point of you on your part. Please reconsider and act like good citizens

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:07:37

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Below is the comment you selected to display. Comment 2024 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jim
Last Name: cox
Email Address: jimcox0412@gmail.com
Affiliation: garden community fellowship

Subject: CARB

Comment:

Do not destroy the sport fishing industry in California and the livelihood of 1000's of small business owners, all the employees who work for them and all the local vendors who support the industry in sportfishing, dive boats and whale watching. Also the tens of million of dollars that are generated to local economies along our shores. Shutting it down is not only foolish but

2024.1

devastating to hard working people! If your going after them then why don't you go after all disile engines like simi trucks? There are millions of them in our state. What your perposing does vertually nothing in carbon out put to the people who have the most to lose. Why go after little fish when you can slay the white whale! Sincerly Jim Cox

2024.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:50:02

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Comment Log Display

Below is the comment you selected to display. Comment 2025 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: DeVries
Email Address: Devriesconst@aol.com
Affiliation:

Subject: Harbor Craft Regulations

Comment:

I along with the majority of free people stand with the Commercial Enterprises possibly affected against any amendments that cause unnecessary restrictions to the Commercial Harbor Industry. I would urge common sense on all proposed amendments.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:43:38

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Comment Log Display

Below is the comment you selected to display. Comment 2026 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeffrey
Last Name: DeJung
Email Address: jdejung13@gmail.com
Affiliation:

Subject: save california sportfishing

Comment:

aPassing this will out so so many people out of business and including myself, without a job, most of the boats will be unable to afford these new engines,et alone have the boats capable of changing there engines to these new ones.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:09:54

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Below is the comment you selected to display. Comment 2027 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: steve
Last Name: johnson
Email Address: sdjfish@aol.com
Affiliation:

Subject: sportfishing vessel emission requirements

Comment:

The cargo ships offshore waiting for offloading 2021 caused more emissions than all the sportfishing and whale watching boats combined for the next 10 years! Good idea to limit emissions, bad idea to start with low hanging fruit. Lots of people still fish and most of them have some money and vote.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:04:47

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Comment Log Display

Below is the comment you selected to display. Comment 2028 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nick
Last Name: RODRIGUEZ
Email Address: bignickbarbers@gmail.com
Affiliation:

Subject: fishing

Comment:

keep the fishing vessels going, its my passion

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:12:33

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Comment Log Display

Below is the comment you selected to display. Comment 2029 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bud
Last Name: Pine
Email Address: raypine1948@hotmail.com
Affiliation:

Subject: www.arb.ca.govsays

Comment:

Leave the boats alone, they are just trying to make a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:10:39

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Comment Log Display

Below is the comment you selected to display. Comment 2030 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Dayton
Email Address: Tonydaytonj@gmail.com
Affiliation:

Subject: Commercial boat and sport fishing

Comment:

This will effect friends, family and people to to support their family and life. This has been a way that people live and be able to enjoy time with friends and enjoy great food. Not shocked that this state would try to take more from its people and not help the environment in other ways.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:10:29

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Comment Log Display

Below is the comment you selected to display. Comment 2031 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: george
Last Name: gibbs
Email Address: glenrealty@aol.com
Affiliation:

Subject: fishing boats / whale wayching

Comment:

You need to stop this insanity. My vote is going Republican from now on. I've been a democrats for 30 years not anymore and there are a lot more of us changing with these ridiculous rules you are doing.

Let people live there lives. You work for us!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:15:15

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Comment Log Display

Below is the comment you selected to display. Comment 2032 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Swanson
Email Address: Hiswansons@cs.com
Affiliation: None

Subject: Boating

Comment:

As a 65 year boater and fisherman, I feel pretty confident saying damage caused by each of the following have caused more damage than all private, and, sporting fishing in the world combined!

- 1, Cruise Ships dumping garbage, fuel/oil spills, etc.
- 2, Freighter/Container Ships cross contamination of the worlds ports
- 3, Military Vessels
- 4, Automobiles/Trucks dumping millions of tons rubber, brake dirt, oil, metals ending up being washed off of roads, ending up in runoff eventually to rivers and the oceans.
- 5, Oil rigs speak for themselves
- 6, City's "spilling" millions of gallons of untreated sewage
- 7, Air pollution being washed eventually into the oceans
- 8, I can go on, I think you should understand my point.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 19:49:17

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Comment Log Display

Below is the comment you selected to display. Comment 2033 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sharon
Last Name: Rhoads
Email Address: srhoads@reagan.com
Affiliation: Retired

Subject: CHC2021 save our boats

Comment:

there is absolutely no reasonable reason for you to do the damage to so many citizens and put in place this ridiculous rule. you are cruel and indicative. VOTE NO ON THIS ISSUE. LET THE BOATER AND CITICENS ENJOY OUR LIVES.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:16:15

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Comment Log Display

**Below is the comment you selected to display.
Comment 2034 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Arttu
Last Name: Kaariainen
Email Address: Crusherarttu@gmail.com
Affiliation:

Subject: Boating
Comment:
Keep boating alive!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:23:30

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Comment Log Display

Below is the comment you selected to display. Comment 2035 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Justin
Last Name: Buckingham
Email Address: justin_buckingham@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

The regulations that are being put on the spot fishing industry are unacceptable and unattainable. This will put people out of work and take food off of peoples tables. The sport fishing fleet of Ca has long a way for people to e able to provide for themselves rather than have to buy commercial caught fish. Ca has long over regulated the small business and the working man. None of us want to rely upon the state to to provide for us when it can't even take care of itself. Stop the attack on the livelihood of sport fishing and all the small business this will shut down.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:16:29

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Comment Log Display

Below is the comment you selected to display. Comment 2036 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Fedorowicz
Email Address: Johnfed099@gmail.com
Affiliation:

Subject: Keep recreational boating and fishing open to the public

Comment:

I want to experience what my father felt when I was 8 years old and he asked me this. John we are going fishing on a boat out in the ocean next week, do you want to go? I am 68 now and have 2 grand sons 3 and 11. My. Son who is 40 now was so excited to get to go on a boat and fish. 30 years ago, and we continue to fish a few times a year. Please keep the recreational boats available to the people for food and recreation. I want to see my sons face when he asks his first son. Osiris, Son do you want to go out on boat in the ocean and go fishing?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:05:47

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Comment Log Display

Below is the comment you selected to display. Comment 2037 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Corral
Email Address: fireelectric.don@gmail.com
Affiliation:

Subject: Save Sportfishing

Comment:

I have trouble believing this could ever be an issue. To take my son out sportfishing for rock COD or salmon I the S.F. coastal waters is a joy. It is great for the children and adults. I worked on sportfishing boats when I was younger and have gone fishing on a regular basis for more than 30 years and have nothing but good things. Please leave the fishing alone!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:27:19

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Comment Log Display

Below is the comment you selected to display. Comment 2038 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kensen
Last Name: Lee
Email Address: Nvbirdk9@yahoo.com
Affiliation:

Subject: Carb requirements for commercial fishing boats

Comment:

I disregard with the proposed carb standards.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:25:14

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Comment Log Display

Below is the comment you selected to display. Comment 2039 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Hickle
Email Address: Jrhickle@gmail.com
Affiliation:

Subject: Emissions regulations on Harbor Craft

Comment:

There are several other ways for older boats to off set emissions. The airline industry and many other forms of transportation as well as large corporation utilize carbon off sets as part of the neutral carbo footprint strategy. I encourage CARB resources board to offer or enable small businesses like sports fishing boat owner the same opportunities for offsets verses passing regulations that essentially will cost boat owners their business due to the extraordinary cost to retrofit with new engines. The engine room space necessary for after treatment in order to achieve tier 3 or 4 diesel emissions is just not available in a boat. After treatment exchangers, valves and urea storage is equal or larger than the engine itself. It would be a shame to regulate small businesses out of business when other sound strategies are available.
Jim Hickle

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:08:25

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Comment Log Display

**Below is the comment you selected to display.
Comment 2040 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jose
Last Name: Moreno
Email Address: valente.morenosr@gmail.com
Affiliation:

Subject: Clerk of the Board
Comment:
Save sportfishing industry !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:33:08

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Comment Log Display

Below is the comment you selected to display. Comment 2041 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clifton
Last Name: Quinn
Email Address: seaquinns@hotmail.com
Affiliation:

Subject: Reconsider the Sport boat regulations....

Comment:

Hello there,

We have been hearing of a potentially devastating ruling that would dramatically affect access to the local fishing boats. If this bill were to pass, then a LOT of people would go out of business. There are many ways to gradually lower emissions in our State and in the world, and we are all for that. But let's not be drastic and damage the businesses and livelihoods of so many people.

Let's be rational and take some time to re-consider this bold move.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:34:27

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Comment Log Display

Below is the comment you selected to display. Comment 2042 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jay
Last Name: Krippes
Email Address: jkrippes@cox.net
Affiliation:

Subject: Sportfishing and whale watching boats

Comment:

Vote NO on regulations that rely on technology that are economically unfeasible and have not been tested as safe on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:36:23

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Comment Log Display

Below is the comment you selected to display. Comment 2043 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Beau
Last Name: Tindall
Email Address: bowmantindall@gmail.com
Affiliation:

Subject: Please do not get rid of sportfishing boats

Comment:

This is such a terrible idea, it is such a valuable resource here in California and is cherished by so many to be able to fish on cattle boats! Please do not allow this pass time to go away.

Thabks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:36:15

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Comment Log Display

**Below is the comment you selected to display.
Comment 2044 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Johnny
Last Name: Niemand
Email Address: jtniemand@yahoo.com
Affiliation:

Subject: Attention CARB

Comment:

Hello I am a private citizen who enjoys being on the water whale watching and sport fishing it is important to my family the ocean is a great place for my family and I to get out of the house please do not end it for us

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:33:00

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Comment Log Display

Below is the comment you selected to display. Comment 2045 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patricia
Last Name: Wisniewski
Email Address: trishski@outlook.com
Affiliation:

Subject: Please Vote No

Comment:

Dear CARB,
Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.
Kind regards,
Patricia Wisniewski

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:39:29

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Below is the comment you selected to display. Comment 2046 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Henry
Last Name: Colin
Email Address: henry@colinconsulting.com
Affiliation: Colin INS Consulting

Subject: LEAVE OUR BOATS ALONE!!!!

Comment:

As an avid sports enthusiast of ALL types, its become very clear that the individuals whom their job it is to oversee and care for not just the environment but educate on how to better protect our resources. You go straight to the jugular and strangle those that make it a way of life and live off the land and sea, when you don't like or care to facilitate means of understanding.

But to make sure that WE, the people that depend on this not only for sport but to those who is their job and lively hood. You, CARB, assault the very essence of the industry and punish Californians. In a way that you tackle their pocket books and way of life just to save the environment, what the F*&! are you trying to save?

When the rest of the world watches like "CHINA" who are the biggest polluters of the earth. And no one makes them pay the fines that you impose or try to get rid of, as the garbage from other countries washes up...WE HAD ENUFF!!!

STOP N LEAVE OUR SPORTS FISHING N OTHER GOD GIVEN RESOURCES ALONE!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:31:18

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Comment Log Display

Below is the comment you selected to display. Comment 2047 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: Loredo
Email Address: peterloredo@hotmail.com
Affiliation:

Subject: RE: Sportfishing will Disappear

Comment:

Please DO NOT take the lively hoods of these fishing boat operators by implementing this rule. This will destroy the sportfishing industries as the boat operators are barely making ends meet let alone spending thousands of dollars to comply which will not make any difference at ALL!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:38:53

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Comment Log Display

Below is the comment you selected to display. Comment 2048 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charlene
Last Name: Glacy
Email Address: cglacy@yahoo.com
Affiliation:

Subject: Harbor craft regulation

Comment:

Consider the consequences please. A decision may seem an easy fix for air quality but putting fishing boats and whale watching boats that can not be retrofitted out of business is not an effective way of dealing with air quality improvement. There are bigger fish to go after instead of the small businesses trying to make a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:41:36

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Comment Log Display

Below is the comment you selected to display. Comment 2049 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: L Ryan
Last Name: Broddrick
Email Address: blackdogcinder14@gmail.com
Affiliation: Retired DFG Director

Subject: Commercial Harbor Craft Proposed Regulations

Comment:

With deepest respect to CARB I recommend you not adopt regulations that will serve to deny, restrict, and/or make fishing and whale watching more expensive, especially when retrofit is not within realm of economic or reasonable practicality.

Without affordable access to the sights, sounds, smells of ocean California will abandon the visceral connection to our oceans. The experience will be left to the elites and our commitment to ocean will become cerebral versus from the soul.

Never bring a sledge to a finishing nail and never underestimate the passion of fisher person or whale lover.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:34:46

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Comment Log Display

Below is the comment you selected to display. Comment 2050 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Allan
Last Name: Cruz
Email Address: ae.cruz@verizon.net
Affiliation:

Subject: Proposed fishing boat regulations

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sport-fishing will become too costly. It was very difficult to book a spot on a fishing boat this year, as they were mostly booked up. I recently retired and love to fish and this will make it way too expensive for me to fish if it is passed. I understand that carbon emissions need to be reduced, but it needs to be done in a smart way that doesn't shut down entire industries.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:44:58

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Comment Log Display

**Below is the comment you selected to display.
Comment 2051 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: william
Last Name: roder
Email Address: wjroder@hotmail.com
Affiliation:

Subject: CA sportfishing boats

Comment:

The proposed law is too hasty, so please delay implementation by at least five years.

Sincerely,

Bill Roder

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:49:38

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Comment Log Display

**Below is the comment you selected to display.
Comment 2052 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Roberto
Last Name: Barragan
Email Address: Robertobarraganjr@outlook.com
Affiliation:

Subject: SAVE THE BOATS
Comment:
Save The Boats!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:50:34

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Comment Log Display

Below is the comment you selected to display. Comment 2053 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harold
Last Name: Ressler
Email Address: kayressler@sbcglobal.net
Affiliation:

Subject: Don't close down SoCal access to our coastal waters.

Comment:

I strongly oppose overly stringent air resource board regulations for local marine craft used for sightseeing, salt water fishing pleasure boating. This proposal will shut down an entire industry and deny local residents and tourists a chance to enjoy marine life. There must be a more acceptable alternative.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:47:09

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Comment Log Display

Below is the comment you selected to display. Comment 2054 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bradley
Last Name: Nabong
Email Address: Bradley.a.nabong@gmail.com
Affiliation:

Subject: Save Fishing for Veterans

Comment:

I am a veteran with depression disorder and other disabilities. If you take away fishing you are adding onto the 22 veterans a day that commit suicide. A lot of vets that I know use fishing in the deep sea to combat against PTSD and other disorders. Please help us and work a better solution that everyone can be happy with.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:58:27

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Comment Log Display

Below is the comment you selected to display. Comment 2055 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: robert
Last Name: Derenard
Email Address: foxxbear@pacbell.net
Affiliation:

Subject: fishing boats

Comment:

I'm with carb. lets protect our God given right to fish.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:58:19

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Comment Log Display

Below is the comment you selected to display. Comment 2056 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: CHARLIE
Last Name: JORGENSEN
Email Address: camaronova72@gmail.com
Affiliation:

Subject: CARB for draconian regulations

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. This will not stop global climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:54:44

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Comment Log Display

Below is the comment you selected to display. Comment 2057 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Hutton
Email Address: huttonj829@gmail.com
Affiliation:

Subject: chc2021

Comment:

To Clerk of the Board,
The proposal to outlaw diesels in their current configuration for California sportfishing and Whale Watching/Tour boats is very misguided.

The technology to replace the diesel engines is not there yet; but CARB is going to insist that all these hard working people replace their boats! This is beyond crazy and smacks of government overreach.

What is being threatened is the livelihood of thousands of operators and their crews and the access to the ocean for tens of thousands of California residents and out of state tourists. 2057.1

I have been fishing sport boats for 45 years and I can remember the noxious fumes on some of those old diesel engines. You definitely did not want to be drinking your coffee on deck downwind from those smokestacks. The fleet, over the years, has been upgrading their engines and everyone has benefited from less emissions, better fuel economy, lighter weight, etc. 2057.2

Please take into account the technology currently available, when making your decision. The obvious answer is we are not quite there yet with the technology and to make this decision now will adversely affect too many people. 2057.3

You must table this preposterous proposal until the technology catches up.

Regards,
John Hutton
Fontana, Ca

Attachment:

Original File Name:

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Comment Log Display

**Below is the comment you selected to display.
Comment 2058 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: tracey
Last Name: Bourne
Email Address: Treyella29@gmail.com
Affiliation:

Subject: Save fishing
Comment:
Please no change

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:04:05

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Comment Log Display

Below is the comment you selected to display. Comment 2059 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kenneth
Last Name: Kundargi
Email Address: kkundargi@gmail.com
Affiliation:

Subject: CARB for sportfishing charter boats

Comment:

Can we be reasonable on CARB standards for sportfishing charter boats? The technology doesn't exist yet to safely implement in a cost effective manner. Sportfishing is a major economy on the coast but one that operates on thin margins but more importantly it brings joy to many many people that can't afford the cost of owning a boat. I am a professional fisheries biologist and have deep connections with the industry and recreational fishers. Implementing CARB requirements for technology that doesn't exist would be devastating to many people and communities.

2059.1

2059.2

2059.3

Sincerely,

Kenneth N. Kundargy

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:59:22

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Comment Log Display

**Below is the comment you selected to display.
Comment 2060 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Guy
Last Name: Modica
Email Address: gwmodica@comcast.net
Affiliation:

Subject: Boats

Comment:

Hands off our boats. We can worthies out but don't ruin our
livelihood

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:03:53

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Below is the comment you selected to display. Comment 2061 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Donald
Last Name: Tippie
Email Address: donaldjasontippie@gmail.com
Affiliation:

Subject: Proposed Regulations

Comment:

As a sensible human being and not a fisherman, the proposed regulations on family owned fishing boats and whale watching boats is completely irrational. I can think of hundreds of other industries, from the huge tankers sitting off Long Beach port, to the hundreds of private planes that fly over my house daily, that cause significantly more pollution and emissions than a few fishing boats. Let's be more sensible about this and either go after the real polluters or give these family owned businesses a chance to make a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:04:21

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Comment Log Display

Below is the comment you selected to display. Comment 2062 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tim
Last Name: Isaacson
Email Address: isaacson372@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

I truly hope that you help stop this bill from moving forward. I have had wonderful trips looking at whales and dolphins along with great trips fishing. To keep these experiences from this generation would be terrible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:09:04

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Below is the comment you selected to display. Comment 2063 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Elmer
Last Name: Ng
Email Address: forefish63@hotmail.com
Affiliation:

Subject: Chc2021

Comment:

Please vote no on these new proposed regulations. Please start with the freight liners. It was just in the news that they are the bigger problem.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:03:28

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Below is the comment you selected to display. Comment 2064 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leslie
Last Name: Wood
Email Address: leyore@aol.com
Affiliation: None

Subject: No harsh standards for small boating businesses

Comment:

I am writing to request that you leave room for small businesses who use boats, such as whale watching, dive operators, and sport fishing outfits, to be able to keep operating with the equipment they have or in some other way make it so they aren't put out of business by new clean air regulations for marine settings. We are frequent patrons of whale watching cruises, and it would be a shame for both operators and patrons if such opportunities disappeared. I definitely believe in protecting and safeguarding the environment, but I also want to live in a world where small businesses thrive, not one on which only large corporations can afford to continue to do business. Compromise and accommodation should be possible.

Thank you for your attention to this matter.

Respectfully,

Leslie Wood
San Juan Capistrano, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:04:53

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Below is the comment you selected to display. Comment 2065 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Shelley
Last Name: Moore
Email Address: sunshine9496@yahoo.com
Affiliation:

Subject: Save our small fishing and whale watching boats

Comment:

How are people going to care about the ocean if you refuse to allow them to see whales close up or go one the water and fish. The Ocean isn't for the very rich its for everyone to enjoy. A whole industry will be out of work and for what? So the super rich can pollute the ocean with their mega yachts?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:10:11

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Below is the comment you selected to display. Comment 2066 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: Mack
Email Address: gringofisherman@cox.net
Affiliation:

Subject: Our coming to San Diego and the fishing fleet.

Comment:

In the last 8 years we have come to Calif. for one main reason. Sport fishing on 2 to 5 day trips. My wife and friends wives stay in a motel while we are out fishing. They go shopping, they eat, buy gifts and it all adds up to a lot of money..I am just one person ,but multiply me, family and friends by thousands and the economy of the area will be severely impacted.. we wont have any reason to come to Calif.. A lot other states offer fishing...Use some common sense please

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:01:36

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Comment Log Display

Below is the comment you selected to display. Comment 2067 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Park
Email Address: Robpark714@gmail.com
Affiliation:

Subject: CARB fishing and me whale watching boat restrictions

Comment:

Please stop CARB restrictions on fishing na dwhale watching boats.
This will distroy the California sports fishing industry.

Regards,

Rob Park

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:18:03

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Comment Log Display

Below is the comment you selected to display. Comment 2068 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Walter
Last Name: Ignash
Email Address: s_ignash@yahoo.com
Affiliation:

Subject: Keep Sportfishing Affordable

Comment:

As I'm reading through the proposed amendments to fishing regulations, I'm struck by the negative effect these regulations are going to have on a pastime that so many people enjoy. It is irresponsible to put into effect regulations that are economically unfeasible and significantly harm our fishing and oceanic travel industries. To pass these regulations would be irresponsible and a harm to our community. Have some common sense and keep sport fishing and ocean travel affordable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:17:49

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Comment Log Display

**Below is the comment you selected to display.
Comment 2069 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ken
Last Name: Miyamoto
Email Address: srskinut@cox.net
Affiliation:

Subject: CARB Vote

Comment:

Please vote no. Current technology is not ready for passenger boats to comply at this time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:20:17

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**Below is the comment you selected to display.
Comment 2070 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Gary
Last Name: Pulver
Email Address: gpulver@twc.com
Affiliation:

Subject: CHC2021 save our boats
Comment:
CHC2021 Please vote No

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:17:28

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Comment Log Display

Below is the comment you selected to display. Comment 2071 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Rothenberg
Email Address: saltyhooker@gmail.com
Affiliation:

Subject: Proposed emission regulations for sport fishing boats

Comment:

I propose that you ban billionaires from owning massive mansions and flying on private jets everywhere before you pass impossible emission standards and back door ban the public from enjoying fishing and whale watching watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:23:58

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Below is the comment you selected to display. Comment 2072 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Ribble
Email Address: richardribble@gmail.com
Affiliation:

Subject: Sportfishing and Whale Watching

Comment:

I hope no legislation will go into effect to restrict the current availability of sport fishing and whale watching in California. That would be very sad, and seems wrong.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:27:44

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Below is the comment you selected to display. Comment 2073 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jonathan
Last Name: Dewhurst
Email Address: jdewhurst@gmail.com
Affiliation:

Subject: Unrealistic Expectations

Comment:

The proposed implementation of Tier 4 diesel engines into sportfishing boats is unrealistic and destroys the investment that families have made in purchasing and maintaining these vessels. They will be underpowered, the emissions equipment will not fit or make the vessel unsafe or decrease the utility of the vessel for it's intended purpose. The number of boats in the sportfishing fleet with existing Tier2/3 engines have a negligible impact on air quality compared to the larger shipping vessels burning heavy fuel oil. Do not impose these unrealistic regulations on sportfishing boats and destroy these family-owned businesses.

2073.1

2073.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:18:51

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Below is the comment you selected to display. Comment 2074 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Harris
Email Address: scott.harris.m@gmail.com
Affiliation: Just an avid sportfisherman!

Subject: Sportfishing Regulations

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

If these regulations are passed and some of the boats manage to stay in business, the price of trips will have to be raised so much that the average joe like myself will no longer be able to afford to go. Please don't place this hardship on boat owners and the general public who spend their precious free time doing the thing they love. Please think about what the consequences of voting for this will mean to peoples' lives.

Regards,
Scott M Harris
San Diego Angler

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:23:15

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Comment Log Display

Below is the comment you selected to display. Comment 2075 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: frank
Last Name: martinez
Email Address: frankpm44@yahoo.com
Affiliation:

Subject: commercial harbor craft regulation

Comment:

Please vote no on any new regulations that would remove any sport fishing boat from service. Sport boat fishing is getting very expensive. With new regulations it might make it so a retired person like myself, can not afford to go fishing , thank you
Frank m

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:23:22

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Comment Log Display

Below is the comment you selected to display. Comment 2076 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Manahan
Email Address: Digitnow@mac.com
Affiliation:

Subject: Chc2021

Comment:

I urge a no vote on the current proposed legislation. Sport fishing, diving and whale watching should be affordable to everyone. The cost to retro fit vessels with unproven technology can be costly and will result in many vessels no longer being available to the non boating public.

2076.1

There needs to be a means where the owners of the vessels can receive a no interest business loan and 100% tax credit offset to make conversion feasible. If such provisions are not created then the cost of retrofitting the vessels combined with increasing fuel costs and insurance increases will make sportfishing, diving and whale watching unaffordable for the average wage earner in California. I urge a no vote for the current version.

2076.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:32:27

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Comment Log Display

**Below is the comment you selected to display.
Comment 2077 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Danielle
Last Name: Fauth
Email Address: dani.lynne@gmail.com
Affiliation:

Subject: Vote No

Comment:

I urge you to vote no on regulations that rely on technology that is economically unfeasible and have not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. Don't deny me and future generations of Californians access to the sea.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:35:27

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Comment Log Display

Below is the comment you selected to display. Comment 2078 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mike
Last Name: Desrosiers
Email Address: mikedesrosiers123@gmail.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

This is ridiculous, what else are they going to take away from us. This is one of the greatest pleasures in life. Please don't get caught up into the "Great Reset", that is determined to ruin our lives. May God have mercy on us and help us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:41:35

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Comment Log Display

Below is the comment you selected to display. Comment 2079 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Alpert
Email Address: Robertalpert13@gmail.com
Affiliation: Retired teacher

Subject: Supporting citizens in California

Comment:

To who it may concern: I am not someone who benefits financially from fishing on party boats. My grandpa too me fishing and I took my sons and now grandson. Regardless of you connection with the fishing industry, it is you responsibility and duty to support us as citizens. Please do what you need to do to earn our public trust.

I believe you will.

Respectfully, Robert Alpert

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:33:05

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Comment Log Display

Below is the comment you selected to display. Comment 2080 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Miller
Email Address: mgm52760@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Thank You
Mark Miller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:42:01

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Comment Log Display

Below is the comment you selected to display. Comment 2081 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bradley
Last Name: Nabong
Email Address: Bradley.a.nabong@gmail.com
Affiliation:

Subject: Save Fishing for Veterans

Comment:

I am a veteran with depression disorder and other disabilities. If you take away fishing you are adding onto the 22 veterans a day that commit suicide. A lot of vets that I know use fishing in the deep sea to combat against PTSD and other disorders. Please help us and work a better solution that everyone can be happy with.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 20:58:27

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Comment Log Display

Below is the comment you selected to display. Comment 2082 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Serratelli
Email Address: Serratelli332@gmail.com
Affiliation:

Subject: Keep the boats on the water

Comment:

Sport fishing is where my son and I go to have our father son trips. We attended them at least 3 -5 times a year. Not only do I fish with my son on the regular basis I fish with my good friends and co workers. We use this time on the water with each other to unwind from weeks of hard work and stress at home. My wife loves the fish we bring home and loves to make some of our favorite dishes. Please don't take that away from us, that's all we have . My son would be devastated and so heart broken. Thank you for taking the time to read this.

Signed,

A father making memories with his son

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:43:36

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Comment Log Display

Below is the comment you selected to display. Comment 2083 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: C
Last Name: Siebler
Email Address: c_s44@ymail.com
Affiliation: n/a

Subject: sportsfishing

Comment:

This is so sad; yearly I whale watch off the SD coast. Please leave what's left of our fishing/whale watching industry ALONE!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:01:26

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Comment Log Display

Below is the comment you selected to display. Comment 2084 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jonathan
Last Name: Kang
Email Address: jon.j.kang@gmail.com
Affiliation:

Subject: Please reconsider

Comment:

I am writing to strongly protest the proposed legislation that would adversely affect the sportfishing and whale watching industries.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:07:58

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Comment Log Display

Below is the comment you selected to display. Comment 2085 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Sutke
Email Address: rsutke1@san.rr.com
Affiliation:

Subject: How short sided

Comment:

Folks if you want to go after the polluters go to china not
Americans DUH

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:06:37

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Comment Log Display

Below is the comment you selected to display. Comment 2086 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kelly
Last Name: Cortez
Email Address: kelly.cortez@entheosacademy.org
Affiliation:

Subject: CHC2021

Comment:

Whale watching is a pastime my family and I have enjoyed for years. We look forward to a new adventure each time. It would be devastating to not enjoy this treasured pastime in the future. It is such a neat experience to see the animal life up close and personal in their natural habitat. Much better than these sweet animals being in captivity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:06:27

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Comment Log Display

Below is the comment you selected to display. Comment 2087 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Pak
Email Address: stevenpak1@gmail.com
Affiliation:

Subject: This law will affect the ecosystem of the ocean

Comment:

Just like any mammal living here on earth, humans are part of the ecosystem that is necessary for the flourishing of all life forms including aquatic life. If you remove the opportunity for fishermen to catch fish for food, you not only endanger the ocean life, but limit humans from gaining necessary nourishment from eating fish. There will be an influx of certain types of fish which will in turn throw off the balance of the ocean life forms. You attempts to save the planet will actually destroy it in the long run. Hunters and fishermen are all part of the ecosystem and this must be preserved.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:03:14

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Comment Log Display

Below is the comment you selected to display. Comment 2088 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jon
Last Name: Dickens
Email Address: jonrobertdickens@gmail.com
Affiliation: Western Outdoor News

Subject: Save the Sportfishing Industry

Comment:

Add me to the list of thousands of California sport fishermen and fisherwomen who want to keep the sportfishing industry alive. As if the pandemic wasn't bad enough - and many boat owners did not survive it - now we are facing potential legislation that will put most of those left out of business due to the proposed repowering legislation.

2088.1

There are many industries whose practices produce far more pollution and harm than the relatively small number of sport boats who are scratching and clawing to keep their businesses above water. The sport of fishing will likely end for those citizens who can not afford a boat of their own. Sport boats and related fishing tackle and tourist businesses that add significant revenue to the state's economy will be doomed as well.

2088.2

Please reconsider your position on this misguided effort to require boat owners to spend hundreds of thousands of dollars that they don't have to repower their boats. Help us keep sportfishing alive so it can provide relief from the challenging times we're in for the thousands of passengers they carry each year.

2088.3

2088.4

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 21:51:15

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Comment Log Display

**Below is the comment you selected to display.
Comment 2089 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Morgan
Last Name: wallace
Email Address: iamwallace@gmail.com
Affiliation:

Subject: CHC2021 Save Our Boats
Comment:
Don't shut fishing down

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:11:42

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Comment Log Display

Below is the comment you selected to display. Comment 2090 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Danny
Last Name: Peltz
Email Address: dillstarr@gmail.com
Affiliation:

Subject: Save sports fishing

Comment:

For many years I have enjoyed sports fishing. I can't imagine the Bay Area without it. For generations, families of fisherman have supported themselves and provided a rewarding outside experience for many. Please don't make it cost prohibitive. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:11:31

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Comment Log Display

Below is the comment you selected to display. Comment 2091 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Russo
Email Address: jrusso7881@gmail.com
Affiliation:

Subject: Proposed Boat Emissions Regulations

Comment:

Hello,

The proposed regulations, based on currently non-existent technology would make it either impossible or at least cost prohibitive for people such as myself to fish and experience the outdoors and our beautiful ocean environment, something I've been doing for more than forty years. It would also cost thousands of jobs throughout California, and make it impossible for non-fishermen (such as whale and bird watchers to pursue these activities).

2091.1

2091.2

We all want and care about having clean air, but forcing businesses to close and people to not be able to pursue their passions is not the correct approach.

Please reconsider the proposed regulations, and allow the industries involved to work with you to find better alternatives.

Very respectfully,

Joseph Russo
San Diego, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:09:11

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**Below is the comment you selected to display.
Comment 2092 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mike
Last Name: Shaw
Email Address: michealshaw55@yahoo.com
Affiliation:

Subject: Save our sport fishing fleet

Comment:

Please do not rob California of our sport fishing fleet

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:27:13

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Below is the comment you selected to display. Comment 2093 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Conners
Email Address: Jpc4conners@msn.com
Affiliation:

Subject: Save the fishing fleet

Comment:

Fishing is an important part of So Cal culture and Hugh contributor to local encomny. The fleet takes all the needed steps to assure that it leaves very little footprint on the Ocean Waters . Please don't take steps that will shut them down Hurting the families that depend on this industry for there livily hood plus the enjoyment of many families

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:17:22

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Below is the comment you selected to display. Comment 2094 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Claude
Last Name: Alexander
Email Address: htcalex@yahoo.com
Affiliation:

Subject: Sportfishing boats

Comment:

As a veteran and longtime fisherman I am against your efforts to require boats to make engine changes that will ultimately put over half the fleet out of commission. In addition, you are taking away a pasttime that is barely affordable for us already. Those boats that will be able to retrofit will have to charge an exorbitant fee to sportsmen just to be able to operate. It seems as though you are partnering with PETA to end sportfishing and close down a multi million dollar industry for no good reason. Go after the big corporations and leave us alone.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:36:40

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Comment Log Display

Below is the comment you selected to display. Comment 2095 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christina
Last Name: Bougas
Email Address: bogie33@mac.com
Affiliation:

Subject: No on more regulations.

Comment:

We have enough regulations. Jeeze. Enough!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 22:58:59

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Comment 2096 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: leroy
Last Name: hensley
Email Address: LeroyH11@Charter.Net
Affiliation: no company

Subject: keeping the sport fishing industry open
Comment:
LEAVE IT ALONE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:04:52

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Comment Log Display

Below is the comment you selected to display. Comment 2097 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leeroy
Last Name: Susan
Email Address: leerroysusan.mendo@gmail.com
Affiliation: Disabled veteran

Subject: Harbor craft bill

Comment:

I strongly oppose any regulation on emissions from fishing vessels. Thier numbers are too few to be of significance, thier heritage too rich too abandon and there patrons too American to ignore!

With sincere respect,
Leeroy Susan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:09:11

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Comment Log Display

Below is the comment you selected to display. Comment 2098 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Hendrick
Email Address: dehendrick@att.net
Affiliation: K6JHD

Subject: CHC2021 Save Our Boats

Comment:

Save sport fishing and whale watching boats. Also save the tour boats in San Diego bay!

Sincerely,

David Hendrick, Coast Guard Veteran.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:14:46

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Comment Log Display

Below is the comment you selected to display. Comment 2099 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Marrone
Email Address: edspics760@gmail.com
Affiliation:

Subject: sportfishing regulations

Comment:

Please vote no on regulations imposing technology upgrades to passenger harbor crafts used for sportfishing and whale watching.

This will result in cost increases that must be borne by the customer and would likely result in a loss of revenue to the business operator and decreased access to the open waters. The affect this would have on the health of the planet is dubious at best, and unproven. The sportfishing business is comprised of hard working folks who return value to their customers. Don't burden them with unneeded regulations!

2099.1

I am an angler. I have no ownership or interest in the sport fishing business other than a desire to keep them solvent so I and others may continue to enjoy sportfishing.

2099.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:24:38

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Comment Log Display

Below is the comment you selected to display. Comment 2100 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Janet
Last Name: Burdick
Email Address: janburdick805@gmail.com
Affiliation: Fidhersomen

Subject: CARB

Comment:

Absolutely ridiculous do not require commercial boats against the CARB INITIATIVE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:39:54

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Comment Log Display

**Below is the comment you selected to display.
Comment 2101 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Warren
Last Name: Johnson
Email Address: billdanc@att.net
Affiliation:

Subject: Please Protect The Sportfishing Industry

Comment:

Please think of the families of the operators of these vessels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:39:58

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Comment Log Display

Below is the comment you selected to display. Comment 2102 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Janet
Last Name: Burdick
Email Address: janburdick805@gmail.com
Affiliation: Recreation boater

Subject: CARB

Comment:

Your worried about commercial local boats when those huge cargo ships come into port and sit for months polluting..or the oil wells off our coast if your so concerned oh you probably get kicks back from the oil companies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:43:32

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Comment Log Display

Below is the comment you selected to display. Comment 2103 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Henry
Last Name: Saucedo
Email Address: hsauceda@earthlink.net
Affiliation:

Subject: Commercial Harbor Craft regulation

Comment:

I oppose any legislation or regulation that will hurt the sport fishing industry. Most of these sport fishing boats are family owned. It will also have a negative affect to those of us that fish from these boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:47:49

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Comment Log Display

Below is the comment you selected to display. Comment 2104 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Keith
Last Name: Mossman
Email Address: kalanimossman@yahoo.com
Affiliation: Fisherman

Subject: Do not make these boat owners close down!

Comment:

I fish up and down the coast from Mexico to Monterey for many of years! It would be a tragic mistake to close all these fishing boat operators! They are trying to make a living just like everyone else in these trying times!!! With these new regulations you will cause a lot of these boat owners to end up closing down! Please don't let this happen ! Family men women kids is a family business through out the whole coast!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 00:05:31

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Comment Log Display

Below is the comment you selected to display. Comment 2105 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Black
Email Address: bajablackie2004@yahoo.com
Affiliation: Oceanside Senior Anglers

Subject: Forced replacement of current Sportfishing Fleet and Whale Watching Vessals Engines
Comment:

Sirs: As a senior citizen angler I find it almost impossible to maintain and safely pilot a personal watercraft. The coastal Sportfishing Fleet affords me away to enjoy a recreational pastime I have enjoyed for nigh on 71 years now. The California State constitution protects my right to fish in the wonderfull offshore waters of our state. Its not fair to the owner operators of our fleet to be forced to install new costly engines because of pollution concerns without an additional financial plan that subsidizes such a costly change over. Theres various ways to accomplish this like providing ZeroPercent financing like the car dealers do. OR providing wholesale prices for the engines with extended terms that the boat owners could afford. Or provide a plan that encopassees all the diferent ways available , to help the Captains make the switch. The current plan also doesnt take into consideration the massive losses to californis Economy! These fleet boost the growth of oor economy to the tune of 3-4 BILLION dallars a year!!! These fleets and the businesses associated with them provide livelyhoods for thousands of workers!! There has to be a better and more equitable way to reduce pollution levels than this prposes one!! Thankyou for listening. Cordially Michael R Black .

2105.1

2105.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-03 23:59:14

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Comment Log Display

Below is the comment you selected to display. Comment 2106 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Symon
Last Name: Whitehorn
Email Address: sw@mec.ai
Affiliation:

Subject: objection: chc2021 - Commercial Harbor Craft Regulation

Comment:

I oppose chc2021 (California Air Resources Board votes for regulations that stand to remove boats up and down California's coast from service) on the grounds that limiting public activity and engagement in this environment will be counter productive in preserving our natural resources - it has been clearly demonstrated that participating in activities in these environments leads to their conservation and preservation for future generations that are emotionally, culturally and commercially invested in them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 00:25:46

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Below is the comment you selected to display. Comment 2107 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Henning
Email Address: DRwillieH@gmail.com
Affiliation:

Subject: Save The Sportfishing

Comment:

I want to make sure to prevent the sportfishing boats from being impacted with unnecessary expenses. I am a sportfishing supporter.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 00:43:28

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Comment Log Display

Below is the comment you selected to display. Comment 2108 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dominic
Last Name: Padula
Email Address: dominicuspadula@gmail.com
Affiliation: None

Subject: CHC2021

Comment:

Vote to keep sportfishing boats in the water. Don't pass engine regulations that would make it impossible to run them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 01:14:36

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Below is the comment you selected to display. Comment 2109 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Barbara
Last Name: Stanculescu
Email Address: abcde_bunch@hotmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

We as a family living in SD go at least twice a year whale watching and we had the most wonderful experiences for the last 12 years. For our guests out of town it is one of the highlights. Please find an affordable way that the boats can still run and we can continue enjoying the wonders of the ocean. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 01:35:21

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Comment Log Display

Below is the comment you selected to display. Comment 2110 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robbie
Last Name: Goff
Email Address: Jitsurob1@hotmail.com
Affiliation:

Subject: Keep the Sea great!

Comment:

I've been fishing all my life and thus passed the passion to my children. If this current bill is allowed to pass it will effectively end the opportunity my children have to appreciate the seas as I do. Please keep the ocean accessible for years to come.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 02:14:26

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Comment Log Display

Below is the comment you selected to display. Comment 2111 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Taylor
Last Name: Kovach
Email Address: ilikeditx22@gmail.com
Affiliation:

Subject: Sportfishing Fleet

Comment:

Hello

The regulations you guys are trying to push are going to put the Sportfishing community out of business. A lot of people are going to lose their jobs and millions of dollars of tax revenue will be lost. Please stop trying to put them out of business.

Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 03:51:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2112 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: George
Last Name: Kessel
Email Address: Gwkessel@gmail.com
Affiliation:

Subject: CHCR
Comment:
No

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:28:06

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Comment Log Display

Below is the comment you selected to display. Comment 2113 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Mathews
Email Address: robertaustinmath@gmail.com
Affiliation:

Subject: Commercial Harbor craft regulation

Comment:

Very important for thousands of present and future generations of recreational anglers to have access to the fleet of boats that are threatened by this legislation.

Not to mention the financial impact to all the businesses associated with the recreational fishing industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:25:14

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Comment Log Display

Below is the comment you selected to display. Comment 2114 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Dittenhoefer
Email Address: rdittenhoefer@gmail.com
Affiliation:

Subject: Sportfishing Engine Regulations.

Comment:

I grew up working on these vessels, and they contribute more to the community than just fishing! This would have a huge economic impact on the city's across California. This would be the biggest mistake of any of these Board Members careers!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:37:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 2115 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Theresa
Last Name: Howell
Email Address: tippytoeresa@comcast.net
Affiliation:

Subject: Sportfishing
Comment:
Don't sink Sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:54:20

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Comment Log Display

**Below is the comment you selected to display.
Comment 2116 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Charles
Last Name: Weatherwax
Email Address: candcplumbinginc@yahoo.com
Affiliation:

Subject: Vote No CARB
Comment:
Please vote no!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:54:40

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Comment Log Display

Below is the comment you selected to display. Comment 2117 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nick
Last Name: Brecht
Email Address: nicholas.j.brecht@gmail.com
Affiliation:

Subject: New Boat Regulations Will End Sportfishing

Comment:

The proposed regulations for passenger and commercial boats will effectively end sport fishing for families. I am a 4th generation recreational angler who takes my own kids fishing on passenger boats here in Southern California. Family run boats will not be able to afford the proposed upgrades to make their boats compliant. Please do not vote YES on this measure as it will effectively end Sport Fishing for future generations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 04:58:53

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Comment Log Display

Below is the comment you selected to display. Comment 2118 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Snyder
Email Address: kickin45@yahoo.com
Affiliation: SportFishing/Whale watching

Subject: Stop!

Comment:

Please stop messing with the regulations. While I am not a resident of California, I frequently go out on sport fishing trips at H&M Landing and Fishermans Landing in San Diego. CARB's new restrictions placed on boats is going to kill that industry and ruin the fleets. These are family businesses catering to families.

2118.1

I have been fishing on these boats for the last 40 years and what you're proposing will end this. I will be unable to take my children out fishing as the cost will not allow me to do so. Please rethink your plans and do not do this to a robust section of the economy and our children's future memories.

2118.2

Will Snyder.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:01:40

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Below is the comment you selected to display. Comment 2119 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: Dorris
Email Address: fisherdudekev@yahoo.com
Affiliation: Contractor Local /Avid fisherman

Subject: Re- CARB

Comment:

It sounds dreadful how some vote could change the lives of so many by regulation to boats to be retrofitted at the cost of each owner and passenger we who enjoy activities on boats at everyone's expense !!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:05:36

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Comment Log Display

Below is the comment you selected to display. Comment 2120 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Joseph
Email Address: tomjoseph@pacbell.net
Affiliation:

Subject: Commercial Passenger Boats

Comment:

This would be a disaster and devastating to the commercial boat Sportfishing industry. What are people going to do if there not able to fish? How many tackle or sport fishing shops could close.

Has anyone done a study what the effects would be for the commercial passenger boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:00:41

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Comment Log Display

Below is the comment you selected to display. Comment 2121 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Wills
Email Address: stevewills411@msn.com
Affiliation:

Subject: chc2031

Comment:

Stop this job/business killing action you left wing hacks. Bet you never ran a business yourselves and care nothing of the ramifications of your radical agendas..you never do
Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:10:36

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Comment Log Display

Below is the comment you selected to display. Comment 2122 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dale
Last Name: Dargatz
Email Address: tunacatd@gmail.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

There are far too few boats to justify these unreachable regulations for 95% of the fishing % whale watch boats! The few owners that could afford this will probably not stay in business because of the huge ticket prices they'll have to charge. 90% of the fisherman wont be able to afford to go. It's not just the boat owners that will lose their business & livelihood, from the landing employees, bait companies, tackle stores, tackle manufactures with all their employees!!! We're not just talking 4 hour fishing boats, some boats do up to 15 day trips for \$5000, whos going to be able to afford a \$9000 trip to offset this huge overly expensive regulation? 2122.1

Also this engine process in the exhaust can & does catch fire from time to time, what are you going to do when a boat is 100 miles OFFSHORE catches fire??? This is just not obtainable now!!! 2122.2

2122.3

2122.4

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:02:33

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Comment Log Display

Below is the comment you selected to display. Comment 2123 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Bacilek
Email Address: mbacilek@gmail.com
Affiliation: Citizen

Subject: Sportfishing

Comment:

There must be some way where we all can live in this world or state together and simultaneously. This old world belongs to ALL of us and ALL of us should have some say as what happens to the future of their beloved past times and hobbies. Its not right that the side or group with the most money wins. Thats why the Democrat's exist today. They are for the little guy. The masses. The ones who were run over and left behind on the way to prosperity of the rich. Now the tide has turned and they are running down folks to push their agenda. Dont cut off your noses to spite your faces. Live and let live. ALL of us together. It looks as though the cure is worse than the disease. Dont kill your fellow Californians ability to make a living and the hundreds of thousands of citizens who enjoy sportfishing in our once wonderful state. Im afraid the whole thing was not well thought out and is just a form of cancellation. The problem is, it will stimulate a form of counter action that is not good for anybody. You see by the elections what the sediment of the voters is now. Do we have to experience this every year or two. Lets not rock the boat!! The sportfishing boat that is.....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:02:06

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Comment Log Display

**Below is the comment you selected to display.
Comment 2124 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: KEN
Last Name: MURRAY
Email Address: ghengiskenn@yahoo.com
Affiliation:

Subject: Don't Sink Sportfishing!

Comment:

I urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:30:04

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Comment Log Display

Below is the comment you selected to display. Comment 2125 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harry
Last Name: LeKites
Email Address: ross124@verizon.net
Affiliation:

Subject: Support for fishing fleet

Comment:

I support sport fishing fleet stop engine upgrade

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:37:33

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Comment Log Display

Below is the comment you selected to display. Comment 2126 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Balmforth
Email Address: Akbalmforth@aol.com
Affiliation:

Subject: Sportfishing boats

Comment:

The operators of these boat work on minimal profit .Any additional regulations would creat a trickle down loss throughout our economy and take away opportunities for what has become a lifelong recreation for many. Please vote No on any additional regulations.

Tony Balmforth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:33:26

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Comment Log Display

Below is the comment you selected to display. Comment 2127 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clyde
Last Name: Summers
Email Address: frank.summers23@gmail.com
Affiliation:

Subject: CHC2021

Comment:

Please vote no on the proposed regulations. I feel the educational and economical impact to our communities far out weigh any potential benefit, especially after how the pandemic has affected our local economies. Perhaps a better solution would be to phase in the requirements on newer vessels as they come on line. Please remember how hard the pandemic has been on everyone as we try to recover and get back to some normalcy.

Thank you
Clyde Summers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:38:09

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Comment Log Display

Below is the comment you selected to display. Comment 2128 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Bacilek
Email Address: mbacilek@gmail.com
Affiliation:

Subject: air

Comment:

I have lived in California since 1961. I know SMOG. The air has never been cleaner than it is now. You want to do something for the earth? Do more to promote Bicycles. Even electric bicycles. Smaller private vehicles all the way around. The trend in cars and trucks is bigger every year. I drive a 125cc Yamaha. Its a dream. 5 liters a week. At least 1/2 the people live close enough and are healthy enough to ride a bike or a electric bike to work and school. We are mostly scared to drive out there with the giants. No room for a tiny bike. Build it and they will come. Tax incentives for bicyclists. You can come up with a better and more popular solution to these problems. Only weak people go after soft targets. Challenge yourselves to attain your goals with out casualties. There are always trade offs such as Grandfathering, and from now on. It seems you haven't given enough thought. Its not to late to reconsider the plan. No Casualties!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:28:28

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Comment Log Display

Below is the comment you selected to display. Comment 2129 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Bozzano
Email Address: richbozzano@gmail.com
Affiliation: L&R Bozzano Inc

Subject: CARB Ruling...

Comment:

Clerk of the board...shing regulationsPlease do not change current sportfishing, regulations.....sincerely, Richard Bozzano

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:52:07

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Comment Log Display

Below is the comment you selected to display. Comment 2130 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anastasia
Last Name: Larsen
Email Address: anastasia.r.larsen@kp.org
Affiliation:

Subject: Save Sportfishing

Comment:

These proposed amendments to our fishing and whale watching industry should not be passed. It will cripple our community causing loss of jobs and affect consumers like myself who support our community. Please vote NO on these new regulations.

Warm regards,

Anastasia Rain Larsen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 05:51:58

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Comment Log Display

Below is the comment you selected to display. Comment 2131 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dan
Last Name: McIntyre
Email Address: jlproject51@yahoo.com
Affiliation: Fisherman

Subject: Commercial Harbor Craft Regulation

Comment:

As a former San Diego resident and salt water fisherman, I know the value of having active fleets in the CA harbors. My hope is that the proposed changes in regulations are not adopted for the future of the fishing community and our kids.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:01:54

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Comment Log Display

Below is the comment you selected to display. Comment 2132 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Colleen
Last Name: Burkhalter
Email Address: Cburkhalter05@gmail.com
Affiliation:

Subject: Commercial Craft Regulation

Comment:

Yet again we have California lawmakers hurting small businesses
with "good intentions" the carbon footprint from small boats is
minuscule compared to emissions put out everyday by airlines,
trucks, and personal vehicles. The difference is we don't have the
deep pockets to fight compared to the airlines and car companies.

2132.1

It feels like since lawmakers can't go after the big guns they
will go after the little guy who they think they can squash and
then tout how they are doing good things for the environment.

Please reconsider how much this will hurt small businesses and
future generations access to the ocean. It's not just Sportfishing,
but whale watching as well. This is the "whale watching capitol of
the world". Don't deny our children access to boating that lets
them experience nature and the sea. Thank you.

2132.2

2132.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:02:41

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Comment Log Display

Below is the comment you selected to display. Comment 2133 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jerry
Last Name: Turgeon
Email Address: jerzjf40@hotmail.com
Affiliation:

Subject: Vote No

Comment:

With the economy still trying to recover from unconstitutional mandates regarding Covid, Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. This would put a majority of fishermen out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:06:30

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Comment Log Display

Below is the comment you selected to display. Comment 2134 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Blair
Last Name: Olsen
Email Address: blair@olsencr.com
Affiliation:

Subject: Sport fishing community

Comment:

Good morning, please look further into the 4 teer requirement for the sport fishing industry.

It is important that people and kids have access to off shore fishing and whale watching.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:11:03

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Comment Log Display

Below is the comment you selected to display. Comment 2135 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Bacilek
Email Address: crewhh@live.com
Affiliation:

Subject: Opposing sport fishing ban

Comment:

To CARP,

Ban sport fishing is nothing but abosolutely ridiculous. We have generations that are coming that have never experienced sport fishing and I feel the same for whale watching. If you vote to make this a ban in California, all your doing just making just making complete idiots out of yourselves. Banning motorized boats will not save the world, only Jesus can. Plus it's you taking away the American dream from others as well. Fishermen are law Abiding anglers and we don't need that taken away.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:12:04

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Comment Log Display

**Below is the comment you selected to display.
Comment 2136 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: James
Last Name: Garner
Email Address: jimgarner001@gmail.com
Affiliation:

Subject: chc2021

Comment:

Please do not adopt these proposed regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:24:36

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Comment Log Display

Below is the comment you selected to display. Comment 2137 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ron
Last Name: Fleenor
Email Address: ronfleenor@msn.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

Concerned citizens continue to be driven by unreasonable regulations that do not improve environmental conditions in our state. Please consider the rights and desires of other citizens. Splinter special interests groups are controlling our politicians and denying our rights of America. It is OK for traitors like Colin Kapernick and others to kneel and disrespect our flag but not the citizens to have the full consideration and concern from our politicians.

Attachment: www.arb.ca.gov/lists/com-attach/2430-chc2021-B2RTOIMgWWtVPwIW.docx

Original File Name: Coral Sea Logo Cap.docx

Date and Time Comment Was Submitted: 2021-11-04 06:21:29

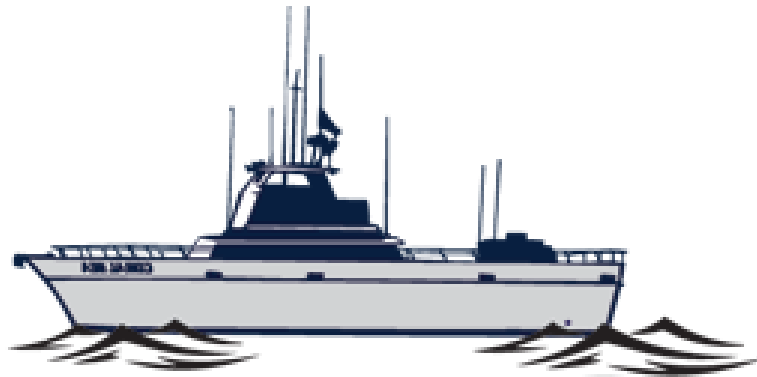
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CORAL SEA

SPORTFISHING

BRIAN RON



Comment Log Display

Below is the comment you selected to display. Comment 2138 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Yokoyama
Email Address: ryokoyama@sbcglobal.net
Affiliation:

Subject: CHC2021

Comment:

Do not kill our Sportfishing Industry with your preposterous new laws that are unobtainable for the small private fleets. Sportfishing is an enjoyable, sustainable source of fish.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:23:44

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Comment Log Display

Below is the comment you selected to display. Comment 2139 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Nulton
Email Address: snulton@gmail.com
Affiliation:

Subject: Vote NO on new regulations

Comment:

The technology you are considering is unsustainable and economically unfeasible. It has not been tested as safe on passenger harbor crafts. This is way to promote further incursion into our Constitutionally guaranteed rights.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:45:33

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Comment Log Display

Below is the comment you selected to display. Comment 2140 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Jones
Email Address: Krakenstorm@yahoo.com
Affiliation:

Subject: Sportfishing and whale watching

Comment:

Please do not kill these industries by mandating emissions laws that will force them out of business. My family has enjoyed these activities for generations and my children have learned about sustainable resources, the delicate balance of nature and how we can be a positive player while enjoying. Please find a way keep this wonderful opportunity for people to live and learn with the ocean alive.
Please don't erase these businesses.

Thank you,
Jeff Jones
Menifee, Ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:44:32

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Comment Log Display

Below is the comment you selected to display. Comment 2141 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robin
Last Name: Krohn
Email Address: rkrohn2@yahoo.com
Affiliation:

Subject: CARB

Comment:

I vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:49:42

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Comment Log Display

Below is the comment you selected to display. Comment 2142 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Eric
Last Name: Zillmer
Email Address: ezaznd@aol.com
Affiliation:

Subject: Leave fishing in the ocean alone the cargo ships coming from China are the real threat t
Comment:

Leave the local Sport fishing alone and stop picking on the little guys the real issue in are local waters are all the cargo ships from China dumping raw sewage and raw diesel fuel right into the air making ever body sick including are young next generation of children

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:43:42

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Comment Log Display

Below is the comment you selected to display. Comment 2143 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Zajicek
Email Address: 3johnjz@gmail.com
Affiliation: veteran

Subject: chc2021

Comment:

I have been fishing on these boats since 1972, these boat owners have a hard enough time making ends meet and for you to redo these boats will close down a lot of them and more people on unemployment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:52:14

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Comment Log Display

Below is the comment you selected to display. Comment 2144 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Davis
Email Address: bosshogg13@msn.com
Affiliation:

Subject: draconian regulations

Comment:

please do not put into place these new draconian regulations that would put so many businesses and families out of work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:51:06

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Below is the comment you selected to display. Comment 2145 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Atkins
Email Address: geeatkins@yahoo.com
Affiliation:

Subject: Banning motorized boats

Comment:

Please reconsider the idea of restricting engine pierced vessels from our California waters. This will deal a huge blow, especially our robust fishing industry

My life with my brothers was Downs with our father learning to fish on commercial 1.2 day fishing boats in Long Beach area and now myself and a friend have our own boat to teach our kids and grandkids such a great escape for them to enjoy Recreational fishing & bonding time together

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:57:58

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Comment Log Display

Below is the comment you selected to display. Comment 2146 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Jamriska
Email Address: djamriska@hotmail.com
Affiliation:

Subject: Can we get there thru steps

Comment:

Instead of jumping straight to Tier 4, look at Tier 3 or maybe Tier 4 with financial incentives.

2146.1

There are so many sources of pollution, does taking away something that provides so much joy? I see so many trucks on the road that blech smoke, why don't look at enforcing existing rules?

2146.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:06:14

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Comment Log Display

**Below is the comment you selected to display.
Comment 2147 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: charles
Last Name: feliciano
Email Address: cfelco@hotmail.com
Affiliation: cfelco

Subject: CHC2021 Save Our Boats
Comment:
save our sports fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:14:53

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Comment Log Display

Below is the comment you selected to display. Comment 2148 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Levendoski
Email Address: lev81587@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

I am a fisherman that spends 20-30 days per year on sport boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:12:00

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Comment Log Display

Below is the comment you selected to display. Comment 2149 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mitchell
Last Name: Gutierrez
Email Address: orbitrental@yahoo.com
Affiliation: Orbit Rentals Inc

Subject: chc2021

Comment:

I have been fishing since I was 16 years old. Please allow future generation fisherman and fisher gals continue the tradition of the sport. If you vote to amend this measure you will affect multiple businesses and industries economically and financially and with the loss of jobs. Don't do this because you will destroy an American tradition. Mitch Gutierrez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 06:52:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 2150 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Edward
Last Name: McCarthy
Email Address: eddiemccarthy1953@gmail.com
Affiliation:

Subject: Fisherman

Comment:

Please relax your laws for the sport fishermen as we really enjoy fishing the waters off of San Diego.....thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:16:37

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Comment Log Display

Below is the comment you selected to display. Comment 2151 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joshua
Last Name: Kidwell
Email Address: Kernrugby@gmail.com
Affiliation:

Subject: Vote NO

Comment:

I'm writing you in opposition to the new proposed standards on boat engines. As a CA fisherman and boat owner I strongly oppose these new proposed standards that would place undue financial hardship on those who struggle to make their living on the water. As a CA voter, sportsmen, and conservationist I'm urging you to vote no.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:12:41

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Comment Log Display

Below is the comment you selected to display. Comment 2152 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dennis
Last Name: Saylor
Email Address: d.saylor79@gmail.com
Affiliation: sport fisherman

Subject: sport fishing

Comment:

people have a right to make a honest living and raise there families, they pay taxes and support there communities.You want to destroy this, no reason for it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:18:09

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Comment Log Display

Below is the comment you selected to display. Comment 2153 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ronald
Last Name: Donnelly
Email Address: rjdonnelly@comcast.net
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Please do not Amendment this at this time as the ability to do this is not in place at this time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:16:53

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Comment Log Display

Below is the comment you selected to display. Comment 2154 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jerry
Last Name: Sutton
Email Address: jsutton@dotprinter.com
Affiliation:

Subject: Proposed regulations for sportfishing and whale watching vessels

Comment:

Please consider what this will do to our sportfishing and whale watching industries, as well as all peripheral businesses directly linked to them. I ask that you spend more time exploring other options that will be sustainable, and keep family businesses running. Thank you, Jerry Sutton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:17:11

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Below is the comment you selected to display. Comment 2155 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Louis
Last Name: Magnasco
Email Address: 1998Yankees1939@gmail.com
Affiliation:

Subject: Recreational fishing
Comment:
Costs will skyrocket.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:20:53

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Below is the comment you selected to display. Comment 2156 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: kevin
Last Name: kraft
Email Address: kevinkraft561@gmail.com
Affiliation:

Subject: fishing offshore on charter boats

Comment:

My Family has been recreational offshore fishing for generations and i am 60 years and been enjoying charter boats from San Francisco and Bodega Bay.they need to stay in business and keep economy going.there percentage of carbon footprint is not significant IMO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:17:29

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Comment Log Display

Below is the comment you selected to display. Comment 2157 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ben
Last Name: Petrucci
Email Address: Bpetrucci1051@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

I have been fishing on the sport boats for 20 years and over that time have watched the prices increase. By doing what you're doing you're getting rid of the opportunity for people to take their kids fishing at an affordable price. It is wrong do not let everybody have the same opportunities. When I take a look around this great country everything has changed in the last couple of years. Gas prices are out of control cost of living is out of control. I fear for our children because I believe a new level of poverty will hit our country because of decisions like these that are being made. Do not vote to end sports fishing on these boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:16:05

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Below is the comment you selected to display. Comment 2158 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ron
Last Name: Ford
Email Address: Bajaron61@yahoo.com
Affiliation:

Subject: Request to keep fishing boats.

Comment:

I'm Ron Ford who enjoys going out on a fishing charter boat that adheres to all of the rules and regulations. I'm to ask to please keep the fishing boats permission to go into the water.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:20:14

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Below is the comment you selected to display. Comment 2159 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Noel
Last Name: Joynt
Email Address: beachboysur@cox.net
Affiliation:

Subject: sport fishing boats

Comment:

Please consider the bigger picture , the financial and emotional harm that these changes could cause.
I'm not sure how to say this strongly enough.
Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:22:53

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**Below is the comment you selected to display.
Comment 2160 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: mike
Last Name: moore
Email Address: mosarto@cox.net
Affiliation:

Subject: CHC SAVE OUR BOATS
Comment:
CHC SAVE OUR BOATS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:25:38

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**Below is the comment you selected to display.
Comment 2161 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Donald
Last Name: Whitley
Email Address: dkwranch1@gmail.com
Affiliation:

Subject: Fishing and Whale watching

Comment:

I have raised my children and grandchildren enjoying and respecting the ocean. Both fishing and whale watching. Please don't destroy this for are future Americans.

Thank You,
Don

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:24:37

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**Below is the comment you selected to display.
Comment 2162 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: Gustus
Email Address: magustusdds@gmail.com
Affiliation:

Subject: new commercial boat regulations

Comment:

pls vote NO on regulations on unfeasible technology that may make too expensive for sportfishing boats and potentially limit access or even stop many boats /captains /families to make a living
thankyou

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:30:13

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Below is the comment you selected to display. Comment 2163 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bill
Last Name: Hall
Email Address: wdhall2@pacbell.net
Affiliation:

Subject: Chc2021

Comment:

Support sportfishing...don't smash it with this Commercial harbor craft regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:31:13

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Comment Log Display

Below is the comment you selected to display. Comment 2164 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Kelley
Email Address: Kelleyjm@outlook.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

Enacting measures that kill jobs (crippling families) have already severely harmed this State. My patience has been tested beyond comprehension and my vote will show this anger. Stop killing jobs and their related revenue streams.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:30:53

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Comment Log Display

Below is the comment you selected to display. Comment 2165 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrea
Last Name: Petrucci
Email Address: apetrucci10@yahoo.com
Affiliation:

Subject: Do not stop sports fishing please

Comment:

Please do not stop sport fishing. My daughters love their daddy daughter dates on ocean fishing trips. Please don't take that from them. It gives them a chance to bond with their father, learn how to get their own food and have fun in nature.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:38:41

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Comment Log Display

Below is the comment you selected to display. Comment 2166 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jesse
Last Name: Martinez
Email Address: Speedtwinjesse87@gmail.com
Affiliation:

Subject: Carb

Comment:

Worrying about sportfishing and whale watchers seems like a giant waste of time in the grand scheme of things. How about focusing of something that actually matters rather than pick on the little people. There are of families you are trying to put out in the cold.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:44:17

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Comment Log Display

Below is the comment you selected to display. Comment 2167 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Curtis
Last Name: Saito
Email Address: Curtissaito@gmail.com
Affiliation:

Subject: Vote no on draconian regulations

Comment:

To whom it may concern,
I urge your to vote no on the pending draconian regulations that will have a detrimental impact on sportfishing industry. Families have build their livelihood on this business bringing happiness to avid anglers and the youth that enjoy angling. I personally utilize fishing charters as a part of therapy to help cope with my PTSD from 15 years served in the military serving in both Iraq and Afghanistan. It would be tragic to see this industry come to an end.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:39:24

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Comment Log Display

Below is the comment you selected to display. Comment 2168 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Danny
Last Name: Plumlee
Email Address: dplumlee12@yahoo.com
Affiliation:

Subject: boats aren't a problem

Comment:

Seagoing vessels are not a large contributor to the air pollution problems. Shutting down these legacy boats will hurt sport fishing opportunities. Will cut down on revenue from fishing licenses. Will put small fishing out of business. Changes like these in the past have always grandfathered in existing vessels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:48:59

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Comment Log Display

Below is the comment you selected to display. Comment 2169 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jennifer
Last Name: Nary
Email Address: Jennifer.nary@yahoo.com
Affiliation:

Subject: Sportsfishing and whale watching

Comment:

Please do not take away our rights to go out onto the ocean and experience fishing with our children and families. We have had many family adventures on a half day sportsfishing boat and ate fresh fish our kids caught. This family bonding experience has forever impressed good living values on our children. This experience is priceless and we could not be able to afford our own boat to do this. I ask you to please keep sportsfishing available to us, the people in San Diego and California. Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:52:17

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Comment Log Display

Below is the comment you selected to display. Comment 2170 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Nary
Email Address: Mwnary@gmail.com
Affiliation:

Subject: Keep Sportsfishing in California oceans

Comment:

Please do not take away our rights to go out onto the ocean and experience fishing with our children and families. We have had many family adventures on a half day sportsfishing boat and ate fresh fish our kids caught. This family bonding experience has forever impressed good living values on our children. This experience is priceless and we could not be able to afford our own boat to do this. I ask you to please keep sportsfishing available to us, the people in San Diego and California. Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:58:10

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Comment Log Display

Below is the comment you selected to display. Comment 2171 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Swett
Email Address: danswett@sbcglobal.net
Affiliation: Yacht Services, Angler

Subject: CARB Marine/Boat Emission Restrictions

Comment:

I am a marine mechanic and have first hand experience with the engine manufacturers inability to conform with your new emissions requirement. This is overreaching any realistic emission goals and will have economic repercussions far beyond the scope of your plan. There is currently no marine engine that will take the place of what is in use. You need to shelve this plan and work out a timetable that will not ruin our economic and recreational sport.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:00:21

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Comment Log Display

Below is the comment you selected to display. Comment 2172 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Luis Carlos
Last Name: Marinelarena
Email Address: Carlosmarinelarena@msn.com
Affiliation: Sport Fisherman

Subject: Don't sink sportfishing and whale watching

Comment:

CARB we urge you to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

I've been fishing since I could remember and enjoy being out in the open waters as often as I can.

Please help the sport fishing community.

Thank you and God bless.

Respectfully,
Luis Carlos Marinelarena

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:06:21

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Comment Log Display

Below is the comment you selected to display. Comment 2173 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Howard
Last Name: Yamagiwa
Email Address: hyamagiwa@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I would like to voice my objection to the proposed amendment to the Commercial Harbor Craft Regulation. Additional regulations that are untested and economically unfeasible will remove my and all others' access to the ocean. My only way to enjoy sport fishing and other ocean recreation will be either eliminated or made so expensive as to be unavailable. Please VOTE NO!
Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:54:25

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Comment Log Display

Below is the comment you selected to display. Comment 2174 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randall
Last Name: Patterson
Email Address: rcpatterson0915@aol.com
Affiliation:

Subject: CHC2021

Comment:

I urge you to vote against the draconian regulations that will have the effect of removing boats from the water - denying me and future generations of Californians access to the sea.

Respectfully,

Randall C. Patterson
Burlingame, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:06:41

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Comment Log Display

Below is the comment you selected to display. Comment 2175 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: tom
Last Name: sandau
Email Address: bub61fd@yahoo.com
Affiliation: Retired commercial fisherman

Subject: Realistic laws and rules

Comment:

These potential new regulations would be the death of a long and thriving lively hood for the common and self reliant person or families. We can't afford the additional cost of retrofitting our boats and vessels, many of these seamen and women are just scratching out a living as is with the rising cost of fuel and berthing and safety equipment.	2175.1
We're some what able now to fix our our motors and equipment on our boats, these new engines your requiring we'd be stranded at seas, unable to fix an electrical problem mixing salt water and electricity don't mix.we would need grants and other tax deferments to make up for the slim profits we could make. Look what happened to the farmers- they were all hard working everyday day people then one by one big business bought them out and now Congress bails them out year after year. More and more subsidies going there way as we the people pay higher and higher food costs- Please take a second or third look to who we are - we're trying to get by with what we have and that is determination to make it on our own. Thank you!	2175.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:54:01

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Comment Log Display

Below is the comment you selected to display. Comment 2176 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: biro
Email Address: PATB1251@YAHOO.COM
Affiliation:

Subject: chc2021 save our boats

Comment:

Please do not pass this amendment, at least not without some kind of change or compromise. As it is now it is not feasible, it will put a great many boat owners and operators out of business statewide. Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:38:53

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Comment Log Display

Below is the comment you selected to display. Comment 2177 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Merin
Email Address: davedog2u@aol.com
Affiliation: Son of whale watch captian

Subject: cmon with this measure

Comment:

this would destroy jobs and families and resources. This need to stop so people can make a living. Like we don't already have it hard enough with our government as it is, you have to add this.

Not cool

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:12:27

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Comment Log Display

Below is the comment you selected to display. Comment 2178 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Hendren
Email Address: Jbhendren@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I have been taking my children out sportsfishing for years and any changes to the way the boats operate and added regulations would be devastating. There are numerous youth fishing groups that would never be able to afford fishing trips if the regulations proposed were passed. Please do not make any changes to the current standards .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:16:48

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Comment Log Display

Below is the comment you selected to display. Comment 2179 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Gilkerson
Email Address: a.salt.weapon@att.net
Affiliation:

Subject: Proposed CARB Regulations for Passenger Boats

Comment:

The proposed regulations should be voted against (NO) until affordable technology is available that can be implemented on the existing fleet. From what I understand the proposed requirements would obsolete many of the boats in the Southern California Sport Fishing Fleet.

2179.1

Instead of destroying an industry and taking away opportunities for citizens to enjoy and experience the ocean, I suggest CARB find ways to reduce the air and water pollution caused by the ships piled up off our coast. They spew exhaust into the air and pump pollution into the water. Being a local boater in the Long Beach area, I have seen it first hand, and I have no doubt they are doing more damage than the recent oil spill.

2179.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:06:27

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Comment Log Display

Below is the comment you selected to display. Comment 2180 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Wolf
Email Address: the8wolfs@aol.com
Affiliation:

Subject: SportFishing

Comment:

I love to go fishing on the ocean and what you are proposing will be a detriment to sport fishing and whale watching on a very wide scale. Please reconsider what you are proposing!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:22:16

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Comment Log Display

Below is the comment you selected to display. Comment 2181 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Endicott
Email Address: jeffendicott99@gmail.com
Affiliation:

Subject: Technology Requirements for Sportfishing and Touring Vessels

Comment:

Please vote "No" on regulations that rely on economically unfeasible technology and have not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited, and sportfishing will become too costly.

Now is not the right economic time to pursue these restrictions. Would you please give the sportfishing and sport-touring industry time to recover economically before moving ahead with these regulations?

Allow the technology to mature in the R&D Departments and on land before moving these technologies to sea-going vessels, and then, start with entirely new vessels so that that technology can be fully integrated (as opposed to retrofitting existing vessels where the perfect fit of the latest technologies will not be possible).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 07:53:37

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Comment Log Display

Below is the comment you selected to display. Comment 2182 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: william
Last Name: Morgan
Email Address: bill@gunsfishing.com
Affiliation:

Subject: chc2021

Comment:

I am against any measure that would limit any persons ability to access the waters in Ca or any other state. Fishermen contribute billions to the states economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:22:22

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Comment Log Display

Below is the comment you selected to display. Comment 2183 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: TommyP
Last Name: Pfingsten
Email Address: pfinksphoto@gmail.com
Affiliation:

Subject: CARB

Comment:

The passage of this legislation is just plain WRONG. Think of the consequences this will have on the fishing community. I urge you not to do this.

TommyP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:31:02

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Below is the comment you selected to display. Comment 2184 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Nese
Email Address: sidexside@dslextreme.com
Affiliation:

Subject: fishing and whale boats

Comment:

leave the fishing and other small boats alone. Why do you want to put people out of business? Government regulation is the only problem our country and state has. Stop making stupid laws. Thousands of California fisherman and hunters have quit because of the HIGH fees the state charges.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:18:12

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Comment Log Display

Below is the comment you selected to display. Comment 2185 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Choate
Email Address: wahoodad427@gmail.com
Affiliation: Sport fisherman, sometimes crew member

Subject: CHC 2021

Comment:

To whom it may concern,

Sportfishing is important to me and my family. I've been an active sports fisherman for almost 60 years! I have introduced it to my kids, grandkids, and countless acquaintances.

2185.1

It's not just about catching- being out on the ocean, I have seen many sights on seen on Nat Geo!

These regulations proposed are not feasible, and many people will lose their livelihood!

2185.2

We all want to try and make the world a cleaner place, but these standards proposed don't even exist. They are simply put, cost prohibitive.

I urge you to vote this down, and look into some other solutions!
Thanks, David Choate

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:24:59

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Comment Log Display

**Below is the comment you selected to display.
Comment 2186 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jim
Last Name: Wedell
Email Address: jimwedell@yahoo.com
Affiliation:

Subject: sport fishing

Comment:

Please don't burden sportfishing employees, who work tirelessly to make our southern California sportfishing trips wonderful experiences on Our waters with our families and our friends. These trips have been going on for a very long time and beach communities have still thrived and prospered.....Stop destroying peoples livelihoods and southern California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:32:31

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Comment Log Display

Below is the comment you selected to display. Comment 2187 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: Yen
Email Address: yenp2001@yahoo.com
Affiliation:

Subject: Stop draconian regulations

Comment:

Please stop the effort to regulate our fishing boats. Why don't you start with manufacturing and utilities that are using diesel generators 1st. They pump out ore pollutants then our commercial fleets by 100 fold!

Peter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:35:16

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**Below is the comment you selected to display.
Comment 2188 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Drew
Last Name: Krake
Email Address: drewkrake@yahoo.com
Affiliation:

Subject: Politicians

Comment:

Set on destroying California under the guise of a global warming rescue team, I will never support a California democrat again!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:39:04

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Comment Log Display

**Below is the comment you selected to display.
Comment 2189 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Anthony
Last Name: Gibbs
Email Address: Deltaslayer4949@gmail.com
Affiliation:

Subject: Boat
Comment:
Let us fish!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:40:20

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Comment Log Display

Below is the comment you selected to display. Comment 2190 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jim
Last Name: Randall
Email Address: jimran@ftcnet.net
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Pleas do not implement the Proposed Amendments to the Commercial Harbor Craft Regulations. These vessels contribute an insignificant amount of air pollution. The proposed regulations will put these vessels out of business. These are ill-conceived regulations at best.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:37:36

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Comment Log Display

Below is the comment you selected to display. Comment 2191 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Alcaraz
Email Address: chrisalcaraz@verizon.net
Affiliation:

Subject: Save Sportfishing

Comment:

Good morning CARB,

I am a life long hunter/fisherman/outdoorsman. I no longer own my own fishing boat, so I rely solely on the sportfishing industry to take me fishing and participate in an outdoor activity that I truly enjoy with all my heart! One that I've passed on to my sons and now my grandson, so that we can keep alive something that is truly unique and American! In an age where too many hunters and fisherman are working, in my opinion, against our community with negative comments and opinions all in the name of protecting their "favorite honey holes." I, for one, have always felt that we don't need to chase new hunters & fisherman away but rather embrace and recruit them to join the fraternity! We don't need less, we need MORE! And now we are faced with opposition from another front. Shutting down sport boat owners/captains and putting them OUT OF BUSINESS! For what?? Said sport boat captains & owners are the ones who ARE protecting our waters, keeping them safe, clean, etc! IT'S THEIR LIVELIHOOD! THEIR OFFICE! THEIR HOME!!! These are good people who are just trying, like the rest of us, to make a living. So a man who has owned a business for 30-40 years is suddenly told it's being taken away??!! Are you serious??! Now what? As someone who had to close a longtime/successful business, when the economy took a dive, I can tell you firsthand, It's hard to live with.....and it NEVER goes away! With all that we've gone through the last 2 years, a lot of good people lost their livelihoods.....let's not lose more!! Please can we just come to our senses?!!

2191.1

2191.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:19:25

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Below is the comment you selected to display. Comment 2192 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: tim
Last Name: Durkos
Email Address: mamadurkos@yahoo.com
Affiliation:

Subject: california leads nation in "stupid"

Comment:

The brilliant Jon Kerry told the people at a climate speech in Paris that if america became 100 percent carbon free it would have no effect on climate change. This idiot attack on the sport fishing industry will destroy tens of thousands of jobs and lives--for what???

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:35:28

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Comment Log Display

Below is the comment you selected to display. Comment 2193 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: ROBERT
Last Name: WHITE
Email Address: robertwhite3006@gmail.com
Affiliation:

Subject: CHCR

Comment:

THIS WILL MARK THE END OF THE DEMOCRATIC PARTY

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:47:27

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Comment Log Display

Below is the comment you selected to display. Comment 2194 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paula
Last Name: Evans
Email Address: pc.paula@verizon.net
Affiliation:

Subject: Proposed Amendments to Commercial Harbor Craft Regulation

Comment:

Please protect access to the sea by continuing to allow commercial Sportfishing boats and Whale watching vessels.

The ocean experience should be available to all of us without boats!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:49:05

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Comment Log Display

Below is the comment you selected to display. Comment 2195 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Geoffrey
Last Name: Dawson
Email Address: gdwsn@yahoo.com
Affiliation:

Subject: Sportfishing

Comment:

Having fished my entire life and raising my children doing the same this industry is part of the fabric of our family. The proposed change to the laws will at the worst, cripple this economic sector and at the least will put it out of reach for the average citizen.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:49:50

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Comment Log Display

**Below is the comment you selected to display.
Comment 2196 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: SHANE
Last Name: LAVELLE
Email Address: lavelle@ucr.edu
Affiliation:

Subject: Oil Drilling Ok , Sportfishing not OK???

Comment:

We just had another tragic oil spill pollute our beautiful pacific ocean, and for some insane reason the pollution from fishing boats is a priority. Get it together CARB and get your priorities straight. Stop oil drilling in California!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:51:12

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Comment Log Display

**Below is the comment you selected to display.
Comment 2197 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Kevin
Last Name: Priestley
Email Address: drp@priestleychiropractic.com
Affiliation:

Subject: Sportfishing

Comment:

Please don't take the fishing boats off the water

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:59:59

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Comment Log Display

Below is the comment you selected to display. Comment 2198 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cali
Last Name: Delgado
Email Address: cali1d@yahoo.com
Affiliation:

Subject: Sports Fishing

Comment:

Dear Sir(s) /Madame(s)

I believe that the new regulations for commercial passenger boats like sports fishing or whale watching boats are going to make a big negative impact in many peoples lives.

I use sports fishing as a therapeutic process, especially during this pandemic being able to go out and fish has made life so much better.

I also participate in veteran fishing trips and I see how these trips are so helpful for those vets that are going through PTSD or other trauma.

Please reconsider this proposed amendment, I want to be able to afford going out on the boats. There are so many people that need this industry for their livelihood as well as people like myself that need it for our metal well being.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:55:00

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Comment Log Display

Below is the comment you selected to display. Comment 2199 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edwin
Last Name: Simons
Email Address: ed@simonscorp.com
Affiliation:

Subject: Sportfishing

Comment:

Hello:

It has come to my attention that CARB is trying to add MORE restrictions on the sportfishing industry.

These additional restrictions and limitations are expensive, and as such, many small businesses will not be able to comply. Therefore, additional costs/regulations will require many small businesses, that are already struggling due to Covid, to close.

These additional burdens are too costly, unnecessary and need to stop.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:57:23

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Comment Log Display

Below is the comment you selected to display. Comment 2200 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jerry
Last Name: Lukenbill
Email Address: Jluke11@cox.net
Affiliation:

Subject: Chc2021 thoughts

Comment:

This proposal will be the "death knell" for the sport fishing and whale watching industry of California along with the tourist dollars that they bring to the coastal communities. The vast majority of the operators in this enterprise are small private owners who operate with a very small profit margin and would NOT be able to absorb these mandatory expenditures and so would be forced out of business. All of these businesses were VERY hard hit by the Covid-19 shutdown. This proposal was definitely Not thought out and will cost the coastal communities and the state of California dearly in lost revenue from taxes, licensing fees and tourist money spent in the areas. Most of this generated income would go to Mexico.

2200.1

2200.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:30:04

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Comment Log Display

Below is the comment you selected to display. Comment 2201 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joanie
Last Name: Laxson
Email Address: jlaxson@scripttoscreen.com
Affiliation:

Subject: CARB Vote No on regulations

Comment:

Please vote no on regulations that limit or remove fishing and whale watching boats in our SoCal waters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:09:06

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Comment Log Display

Below is the comment you selected to display. Comment 2202 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: carter
Last Name: rosenbaum
Email Address: carterrosenbaum11@gmail.com
Affiliation:

Subject: sport fishing

Comment:

Hi my name is Carter. I work on a charter boat out of Channel Islands Sportfishing. If this recall passes that means that me and all my friends and other deck hands and captains are out of jobs and out of our lifestyles. All of these great people who work on or own sport fishing boats or whale watching will have to stop doing what they do and what they love to do. 2202.1

I Feel this recall is unfair and misinformed because is they are worried about us polluting our waters then they clearly didn't acknowledge the fact of oil tankers coming across our oceans and all the pollution that could and does come from them or any other big transportation boats from passenger to products of all sorts. 2202.2

I would also like to grow up and take my kids out fishing where I grew up working and fishing. Fishing has been a part of my life for as long as I can remember. All I can ask you is think on how many people who use these boat and how much they get out of these boats. 2202.3

would you rather have every person who goes on sport fishing boats get a boat and pollute more or would your rather have all these people keep using these sportfishing boats which allows more people on the water for less pollution? 2202.4

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:49:27

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Below is the comment you selected to display. Comment 2203 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Phillips
Email Address: CEPCEP@COMCAST.NET
Affiliation:

Subject: Ocean access

Comment:

Ocean sportfishing access was was the highlight of my 40+ years of living in the Bay Area. Do NOT adjudicate it out of existence!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:20:06

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Comment Log Display

Below is the comment you selected to display. Comment 2204 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Johnson
Email Address: paul.fulcrumcs@yahoo.com
Affiliation: Business owner California Native and tax

Subject: Fishing Vessel restrictions

Comment:

Good day, As a representative of the State and your constituents, please delay the restrictions on the fishing vessels until solutions that are actually available for retrofitting and replacement in a common sense manner and not unobtainable. Fishing is a huge part of our economy and the environmental concerns can be phased in effectively over time with realistic means. Hold off on knee jerk reactions and uncompromising mandates.

Regards,

Paul M Johnson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:15:59

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Comment Log Display

Below is the comment you selected to display. Comment 2205 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregg
Last Name: Hamer
Email Address: gj69nj07@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

Hello, I am writing in regards of the potential Commercial Harbor Craft Regulation. As a regular participant in ocean sport-fishing I feel if this regulation goes forward it will set in motion the disruption if not fully wiping out the livelihood and recreation of tens of thousands if not hundreds of thousands of residents and visitors.

2205.1

Most everyone is in favor in taking steps in the direction to ensure our coastal waters are preserved and remain clean for future generations. However to impose regulations that upset the lives of so many seems a bit extreme. There has to be some rational compromise rather than simply imposing technology on commercial vessels that is economically unfeasible and has not yet been fully tested as safe on passenger harbor crafts, thus severely limiting access to the seas we all love to enjoy.

2205.2

There has to be a way to initiate some sort of compromise to ensure a cohesive path to preservation.

Gregg Hamer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 08:58:57

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Comment Log Display

Below is the comment you selected to display. Comment 2206 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jan
Last Name: Dinkle
Email Address: jandinkle@hotmail.com
Affiliation: Father And Grand Father

Subject: Sport Fishing And Whale Watching Boats

Comment:

There is not much left in Calif, That a family can enjoy more than Fishing or Whale Watching and is affordable!!! And MEMORIES for a LIFE TIME for everyone that knows what I'M Talking About. Please Do not Destroy Lives of the people that make this there Livelihood, And loose another industry that makes CALIFORNIA SPECIAL. Thank-YOU FATHER and GRAND FATHER.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:06:23

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**Below is the comment you selected to display.
Comment 2207 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Michael
Last Name: McDill
Email Address: meat_bomb_13@yahoo.com
Affiliation:

Subject: Sportfishing

Comment:

URGING YOU TO VOTE NO, SAVE THE SPORTFISHING INDUSTRY.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:27:54

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Below is the comment you selected to display. Comment 2208 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Carl
Last Name: wuebben
Email Address: prostock37@sbcglobal.net
Affiliation:

Subject: Killing the fishing and whale watching boats

Comment:

Why must we keep up this caring for nobody but yourself stuff. You want change but don't have a reasonable solution that helps everyone try helping small business instead of trying to get rid of it.

How would you feel if someone just said your house has to be torn down within 1 year and rebuilt under a stricter code and you had no money to do it. You keep informing rules that are not attainable in the extremely short period you give them.

Thouraly think it out for the better of both party's before just isuing bad judgement.

THANKS Carl wuebben from DEEP CREEK FLY FISHERS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:19:17

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Comment Log Display

Below is the comment you selected to display. Comment 2209 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Faultersack
Email Address: dfaultersack@cox.net
Affiliation: March Innovation

Subject: CHC2021 - Engine Emission Regulations

Comment:

This effort has to be unmasked as the elitist staff implement laws that only hurts the fishing community; a community that supports game fishing with many, many millions of dollars and that supports a clean environment. This is blatantly being proposed to stop fishing and ocean watching by elitists in our State. Just say, "NO!"

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:26:20

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Below is the comment you selected to display. Comment 2210 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: JAMES
Last Name: MACISAAC
Email Address: james.w.macisaac@gmail.com
Affiliation:

Subject: CHC2021

Comment:

Don't impose this legislation. Sportfishing in SOCAL is world renown. Millions of anglers from around the world contribute large sums of money in taxes by participating in California's Sportfishing industry not to mention hotel stays, bars, and restaurants. This legislation would effectively kill many family owned businesses or drive them to move south of the border and taking their money with them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:08:16

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Comment Log Display

Below is the comment you selected to display. Comment 2211 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: JAMES
Last Name: WRIGHT
Email Address: wrightway759@yahoo.com
Affiliation:

Subject: chc2021

Comment:

I am an avid So. Cal. sportfisherman. These new regulations will ruin the sportfishing industry!!! Please vote NO on this proposal to let us all continue to enjoy the sport we all truly love!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:23:03

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**Below is the comment you selected to display.
Comment 2212 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Peter
Last Name: Syapin
Email Address: psyapin@yahoo.com
Affiliation:

Subject: CHCR

Comment:

Vote NO on distroying private and commercial sportfishing in California. The new proposed regulations on engine and body retrofit is draconian. Don't support the hidden agenda of banning sportfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:28:38

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Below is the comment you selected to display. Comment 2213 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Craig
Last Name: Uithoven
Email Address: fishfinaddict@att.net
Affiliation: Fisherman

Subject: Fishing vessels

Comment:

Leave our sport boats , party boats alone. If you want to make a difference go after all cruise and container ships spewing pollutants into the air.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:33:44

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Comment Log Display

Below is the comment you selected to display. Comment 2214 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jair
Last Name: Langarica
Email Address: langarica88@live.com
Affiliation:

Subject: Please dont take my livelihood away

Comment:

Please dont shut down sport fishing this is a sport i have enjoyed for many years and look forward to it every year. Its a chance to get on the water and build relationships with people that enjoy fishing with a passion. My dad taught me to fish and he passed away and you will take my opportunity to teach this to my kids. All of us that fish do whatever we can to follow regulations and we respect the sport.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:34:41

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Below is the comment you selected to display. Comment 2215 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Frank
Last Name: Seres
Email Address: seresmary59@gmail.com
Affiliation:

Subject: Sport fishing & whale watching

Comment:

Private and commercial fushing has been the lufe blood of feeding himanity for thousands of years. It has been the lively hood of fishermen. Certainly Whale Watching has been and education to children and adults alike to see the beauty of these incredible creatures.

Dont stop sport fishing and whale watching, what a tragedy that would be.

Mr. and Mrs. Frank Seres
Laguna Woods, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:31:49

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Below is the comment you selected to display. Comment 2216 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Roark
Last Name: Griffin
Email Address: roark@sdpooltilecleaning.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Please do not pass any regulation that will limit access to boaters or change the current emission standards. Many of us enjoy the ocean and we take great pride in being good stewards of the ocean. If the sport boats and private boats go away, the new stewards will be the commercial/corporate boats. When recreation is eliminated, the for profit only boats will cause more harm than the current situation.

Thank you
Roark Griffin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:33:11

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Comment Log Display

Below is the comment you selected to display. Comment 2217 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sean
Last Name: Hayes
Email Address: rtdsniper@yahoo.com
Affiliation:

Subject: CARB

Comment:

To whom it may concern,

This is not a very well thought of regulation as much as revenue loss to all the fisherman. To my knowledge, there is zero science behind this except special interest groups who do not fish, crab or whale watch. Please think of the people who live off whale watching, fishermen and the average person who enjoys boat rides.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:34:06

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Comment Log Display

Below is the comment you selected to display. Comment 2218 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregory
Last Name: Norris
Email Address: greg@quickdrawfundcontrol.com
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft
Re

Comment:

Dear Board Members,

Please take a step back and reflect on what is being asked of an industry to comply with regulations for systems that have yet to be manufactured or properly tested.

Please vote no on the proposed amendments to the Commercial Harbor Craft Regulation and reconvene to formulate a reasonable approach that can work for all parties.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:35:21

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Comment Log Display

Below is the comment you selected to display. Comment 2219 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jen
Last Name: Hamaker
Email Address: jenhamaker1@gmail.com
Affiliation:

Subject: Wildfires vs Anglers!

Comment:

If elected officials really want to curb CO2 emissions, they should focus on forest management to help mitigate wildfires that emit millions of tons of Green House Gas into our atmosphere every year. Compared to wildfires, anglers contribute a minuscule amount of CO2 and they produce food while doing it. Come on people, stop focusing on minuscule effects when we have bigger fish to fry!!

Jen Hamaker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:40:21

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Comment Log Display

Below is the comment you selected to display. Comment 2220 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: Gardner
Email Address: mgwebuy@gmail.com
Affiliation:

Subject: Harbor Craft

Comment:

Please vote no on this regulation. The law that was passed to keep old trucks out of the port has led to this massive back log of ships sitting off the coast. Laws and rules have unseen results.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:35:40

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Comment Log Display

Below is the comment you selected to display. Comment 2221 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mary
Last Name: Taverna
Email Address: mary.taverna@sbcglobal.net
Affiliation: Save our fishing & whale watching boats

Subject: Save our Fishing and Whale watching Boats

Comment:

This action will negatively affect thousands of individuals who make a living by owning sports fishing and whale watching boats. We are adamantly opposed to this potential regulation and urge Governor Newsom to think more about the negative and devastating results for California residents if this regulation goes into effect.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:47:22

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Comment Log Display

Below is the comment you selected to display. Comment 2222 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Pekin
Email Address: dpekin@ssccorp.com
Affiliation:

Subject: No Putting the Fishing Fleet Out of Business!!

Comment:

Dear CARB Board,

I am strongly against ANY regulations that put ANY business segment out of business. The idea of passing a law that will immediately spell the end of the sport fishing and whale watching industry (among others) is ludicrous. It is not physically possible to retrofit almost all of the fleet to meet the proposed standards. I know families who have been in the fishing industry for generations and this law will effectively put them out of business and ruin their livelihood. You should be ashamed of even contemplating passing this law when you know the hardship and loss it will create upon its passage.

David Pekin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:43:27

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Comment Log Display

Below is the comment you selected to display. Comment 2223 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Bedor
Email Address: marktbedor@sbcglobal.net
Affiliation:

Subject: protect sportfishing and access to the sea

Comment:

Dear CARB -

The cost of your proposed rules for sportfishing and whale watching boats far outweighs any benefit. These draconian regulations will destroy access to the ocean for people like me who enjoy ocean fishing and whale watching.

I ask you to drop these unreasonable and destructive regulations on fishing and whale watching boats that will destroy a cherished and valued industry that provides amazing experiences on the ocean to people of all ages.

Sincerely -

Mark Bedor
626 379 0113
1906 Mill Road
South Pasadena, CA 91030

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:45:06

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Comment Log Display

**Below is the comment you selected to display.
Comment 2224 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Rene
Last Name: Rocha
Email Address: rprocha@mail.com
Affiliation:

Subject: Keep sportfishing & Whale watching

Comment:

To whom it may concern:

"You must understand the value of fishing with family,
watching Whales, just being outdoors"

Please do not take this away....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:47:12

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Comment Log Display

Below is the comment you selected to display. Comment 2225 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Fred
Last Name: Main
Email Address: fred@clearadvocacy.com
Affiliation: Tri County Chamber Alliance

Subject: Sportfishing regulation

Comment:

attached is letter opposing Sport fishing engine regulation.

Attachment: www.arb.ca.gov/lists/com-attach/2520-chc2021-BnVXIQFvU3JRlwJk.docx

Original File Name: Sportfishing Carb Letter[1].docx

Date and Time Comment Was Submitted: 2021-11-04 09:50:05

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November 3, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed CARB Commercial Harborcraft Regulations/Sportfishing Boat Engine Regulations, oppose.

Dear Governor Newsom,

On behalf of the Chamber of Commerce Alliance of Ventura, Santa Barbara and San Luis Obispo Counties, representing eleven local chambers in the three-county area, I write to oppose the proposed CARB Commercial Harborcraft Regulation/Sportfishing Boat Regulations.

Representing three coastal counties, sport fishing, whale watching, and cruises are an important part of the tourist economy. Statewide recreational fishing contributes \$5.6 billion annually in economic activity, supporting nearly 40,000 California jobs.

The sportfishing industry embraces the need to reduce engine emissions, securing air quality grants over the years to upgrade vessels with cleaner burning engines. However, Chamber Alliance believes harbor craft engine regulations recently proposed by the California Air Resources Board (CARB) place an undue burden on family-owned boating operations. 2225.1

The lack of real technology solutions, and the cost of those that exist, will result in the vast majority of sportfishing and whale watching vessels being taken out of service as vessels made of wood and fiberglass cannot be modified as steel hulled vessels can. Vessels that can be modified will incur a significant cost for retrofit and will be faced with the potential safety issues. The impact of the regulations will be felt by the sportfishing industry within 3-6 years. 2225.2

As a community, we share the State’s desire to reduce engine emissions, however, the regulations as drafted will adversely affect sportfishing and whale watching businesses, and communities economically dependent on a strong and vibrant hospitality and tourism industry. This is why we believe the proposed regulations will undermine your economic plan that aims to rebuild California’s economy and recover [1.2 million tourism and hospitality jobs lost](#) . 2225.3

For the aforementioned reasons, we encourage your Administration to work with the sportfishing industry to develop air quality regulations that are economically feasible, take into account existing technology and not putting the safety of passengers and crew at risk.

Thank you for your consideration.





Sincerely,

Glenn D. Morris

Glen Morris

Chair Tri-County Chamber Alliance of Ventura, Santa Barbara, and San Luis Obispo Counties





Comment Log Display

Below is the comment you selected to display. Comment 2226 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bob
Last Name: Harris
Email Address: bobharris27@hotmail.com
Affiliation:

Subject: Impossible regulations

Comment:

These regulations are unreasonable, unattainable, and downright ridiculous. They must not be put into law.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:51:05

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Comment Log Display

Below is the comment you selected to display. Comment 2227 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leif
Last Name: Bjerke
Email Address: erikbcool@sbcglobal.net
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

I strongly urge CARB to vote no on this issue because the proposed regulations rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 09:51:26

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Comment Log Display

Below is the comment you selected to display. Comment 2228 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sportfishing Assoc
Last Name: of California
Email Address: letters@savefishing.com
Affiliation: 20 Sportfishing/Boating Organizations

Subject: CHC2021 - 20 Sportfishing/Boating Organizations Oppose Proposed Engine Regulations
Comment:

20 organizations representing sportfishing and boating oppose CARB's proposed engine emission regulations that could undermine State's recent gains in fishing participation rates, conservation funding and economic activity.

Attachment: www.arb.ca.gov/lists/com-attach/2523-chc2021-VmdVYld7A2MFLgU3.pdf

Original File Name: 11-3-21CARBSportfishingCoalitionLetter.pdf

Date and Time Comment Was Submitted: 2021-11-04 09:52:39

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November 3 , 2021

Ms. Liane Randolph, Chair
 c/o Harborcraft
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

RE: Proposed Harbor Craft Engine Emission Regulations/Commercial Passenger Vessels

Dear Madam Chair,

As you may know, California has over 2 million anglers. While this number is significant, it is offset by the reality that saltwater fishing is a subset of this number and according to the U.S. Census California's fishing participation rate (per capita) has dropped to dead last in the Nation. Moreover, according to the California Department of Fish and Wildlife's (CDFW) sales reports, annual fishing license sales have declined by more than 50% since the early 1980s, as the State's population grew by over 60%.

According to the Recreational Boating and Fishing Foundation (RBFF), fishing participation continues to reach new and diverse audiences in the United States, specifically, nontraditional participants that are younger, more urban, and more diverse with significant gains among women, African Americans, and Hispanics.

- 19.7 million females went fishing in 2020, a 10% participation increase in comparison with 2019.
- Youth and adolescent fishing skyrocketed last year, with 13.5 million youth ages 6 to 17 hitting the water.
- 5 million Hispanic Americans went fishing in 2020, the highest recorded volume in 14 years.
- African Americans have had the highest participation rate in the last three years, with a 7.4% increase in participation and 14.6% growth since 2019.

It appears that California is no exception to this national surge in fishing participation rates. According to CDFW sales reports, between 2019-20, fishing license sales increased over 19 percent, generating an additional \$12.3 million in revenue.

These increases are consistent with other forms of outdoor recreation that experienced an increase in outdoor activity during the COVID-19 pandemic, such as camping, RV sales, and recreational boating. It is yet to be seen if the increased participation levels will be sustained after COVID related restrictions are lifted and individuals and families can return to previous forms of entertainment.

Again, while the one-year surge in California sales and revenue is encouraging, it has not restored recreational fishing to even close to historical levels. According to CDFW, hunting and fishing license sales once funded 40% of the department's budget. However, as hunting and fishing license sales declined, so did its share of the budget contribution to CDFW. By 2018, license sales funded only 21% of CDFW's overall budget.

Additionally, because sportfishing vessels were considered non-essential during the pandemic marine fishing in California did not see a commensurate surge in sales and access as was experienced in our lakes and streams. In fact, passenger fishing vessels were closed for several months during the pandemic and experienced substantial losses in revenue.

Economically and Technically Infeasible Regulations

As organizations that represent sportfishing, recreational boating, marinas and outdoor retail, we are gravely concerned that the progress that CDFW has made to increase fishing participation will be short lived.

Before California's sportfishing, whale watching and eco-tourism commercial passenger boat industry can recover from their financial losses from the COVID-19 pandemic, the California Air Resources Board (CARB) has proposed cost prohibitive engine emission regulations that require technology that has not been developed or tested safe at sea.

CARB readily admits the proposed regulations are not compatible with some vessels, specifically stating that **"vessel replacement will be likely, especially the categories with wood or fiberglass vessels."** When more than 80% of vessels are constructed with these materials, many boat owners have reasonably concluded that they will go out of business in 3-6 years from the adoption of the proposed regulations.

Rather than accepting the draft rules as economically and structurally infeasible, CARB claims that new metal vessels with Tier 4 engines and untested emission reduction equipment can be built for as little as \$1.2 million, rather than the millions more they would actually cost. CARB contends that this is economically feasible even though existing boats that can't comply with the proposed regulations will have no resale value in California. Their solution; pass on the regulatory costs in the form of higher passenger tickets.

To date, CARB has refused to conduct an appropriate vessel replacement analysis; essentially providing all boat sizes and uses and the equipment envisioned to a credible shipbuilder and an analysis of at what price point passengers will no longer fish offshore. Moreover, boat operations and the length of fishing seasons vary widely from Southern California to the Central and North Coast, all of which should have been factored into CARB's analysis to determine whether regulatory costs and/or vessel replacement is economically feasible throughout the industry.

2228.1

The only credible comment by CARB is the fact that they concede that business elimination is possible but continues to withhold any analysis that led to this determination or how widespread the business elimination will be.

"...(CARB) staff cannot rule out the possibility of some business elimination if costs cannot be passed onto the customer or if passing through costs would result in significant decrease in demand." - CARB, Standardized Regulatory Impact Assessment, July 7, 2021

The broad-based consensus among the boating industry is that CARB has grossly underestimated the cost of vessel replacement, especially since no assessment can be made on engine technology that has not been developed yet. If this proves to be so and if some replacement vessels cost double to triple CARB's estimate, **business elimination will be significant.**

CARB's economic analysis also reflects a failure to recognize that the recreational angling community is racially and economically diverse and many passengers tend to be people who do not have the means to own a recreational boat. For example, 38% of anglers in the U.S. have an income of \$49,999 or less, and 59% have an income of \$74,999 or less.

2228.2

What’s more, anglers are no different than other consumers when it comes to how they spend their disposable income – they seek value. Unlike some amusement parks where admission can cost less than a full day of offshore fishing, fishing passengers are not assured some minimum level of satisfaction. Anglers are not guaranteed to catch a fish, just the opportunity. This is an ongoing challenge for the industry’s ability to attract returning customers, unlike amusement parks, and most other forms of recreational activity and entertainment. The passenger boating industry’s ability to retain customers will only grow as passenger prices increase.

It should be evident by reviewing the chart that CARB’s regulations will lead to the gentrification of offshore sportfishing, a luxury reserved only for those of greater economic means.

	Ex: San Diego Prices	CARB’s Projected Increase for \$1.2m boat		If Boat Costs Are Underestimated
Trip Length	Current Price	14% Increase	28% Increase	100% increase
Half day	\$60.00	\$68.40	\$76.80	\$120.00
Full day	\$225.00	\$256.54	\$288.00	\$450.00
Overnight	\$295.00	\$373.30	\$348.01	\$590.00
2.5 Day	\$800.00	\$912.00	\$1024.00	\$1,600

Threat to Fishing Participation and Conservation Funding

Supported by the Governor and the Legislature, the California Department of Fish and Wildlife (CDFW) has made significant strides with its R3 Program (Recruit, Retain, Reactivate). This program aims to increase outdoor recreation, fishing participation rates and license sales. However, any gains will be lost as passenger sportfishing boats are removed from service or as higher prices prove to be an economic barrier for existing and prospective anglers.

2228.3

When CARB developed its economic analysis, *the Standardized Regulatory Impact Assessment*, it failed to evaluate the financial impact the regulations would have on CDFW license sales and revenue. As fishing participation declines, the CDFW stands to lose fishing license sales and revenue that fund state conservation and fisheries programs that are essential to protecting our environment, endangered species and habitat – both offshore and inland. The Department of Boating and Waterways also stands to lose funding.

2228.4

Compounding the funding risk, as fishing rod, reel and lures and boat fuel sales decline, so will the State’s share of federal excise taxes and Dingell-Johnson Act funding that are distributed as a federal matching grant to the states. In 2020, California received \$17 million from the U.S. Department of Interior that is provided as a \$3 (federal) to \$1 (state) match.

Threat to Coastal Economies

California has one of the largest coastlines in the country and for most residents, commercial passenger boats provide their only access to offshore fishing and marine life.

CARB also failed to evaluate the overall economic impact on coastal communities, and specifically their hospitality and tourism industry. For many coastal communities, passenger boats are the primary draw for tens of thousands of visitors each year. It is important to note that California is also one of the largest retail markets in the country for outdoor products, generating millions of dollars in sales tax revenue.

2228.5

As access to the sea diminishes so will economic activity and tax revenue. As an example, over 50 percent of all commercially inspected sportfishing boats in California are located within the City of San Diego. The elimination of San Diego's sportfishing and whale watching fleet, in whole or part, would have a devastating impact on the regional economy and jobs. The same could be said for most every harbor and marina community from Southern California to the Oregon border.

Governor Gavin Newsom recognizes that California draws millions of visitors from all over the United States and the world and has make it a priority to restore the half of the 1.2 million hospitality and tourism jobs lost during the pandemic. This laudable goal cannot be achieved without protecting commercial passenger boats that provide access to sportfishing, whale-watching, marine life and scuba diving.

Protecting Public Partnerships

Passenger boat owners provide another public benefit that occurs, often unseen, but greatly appreciated by community partners. Many boat owners provide schools and non-profit organizations access to the marine environment, often at little to no cost. Many of the beneficiaries of these fishing and marine life programs are school children, disadvantaged youth and veterans. For many children, this is their first introduction to marine life and for wounded warriors, it is a source of mental rehabilitation. Greater regulatory costs would jeopardize these programs.

2228.6

A Failed Process

The regulations were drafted during the height of the global pandemic without proper in-person stakeholder outreach and insufficient consultation with experts in boat construction, and maritime and fishing practices. Moreover, when CARB released its amended regulations on September 21st, notices were not mailed to boat owners notifying them of the regulations, public comment period and public hearing. Given that CARB has an inventory of all boat engines and commercial fishing licenses held with the California Department of Fish and Wildlife, this could have been easily achieved. Afterall, there are only 174 commercial passenger boats in California, or less than 10 percent of all harbor craft. It is conceivable that

2228.7

many, if not most, boat owners remain unaware of the proposed regulations and specifically, that their boats could be removed from service.

We remain concerned that as part of the drafting of the regulations and subsequently, during the public comment period, CARB did not consult with the California Department of Fish and Wildlife, the California Fish and Game Commission, the Department of Boating and Waterways, the Coastal Commission, tourism authorities, chambers of commerce, harbor and marina organizations, port authorities, the United States Coast Guard or local government agencies up and down the California coast.

A Reasonable Solution Can Be Achieved

Boat owners share the desire to reduce engine emissions and they have been repowering their engines for years. However, rather than deny boat owners their livelihood, CARB should consider amending the draft regulations to incentivize boat owners to continue to upgrade their vessels to lower emission engines, using available and tested and feasible technology that does not require vessel replacement. This is the reasonable approach CARB has applied to commercial fishing vessels that bring fish to market, vessels with engines that are technically identical. What's more, commercial passenger vessels will no longer have access to Carl Moyer funds, a reliable source of state funding for repowering engines – while commercial fishing vessels will. CARB has failed to provide an acceptable answer as to why they have applied a double standard and with it, introduced catastrophic economic consequences for the families that operate passenger boats.

2228.8

Our coalition implores the CARB board to protect the families and crew that depend on the boats that provide millions of Californians affordable access to offshore fishing and all the splendor of the sea.

Sincerely,

American Sportfishing Association
California Association of Harbor Masters and Port Captains
California Yacht Brokers Association
Coastal Conservation Association of California
Congressional Sportsmen's Foundation
Golden Gate Fishermen's Association
Marine Recreation Association
Marine Retailers Association of the Americas
National Marine Manufacturers Association
National Professional Anglers Association
Nor-Cal Guides & Sportsmen's Association
Recreational Boaters of California
Sportfishing Association of California
The International Game Fish Association

Berkley Fishing Gear
Okuma Fishing Tackle
PENN Fishing Gear
Shakespeare Rods and Reels
Turner's Outdoorsman
Boat U.S. – Boat Owners Association of The United States

CC: Governor Gavin Newsom
California State Legislature
California Fish and Game Commission
California Department of Fish and Game, Director Charles Bonham



Comment Log Display

Below is the comment you selected to display. Comment 2229 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kristofer
Last Name: Ekdahl
Email Address: Agroman1963@gmail.com
Affiliation: CCA, Surfrider

Subject: Ocean boating regulation

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. This will affect the livelihoods of thousands and impact access to the ocean for sportspersons and sightseers alike. I am a sport fisherman and conservationist.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:00:16

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Comment Log Display

Below is the comment you selected to display. Comment 2230 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: A.
Last Name: Evans
Email Address: bigal2919@aol.com
Affiliation:

Subject: Vote No on Commercial harbor Craft Regulation

Comment:

To Whom It May Concern,

Please vote not on this measure. if this passes this will effect the sportfishing industry and most likely shut it down. My family has been sportfishing our whole lives and this will take away from any future family outings with my children and my grand children. Dont take that away.

Alan Evans

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:01:05

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Comment Log Display

Below is the comment you selected to display. Comment 2231 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Keith
Last Name: Rieken
Email Address: mkrieken2002@yahoo.com
Affiliation:

Subject: NO

Comment:

I urge you to vote NO. We need to give the industry time to adjust. This will take years for vessels to convert. Do NOT force this issue. Give us to to make the changes needed for a safer environment. Do not force this upon all of us

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:04:48

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Comment Log Display

Below is the comment you selected to display. Comment 2232 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lyle
Last Name: Vanhorn
Email Address: vanhorn77@gmail.com
Affiliation:

Subject: NO More Regulations

Comment:

Please do not implement any more regulations on the fishing and whale watching industry with emissions. This state is losing its worth to reside here.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:05:08

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Comment Log Display

Below is the comment you selected to display. Comment 2233 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Douglas
Last Name: Powers
Email Address: dwpowers44@yahoo.com
Affiliation: Retired

Subject: Commercial Fishing Boats

Comment:

Leave our fishing boats alone they are doing nothing to harm the environment these guys got to make a living that's what they know. Its a release for the guy that wants to go fishing and don't own a boat. You try to take this away there will be hell to pay sportsmen are getting tired of being pushed around by people that don't know what they are doing go out on a boat and catch some fish just once and see what we enjoy. You guys drive around in your Limos and want everyone else to drive electric you fly around in your Leer Jets using up a lot of oxygen in the air how about you fly electric. Leave the boats alone.

2233.1

2233.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:00:05

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Comment Log Display

Below is the comment you selected to display. Comment 2234 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Mailey
Email Address: tnvmailey@gmail.com
Affiliation: Get The Net Fishing Guide Service

Subject: Keep sports fishing boats afloat

Comment:

Just a message of support for sport fishing and whale watching boats off the California coast, from a lifelong fisherman. I am also a conservationist, and believe we need better air standards. But targeting the relatively few passenger vessels of this sort still working the California coast is misguided. There are fewer and fewer ways for people to experience the "real" outdoors these days, and a morning on a charter can create lifelong memories. It can also spark an appreciation for the very thing you're trying to attain: a cleaner environment. It may seem ironic and I suppose it is, but that doesn't lessen the value.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:05:54

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Below is the comment you selected to display. Comment 2235 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leticia
Last Name: Rodriguez
Email Address: letirodriguez@sbcglobal.net
Affiliation:

Subject: Save our boats. We need gas and diesel to stay!

Comment:

Our country needs all types of fuel options.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:10:17

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Comment Log Display

**Below is the comment you selected to display.
Comment 2236 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Michael
Last Name: Core
Email Address: mikecore150@gmail.com
Affiliation:

Subject: CHC2021 sportfishing boats

Comment:

PLEASE STOP THIS REGULATION THAT WILL SEVERELY AFFECT THE SPORT FISHING INDUSTRY

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:13:59

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Comment Log Display

Below is the comment you selected to display. Comment 2237 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: RANDY
Last Name: OXEN
Email Address: rscottoxen@yahoo.com
Affiliation:

Subject: CA Sportfishing boats

Comment:

The last thing we need right now is to kill another industry in CA. Denying current and future customers reasonable access to the ocean and fishing is draconian at best. the outrageous cost hikes for this industry will be passed onto consumers and will kill the industry. You must reconsider these outrageous new sanctions. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:11:23

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Comment Log Display

Below is the comment you selected to display. Comment 2238 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Isaac
Last Name: Lowe
Email Address: Isaaclowe909@gmail.com
Affiliation:

Subject: Save our sport fishing boats

Comment:

I am a dad who takes my two boys fishing in the ocean. Its the most amazing experience for me and my children. Please keep our sport fishing boats in the water and available to our children so they can continue to experience one of life's joys of the ocean.

Attachment: www.arb.ca.gov/lists/com-attach/2534-chc2021-WmMHNFw4UTsGNgEz.jpeg

Original File Name: 95E9627D-4FF6-4611-B515-253AC85F18CA.jpeg

Date and Time Comment Was Submitted: 2021-11-04 10:14:56

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Comment Log Display

Below is the comment you selected to display. Comment 2239 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Lee
Email Address: roofrack@roadrunner.com
Affiliation:

Subject: CHC2021

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:20:44

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**Below is the comment you selected to display.
Comment 2240 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Georgett
Last Name: Tolman
Email Address: jettset21@hotmail.com
Affiliation:

Subject: Sport fishing
Comment:
Please stop

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:26:29

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Comment Log Display

Below is the comment you selected to display. Comment 2241 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Roger
Last Name: Combs
Email Address: roger_com@msn.com
Affiliation:

Subject: Ocean Boating

Comment:

I urge a no vote on the measure that would effectively eliminate sport fishing and boating on our coastal waters. The measure is not needed and would financially injure thousands and would reduce income to this state by millions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:36:15

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Below is the comment you selected to display. Comment 2242 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Eric
Last Name: Gregory
Email Address: ericgregory@gmail.com
Affiliation:

Subject: Please do not kill sportfishing!

Comment:

Hello,
I'm writing to express my support for the very few sportfishing boats we have left in the Bay Area.

In general, I do support new regulations, and initiatives that motivate technical innovation toward cleaner alternatives to fossil fuels. I actually do believe that electric propulsion is our future, and support the move toward that goal.

I also understand that often changes like this need to be forced.

However, the timing and scope of forced changes like this must be carefully considered, because they do not affect everyone in the same way, and do not have the same impact or deliver the same value.

In addition, it's not feasible to force a significant change like this too often. Changing engine technology is a big deal, so you better be sure you have the right technology, and that it works.

I have a serious concern that the changes proposed are forcing adoption of an unproven technology that would put 80% of CA sportfishing boats out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:29:03

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Comment Log Display

**Below is the comment you selected to display.
Comment 2243 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Alex
Last Name: Molnar
Email Address: amofro@hotmail.com
Affiliation:

Subject: Save sportfishing
Comment:
Please Please Please save sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:44:52

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Comment Log Display

Below is the comment you selected to display. Comment 2244 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Louis
Last Name: Villa
Email Address: Louisvilla@ymail.com
Affiliation:

Subject: Harbor craft regulations

Comment:

I want to express my concerns about any newly proposed regulations that will affect the commercial fishing industry or my continuing to operate my personal fishing vessel for fishing and pleasure. Please do not pass any new regulations that will restrict the current situation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:45:15

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Comment Log Display

Below is the comment you selected to display. Comment 2245 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Noll
Email Address: RW.Noll@cox.net
Affiliation:

Subject: Sportfishing

Comment:

Dear Sirs, I strongly urge you to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. If the proposed regulations go into effect it will have a pronounced negative effect on the livelihood of the sportfishing industry and will restrict access to sportfishing for the public, Most of us can't afford the luxury of a private boat, and this the only way to enjoy this sport.

PLease vote no on this legislation.

Thank You

Robert Noll

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:44:17

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Comment Log Display

Below is the comment you selected to display. Comment 2246 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Lowe
Email Address: daniel.j.lowe@gmail.com
Affiliation:

Subject: Keep Sportfishing Viable

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:57:27

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Comment Log Display

Below is the comment you selected to display. Comment 2247 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Louis
Last Name: Villa
Email Address: Louisvilla@ymail.com
Affiliation:

Subject: Harbor craft regulations

Comment:

I want to express my concerns about any newly proposed regulations that will affect the commercial fishing industry or my continuing to operate my personal fishing vessel for fishing and pleasure. Please do not pass any new regulations that will restrict the current situation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:45:15

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Comment Log Display

Below is the comment you selected to display. Comment 2248 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kantilal
Last Name: Desai
Email Address: desco1943@gmail.com
Affiliation:

Subject: Sports Fishing in Southern California

Comment:

Sports Fishing is back bone of the economy of San Diego County employing thousands of people directly and hundreds of thousands indirectly. Let's find alternatives to keep our environment safe for our future generations. Eg. Electric power engines for power boats. Biodiesel and Solar power where possible. I and my family strongly oppose any bans on sports fishing and whale watching birdwatching tourism.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 10:54:11

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Below is the comment you selected to display. Comment 2249 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Vuong
Email Address: myke.vuong@gmail.com
Affiliation: Burlington safety

Subject: No to new purposed requirements

Comment:

This will impact the lower class who relies on this for protein and food

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:03:52

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Comment Log Display

Below is the comment you selected to display. Comment 2250 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dustin
Last Name: Hoiseth
Email Address: dustin@sbscchamber.com
Affiliation: SBSC Chamber of Commerce

Subject: CHC2021 (Santa Barbara South Coast Chamber of Commerce)

Comment:

Dear California Air Resources Board Members,

Sportfishing and whale watching boats are not only valued sources of outdoor recreation, but they are important economic contributors to California's coastal communities and their tourist industries. Commercial passenger boats only represent less than 10% of all harbor crafts, yet these local small businesses draw in hundreds of thousands of visitors each year. These businesses have contributed \$5.6 billion a year in economic activity and have supported nearly 40,000 jobs in California. The tourism industry is just beginning to recover from the devastating impacts of the pandemic, and before these commercial passenger boat businesses have been able to recuperate the California Air Resources Board is proposing costly engine emission regulations.

2250.1

These proposed regulations will require technology that has not yet been developed for use on commercial fishing vessels. The modifications needed to comply with this regulation are often too large to fit in existing engine rooms. Even in the cases where the modifications fit, the California State University of Maritime Academy concluded that the modifications would significantly impact vessel stability. Boat owners have many safety concerns beyond stability issues. There has been little testing done at sea for engines with DPF's. It is concerning that the U.S. Coast Guard has not been included in discussions regarding the safety of these regulations, considering they are responsible for regulating the safety of commercial passenger vessels.

2250.2

The California Air Resources Board has concluded that wood and fiberglass boats will likely have to be removed from service. Over 80% of commercial passenger boats are constructed of wood and fiberglass and owners will be required to purchase new metal boats as soon as 2023. With small businesses continuing to recover from the pandemic, the costs associated with this regulation would likely put many commercial passenger boat companies out of business.

2250.3

While we should embrace the need to reduce engine emissions, we encourage the California Air Resources Board to find a way to do so that does not place additional burden upon our local small business boating operations. There must be a solution that is both economically viable and environmentally sound. This regulation feels rushed and has not done enough to address the realistic and valid concerns of the passenger boat industry. We hope that the California Air Resources Board will choose not to adopt these new regulations, and instead take the time to find a solution that does not threaten the important passenger boats that help our coastal communities thrive.

Sincerely,
Santa Barbara South Coast Chamber of Commerce

Attachment: www.arb.ca.gov/lists/com-attach/2546-chc2021-AWIGaAZkUjMKPAY0.pdf

Original File Name: CHC2021_SBSCChamberofCommerce.pdf

Date and Time Comment Was Submitted: 2021-11-04 11:18:15

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Sportfishing and whale watching boats are not only valued sources of outdoor recreation, but they are important economic contributors to California's coastal communities and their tourist industries. Commercial passenger boats only represent less than 10% of all harbor crafts, yet these local small businesses draw in hundreds of thousands of visitors each year. These businesses have contributed \$5.6 billion a year in economic activity and have supported nearly 40,000 jobs in California. The tourism industry is just beginning to recover from the devastating impacts of the pandemic, and before these commercial passenger boat businesses have been able to recuperate the California Air Resources Board is proposing costly engine emission regulations.

These proposed regulations will require technology that has not yet been developed for use on commercial fishing vessels. The modifications needed to comply with this regulation are often too large to fit in existing engine rooms. Even in the cases where the modifications fit, the California State University of Maritime Academy concluded that the modifications would significantly impact vessel stability. Boat owners have many safety concerns beyond stability issues. There has been little testing done at sea for engines with DPF's. It is concerning that the U.S. Coast Guard has not been included in discussions regarding the safety of these regulations, considering they are responsible for regulating the safety of commercial passenger vessels.

The California Air Resources Board has concluded that wood and fiberglass boats will likely have to be removed from service. Over 80% of commercial passenger boats are constructed of wood and fiberglass and owners will be required to purchase new metal boats as soon as 2023. With small businesses continuing to recover from the pandemic, the costs associated with this regulation would likely put many commercial passenger boat companies out of business.

While we should embrace the need to reduce engine emissions, we encourage the California Air Resources Board to find a way to do so that does not place additional burden upon our local small business boating operations. There must be a solution that is both economically viable and environmentally sound. This regulation feels rushed and has not done enough to address the realistic and valid concerns of the passenger boat industry. We hope that the California Air Resources Board will choose not to adopt these new regulations, and instead take the time to find a solution that does not threaten the important passenger boats that help our coastal communities thrive.

Sincerely,

Santa Barbara South Coast Chamber of Commerce



Comment Log Display

**Below is the comment you selected to display.
Comment 2251 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jimmy
Last Name: Cole
Email Address: MRJCOLE00@GMAIL.COM
Affiliation:

Subject: DONT SINK SPORTFISHING

Comment:

why cant attack the commercial operations and not the private sector to make your impact. Sees like there is much more opportunity for progress there.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:26:00

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Comment Log Display

Below is the comment you selected to display. Comment 2252 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: Howard
Email Address: tunabomber9@yahoo.com
Affiliation:

Subject: Sportfishing/whale watching restrictions.

Comment:

To whom it may concern:

Please rethink the impending restrictions you are anticipating on applying to our fishing/whale watching fleets. They are a draconian measure that would equal the loss of many jobs not to mention the freedom of enjoyment of thousands.

These activities themselves are the main source of revenue to help the matters they concern; sportfishing generates license sales that promote fisheries conservation, and whale watching educates and the public on the animals and their conservation/study as well.

Do NOT go forward with this act.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:22:26

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Comment Log Display

Below is the comment you selected to display. Comment 2253 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Carrie
Last Name: Smedley
Email Address: ladyfishonline@yahoo.com
Affiliation:

Subject: Protect Sportfishing

Comment:

As an avid fisherwoman, I am begging you to vote NO on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

I have fished for years and I do not always catch fish, but it is a tremendous mental recharge to be out on the water. Many of my friends and family also partake in fishing/whale watching and this proposal is absolutely ridiculous, especially in these trying times. Please don't take this away from us!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:26:04

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Comment Log Display

Below is the comment you selected to display. Comment 2254 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alan
Last Name: Breininger
Email Address: agbrein@cox.net
Affiliation:

Subject: Vote No on CHC2021

Comment:

Please vote no on CHC2021. These regulations are another example of poorly conceived draconian measures being foisted off on the public to solve a problem without any consideration for the practicality of implementing such measures. These new regulations are economically unfeasible for the sportfishing industry. CHC2021 will have the effect of eliminating a billion dollar industry affecting millions of Californians, resulting in only a minimal affect on the environment. The regulation needs to be rejected in it's current state and rewritten to address the varying needs of industries in the state that have no feasible way to meet these new requirements and that don't contribute significantly to the environmental problems. I urge you to reject this version of CHC2021.

2254.1

2254.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:00:53

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Comment Log Display

Below is the comment you selected to display. Comment 2255 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Takacs
Email Address: doubletrouble33@cox.net
Affiliation: Oceanside Senior Anglers

Subject: Banning Commercial Fishing Boats

Comment:

Are you people CRAZY. There is NO ENGINE produced to replace in these boats. NONE. ABSOLUTELY NONE. Stop this WOKE way of thinking. Think of the loss of funds to the state. No KIDS being able to fish. The expense to the boat owners. A way to get on the ocean away from covid let down. Where does the state find you people. Who think this way. Next will be the recreational boaters. Why don't you spend your time and energy going after countries like China and their polutants. This is absolutely NUTS>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:27:54

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Comment Log Display

Below is the comment you selected to display. Comment 2256 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rachel
Last Name: Hollers
Email Address: rholmes219@gmail.com
Affiliation:

Subject: Vote NO

Comment:

This will cripple multiple industries, the fact this is on the table is mind blowing. There are other ways! Vote no on regulations that rely on technology that is economically unfeasible and has NOT BEEN TESTED AS SAVE on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:28:22

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Below is the comment you selected to display. Comment 2257 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chuck
Last Name: Ormson
Email Address: chucko@venturawestmarina.com
Affiliation: www.venturawestmarina.com

Subject: The End is Coming for Sportfishing and Whale Watching Boats

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:36:45

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Comment Log Display

Below is the comment you selected to display. Comment 2258 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alexander
Last Name: Rosalino
Email Address: alexrosalino99@gmail.com
Affiliation:

Subject: Putting restrictions on fishing and whale watching will hurt rather than help

Comment:

I believe rushing into this is the wrong way of going about it. If boat captains could get more time to change marine equipment at least. I don't think I will be participating in any whale watching or fishing any time soon because of rate increases.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:27:14

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**Below is the comment you selected to display.
Comment 2259 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: Darcey
Email Address: jhdarcey@yahoo.com
Affiliation:

Subject: chc21
Comment:
Please don't stop California Sportfishng!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:42:52

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Comment Log Display

Below is the comment you selected to display. Comment 2260 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Billie
Last Name: Criss
Email Address: billiejcriss@yahoo.com
Affiliation:

Subject: Deep-sea fishing and well watching boat

Comment:

To whom it may concern,
I sincerely hope that you read this email in defense of the fishing boats and whale watching boats their owners and the families that own them also the families that enjoyed going on these boat for years my family has gone on fishing boats and whale watching bolts if they were not available to pay a small price for a ticket our family would have never seen wells out in the ocean Oregon deep-sea fishing I truly hope you think about this and decide not to take this pleasure away from the people thank you, BILLIE CRISS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:43:20

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Comment Log Display

Below is the comment you selected to display. Comment 2261 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Twyia
Last Name: McKinney
Email Address: twyia@yahoo.com
Affiliation:

Subject: Don't Sink us and just leave us alone!!!

Comment:

Please don't take something else away from the family owned
business'

This is a fun and exciting activity for families like mine to do
together!!!

Plus there are more concerning things in our state which need to be
delt with NOT our beautiful whale and mammal watching.

Sincerely,
Twyia

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:43:04

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Comment Log Display

Below is the comment you selected to display. Comment 2262 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Danny
Last Name: Do
Email Address: Reelfishingaddicts209@gmail.com
Affiliation:

Subject: Save the sports fishing fleet

Comment:

We would like to help save the sports fishing fleet by sending this email

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:45:53

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Below is the comment you selected to display. Comment 2263 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Timothy
Last Name: Becker
Email Address: sandmantjb@yahoo.com
Affiliation: Fishing enthusiast

Subject: Protect Sportfishing

Comment:

Instead of going after fishing boats which makes no sense, why don't we start thinking about shutting down and removing the oil platforms that cause much more damage to our beautiful California coast line. We are dealing with a spill in So Cal as I speak. Stop this nonsense!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:40:20

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Comment Log Display

Below is the comment you selected to display. Comment 2264 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Norris
Email Address: scott.norris57@gmail.com
Affiliation: Mission Fish

Subject: Bad idea from Sacramento

Comment:

As a sponsor and participant for the Mission Fish organization, I am saddened by the proposal. For several years we have chartered sportfishing boats for veterans and first responders suffering from PTSD. ALL of the fisherman have been of modest means and could not afford the cost of the trip and equipment rental. Targeting our veterans and first responders who need care and kindness to help with their recovery is cruel and the sign of politicians completely disconnected to their electorate. NO more bad ideas from Sacramento!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:45:19

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Below is the comment you selected to display. Comment 2265 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gerald
Last Name: Lam
Email Address: geraldlam05@gmail.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

Please consider delaying the emissions requirements for sportfishing boats. With the uncertainty caused by the pandemic and associated supply chain disruptions, the families and workers in the fishing industry will face even more difficulties attempting to comply with the proposed regulations. Future generations would have less access to the marine resource as well.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:40:51

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Comment Log Display

Below is the comment you selected to display. Comment 2266 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andre
Last Name: Graves
Email Address: pottz@cox.net
Affiliation: Fisherman

Subject: Regulations

Comment:

Please do not impose these regulations. You are going to destroy the the lives of fisherman. I am all about bettering the environment but there has to be a better way than this. Put regulations on newly manufactured engines and boats and marine vessels so they comply and in time existing ones will be replaced. This can be done over time, this agenda is ruining everything around us in an acute manner.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:50:08

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Comment Log Display

Below is the comment you selected to display. Comment 2267 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Porter
Email Address: mikegporter63@icloud.com
Affiliation:

Subject: CHC20121

Comment:

Please don't move forward with CHC2021. I believe in clean air and clean water, but these proposed maritime internal combustion emissions regulations should be implemented over a much longer period of time - like 15 to 20 years to allow the small operators to afford new, cleaner technologies.

Thank you very much,
Michael Porter
San Diego, CA 92111

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:49:03

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Below is the comment you selected to display. Comment 2268 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paula
Last Name: Hugill
Email Address: phugill@sbcglobal.net
Affiliation:

Subject: Commercial harbor craft new regulation

Comment:

You should not impose more regulations on commercial fishing boats, especially when the technology is NOT YET AVAILABLE to do the improvements.

These peoples livelihoods and the enjoyment of millions of fisherman are just being tossed aside so that you can say that California is leading in helping to save the planet.

Its just wrong on so very many levels.

Please vote against this horrible regulation!!!!

Paula

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:49:54

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Comment Log Display

Below is the comment you selected to display. Comment 2269 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: ron
Last Name: bertacchi
Email Address: bertron@winfirst.com
Affiliation: none

Subject: chc2021 save our boats

Comment:

Hi, this is in response to making the ocean fleet of boats for sport fishing and whale watching either obsolete or so expensive to refit no one can afford to do either for recreation. Have you not watched the news to see what you have done to trucking with having to refit the trucks or with AB5 we have no trucks to move supplies. But you don't care as long as you get your way. We have to cut exhaust while other countries don't have to do anything, but that's ok. As you all live in a fantasy world where Ca. will fix all and you will earn your large paycheck, but no one else will be able to work and support a family.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:51:00

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Comment Log Display

Below is the comment you selected to display. Comment 2270 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: john
Last Name: placido
Email Address: protome123@outlook.com
Affiliation: retired tunafisherman

Subject: give me ocean or give me DEATH

Comment:

i knew i was going to be a fisherman when i was 8 please dont take away.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 11:50:49

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Below is the comment you selected to display. Comment 2271 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Adams
Email Address: dadams619@aol.com
Affiliation: fisherman

Subject: Protect sport fishing

Comment:

Please preserve sport fishing ~ the public deserves it.

Thanks,

Dr Adams

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:04:14

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Below is the comment you selected to display. Comment 2272 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jessica
Last Name: Dowsett
Email Address: jjdowsett@icloud.com
Affiliation:

Subject: Sport fishing boats

Comment:

To whom it may concern,

I've enjoyed going on deep sea fishing boats for years.

I would like to continue taking fishing and whale watching trips.
I hope that they're allowed to continue for years to come.

Sincerely,

Jessica Dowsett (and kids)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:06:42

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Comment Log Display

Below is the comment you selected to display. Comment 2273 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Todd
Last Name: Shelton
Email Address: Snobrders@att.net
Affiliation:

Subject: Boats

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:09:47

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Comment Log Display

Below is the comment you selected to display. Comment 2274 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ignacio
Last Name: Rodriguez
Email Address: IRodriguez@crimsonrm.com
Affiliation:

Subject: Vote no on sportsfishing boat regulationa

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:09:05

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Comment Log Display

Below is the comment you selected to display. Comment 2275 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Toni
Last Name: Rawlins
Email Address: ladyskpper@aol.com
Affiliation:

Subject: Protection of the Commercial Passenger & Fishing Industry in So. CA

Comment:

Dear Sirs/Madames.

I am writing today to urge you to allow the continuation of "business as usual" for the local Commercial Passenger, Whale Watching and Fishing Fleets in our local area of Southern California.

Many livelihoods depend upon these industries.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:14:47

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Comment Log Display

Below is the comment you selected to display. Comment 2276 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Ferguson
Email Address: fergdads@yahoo.com
Affiliation:

Subject: Vote No

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:18:25

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Comment Log Display

Below is the comment you selected to display. Comment 2277 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lori
Last Name: Donchak
Email Address: lordonchak@gmail.com
Affiliation: PierPride Foundation

Subject: Harbor Emissions Regulations/ CARB

Comment:

Please forward this letter to relevant CARB officials and incorporate it into the record. Thank you. If possible, please confirm receipt. Lori Donchak, Secretary--PierPride Foundation.

Attachment: www.arb.ca.gov/lists/com-attach/2574-chc2021-UTVSNQFuBTcDclU9.pdf

Original File Name: DanaWharfPositionLetter.pdf

Date and Time Comment Was Submitted: 2021-11-04 12:16:24

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Ms. Liane M Randolph
Chair, California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

September 24, 2021

RE: Harbor Craft Emissions Regulations

Dear Chair Randolph,

Please consider our concerns regarding proposed draft regulations on commercial harbor craft vessels coming before your Board in the next few months. The proposed new harbor craft engine emissions control regulations will have a significant impact on maritime businesses, tourism, local revenues and affordable ocean access for all Californians. PierPride Foundation is a non-profit devoted to preserving San Clemente Pier, a fishing and recreation Pier. In our love for the ocean, we partner with many groups who would be done a disservice by the proposed restrictions in this legislation.

2277.1

As you know, the regulations will require passenger vessels and ferries, tugboats and barges, pilot boats, sportfishing boats and other marine vessels to either retrofit or replace vessels, and that CARB staff has conservatively estimated costs over \$2 billion.

Improved air quality is a desirable goal. However, technology does not exist for some vessels and will pose safety risks for others. The proposed regulations will require some operators to build new larger vessels to accommodate the weight and size of the mandated equipment. In other cases, due to the additional weight of the mandated engines and diesel particulate filters, vessels such as ferries and sportfishing boats would have to reduce passenger load; some potentially by half- which alone would double the cost of tickets, reducing tourism dollars and making ocean access unaffordable to many.

2277.2

2277.3

Please provide sufficient time to work collaboratively with the maritime industry on solutions that will achieve emissions reductions while preserving our coastal communities and allowing affordable access to our ocean waters for all Californians.

Sincerely,

Eileen Kawas

Eileen Kawas

PierPride Foundation Board President



Comment Log Display

Below is the comment you selected to display. Comment 2278 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Del
Last Name: Denlinger
Email Address: deldenlinger@gmail.com
Affiliation:

Subject: Sportfishing and whale watching boats.

Comment:

I can't believe you would initiate this bill. You will kill the fishing industry!!!
Thanks California!! Another bad bill!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:20:17

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Comment Log Display

Below is the comment you selected to display. Comment 2279 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeffery
Last Name: Sonneberger
Email Address: jeffery.sonneberger@comcast.net
Affiliation:

Subject: You got better things to do

Comment:

You got better things to do like The homeless problem

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:25:55

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Comment Log Display

Below is the comment you selected to display. Comment 2280 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Val
Last Name: Pillado
Email Address: valpillado@yahoo.com
Affiliation: Angler

Subject: Chc2021

Comment:

I am a Veteran of the us army. I Suffer from PTSD and sport fishing is a way that I cooe with some of my episodes. Sport fishing is very therapeutic for my condition. I also am a registered voter and I did in fact vote for Governor Newsom in the orignal vote and the recall. Please keep this available to all California residents.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:24:30

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Comment Log Display

Below is the comment you selected to display. Comment 2281 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clauda
Last Name: L
Email Address: clowndianyc@yahoo.com
Affiliation:

Subject: DO NOT End for Sportfishing and Whale Watching Boats

Comment:

Dear Board,

I am a New Yorker and every year I visit California. It has become tradition for me and my family to book a whale watching trip at New Port Beach. We look forward to this whale watching venture every year. I have taken friends, family members and co-workers to enjoy this beautiful boat treat. I hope that you continue to let this be a tradition for myself and my loved ones for years to come.

Sincerely,

Claudia L.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:33:48

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Comment Log Display

Below is the comment you selected to display. Comment 2282 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Gloor
Email Address: gloordave@gmail.com
Affiliation:

Subject: Sportfishing

Comment:

Please do not regulate the few boats that ply the Sportfishing trade out of business. The impact these boats have on air quality is insignificant compared to other industries such as power production construction and transportation. These few boats have a history in California that is a west coast tradition, providing well paying jobs generation after generation. Parents pass these operations on to their children continuing a way of life that is romantic and essential. These boats provide food and recreational opportunities to people who would otherwise never be able to participate in an activity that has historically gone on for thousands of years. These boats will not disappear from the earth with these regulations they will be sold out of state, the operations will relocate out of the country, families will have their incomes eliminated, retail sales will suffer, hotels will suffer and the mental health of California citizens will also suffer. You must consider this activity as essential.

2282.1

2282.2

2282.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:15:58

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Comment Log Display

Below is the comment you selected to display. Comment 2283 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Arthur
Last Name: Dorr
Email Address: artie@gobalboa.com
Affiliation:

Subject: SAVE OUR SPORTFISHING FLEETS!

Comment:

My family has been utilizing the sportfishing boats for multiple generations to put food on the table. The families that run the boats have taken great care of us and we truly care about their livelihoods.

Please don't force them to shut down their operations as this new legislation will be devastating to us and many other anglers up and down the coast.

Kind Regards,

Arthur

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:00:34

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Comment Log Display

Below is the comment you selected to display. Comment 2284 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mary
Last Name: Lawrence
Email Address: eliza.zimmerle@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

Please keep fishing and whale watching I have loved going and I hope that my children and their children can go on participating. This country needs to see the wonders of the sea. Not take it away.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:58:14

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Comment Log Display

**Below is the comment you selected to display.
Comment 2285 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: DAVID
Last Name: MEJIA
Email Address: finelinedave@yahoo.com
Affiliation:

Subject: SPORT FISHING BOATS

Comment:

Hi, my name is David Mejia and i want to express my frustration regarding this bill that can ultimately shut down the sport fishing industry, out of all the crazyness that is going around right now with not only california but the nation as a whole, sportfishing is the only good, clean, kid friendly sport we have left. please reconsider passing this bill. thank you for your time

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 12:43:07

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Comment Log Display

Below is the comment you selected to display. Comment 2286 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Phillip
Last Name: Cruz
Email Address: pjcruz26@gmail.com
Affiliation:

Subject: CHC2021 Save the Boats!

Comment:

Hello,

I just wanted to voice a quick message that the sport fishing and boating is a huge value to many people's livelihoods as well as great method for which to learn more about our wonderful ocean. How we can enjoy AND take care of nature's wonders. Without sport fishing and boating activities, we deny current and future generations of experiencing many things the ocean and local waters can offer. Please do not remove the boats from the water. I want to continue to share my love of the ocean with my growing family and friends. Thank you for listening!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:06:59

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Comment Log Display

Below is the comment you selected to display. Comment 2287 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Day
Email Address: davidwday@att.net
Affiliation:

Subject: Amendments to the Commercial Harbor Craft Regulation

Comment:

Please consider any amendments to be realistic and obtainable to sole owners and small family businesses.

Clean air is definitely important but, please make the goal reachable in small steps with current technology.

Please also consider the financial impact this will have on businesses already ran on a very fine line.

Thank you,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:15:06

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Comment Log Display

**Below is the comment you selected to display.
Comment 2288 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: TOM
Last Name: BOGGESS
Email Address: TBOGGESS@COURTESYSD.COM
Affiliation:

Subject: FISHING

Comment:

these boats taught me how to fish-these taught my son how to fish.
please do not do this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:24:45

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Comment Log Display

**Below is the comment you selected to display.
Comment 2289 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Kent
Last Name: Chatfield
Email Address: Kcsguess@yahoo.com
Affiliation:

Subject: Sports fishing

Comment:

Please use your heads you can't just stop sports fishing and whale
come on use your heads

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:29:19

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Comment Log Display

Below is the comment you selected to display. Comment 2290 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Wojdylak
Email Address: Williamwojo@me.com
Affiliation:

Subject: Sport fishing engine regulations

Comment:

The measure you are planning to pass is going to ruin the livelihood of countless people. You are going to rely on technology and that isn't even out yet and force people to comply? This is a heinous overstep and I pray that you can find a better way than to outlaw peoples ships.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 13:35:10

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Comment Log Display

Below is the comment you selected to display. Comment 2291 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Madden
Email Address: danmadden08@gmail.com
Affiliation:

Subject: Carb proposal

Comment:

Please save sport fishing and it's related industries.
Save jobs and preserve tradition.
Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:11:09

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Comment Log Display

**Below is the comment you selected to display.
Comment 2292 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Melissa
Last Name: Grabowski
Email Address: Mgbowski@yahoo.com
Affiliation:

Subject: Fishing Boats

Comment:

There should be some grants to help these boats get what they need to comply.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:16:53

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Comment Log Display

Below is the comment you selected to display. Comment 2293 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randy
Last Name: Shrier
Email Address: Mybluefintuna@gmail.com
Affiliation:

Subject: Sport boat regulations

Comment:

To whom it may concern,

I understand that air pollution is a contributing factor to global warming. If you were to take the amount of increased pollution if the sport fleet was to be mothballed and 50% of the anglers that could no longer fish on a sport boats would get smaller gas powered skiffs and towing to the launch ramp, I'm sure that there would be an increase of pollution.

Regards,

Randy Shrier

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:14:31

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Below is the comment you selected to display. Comment 2294 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Brown
Email Address: anthonybrown112081@gmail.com
Affiliation:

Subject: Fishing

Comment:

Please leave us to fish and enjoy what we do. It is one of the best get away and some of the best memories of some of our loved ones that we've had fun with.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:24:56

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Comment Log Display

Below is the comment you selected to display. Comment 2295 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Elizabeth
Last Name: Ellis
Email Address: eaellis_1@hotmail.com
Affiliation:

Subject: request you to vote no on the new technology regulations

Comment:

I would like to request that you vote no on new regulations that rely on technology that put too large a burden on small sportfishing and touring vessels. As an ocean fishing enthusiast, I would hate to see these skippers be put out of business or the cost of fishing become too high. I think these regulations will hurt our San Diego fishing community and our overall tourist economy, especially as we are still trying to recover from the Covid pandemic effects.

thank you for your consideration,
Elizabeth Ellis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:22:05

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Comment Log Display

Below is the comment you selected to display. Comment 2296 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alfred
Last Name: Cancino
Email Address: acan6432@gmail.com
Affiliation:

Subject: We are the community

Comment:

We the fisherman are the advocates for environmental protection. The very boats that we fish from are the platforms in which we can observe and protect our environment and oceans.

These boats are the tools in which new young environmentalists are created and taught. Generations of people have become ocean conscious from their experience on these vessels.

Putting such restrictions on these boats will be a step backward toward preserving our oceans and environment, as it will destroy the very tool that has created ocean-loving communities across the world.

These boats are known around the world and are an important part of California history. I offer you my hand and smile. Come fishing with us and see for yourself.

Please reconsider these regulations.

-Alfred

Attachment: www.arb.ca.gov/lists/com-attach/2596-chc2021-VCAAb1w4AzYBdQZj.jpg

Original File Name: TheFreelance.jpg

Date and Time Comment Was Submitted: 2021-11-04 14:11:33

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Comment Log Display

Below is the comment you selected to display. Comment 2297 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Victoria
Last Name: Senuca
Email Address: balticgranit@msn.com
Affiliation: Baltic granite

Subject: Opposition to the new regulations
Comment:
Not agree with the carb new regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:34:41

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Comment Log Display

Below is the comment you selected to display. Comment 2298 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Ritter
Email Address: kjritteraz@yahoo.com
Affiliation:

Subject: Keep the fleet running

Comment:

Please do not put the fishing fleet out of business. This is an important resource for the community and the public in general. Using a fleet is better than a bunch of individuals who may not follow the rules as well as a commercial fishing fleet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:37:24

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Comment Log Display

Below is the comment you selected to display. Comment 2299 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Trinidad
Last Name: Smith
Email Address: Trinidadwilmington@yahoo.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

Consider proposed amendments for the commercial Harbor crafts regulations, we are using our voices to inform you that this will hurt everyone in more ways than one. I have small business that I have been working on for a few years and is barley showing any signs of growth in these already tuff times. I followed my passion of fishing to have a business in this industry and left my surgical assistant career to chase this passion and now this proposal may damper if not stop the decision made by you. Families, businesses, livelihoods are all at risk don't add this us, The American people.

Regards,
Trinidad Smith

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:16:34

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Comment Log Display

Below is the comment you selected to display. Comment 2300 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Goodrich
Email Address: goodrjim@protonmail.com
Affiliation:

Subject: CHC2021 Concerns

Comment:

To Whom It May Concern, I read the fact sheet and ultimately agree there is a problem. However, I think the timeline to remedy the problem isn't realistic. Besides the timeline, I believe the requirements set forth will be impossible, or close to impossible to achieve. I don't see any relief for the family businesses that will eventually shut down and I think that's wrong.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:42:01

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Comment Log Display

Below is the comment you selected to display. Comment 2301 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Pisano
Email Address: markontheamigo@gmail.com
Affiliation:

Subject: Carb tier 4 engine regulations

Comment:

My name is mark pisano jr and I am a 4 th generation California fisherman. I have dedicated my life and every dollar I have ever worked for to start my own business and earn a living sportfishing. There are many other people like me. Good, honest, and hardworking people. I am putting tier 3 engines into my boat which are the cleanest burning engines for my size vessel on the market. I am only 23 years old so I have a long career ahead of me and this new bill will crush me financially and destroy everything I have worked for. Commercial fishing vessels are exempt from complying which makes little to no sense. One thing I have observed is the tanker ships drifting off our coast pouring black smoke and soot into the air. Nothing is being done about that . I would love to eventually be all for putting the newest and cleanest burning engines in my boat but they simply do not exist. My charter groups come from all over the country and spend money on tackle, hotel rooms, and eat at local restaurants if we go away so will all the revenue our customers bring into the state. All I ask is please consider rethinking this bill and realize it is not realistic as of right now . When smaller tier 4 engines are on the market then we can all work towards replacing our engines. A lot of people besides myself will be crippled by this bill. I really do not want to have to bring my business to another state . Thank you for your time.

2301.1

2301.2

2301.3

2301.4

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 14:38:32

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Comment Log Display

Below is the comment you selected to display. Comment 2302 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Holloway
Email Address: Livebaitguy@att.net
Affiliation: Pacific Pearl sportfishing

Subject: CHC 2021

Comment:

I am asking you to please not pass bill CHC 2021 it will put my family and families have many other companies like mine out of business I ask for you to wait for the technology to build an engine that would fit in the existing boats.e my family is very much into clean air for the future and the technology will eventually be there. As of now the proposed replacements are unsafe and will put most charter boats out of business. Thank you
Capt. James Holloway

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:14:15

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Comment Log Display

Below is the comment you selected to display. Comment 2303 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ross
Last Name: Paratore
Email Address: rocky.paratore@gmail.com
Affiliation: --None--

Subject: Commercial Harbor Craft Regulation

Comment:

I believe the boats in use as of now should be exempt from new regulations. There is no reason to put more people out of work!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:21:21

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Comment Log Display

**Below is the comment you selected to display.
Comment 2304 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Cody
Last Name: Paratore
Email Address: info@rkymtnnsy.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

The boats in use now should be exempt!!!!!!!!!!!!!!!!!!!! No more people
put out of work!!!!!!!!!!!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:24:44

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Comment Log Display

**Below is the comment you selected to display.
Comment 2305 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: kristy
Last Name: Paratore
Email Address: kristy@rkymtnnsy.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

The boats in use now should be exempt!!!!!!!!!!!!!!!!!!!! No more people
put out of work!!!!!!!!!!!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:24:44

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Comment Log Display

Below is the comment you selected to display. Comment 2306 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kyle
Last Name: Paratore
Email Address: Kyle@rkymtnnsy.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

The boats in use now should be exempt!!!!!!!!!!!!!!!!!!!! No more people put out of work!!!!!!!!!!!!!!!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:24:44

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Below is the comment you selected to display. Comment 2307 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Kaufman
Email Address: ek609@aol.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

Gentlemen,

I believe that this legislation is shortsighted and will lead to the restriction and eventual elimination of Whale watching and some sport fishing in California. I would request that you not support this legislation as written.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:30:38

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Comment Log Display

Below is the comment you selected to display. Comment 2308 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Russell
Last Name: Girvin
Email Address: argylltbs@verizon.net
Affiliation:

Subject: CARB regulations on sportfishing and whale watching boats

Comment:

Please do not take advantage of your position that will end sportfishing and whale watching boats. Have a little compassion for the public that has endured far too many mandates and laws.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:23:31

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Comment Log Display

Below is the comment you selected to display. Comment 2309 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bryan
Last Name: Pruitt
Email Address: prudog2u@sbcglobal.net
Affiliation:

Subject: Nature is Beautiful!!

Comment:

PLEASE don't take away our option to view nature at it's finest. A boat on the water viewing wildlife is a GOD given privilege. Allow the public to keep this experience

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:34:08

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Comment Log Display

Below is the comment you selected to display. Comment 2310 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Phillip
Last Name: Castillo
Email Address: philcastillo@ymail.com
Affiliation:

Subject: Proposed new requirements for sport fishing vessel emissions

Comment:

CARB personnel and leadership,

For over 55 years I have had as my greatest passion here in California participating in sportfishing offshore on various operations. I am not from significant means and can not afford my own boat, so besides fishing from shore (which is now limited by marine preserve closures in my area) my only options are a few piers and one of the boats operating out of our landings. My father introduced me and I have introduced my 6 children to sport fishing.

Should you allow for passage of unrealistic and in many cases impossible to comply with regulations on the hard working blue collar sportfishing operations, it will be a crime against our rights to enjoy and participate in our California resources. Please be common sensical and not politically over incented to do something rash to some good people including myself and the millions that have and will participate in fishing, whale watching and cruising. The economic impact will be crushing to so many unintended industries. Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:46:56

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Comment Log Display

Below is the comment you selected to display. Comment 2311 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tim
Last Name: Drabek
Email Address: ttdsd@hotmail.com
Affiliation:

Subject: sportfishing

Comment:

The sport fishing fleet is not a major offender as compared to even the recreational boater. You have 20 or more people on one vessel instead of having 20 different polluters .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 16:03:49

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Below is the comment you selected to display. Comment 2312 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Phil
Last Name: Bell
Email Address: shalvah@aol.com
Affiliation: Marina Del Rey Anglers and LARRC

Subject: Proposed New Exhaust Systems for Sportfishing Boats

Comment:

If this passes, you will effectively destroy sportfishing in California as we now it. Many of the older sportfishing boats, like the Betty O out of Marina DelRe, will not be able to install the new exhaust system, and will be out of business. The Betty O, in addition to their sportfishing business, takes 100s of disadvantaged kids fishing every summer sponsored by MDRA. The boat also takes disabled vets fishing sponsored by MDRA, LARRC. By voting in favor of this proposal, disadvantaged youngsters and disabled vets will be deprived of these wonderful fishing opportunities. I urge you to vote against this proposal requiring new exhaust systems for sportfishing boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 15:48:48

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Comment Log Display

Below is the comment you selected to display. Comment 2313 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Moritz
Email Address: pmoritz@netzero.net
Affiliation:

Subject: Sport Fishing

Comment:

I urge you to vote NO on regulations that would effect the sport fishing and whale watching industry. This would have a huge impact on people's lives and the economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 16:27:26

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Comment Log Display

Below is the comment you selected to display. Comment 2314 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Kurtz
Email Address: cckurtz@cox.net
Affiliation:

Subject: Comments to the board

Comment:

I am strongly against new regulations that will impact our freedom and ability to go sportfishing and whale watching on the San Diego fleet.

As well, many of these boats are local and state family owned businesses that depend on these trips for their income.

Whatever technology can replace gas and diesel boat engines is decades away and needs time to evolve. We cannot simply ban these types of engines and expect to have a replacement without putting these businesses out of business and into bankruptcy.

this is an unfair and unjust proposal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:12:59

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Comment Log Display

**Below is the comment you selected to display.
Comment 2315 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: HOWARD
Last Name: REED
Email Address: howardjreed@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:24:05

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Below is the comment you selected to display. Comment 2316 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Badger
Email Address: badger.johnjr@yahoo.com
Affiliation: Small boat charter fishing business owne

Subject: Bad news for California tourism.

Comment:

People in California enjoy sight seeing. Touristy coming to Ca come for its beauty. The small boat s are necessary to ensure. The tourist has something to do when they get here. .
You are trashing an industry that has survived year after year .
Shame on you CARB.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:23:02

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Comment Log Display

Below is the comment you selected to display. Comment 2317 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Walter
Last Name: Reising
Email Address: wreising007@msn.com
Affiliation:

Subject: Sportfishing Engine Regulations

Comment:

To Whom It May Concern,

Please help our California sport fishing and whale watching boats by listening to what they need right now understanding what they all have just gone through in regards to the Pandemic. Please let them tell you what can be done soon/now to meet what are shared goals.

Our sportfishers allow "Average Joe's" great natural value; healthy food and activities. Don't throw a wrench in the works, PLEASE. Work WITH these stake holders, employers, neighbors.

Thank you,
Walt Reising

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:13:04

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Comment Log Display

**Below is the comment you selected to display.
Comment 2318 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Amy
Last Name: Ito
Email Address: aifshgirl@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I don't agree that you should cripple the fishing industry with the proposed regulations. Out country is made of diverse people and industries. They were hit in the pockets in 2020 and are still trying to recover!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:43:03

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Comment Log Display

Below is the comment you selected to display. Comment 2319 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Wayne
Last Name: Ito
Email Address: Wayneito55@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I do not agree with the regulations you are proposing. I've fished for 60 years in the San Francisco Bay Area and know how hard Sports and Commercial fishermen work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:46:05

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Comment Log Display

**Below is the comment you selected to display.
Comment 2320 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: Loska
Email Address: Jloska2@gmail.com
Affiliation:

Subject: Fishing boats

Comment:

I support the California fishing industry. Do ruin this for us and the young PEOPLE that love this sport by this nonsense.wake up AMERICANS. This is sickening to even think of closing this down for nonsense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:45:35

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Comment Log Display

**Below is the comment you selected to display.
Comment 2321 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Bart
Last Name: Corrie
Email Address: bigbassbartman@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

Please, do not put sport fishing boats out of business!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 18:04:14

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Comment Log Display

Below is the comment you selected to display. Comment 2322 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mary
Last Name: Matthews
Email Address: mamatthews61@yahoo.com
Affiliation:

Subject: Commercial Harbor Craft Regulation Amendment

Comment:

Dear Board Members,

Please consider a balanced approach when drafting an amendment to regulate fishing and whale watching boats. What you are proposing would put so many boats out of commission. Your demands are too extreme for harbor cruise businesses to accomplish and still stay in business. Just the opposite of what we need right now. I'm hoping you can work with the owner/operators to come up with a plan that satisfies some of what you want to accomplish without risking their business. Also, people need this type of recreation - the ocean should be available to everyone who wants this experience.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 17:55:28

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Comment Log Display

**Below is the comment you selected to display.
Comment 2323 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Paul
Last Name: Tietjen
Email Address: Paultietjen@sbcglobal.net
Affiliation:

Subject: Public comments

Comment:

State officials do not listen well they only think about their own retirement
And the 1.5 trillion state debt were use to the screw job from officials

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 18:10:53

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Comment Log Display

Below is the comment you selected to display. Comment 2324 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cat
Last Name: Kelley
Email Address: PrincessPidge@msn.com
Affiliation:

Subject: Please Vote No

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

My family loves to go whale watching and this could end that for us. The connection to nature is so important, please help preserve these experiences for us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 18:16:20

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Comment Log Display

Below is the comment you selected to display. Comment 2325 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Donald
Last Name: Dierdorff
Email Address: dddierdorff@gmail.com
Affiliation:

Subject: Gruesome's Insanity

Comment:

Me and millions of other anglers enjoy fishing! Global warming is an unproven science and has no business in the fishing industry or any other industry.

Stop your insanity. Californians have had enough of your money grab.

Hopefully, your time as governor will be extremely limited.

Sincerely,

Don Dierdorff
Tel: 702 335-0219

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 18:48:23

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Comment Log Display

**Below is the comment you selected to display.
Comment 2326 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Sara
Last Name: Grose
Email Address: sgrose63@gmail.com
Affiliation: cook on a sportfishing boat

Subject: CARB

Comment:

Please just answer this question. Why did we all just repower if that wasn't good enough ?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:13:38

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Comment Log Display

Below is the comment you selected to display. Comment 2327 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Westphal
Email Address: robertwestphal1974@gmail.com
Affiliation: Fisherman

Subject: Save our boats

Comment:

Don't the the food from our table and don't put our good captains and out of work

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:19:35

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Below is the comment you selected to display. Comment 2328 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Cook
Email Address: foggiehat@yahoo.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

I DO NOT SUPPORT THE Commercial Harbor Craft Regulation TO REMOVE VESSALS THIS IS FAR OVER-REACHING AND TOO BURDOMSOME OVERKILL WHICH CA GOVT ENTITIES SEEMS TO BE WAY TOO HEAVY HANDED AND THE RESULTS ARE OVER-REGULATING CALIFORNIANS TO DEATH HENCE WHY PEOPLE ARE ABANDONING THIS STATE IN DROVES.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:18:04

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Comment Log Display

Below is the comment you selected to display. Comment 2329 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Jones
Email Address: salbertj707707707@hotmail.com
Affiliation:

Subject: Ship strikes vs crab lines

Comment:

You guys should do a study on whales that are killed in each location. See if it's really crab lines or ship strikes. Compare San Francisco area to bodega bay. Number of whales in each places compared to deaths.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:38:41

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**Below is the comment you selected to display.
Comment 2330 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Quinn
Last Name: Rich
Email Address: Sandpike10@gmail.com
Affiliation:

Subject: Fishing
Comment:
Don't shut down our fishery's thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:41:14

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**Below is the comment you selected to display.
Comment 2331 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: Sperling
Email Address: markjsperling@gmail.com
Affiliation:

Subject: fishing

Comment:

Take it away but you can never replace it with anything that comes close to just being with nature

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:43:13

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Comment Log Display

Below is the comment you selected to display. Comment 2332 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: August
Last Name: Dougherty
Email Address: augustdougherty@yahoo.com
Affiliation:

Subject: CHC2021- Save our Fishing Industry

Comment:

As a lifelong angler, I enjoy bringing my children to the great outdoors to share life experiences that hopefully will be remembered long after I'm gone. Please don't push through laws that will curtail these wonderful moments in time. In my opinion, the smaller boats (under 125') should be left alone. Those are small operators who take a well regulated group of enthusiastic anglers out for trips of a lifetime. Please consider the scope your proposed rules to perhaps exempt the local commercial fishing operators. Some memories and traditions are worth saving.

Respectfully,

Captain August Dougherty
L.A. County Fire Department

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:44:04

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Comment Log Display

Below is the comment you selected to display. Comment 2333 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Esposito
Email Address: a.espositojr1990@gmail.com
Affiliation:

Subject: Save sport fishing

Comment:

The loss of Southern California sport fishing would be a massive detriment to the local culture and the entire community in our region. The elimination of sport fishing boats would effectively make fishing a sport only available to the upper middle and upper class, those individuals with a boat of their own, while the lower economical classes would be relegated to fishing from the land and land based structures, this would in turn limit activities for some kids and young people who otherwise may have a budding passion for the outdoors which in turn would breed a mind for conservation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 19:57:53

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Comment Log Display

Below is the comment you selected to display. Comment 2334 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Betty
Last Name: Schneider
Email Address: bettyaron.schneider@verizon.net
Affiliation:

Subject: Vote NO

Comment:

I urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 20:05:46

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Below is the comment you selected to display. Comment 2335 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leonard
Last Name: Voet
Email Address: leonard.voet@gmail.com
Affiliation:

Subject: Charter Boating

Comment:

If you kill off charter boats, it will lead to more people buying their own boats. More boats = more pollution
Get a clue

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 20:33:46

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Comment Log Display

Below is the comment you selected to display. Comment 2336 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Swede
Email Address: coastaleddie67@yahoo.com
Affiliation:

Subject: Stop the Proposed Amendments to the Commercial Harbor Craft Regulations

Comment:

I have enjoyed sportfishing here in CA most of my life. When my daughter was young I would bring her and be able to spend quality time on the water, away from todays internet screen time. I had hopes of being able to bring my grandchildren out to do the same thing.

The technology to efficiently convert the sportfishing fleet to meet the proposed regulations is not there yet. The few outfits that may be able to bear the cost burden of this task AND that currently have vessels capable of being retrofitted, would effectively pass this cost along to the customers. Along with the

2336.1

greater demand due to the limited supply of sportfishing crafts that would remain in operation the average middle class person would no longer be able to afford to enjoy this favorite California activity.

2336.2

This industry supports a large number of subsidiary businesses that would suffer and possibly go under. More tax revenue and tourist loss for CA.

2336.3

In this day and age would passing more regulations that put more law abiding businesses, out of business, while increasing the tax burden on the remaining businesses really be a good idea in the public eye. Political legislative middle ground is a must if you would like continued public support.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 20:10:55

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Comment Log Display

Below is the comment you selected to display. Comment 2337 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: McIntire
Email Address: MIKAELE97@COX.NET
Affiliation:

Subject: CARB

Comment:

The time table on this is ridiculous. The engines required here are not in production. ■ If they were, most of the vessels that are impacted are older - 30 to 40 years. Those engine rooms do not have the real estate to install one even if they were available. ■ So, is the plan here to put thousands of vessel owners out of business.

2337.1

If so, does the hierarchies know how many people would loss income and this also impacts TAXES collected. ■ For every one of these vessels many other business associated with boating will also suffer greatly. ■ Do the math! ■ This also has a heavy impact on tourism. ■ You just can't flip a switch and all can comply, there has to be a reasonable time of transition.

2337.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 20:54:21

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Comment Log Display

Below is the comment you selected to display. Comment 2338 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Jett
Email Address: Myjetty2@gmail.com
Affiliation:

Subject: Sports fishing in S Cal

Comment:

The sports fishing fleet in S California gives great adventures to kids and adults from all walks of life. It is and has been a great influence in my life and many others that I know. It needs to continue to do so for the S California community. If this is taken away like so much in the last few years, I'm going to have to give in to the reality that I must leave the state I was born and raised in. So many of my neighbors and friends are fleeing this over taxed, over governed state it's sad.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 21:23:22

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Below is the comment you selected to display. Comment 2339 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: Johnson
Email Address: kevjamesjohnson@gmail.com
Affiliation: Retired Sergeant at Arms

Subject: Sport Fishing

Comment:

Please don't take away our ability to put fresh fish on the table. I share with all my neighbors and those that ask for it.

Imagine if we who fish on charter boats had to buy our own boats. There would be much more pollution. It's kind of like mass transit if you think about it.

Thanks! Kevin Johnson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-04 21:56:31

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**Below is the comment you selected to display.
Comment 2340 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Becky
Last Name: Jackson
Email Address: buggy_flower@yahoo.com
Affiliation:

Subject: Fishing in the Bay Area

Comment:

San Francisco is famous for Fishermans Wharf and the charm of being a fishing town. It is a pretty small fishing community though and the people who make their living as fishermen really have to work hard to keep the industry alive. It would be very sad if our already small, struggling fishing community became smaller or worse, a thing of the past.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 00:10:47

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Comment Log Display

Below is the comment you selected to display. Comment 2341 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Claudia
Last Name: Waldron
Email Address: Claudiawaldron49@gmail.com
Affiliation:

Subject: Keep Sport Fishing

Comment:

The thought of removing sportfishing for the thousands of people in our state who enjoy this recreational outlet would be one of the biggest travesties ever folks need an opportunity to relax and enjoy the sport.

The boat owners who spent countless hours making sure that their boats are safe and following the guidelines of the state sets up for them to follow...would be Devastated and out of work we don't need this industry to be eliminated!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 05:07:03

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Comment Log Display

**Below is the comment you selected to display.
Comment 2342 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Robert
Last Name: Smith
Email Address: bobstile02@aol.com
Affiliation:

Subject: save fishing
Comment:
save sport fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 06:11:31

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Comment Log Display

Below is the comment you selected to display. Comment 2343 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrew
Last Name: Weiske
Email Address: andreww714@yahoo.com
Affiliation: CCA

Subject: CHC2021

Comment:

Dear Sirs,

As a California Native it is hard to see the undermining efforts of such an act as we invite so many to visit and bask in the glory's of our Gold Coast. We all work very hard to protect and support our Beautiful state and its vast cultures. Responsible Conservation is key, so I ask that you take the time to vet out the facts/impacts before making any recommendations.

I can't begin to tell you how many Veterans, Underprivileged/Orphaned and Handicapped we have had the pleasure of sharing their first or only ocean experience - you will never be able to take those memories and dreams away. I ask that you not take those dreams, hopes, desires and wishes of those whom are still seeking that experience.

"PLEASE DON'T SINK SPORTFISHING"

Best Regards,
Andrew

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 05:52:32

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Below is the comment you selected to display. Comment 2344 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: KIEF
Last Name: ADLER
Email Address: kief@sbcglobal.net
Affiliation:

Subject: Sportfishing Regulations--CHC2021

Comment:

I urge you to vote NO on regulations that will eliminate sportfishing in California. These possible new regulations that you are considering simply can not be applied to an industry that can't afford to comply, effectively forcing sport fishing boats out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 06:57:57

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Comment Log Display

Below is the comment you selected to display. Comment 2345 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marty
Last Name: Leitzman
Email Address: marty@swvditch.com
Affiliation: Southwest V-Ditch, Inc.

Subject: Sportfishing Boating regulations

Comment:

I support the sportfishing and whale watching industry and would like to continue to be able to use company charters. Regulations requiring expensive upgrades make it difficult for smaller companies and only help the larger corporations put the smaller ones out of business and raise pricing. I would prefer that once

2345.1

the technology is more cost friendly, then the regulations be put into place. I work in the construction industry and CARB

requirements have put companies out of business and caused much difficulty for others and us. These regulations were put in too early for the engines available and even today there are still problems with the new engines that we did not have prior to the new regulations. This has been a very expensive and time consuming process that appears will be an ongoing issue in the construction industry. It would be unfortunate if the sportfishing and whale watching industry has to go through the same process as this will affect many peoples leisure and hobby activities also - not just work. Please consider delaying the implementation of requirements until better and more cost effective engine technology is available.

2345.2

Thank you. Marty Leitzman (760) 662-9993

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 07:38:47

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Comment Log Display

Below is the comment you selected to display. Comment 2346 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Neely
Email Address: 13hotpeppers@gmail.com
Affiliation: ex deckhand/fisherman

Subject: shutting down sport boats and wale watching

Comment:

IF anything that should be banned it should be parents driving
there kids to school.Im sure the emmissions is 10000000 time worse
every day than all the boats running at the same time.

Scott Neely

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:05:48

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Comment Log Display

Below is the comment you selected to display. Comment 2347 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Kanemitsu
Email Address: chris@rkrae.com
Affiliation:

Subject: Sportfishing and Whale Watching Boats

Comment:

As an avid fisherman, I find this proposed regulation abhorrent and highly detrimental to an entire industry. Many businesses have already moved out of California due to extremes in regulations. Don't do the same to the Sportfishing and Whale watching industry. Viable alternatives should be available at the onset of any regulation such as this.

2347.1

There is a greater environmental impact with all of the freighters waiting, off the coast, for their turn to unload. How is CARB going to address this?

2347.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:08:56

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Comment Log Display

Below is the comment you selected to display. Comment 2348 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Atsushi
Last Name: Morimura
Email Address: ATSUSHI.MORIMURA@GMAIL.COM
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

The newly proposed regulations will put many good, hard-working sport fishing & whale watching boats out of business, and will eliminate the opportunity for our next generations to enjoy the natural wonders the California coastline has to offer us. I strongly oppose these proposed regulations. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:29:50

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Comment Log Display

Below is the comment you selected to display. Comment 2349 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jack
Last Name: Nydam
Email Address: jhnydam@msn.com
Affiliation:

Subject: Harbor Craft Regulation

Comment:

Dear Clerk of the Board,

Please look at the facts and see the big picture. The lives and occupations this could ruin far outweigh any benefit this proposed law would accomplish. Put yourself in these fisherman's place and ask yourself how you would vote. Do you want fishing to become an elitist thing? Or do you want to take care of the working class?

Please do the right thing and vote NO.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:30:30

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Below is the comment you selected to display. Comment 2350 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lucinda
Last Name: Lilley
Email Address: lucinda.a.lilley@gmail.com
Affiliation: Yachting San Diego

Subject: CHC2021 Save Our Boats

Comment:

Urging CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Beyond that, we will loose our small business which creates jobs for our economy. Please vote NO to save our business and hundreds of others, and access for thousands of people access to the water in California!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:38:33

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Below is the comment you selected to display. Comment 2351 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Stokes
Email Address: don.stokes@att.net
Affiliation:

Subject: Save Sportfishing and Livelihoods

Comment:

Dear Honorable Members of the Board,

I humbly request for you to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. The proposed Commercial Harbor Craft Regulation places unattainable mandates on ocean going vessels that simply cannot be met and destroys livelihoods. In many cases the costs to comply with the proposed regulation exceed affordability and realistic application. Your attention to this matter is greatly appreciated.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:51:59

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Comment Log Display

Below is the comment you selected to display. Comment 2352 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: PETER
Last Name: ZALESKI
Email Address: mmaxsdg@gmail.com
Affiliation: California Yacht Brokers Association

Subject: Amendments to the Commercial Harbor Craft Regulation

Comment:

Please do not rush to make the proposed changes. Current conditions make the proposed changes impossible for many to continue to serve the public. Waiting for the technology is the only solution that makes any sense.

Than you,
Peter Zaleski
CYBA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:55:34

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Below is the comment you selected to display. Comment 2353 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregory
Last Name: Henry
Email Address: Gregory4381@att.net
Affiliation:

Subject: Carb

Comment:

Please rethink the bill coming up to change marine engine requirements to a level that would basically bankrupt the sportfishing fleet of California , not to mention the thousands of sportsmen unable to fish. There's got to be a better way!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 10:08:16

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**Below is the comment you selected to display.
Comment 2354 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: contreras
Last Name: contreras
Email Address: ccontreras029@gmail.com
Affiliation:

Subject: fishing

Comment:

sports fishing in southern California has always helped me through the highs and lows of life

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 10:25:39

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

Below is the comment you selected to display. Comment 2355 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: PETER
Last Name: ZALESKI
Email Address: mmaxsdg@gmail.com
Affiliation: California Yacht Brokers Association

Subject: Amendments to the Commercial Harbor Craft Regulation

Comment:

Please do not rush to make the proposed changes. Current conditions make the proposed changes impossible for many to continue to serve the public. Waiting for the technology is the only solution that makes any sense.

Than you,
Peter Zaleski
CYBA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 09:55:34

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**Below is the comment you selected to display.
Comment 2356 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jimmy
Last Name: Lew
Email Address: jglueislew@gmail.com
Affiliation:

Subject: Carb problem

Comment:

Sport fishing is great needed for Calif. \$\$\$\$\$\$\$\$ Many Many people will go Broke with out jobs !!!!!!!! Calif. will lost large amount of \$\$\$\$\$\$ without Sport fishing!!! Many boat owners will not have the \$\$\$ to reposed and go out of business!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 10:22:57

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Below is the comment you selected to display. Comment 2357 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jacob
Last Name: Wright
Email Address: Wrightwould@gmail.com
Affiliation: Sportfishing deckhand

Subject: Mr. Newsome dose not care about small business

Comment:

Mr. Newsome clearly understands that this law, will have extreme repercussions for small business owners in the commercial and Sport Fishing industry. Needless to say it shows that Governor Newsom clearly does not care about small business. look at restaurants and other places he patrons and who he supports. now look at the laws he's trying to implement, it will destroy small FAMILY ran businesses in the commercial and Sport Fishing industry. Also increasing the Market price of fish and crustaceans. If he truly cared about the people he will not go through with this.

Sincerely,
Jacob Wright

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 10:34:53

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Comment Log Display

Below is the comment you selected to display. Comment 2358 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sharon
Last Name: Bernie-Cloward
Email Address: sharon@sdpta.com
Affiliation: San Diego Port Tenants Association

Subject: San Diego Port Tenants Association Concerns over the proposed Harbor Craft Rule
Comment:

Please accept the San Diego Port Tenants Association's letter of concern over CARB's proposed Harbor Craft Rule.

Thank you,
Sharon Cloward

Attachment: www.arb.ca.gov/lists/com-attach/2663-chc2021-UDMBZgNwWWgCWwRo.pdf

Original File Name: CARB Ltr from SDPTA Commercial Harbor Craft Nov 2021 Final.pdf

Date and Time Comment Was Submitted: 2021-11-05 10:49:16

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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STAFF
Chelsea Bernie
SPECIAL PROJECTS DIRECTOR
Corchelle E. Worsham
DIRECTOR, MEMBERSHIP & EVENTS

November 5, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CARB's Proposed Revisions to the Commercial Harbor Craft Regulations

Dear Madam Chair,

The San Diego Port Tenants Association represents 800 businesses in the manufacturing, ship building and repair, shipping and trade, commercial and sportfishing, aerospace, hospitality, tourism, and recreation industries as well as the U.S. Navy on San Diego Bay. Collectively, they represent 44,000 jobs within San Diego's working waterfront. We are writing to express our serious concern with the agency's proposed revisions to the commercial harbor craft regulations.

CARB has proposed engine emission regulations that require technology that has not been developed or tested to be reliable and safe at sea. Similar technology used on trucks and farm equipment has been known to stall engines for hours at a time to clean emission control systems, and in worst case scenarios, catch fire. At sea, these scenarios could be life threatening.

2358.1

Vessels often enter and exit harbors that are difficult to navigate, especially during high winds and seas. If a vessel were to stall in a harbor or near shore, the threat of running aground or colliding with another vessel is a very real and an unacceptable possibility. Rather than hours, crews could have only minutes or seconds to regain control of their vessel. In San Diego, well known as a Navy and Coast Guard town, we have heavy traffic of naval war ships coming in and out of the harbor alongside commercial and leisure harbor craft. Therefore, it concerns us greatly that CARB did not initially consult the Coast Guard when drafting the regulations.

2358.2

CARB has concluded that the proposed regulations are not compatible with some vessels, specifically stating that "**vessel replacement will be likely, especially the categories with wood or fiberglass vessels.**" When more than 80 percent of vessels are constructed with these materials, there is a strong possibility that many sportfishing, harbor tour, and whale watching boat owners will go out of business. Moreover, the Cal Maritime Academy raised concerns associated with boat stability, which could have the practical effect of removing metal boats from service as well. As boat owners who can't afford replacement

Ms. Liane Randolph, Chair CARB
November 5, 2021
Page 2

vessels leave the industry, landings will go vacant, devastating visitor spending in and around marinas and harbors occupied by restaurants, stores, and lodging.

2358.3

This is why we are disappointed that CARB's economic analysis did not evaluate the economic impact of the regulations on harbors and marinas, and coastal economies that depend on anglers and marine life watchers to support the outdoor tourism and hospitality industry. It is irresponsible to consider the proposed regulations without such analysis.

Moreover, compliant vessels would have to be of metal construction and larger in size to accommodate TIER 4 engines, Diesel Particulate Filters and other exhaust after treatment systems. It is realistic to assume these larger vessels will necessitate harbors and marinas to resign marina layouts, resulting in decreased berthing available for rent or business operations. CARB did not consult with harbor masters and marina operators as part of any stakeholder outreach. Consequently, the impacts of the proposed regulations raise serious economic and safety issues.

2358.4

Out of concern for the personal safety of passengers and crew, and the economic survival of our boat owners, marinas, and harbors, we cannot support the regulations in their current draft and recommend that passenger commercial harbor craft be allowed to transition to lower emission engines as the technology becomes available and it is economically feasible to do so – the same path as CARB is providing to commercial fishing vessels.

2358.5

Sincerely,



John Laun
Chair



Sharon Cloward
President

CC: The Honorable Gavin Newsom
California Fish and Game Commission
Director Charles Bonham, Director, California Fish and Wildlife Agency
California State Legislature
United States Coast Guard



Comment Log Display

**Below is the comment you selected to display.
Comment 2359 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: Gioia
Email Address: john.gioia@bos.cccounty.us
Affiliation: County Supervisor

Subject: Letter of Support from Elected Official

Comment:

Please see attached official letter.

Attachment: www.arb.ca.gov/lists/com-attach/2664-chc2021-AjBSZAAzAGJRZgQ1.pdf

Original File Name: 20211103_carb.pdf

Date and Time Comment Was Submitted: 2021-11-05 10:59:19

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John Gioia (say "Joy-a")
District One
Chair, Board of Supervisors

Contra Costa County

11780 San Pablo Avenue, Suite D
El Cerrito, CA 94530
Phone: (510) 231-8686
Fax: (510) 374-3429

November 3, 2021



Dear California Air Resources Board:

As the County Supervisor for the greater Richmond area, I am writing to strongly support the strengthening of the Commercial Harbor Craft Regulation ("CHC") for healthier air. As a former California Air Resources Board (CARB) member, I understand the impact of harbor craft, such as tugboats, ferries, barges and dredges, on increased health and cancer risks to millions of Californians near our ports.

Harbor craft, many of them old and polluting, emit a toxic mix of diesel particulate matter. I know you understand that particulate matter gets into our lungs, weakens our immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships.

I join many other local elected officials to call for an end to the continued emissions from harbor craft across our state. Your proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents near our harbors and beyond. Passage of this rule would avoid 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from your own air quality experts. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I'm asking you to strengthen the Commercial Harbor Craft rule in the following ways:

1. Move forward with a strong rule now to advance zero-emission and clean up the dirtiest engines in other commercial harbor craft categories. 2359.1
2. Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035. 2359.2
3. Direct staff to revisit the rule with the Board as the zero-emission boat market evolves to ensure the regulation achieves maximum emission reductions. 2359.3
4. Increase funding for zero-emission boat pilots, retrofits, and new vessels to spur innovation. 2359.4

Let's keep California on a path towards innovation and clean air.

Sincerely,

John Gioia
District One
Board of Supervisors

A handwritten signature in blue ink that reads "John Gioia".

Email: John_Gioia@bos.cccounty.us • Website: www.cocobos.org/gioia

EAST RICHMOND HEIGHTS ◊ EL CERRITO ◊ EL SOBRANTE ◊ KENSINGTON ◊ MONTALVIN MANOR
NORTH RICHMOND ◊ PINOLE ◊ RICHMOND ◊ ROLLINGWOOD ◊ SAN PABLO ◊ TARA HILLS

Comment Log Display

Below is the comment you selected to display. Comment 2360 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Brennan
Email Address: garydaranger@hotmail.com
Affiliation:

Subject: CHC2021

Comment:

To CARB,

As president of the San Diego County Wildlife Federation, A coalition of sporting groups representing 20,000 San Diego County residents, I am urging you to back off on the proposed emission regulations regarding our states sportsfishing, whale watching and scuba diving fleet boats. By your own omission, the technologies do not exist which would bring the fleet within the guidelines you are proposing. This will be the demise of the fleet as we know it.

CARB's regulations will have the unintended consequence of denying millions of Californians access to the sea as commercial passenger boat owners go out of business. CARB's failure to consult with the CDFW to determine what impact declining fishing participation rates could have on conservation and fishery programs, both offshore and inland. Both fishing license sales and a federal excise tax on fishing tackle and boat fuel fund many of CA DFW's environmental programs with the Federal Government matching \$3 for every state dollar contributed.

2360.1

Boat owners will go out of business because they will not want to put millions of dollars into boat modifications which are only temporary until CARB lowers the emission standards to zero in 2025. CARB should lengthen the timeline for modifications of existing engines at least until the modifications actually exist.

2360.2

With fishing participation at an all time high, The new standards will crush the industry. If that is the desired outcome, then we still urge you to slow down the implementation of the regulations until the technology catches up.

2360.3

Respectfully,

Gary F. Brennan
President, San Diego County Wildlife Federation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 10:49:57

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Comment Log Display

Below is the comment you selected to display. Comment 2361 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: victor
Last Name: valencia
Email Address: mookmookmooks@yahoo.com
Affiliation: victor valencia

Subject: Save our boats

Comment:

Please don't change the commercial boating requirements. I've been going on these sport fishing boats for over 20 years with my father and friends. Waiting for my son to come of age so that I can take him out to experience the same joys. God bless.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 11:09:56

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Below is the comment you selected to display. Comment 2362 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Travis
Last Name: Morgan
Email Address: travis@gunsfishing.com
Affiliation:

Subject: CHC2021

Comment:

The passing of this bill would destroy a whole industry. The recreational industry in all ocean front city's would disappear. Some of these cities could not stand the lost of that income. The ocean and seas are for everyone to enjoy and should not be destroyed by using unproven technology.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 11:19:33

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Comment Log Display

Below is the comment you selected to display. Comment 2363 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Cerami
Email Address: bobcerami@gmail.com
Affiliation:

Subject: Sportfishing boats

Comment:

Dear people at CARB,

Please do not shut down sportfishing boats until a better solution can be found to address air pollution. Change is difficult and transition takes time. The hardships on many peoples lives that earn livings from sportfishing would be unfair. All the people who love to fish offshore would also be deprived as well. How to you target one industry while others are allowed to operate. Do you stop all boats from running? Do you stop all cars from starting? Do you stop all public transportation from operating? What about all the diesel trucks that deliver our goods and food? Do you stop the way we live. No!!! find a better solution than to shut down fishing boats. Not fair to these people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 11:27:56

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Comment Log Display

Below is the comment you selected to display. Comment 2364 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Craig
Last Name: Froley
Email Address: craig@cfroley.com
Affiliation:

Subject: New Proposed Sportfishing Boat Requirements

Comment:

Please reconsider your position relative to the proposed emission requirements for sport fishing and whale watching vessels. The proposed requirements are not feasible both from a cost perspective and limitations on the required equipment on existing vessels as there is not enough space on the majority of current vessels to install the equipment. The proposal would eliminate the majority of vessels that service thousands of patrons each year. There must be some more reasonable alternative proposal that could be implemented over time to allow all parties to achieve a reasonable result.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 11:46:59

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Comment Log Display

Below is the comment you selected to display. Comment 2365 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Luttjohann
Email Address: jimluttjohann@gmail.com
Affiliation: Catalina Island Resident

Subject: Proposed Amendments to the Commercial Harbor Craft Regulations

Comment:

Attached please find a letter regarding the proposed regulations which if approved will have a devastating effect on our island.

Attachment: www.arb.ca.gov/lists/com-attach/2671-chc2021-WzhUM1lhVWRWD1Ag.docx

Original File Name: CARB Personal Letter.docx

Date and Time Comment Was Submitted: 2021-11-05 12:38:53

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Jim Luttjohann
PO Box 244
Avalon, CA 90704

November 4, 2021
Members, California Air Resources Board
1001 I Street
Sacramento, CA 95814
VIA EMAIL: harborcraft@arb.ca.gov

RE: Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Members of the Board:

I am a resident of Santa Catalina Island. I have lived here for seven years. I work in the tourism industry and 'am dependent on safe, affordable and efficient travel to and from the mainland on a regular basis.

I am writing today because I am very concerned about the proposed rules requiring ferries to be powered by Tier 4 classified engines. Ferry service is critical for those of us who live here, and these rules could devastate our lives and our livelihoods.

Santa Catalina is very dependent on visitors and their local spending. I am concerned that the costs to meet the CARB rules will force ferry companies to significantly raise the price of tickets and/or diminish service frequency thus discouraging tourism visitation.

2365.1

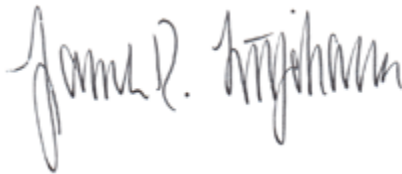
I understand the required new Tier 4 engines are very heavy and will require owners to reduce their passenger capacity to account for the increased bulk and weight. Some estimates suggest that more than half of capacity will be lost. This means we will lose half of our visitors and half of our tourism-related business income.

My neighbors and I travel by ferry to the mainland up to four times per month for trips most people take for granted, like medical appointments, jobs interviews, visits with friends and family, or shopping. In our household there is a heart transplant patient who regularly travels for mainland medical care via passenger ferry. We cannot afford to travel by helicopter or charter boat, and if ferry service is limited and more costly, I may not be able to travel to the mainland as I do now. My daily life will be significantly disrupted. I would likely have to leave my beloved island home, the best job of my life and relocate my family.

2365.2

I urge you to reject the new rules or to modify them so they do not have a negative impact on me, my fellow residents, and our community of Avalon and Santa Catalina.

Thank you,



Jim Luttjohann

505.629.7641

jimluttjohann@gmail.com



Comment Log Display

**Below is the comment you selected to display.
Comment 2366 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Gregory
Last Name: Garside
Email Address: ironfish433@yahoo.com
Affiliation:

Subject: Sport boats

Comment:

Please work together with sport boats. It's hard enough to go fishing and this put put the cost to high to stay in business or pay for the new higher fees they will have to charge.
Thanks for your consideration
Greg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 13:00:16

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Below is the comment you selected to display. Comment 2367 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jen
Last Name: Tuller
Email Address: jen@shogunsportfishing.com
Affiliation: Shogun Sportfishing

Subject: No to CARBs bill

Comment:

CARB's new policy is out of balance with social and economic priorities and is way out in left field when it comes to environmental priorities.

Please stop CARB's job destroying bill that seeks unnecessary draconian regulation of Sport Fishing boat CO2 emissions.

Per an angler on the Shogun

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 13:26:53

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**Below is the comment you selected to display.
Comment 2368 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Wesley
Last Name: Owen
Email Address: talismanheirloom@yahoo.com
Affiliation:

Subject: Ocean Access

Comment:

I am from New Mexico. Home to Millions of acres of National Forest.
The Gilla and Aldo Leopold wilderness are within our state.
We ensure access to these public lands for our costal States.
I believe it is the duty of our costal States to ensure our access to the recreation on our costal Oceans.
Preserve our access to recreational activities on the Ocean.

Thank You

Wesley Owen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 13:24:32

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Comment Log Display

Below is the comment you selected to display. Comment 2369 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Gabaldon
Email Address: Ryan_gabaldon@yahoo.com
Affiliation:

Subject: Proposed new rules for sportfishing and whale watching boats

Comment:

As a full time crew member for the last 7 years on a sportfishing boat, I strongly disagree with the new proposed engine mandates for our vessels. It would put the majority of boats out of business affecting thousands of people that it supports and millions of passengers that love to enjoy the water. Please listen to our voices so we can keep working and supporting our families.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 13:33:07

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Comment Log Display

Below is the comment you selected to display. Comment 2370 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jessica
Last Name: Karraker
Email Address: jesska0530@gmail.com
Affiliation:

Subject: CARB emission law proposal

Comment:

I am writing this letter on behalf of Happy Hooker Sportfishing & Pacific Dream Sportfishing. I have been welcomed into this fishing family for the last four years and have seen firsthand how devoted the Smith family is to the fishing industry. These guys proudly represent 3 generations of charter boat captains with the Happy Hooker being in their family for over 40 years. It really is their way of life as they have been raised on this boat. We hope to raise our children into this business as well so they can continue the family tradition of sportfishing captains. This industry has taught great work ethic, survival skills and how to be devoted to something you love. I also answer the business phones and handle reservations. I have witnessed not only our crew's devotion but our customers as well. We have multiple generations that have fished with us for years to provide food for their families and a wonderful bonding experience. It brings me joy to talk with customers that have been with us throughout the years and share their excitement when they bring out their children and friends to fish together.

We also believe in reducing emissions. The captains have spent many hours discussing options and applying for grants to reduce emissions. We will be repowering the engines on both boats within the next year to reduce emissions. Protecting the environment will give us the ability to continue providing families with a way to bring home fish home to their families as well as continuing with a business we are proud of.

The timing for this new engine proposal has come at a very difficult time for us. We lost part of our season in 2020 due to Covid-19 and are still running with reduced capacity on our boats. The engines that would be needed for this proposal would not allow our current vessels to be retrofitted. Under the new proposal out of 174 passenger vessels only 1 will be able to retrofit to meet the new engine requirements. This we mean we would need to purchase multimillion dollar boats before 2034 in order to stay in

operation. This will be very difficult to achieve, banks will not approve loans for new vessels if our current vessels are deemed non-compliant with little to no resale value. Imagine spending the last 50+ years building a company and investing in your dreams just to have that taken away without any consideration of how that affects everyone.

We provide charters to Boy Scouts, Veterans, and donate to nonprofit organizations. We believe fishing should be accessible and encouraged to the public. I have had clients tell me that the service we provide has given them direction in life and helped them find their passion. We hope to be able to continue to give them this opportunity. Some of our clients have even gone on to find jobs in the industry for themselves and their children. We have teenagers that have grown up fishing with us and volunteer to come out and learn the ways to help people on the deck catch more fish. Technology has such a grip on our youth it has been great to see their eyes light up at the opportunity to be out on the open water helping others and doing what they love.

Historically speaking the CARB board has regulated commercial boats to uphold the same standards to carb emissions as passenger vessels. The double standard of passenger vessels being regulated without holding commercial vessels to the same requirements is discouraging. If this is being done for environmental purposes how can almost identical vessels be held to a certain standard, without the other being held to the same standard. We believe that passenger boat should be put in the same category as commercial fishing boats so we can continue to transition to lower emission engines as it is economically feasible, and technology becomes available.

If we are not allowed to remain in operation with our current vessels it will devastate our family business. Our children may not be able to learn of the legacy my boyfriends grandfather created. Also, the many generations that have fished with us over the years will only be able to tell stories instead of sharing the experience with their family/friends. We really hope that CARB will consider a safer and more practical approach to dealing with carb emissions. We are fully in support of protecting our environment and hope to come to a compromise that will allow us to stay in business.

Thank you for listening
Jessica Karraker

Attachment: www.arb.ca.gov/lists/com-attach/2676-chc2021-WzhTNFEiAzlBWFAz.docx

Original File Name: CARB Coment jessica.docx

Date and Time Comment Was Submitted: 2021-11-05 13:57:08

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We also believe in reducing emissions. The captains have spent many hours discussing options and applying for grants to reduce emissions. We will be repowering the engines on both boats within the next year to reduce emissions. Protecting the environment will give us the ability to continue providing families with a way to bring home fish home to their families as well as continuing with a business we are proud of.

The timing for this new engine proposal has come at a very difficult time for us. We lost part of our season in 2020 due to Covid-19 and are still running with reduced capacity on our boats. The engines that would be needed for this proposal would not allow our current vessels to be retrofitted. Under the new proposal out of 174 passenger vessels only 1 will be able to retrofit to meet the new engine requirements. This we mean we would need to purchase multimillion dollar boats before 2034 in order to stay in operation. This will be very difficult to achieve, banks will not approve loans for new vessels if our current vessels are deemed non-compliant with little to no resale value. Imagine spending the last 50+ years building a company and investing in your dreams just to have that taken away without any consideration of how that affects everyone.

2370.1

2370.2

We provide charters to Boy Scouts, Veterans, and donate to nonprofit organizations. We believe fishing should be accessible and encouraged to the public. I have had clients tell me that the service we provide has given them direction in life and helped them find their passion. We hope to be able to continue to give them this opportunity. Some of our clients have even gone on to find jobs in the industry for themselves and their children. We have teenagers that have grown up fishing with us and volunteer to come out and learn the ways to help people on the deck catch more fish. Technology has such a grip on our youth it has been great to see their eyes light up at the opportunity to be out on the open water helping others and doing what they love.

2370.3

Historically speaking the CARB board has regulated commercial boats to uphold the same standards to carb emissions as passenger vessels. The double standard of passenger vessels being regulated without holding commercial vessels to the same requirements is discouraging. If this is being done for environmental purposes how can almost identical vessels be held to a certain standard, without the other being held to the same standard. We believe that passenger boat should be put in the same category as commercial fishing boats so we can continue to transition to lower emission engines as it is economically feasible, and technology becomes available.

2370.4

If we are not allowed to remain in operation with our current vessels it will devastate our family business. Our children may not be able to learn of the legacy my boyfriend's grandfather created. Also,

the many generations that have fished with us over the years will only be able to tell stories instead of sharing the experience with their family/friends. We really hope that CARB will consider a safer and more practical approach to dealing with carb emissions. We are fully in support of protecting our environment and hope to come to a compromise that will allow us to stay in business.

2370.5

Thank you for listening

Jessica Karraker



Comment Log Display

Below is the comment you selected to display. Comment 2371 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Hetu
Email Address: poptu@sbcglobal.net
Affiliation:

Subject: CARB Mandated Technology

Comment:

If my understanding of the CARB mandated technology is correct, the enforcement of the guidelines would appear to likely do extreme damage to the recreational sportfishing and whale watching industry, to those individuals that make a living within the industry, to the boat owners themselves, and greatly curtail if not completely destroy, the sportfishing and whale watching enjoyment thousands of Californians, and tourists alike currently enjoy. As a fisherman of many years, I have nothing but praise for the captains and crews of the many boats I have been out on, and have never been aboard any that were not kept in immaculate running order.

I don't disagree with the evaporative targets set forth by CARB, but the guidelines set out for the technology are beyond irrational in their prohibitive costs to the boat owners, along with an absolutely unreasonable timeline.

Please halt this mandate until further work is done on its fair and feasible application.

Thank you for your time and thought regarding this.

Stephen Hetu

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 14:35:12

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Below is the comment you selected to display. Comment 2372 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: janet
Last Name: longobucco
Email Address: jil@baymoon.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

Given the climate emergency that we are facing, we need bold climate leadership. Im asking you to strengthen the Commercial Harbor Craft rule:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule 2372.1
2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 2372.2
3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation 2372.3

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 15:02:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 2373 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Vittoria
Last Name: Mollison
Email Address: torimollison@yahoo.com
Affiliation:

Subject: coast

Comment:

help save access to our incredible coast and all its recourses

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 15:18:21

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Comment Log Display

Below is the comment you selected to display. Comment 2374 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: jo
Last Name: zarola
Email Address: joannezarola@gmail.com
Affiliation: Native SAN DIEGAN with SPORTFISHING TIES

Subject: Please do not destroy the Sport Fishing Industry

Comment:

I have lived in San Diego all my life I remember going down to meet the Tuna Fleet with our mom and step father who fought in World War 2 and came here from San Benedetto Italy. He worked the pole fishing in San Diego... my own father, camee here in 1926 and owned sport bait and tackle shops and went on many Sport fishing excursions and won many trophies fishing.. My ex husband was a Captain on the IndependencSportfishing boats, and worked very hard to give the passengers a great fishing experience. Fishing was destroyed once for the fishing industry when they ended the Tuna canneries.... to save the fish who later were being tortured in Japanese Waters.. the Sportfishing in San Diego is known World Wide an have employed thousands of hard working people who could support their famiilie. HOW can you even consider destroying the livelihoods of so many great people and take away what for some, is a yearly get away from their own professions.. Please reconsider this. Thank you .. My beloved father would be turning in his GRAVE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 15:14:12

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Comment Log Display

Below is the comment you selected to display. Comment 2375 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bill
Last Name: Waddle
Email Address: billfish411@aol.com
Affiliation:

Subject: Proposed changes

Comment:

I have been a Southern California resident for 49 years. I remember as a kid when we could not go to recess or play after lunch because of "smog alert" days. I remember going to the beach and fishing in the ocean as a kid, the water was way worse than it is now and the beaches were littered with trash. It is not like that any more thanks to environmental conditions improving and people caring more about our ecosystem. We have come a long way and still have room for improvement but the changes that are being attempted and crammed down the throat of the sport fishing community are absolutely draconian. Enough is enough, you cannot destroy an industry that provides jobs, food and recreation to millions of Californians. Look at the bigger picture not just through the lens of preservationism. The other big question is how is it that the commercial fishing is not being subjected to the same? I have worked in the commercial fishing industry and have owned a sport boat for the last twelve years, I definitely have a stake in this attempted change and so does my family. Rethink what you are trying to do to Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 15:24:50

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Comment Log Display

Below is the comment you selected to display. Comment 2376 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Woodard
Email Address: swoodard8@me.com
Affiliation:

Subject: Harsh restrictions for old vessels

Comment:

Get off your high houses. This is not a realistic solution by any means. Call for solutions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 15:20:06

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Comment Log Display

Below is the comment you selected to display. Comment 2377 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ronald
Last Name: Morton
Email Address: rondimorty@msn.com
Affiliation:

Subject: Sportfishing & Whale watching

Comment:

I have grown up fishing many sports fishing boats up and down the Ca.Coast since 1965. Also have gone on several long range trips out of San Diego. This proposal would be the wrong decision to approve.

Even though I moved to MN in 2004 every year I go back to visit family in CA I go on day trips and have gone on several long range trips out of San Diego . This decision would impact a huge amount of people who make a living in the fishing industry and other businesses who rely on business that occurs when people enjoy this wonderful family sport.

Please let's not approve this measure and keep the fishing industry as is.

Thank You
Ron Morton
Detroit Lakes ,MN

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 16:02:03

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Comment Log Display

Below is the comment you selected to display. Comment 2378 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Philippon
Email Address: Gunslinger.1955@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

The sport fishing industry is vital to family recreation and it has been hit hard by the pandemic and regulations for them already. It's absolutely ridiculous for them to be forced into bankruptcy thanks to stupid regulations that do not need to be implemented immediately.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 16:14:00

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Comment Log Display

Below is the comment you selected to display. Comment 2379 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Delany
Email Address: capt.c.delany@gmail.com
Affiliation:

Subject: CHC2021

Comment:

Dear members of the CARB Board,

I write today to urge you to not adopt the proposed amendments to the commercial harbor craft regulation.

The sportfishing and whale watching industry, composed of small businesses, will be irreparably harmed. 2379.1

This often overlooked industry is actually the catapult to true conservation and environmental efforts. If it wasn't for these boats, the vast majority of people would never be exposed to the beauty of the ocean and all it has to offer. These exposures drive true change because without them, out of sight, out of mind. It is difficult to pass conservation legislation when it will be cost prohibitive for the constituency to actually go out and see and experience what they are voting on and backing. 2379.2

Take for example the Marine Mammal Protection Act, this legislation continues to have a great deal of support nearly 50 years after it's passage. I don't think anyone could envision a future time without that legislation in place. The reason it is supported is because people are able to go out on whale watching boats and see first hand the whales dolphins and sea lions. They are better able to have a connection with these animals when they can see them first hand. All made possible by sportfishing and whale watching fleet.

The economic hardship these regulations will cause to the businesses will undoubtedly put many out of business. Forcing multigenerational mom and pop companies to close their doors, simply based on they didn't have \$1m+ in capital to buy a new boat or modify the ones they have. 2379.3

The overall impact these boats have on pollution pales in comparison to other industries, foreign and domestic. Look at our current situation in Long Beach, 100+ ships anchored, idling, generators running, 24 hours a day for up to two weeks at a time. Exhaust billowing. Meanwhile a sportfishing or whale watching boat gets underway and then turns their motors off when the day is over. 2379.4

With the above being said, my opinion is that this regulation misses the mark of its intent in all aspects. As they say, the road to hell is paved with good intentions and with that, we are currently stopped at a red light, lets hope it doesn't turn green for the sake of the mom and pop business, future generations of children and conservation efforts that can only be passed with peoples support via exposure to the sea and connections made to its creatures.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 16:47:16

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Comment Log Display

Below is the comment you selected to display. Comment 2380 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Eugene
Last Name: Donovan
Email Address: hawkeye4141@aol.com
Affiliation:

Subject: Gas Engine Ban

Comment:

'I am all for better air quality however this ban would hurt the Fishing industry beyond recovery. Now is not the time to add further restrictions to an already hurting industry. As you are aware, the fishing industry has faced too many economic challenges and many are struggling to recover from the challenges that have faced us in recent years.

This would cause many to sell their boats to out of state buyers and would put many out of business. I am urging that no further regulations or laws be enacted that would hurt the industry and affect a multi million dollar industry. It would be catastrophic for many.

Gene Donovan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 16:39:38

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**Below is the comment you selected to display.
Comment 2381 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Kurt
Last Name: Nelson
Email Address: knlopie@gmail.com
Affiliation: Disney

Subject: PLEASE SAVE OUR FISHING BOATS

Comment:

I've been fishing off shore for most of my life. I jus do not see how the emissions from so few vessels could affect sate wide air pollution. The loss of this industry and the devastation to the family's of employs does not seem like a worth wiles trade off

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 17:02:36

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Below is the comment you selected to display. Comment 2382 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregory
Last Name: Campos
Email Address: Gregcampos357@gmail.com
Affiliation:

Subject: California Offshore boat regulations

Comment:

I am writing in regards of the fishing industry as it pertains to small businesses. As people know the ones that hunt and fish and purchase licenses is to preserve the land for all people and the continuation of animal life as in all preservation. I reside in Las Vegas NV and as Californians travel to enjoy our city we travel to enjoy your state. I am writing this in hopes the offshore fishing industry continues for those of the ordinary citizens. We don't use big trawlers and wipe the ocean of life it is a luxury for us to gather with friends and family to enjoy and if lucky put some food in the freezer. I have no stake in the game I am writing this cause of the concern that the one thing my 22 year old son and I enjoy and bond over could possibly disappear. Im also a member of the IBEW and we get together as brother and sister and charter boats for a reunion amongst friends. Maybe the industry won't disappear but I'm also worried that there will be a day that I cannot afford to continue the bond with my friends and family. Please take I to consideration those who are just trying to enjoy something we love in life. Tha k you and have a good day

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 17:49:00

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Comment Log Display

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Comment 2383 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jorge
Last Name: Paz
Email Address: Jorgepaz209@gmail.com
Affiliation:

Subject: Petition for passanger sport fishing
Comment:
Keep sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 18:41:58

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Below is the comment you selected to display. Comment 2384 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hiram
Last Name: Walker
Email Address: hiramfish@sbcglobal.net
Affiliation:

Subject: Sport fishing whale watching boats

Comment:

Don't take away sport fishing and whale watching boats go after the BIG ships that pollute the worlds air and oceans those ships engines are the true polluters

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 19:20:14

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Below is the comment you selected to display. Comment 2385 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Travers
Email Address: dr3dee@yahoo.com
Affiliation:

Subject: New regulations

Comment:

I am a handicapped person. I cannot hike, nor hunt. Sportfishing now for 40 years. Please let our fleets survive. I cannot afford 500 bucks for a day boat. Remember, cargo ships are the number one enemy to our oceans. One cargo ship is equal to 45 local fisherman and charters daily. You will also loose licensing money to enforce poaching. There is no plan for that issue moving forward. Shore fishing is 20% of the saltwater market, and so is fresh water. Loose 60% of the revenue, and no enforcement money. Grow up you lawmakers.

2385.1

2385.2

2385.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 20:30:04

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Comment Log Display

Below is the comment you selected to display. Comment 2386 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Franco
Email Address: john.p.franco@cummins.com
Affiliation:

Subject: Current technology will not achieve emissions standards.

Comment:

I'm a 20 year employee for Cummins Sales and Service North America. I have worked on several projects and prototype engine systems designed to reduce emissions. Cummins emission reduction technology has revolutionized the diesel engine industry. For a time the only diesel engine approved for sale in the state of California was a Cummins engine. Cummins has made a huge capital investment in clean diesel technology and we continue to develop this technology today. Cummins development of the high pressure common rail fuel system revolutionized the diesel engine. Not only did it reduce emissions. It increased fuel efficiency. This technology did not come without a price. Hundreds of millions of dollars have be spent perfecting this technology. This has not detoured Cummins from continued development of ways to reduce emissions.

The point with all this Cummins has made a commitment to develop not only on highway but marine propulsion systems that will benefit our environment and enrich the lives of mankind. We have just begun development on a hybrid marine propulsion system which will help address CARB's concerns. Please withhold the application of the proposed standards until the needed technology is perfected and developed for the marine application. Unlike on highway a marine vessels donot lend to themselves to easily adapt the current technology. Dry stacks is the only way to apply a dpf and urea injection exhaust systems. Wet exhaust will creat too much back pressure for a dpf to be adapted to a wet stacked marine engine. Unfortunately to adapt the current technology would require extensive engineering and because of this it would not be economically viable to adapt this technology to most vessels. Here at Cummins we again have made a huge capital investment to address the needs of the marine industry with regards to reducing emissions. We intend to be the first that has a viable marine exhaust after treatment system that can be adapted to current marine applications. Again I ask on behalf of all the principles that will be affected to withhold the implementation of your

standards until current technology has been perfected for the marine industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 21:16:00

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First Name: Aaron
Last Name: Titelman
Email Address: mrtroutdog@yahoo.com
Affiliation: team 57 fishing group

Subject: Please help our sportfishing in Southern California

Comment:

I have bene fishing on sport boats for close to 40 years, the memories that it has provided will always be dear to me. Please make a concession for sport boats and the new proposed regulations, it is expensive enough and with these restrictions it will certainly put many operations out of business and those that stick around will be inflating prices beyond what most could afford.

I thank you for your time and consideration.
Stay fishy all,
Aaron Titelman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 22:51:18

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Comment 2388 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Billina
Last Name: Webb
Email Address: Webbillina3@gmail.com
Affiliation:

Subject: Anglers

Comment:

This is a way of life these people take care of there family
working on the water

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-05 22:53:18

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Below is the comment you selected to display. Comment 2389 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Josh
Last Name: Kraner
Email Address: gamepro1000@gmail.com
Affiliation:

Subject: Save California Sportfishing

Comment:

If this proposed law is signed it would hurt not only many people who love to go fishing but it would also hurt many of the local businesses. Businesses like harbors, boats, tackle stores, bait shops ect. It would not only hurt the business owners but many people would lose their jobs. Please dont pass this law because it would force many people including many young fisherman from not being able to go out fishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 01:55:38

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Below is the comment you selected to display. Comment 2390 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Danny
Last Name: Craig
Email Address: danny.craig10@gmail.com
Affiliation:

Subject: Save the Sportboats

Comment:

Please don't allow the CARB mandate.
It makes no sense to apply regulations that are technologably unattainable for these small buisnesses.
Work with the boats over a longer period of time to achieve the ultimate goal of becoming cleaner.
These small fishing fleets being targeted surely are not the problem in the bigger picture.

As fisherman and stewards of the sea we all want the resource to be sustainable and clean. We all need to work together to achieve that goal by making these goals reasonable and attainable.

Respectfully
Danny Craig

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 03:47:24

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Comment Log Display

Below is the comment you selected to display. Comment 2391 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anonymous
Last Name: Fisherman
Email Address: foo@bar.com
Affiliation: California citizen and avid fisherman

Subject: California citizen and avid fisherman

Comment:

Please clean up the dirty boats.

I take charters out of Ventura, Los Angeles, and Orange counties several times a year and the boats are always spewing tons of noxious exhaust.

Why should large charters be able to make money from polluting the environment while other industries like gardening and trucking are doing their part?

-Anonymous

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 05:03:58

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Comment Log Display

Below is the comment you selected to display. Comment 2392 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: matthew
Last Name: rock
Email Address: roc444@aol.com
Affiliation: Sport fisherman

Subject: Commercial Harbor Craft Regulation

Comment:

I'm a third generation fisherman please don't rone it for me or my grandkids.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 05:35:47

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Comment Log Display

**Below is the comment you selected to display.
Comment 2393 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Keith
Last Name: Wallace
Email Address: Kwallruss@gmail.com
Affiliation:

Subject: CARB sport fishing boats
Comment:
I oppose the ban on sport fishing boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 06:32:25

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Below is the comment you selected to display. Comment 2394 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Cruz
Email Address: Stevetheverminator@hotmail.com
Affiliation:

Subject: Save sport fishing

Comment:

We need to save Sportfishing. It is great family and friends sport. I have been fishing since I was eight years old with my family. It has also showed me the beauty of our state . And over the year the conservation of our oceans and the sea life. Sportfishing is a big part of California.Do not let it disappear.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 07:03:31

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Comment Log Display

Below is the comment you selected to display. Comment 2395 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Walter
Last Name: Herrera
Email Address: w.herrera75@yahoo.com
Affiliation:

Subject: Arb stop

Comment:

I love to go fishing to the ocean with my boys if this goes away my boys and myself will be sad please save the boat and stop what your trying to charter boat. Sincerely your Walter Herrera

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:01:34

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Comment Log Display

Below is the comment you selected to display. Comment 2396 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Jones
Email Address: Johnjones3784@gmail.com
Affiliation:

Subject: San Diego whale watching and Fishing Industry Fleet

Comment:

Please do not impose engine retrofitting of these boats. It is not financially feasible and would cause these important businesses to close. Thank you, John Jones

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:04:44

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Comment Log Display

Below is the comment you selected to display. Comment 2397 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nick
Last Name: Modesti
Email Address: Nmode@hotmail.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

To whom it may concern:

I'm writing to express my opposition to the emissions standards you will be voting on soon that would result in pleasure boats, sport fishing boats and other water craft to be scrapped due to stricter emissions standards.

Some of my fondest memories as a child were the days my father and I spent fishing. Now I have my own family and fear that if you pass these emissions regulations on boats that I will not be able to create the same memories for my family. It's not just mine, there are many other families that take to our local waters up and down our coast where they bond over fishing, fun and enjoying our local coastal treasure...Our ocean!

2397.1

Further, passing these emissions standards will limit boating only to those who can afford to scrap their boat and purchase a new one. This will eliminate most charter fishing boats, whale watching boats and probably harbor tours too! It will have a huge impact on tourism at our harbors. Some of the big draws to people getting out to the local harbors are fishing, whale watching, harbor tours, diving boats and other activities that involve boating.

2397.2

I'm asking all who will vote on the proposed emissions standards to PLEASE VOTE AGAINST THEM. Please consider the impact on our families, our businesses, marine and tourism industries.
Thank you for your consideration.
Sincerely,
Nick Modesti

Attachment:

Original File Name:

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Comment Log Display

Below is the comment you selected to display. Comment 2398 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nile
Last Name: Schmidt
Email Address: nileschmidt@yahoo.com
Affiliation:

Subject: Sport Fishing

Comment:

The negative results far out way the positive that you are trying to achieve. There needs to be an intelligent process that will not harm the boating industry and with it less access to sportfishing. My daughter needs that access. I have to pry the phone from her hands every day. Need an alternative area that I can steer her to. Thanx, Nile Schmidt

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:12:35

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Comment Log Display

Below is the comment you selected to display. Comment 2399 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Pemberton
Email Address: billystripes@yahoo.com
Affiliation:

Subject: Sport fishing

Comment:

As a boat owner and sport angler, a ban on sport fishing will be detrimental to the industry and to the families who have make their living(some for decades). Stop the nonsense policy making..

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:21:02

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**Below is the comment you selected to display.
Comment 2400 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Gregory
Last Name: Shmayevich
Email Address: gremash@aol.com
Affiliation:

Subject: Carb
Comment:
Save fishing industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:43:08

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Below is the comment you selected to display. Comment 2401 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Roy
Last Name: Levin
Email Address: royslev@verizon.net
Affiliation: Independent

Subject: More Tyrannical Sabotage

Comment:

Listen you morons, you've already screwed up the economy enough. The people are starting to wake up to your B.S. Get off the sportfishing industry's back.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:55:50

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**Below is the comment you selected to display.
Comment 2402 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Anthony
Last Name: Castro
Email Address: elhoser@yahoo.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Please vote NO on this issue. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:56:43

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Comment Log Display

Below is the comment you selected to display. Comment 2403 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Glenn
Last Name: Sutherland
Email Address: glenn_sutherland@hotmail.com
Affiliation: Sunbridge Leasing Corporation

Subject: Don't Stop Sportfishing

Comment:

Please don't stop Sportfishing in California. These are licensed fishing boats that are doing nothing illegal. This is the way they support their families! Why don't you get together with the international community and go after these illegal Chinese fishing vessels and boats from other countries that are breaking the law?

Glenn Sutherland

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:11:46

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Below is the comment you selected to display.
Comment 2404 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tyler
Last Name: Peulicke
Email Address: Tpeulicke1@gmail.com
Affiliation:

Subject: Please say no

Comment:

The world is crazy right now with COVID and with this going on doesn't help. Since COVID I have not done anything but deep sea fish with family and friends I em a air conditioning and heating manager and I deal with 30 employees and it creates a tremendous amount of stress especially during summer and not being with my 3 children and wife As much but when my family knows we are going deep sea fishing out of channel island sports fishing ,h&m landing,Ventura sports fishing ,Etc the family is so excited and they wait for the moment to go deep sea fishing to have time we're there's no phones Just pieace and quiet and fish With no worries what is going on Land and spend time with family .My two twin daughters 7 years old and My son 9 years old and at that age me and my wife want them to experience what we experienced when we were young .With COVID that has already effected my kids learning and the way of life and with this it makes it worse and honestly I could not see not being able to go on a charter to Deep sea fish with family as I did when I was younger that's how u learn and do what u love .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 09:54:38

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Comment Log Display

Below is the comment you selected to display. Comment 2405 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Hewett
Email Address: rchewett1@aol.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

Dear Sirs,

I am highly opposed to the restrictive and financially prohibitive measures proposed by the above-referenced regulations, especially regarding the sportfishing boats. It is incomprehensible that an entire industry could be shut down due to a well-intentioned but utterly misguided set of rules. That these regulations are unrealistic and prohibitively expensive is evidenced by your own testimony at a recent hearing; to wit: "We, through this process, discussed the findings of the feasibility report from the California Maritime Academy and for some sectors are estimating that for vessels operating above the low use threshold that vessel replacement will be likely, especially the categories with wood or fiberglass vessels that can't be as easily reconfigured." - Please let common sense and reason prevail: do not pass these new regulations. They are a gross overstepping of "reasonableness" at best and draconian at worst.

Thank you for your attention to this matter.

-Rick Hewett, Willits, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:30:19

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Comment Log Display

Below is the comment you selected to display. Comment 2406 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Dixon
Email Address: dixon.tw@verizon.net
Affiliation:

Subject: Sportfishing Boats

Comment:

To whom it may concern:

I respectfully request you vote AGAINST CHC2021. Sportfishing has been an American Past-Time for Centuries.

The Commercial Fishing Industry, especially from Foreign Countries, are the ones that are responsible for depleting the species.

Stop Foreign Countries from fishing in our waters, and control the tonage the American Fleet and Sportfishing industry are able to harvest yearly.

T.W. Dixon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:37:30

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Comment Log Display

Below is the comment you selected to display. Comment 2407 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Henry
Last Name: Brown
Email Address: hbfish52@gmail.com
Affiliation:

Subject: Commercial Harbor Craft REgulations

Comment:

Whale Watching and Commercial Fishing Charter Boats are a way for the general public to get out and witness the incredible wildlife in our Costal California waters. The changes as purposed would eliminate the oppportunity for many future kids and their parents, especially from low income families to get out and witness the beauty and learn the importance conservation should they take a fish home for dinner. I have been fortunate to have lived in California my entire life. I have taken Boy Scouts and their families on Whale Watching Charters and have introduced many to fishing and the responsibilities of conservation. The rules as purposed would all but eliminate charter boats from California waters and drive up the price of any which would remain beyond the abilities of financially disadvantage families. Please consider this in your decisions going forward.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:37:46

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Below is the comment you selected to display. Comment 2408 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Williams
Email Address: Dllcwilliams@msn.com
Affiliation:

Subject: Harbor Craft Regulation

Comment:

Please do not impose these restrictions on the sport fishing and whale watching vessels. These are family owned operations and the cost of these new modifications will crush the industry and destroy the livelihoods of many hardworking citizens and their families. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:49:07

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Below is the comment you selected to display. Comment 2409 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: De Young
Email Address: Jeffdeyoung@hotmail.com
Affiliation:

Subject: Charter fishing boat regulations

Comment:

Please rethink charter fishing and whale watching boat regulations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:04:12

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Comment Log Display

Below is the comment you selected to display. Comment 2410 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: doug
Last Name: dean
Email Address: dougkdean@hotmail.com
Affiliation:

Subject: regulation overreach

Comment:

to: The clerk of the board: Sir; This is in response to the existing political atmosphere in California, which can apparently do only one thing well- to whit, interfere with the pursuit of happiness and at the same time, making a living of the tax paying citizens this state depends on to support this incredible balloon of incompetence hovering over us. Your proposed rules and regulations concerning charter boats and their ability to eke out a living are nothing short of dasterdly, a term I had never thought would apply in this day and age. However, we witness that day and age have no restraint on bureaucrats doing their best to skim every dollar possible from an economy that is perilously close to collapsing. I have witnessed your desire to destroy the independent trucking industry in favor of the large transportation combines, and the death of the supply line we are all experiencing is the result. tens of thousands of truckers have left the industry, which was your intended result, however, as we see at all the ports, the unintended consequence of your myopic actions have spelled disaster for an entire nation. Since Politician's specialize in never learning from their mistakes, you are blindly charging on, trying to destroy the fishing and boating industries. as a mental exercise, what do you suppose the consequences of that action would be? Frankly, I prefer not to find out. Drop these ridiculous proposals and crawl back under your rocks!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 10:36:24

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Comment Log Display

Below is the comment you selected to display. Comment 2411 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Doug
Last Name: Bradley
Email Address: dougbradleycabinets@verizon.net
Affiliation:

Subject: sport fishing and whale watching boats

Comment:

I don't think it's a good idea to put these people out of business. I'm sure you will follow with getting rid of private boats and gas lawn mowers. No one can afford to lose this stuff.

Thanks,
Doug Bradley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:11:06

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Below is the comment you selected to display. Comment 2412 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gus
Last Name: Chabre
Email Address: guschabre@gmail.com
Affiliation:

Subject: Don't Make Whale Watching An Activity Only The Rich Can Afford

Comment:

Whale watching is an activity that I can afford and enjoy doing with my grandchildren on a Sunday afternoon in Newport Beach. If you make it so expensive to operate the whale watching boat my requiring regulations that drive the whale watching boats from the ocean, you will have made the ocean and whale watching an activity only the rich can afford.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:10:45

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Comment Log Display

Below is the comment you selected to display. Comment 2413 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rex
Last Name: Long
Email Address: rexlong@aol.com
Affiliation:

Subject: Raising the price of fishing is going to ruin fishing for my grandkids.

Comment:

To whom it may concern.

I am 78 years old and I have been fishing for approximately 72 years I take my sons and my grandkids fishing and if you close all these areas I will not be able to afford to go on a private boat anymore. With everything in the world that's going on now kids and grandkids need to have a wholesome hobby such as fishing please don't deprive them of that. Raising the cost significantly is going to run Fishing thank you. Rex Long.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:16:05

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Comment Log Display

Below is the comment you selected to display. Comment 2414 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: kylee
Last Name: simone
Email Address: simone4reloans@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulations - chc2021

Comment:

Placing dangerous engines into a sport-fishing boat is just ridiculous thinking.

The government is going to push boats to be docked out of nearby ports in Baja California, Mexico.

If the California government approves this bill - we'll just Build Back Baja and cause more job losses in what was an awesome state.

Just plain backward thinking.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:22:45

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Below is the comment you selected to display. Comment 2415 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Southgate
Email Address: paulsouth@cox.net
Affiliation: Southern Cal, Tuna Club

Subject: Comm Harbor Craft Reg.

Comment:

Please defeat this ridiculous proposal. This will put thousands of workers out work and will not effect the atmosphere that much.
Thank you, Paul S.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:28:39

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Below is the comment you selected to display. Comment 2416 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christian
Last Name: Da Costa
Email Address: Cbigdogs@msn.com
Affiliation: None

Subject: Vote No!

Comment:

Good day,

My name is Christian J Da Costa. I am writing because of the whale watching and sportfishing industry, which has positively influenced my family's and my education and enhanced our desire to learn more about marine life and enjoying making memories on the water via various sea going vessels owned by many small business operators. I urge you to VOTE NO on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. Allowing these small businesses to continue their operations, safe practices and methods by which they are able to provide for their families and a community which has been and should be able to continue to enjoy. Thank you for voting no and keeping them on the water.

Regards,

Christian J. Da Costa
14445 San Remo Drive
EASTVALE, CA 92880

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 11:39:21

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Comment Log Display

Below is the comment you selected to display. Comment 2417 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Phillip
Last Name: Capriccio
Email Address: p.capriccio@garveywholesale.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

This proposal cannot pass. It will kill all harbor and fishing industries. As a boat owner i understand the problems of these industries and the amount of expenses they are up against.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 12:01:22

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Comment Log Display

Below is the comment you selected to display. Comment 2418 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Pate
Email Address: ROBERTPATEBORNTOFISH@GMAIL.COM
Affiliation:

Subject: PROPOSED AMENDMENTS TO THE COMMERCIAL HARBOR CCRAFT REGULATION

Comment:

Pease consider what this will do to us as fishermen.As we struggle to maintaine what we love as it is. Thank You!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 12:08:36

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Comment Log Display

Below is the comment you selected to display. Comment 2419 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: vincent
Last Name: finnegan
Email Address: vjfinnegan@yahoo.com
Affiliation:

Subject: Sports Fishing

Comment:

Hello

I am 79. Please do not eliminate sport fishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 12:23:01

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Comment Log Display

**Below is the comment you selected to display.
Comment 2420 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Kichi
Last Name: Iwamoto
Email Address: kiwamotok@yahoo.com
Affiliation: CCA

Subject: Restrictive tourist boats potential law

Comment:

Please do not pass the very restrictive measure that will put whale watching and other turist boats out of business.Thank you,

Kichi Iwamoto

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 12:24:14

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Comment Log Display

Below is the comment you selected to display. Comment 2421 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: MICHAEL
Last Name: VINT
Email Address: M.VINT@COX.NET
Affiliation:

Subject: save san diego fishing fleets

Comment:

putting the fleets out of business will not save our planet!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 12:26:33

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Comment Log Display

Below is the comment you selected to display. Comment 2422 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gene
Last Name: Campbell
Email Address: Baja.gene@verizon.net
Affiliation:

Subject: Carb C.H.C.R. over reach

Comment:

This damaging over reach will over regulate the sport fishing industry and create unsafe and dangerous regulations witch will due extreme harm to the sporfishing and boating industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 13:23:17

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Comment Log Display

Below is the comment you selected to display. Comment 2423 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Mceachern
Email Address: pablo82650@hotmail.com
Affiliation:

Subject: Repower/ replace boat motors

Comment:

This is exactly what we do not need! A law/rule that will severely effect our state economy and put many people out of work. Along with taking access to the ocean away from people who love and want to enjoy it! Please do not let this unthoughtout law pass!!!,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 13:31:07

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Comment Log Display

Below is the comment you selected to display. Comment 2424 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Ryan
Email Address: thomryan01@hotmail.com
Affiliation: Socal Tuna Club

Subject: Don't eliminate Sportfishing and Whale Watching in California

Comment:

To whom it may concern:

It has been brought to my attention that there is a bill that would eliminate the use of commercial boats for sport fishing and whale watching in California. There is no logical reason to take this step and eliminate the livelihood of so many people that run these commercial operations. In addition, the loss of revenues would be a huge impact to the coast communities that provide these services.

Is California going to find another way to chase businesses out of the state or put small businesses out of business. This bill is draconian and ridiculous. Please do not let this bill pass.

Regards,
Thomas Ryan
Member - Southern California Tuna Club and Foundation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 14:18:13

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Comment Log Display

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Comment 2425 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Thomas
Last Name: schlauch
Email Address: t.schlauch@yahoo.com
Affiliation: Trisport consulting

Subject: Tier 4 marine engines

Comment:

80% of the CA sportfishing fleet could be put out of business with the CARB mandate for the new engines. Pretty much all the wood and fiberglass boat would not be able to comply with dry stacking those boats without major construction and CG inspections. Tom

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 14:44:07

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Below is the comment you selected to display. Comment 2426 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: don
Last Name: rodgers
Email Address: rodgers2983@msn.com
Affiliation: self

Subject: regulations on sportfishing and whale watching boats

Comment:

The new legislation would cripple an industry that is made up of small business, and would greatly disadvantage the public by removing these resources from use. Strongly urge a reconsideration of new diesel engine requirements. Your job isn't to put small businesses out of business and harm the public's access to the ocean.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 14:57:20

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Below is the comment you selected to display. Comment 2427 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harold
Last Name: Brower
Email Address: Harrybfl@hotmail.com
Affiliation:

Subject: Fishing bill

Comment:

Fishing is the best family recreational thing any family can do keeps everyone together it's a wholesome fun keeps our kids out of trouble teaches them so many life lessons about family conservatorship and also about the animals of the planet do not pass any bills killing the fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 15:11:59

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Below is the comment you selected to display. Comment 2428 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: john
Last Name: crouch
Email Address: crouchjohn2006@yahoo.com
Affiliation:

Subject: Sportfishing regulations

Comment:

Please do not inflict the Sportfishing and whale watching boat owners with irrational regulations that will put them out of business. My family has patronized these services for generations and plan to continue using them. I'm sure there are less stringent regulations that can be accomplished without ruining this great California system.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 15:22:39

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Below is the comment you selected to display. Comment 2429 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Greg
Last Name: Bohnet
Email Address: captngrander@yahoo.com
Affiliation:

Subject: Boats

Comment:

Just another government agency not knowing what they are doing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 15:47:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2430 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Brad
Last Name: Meister
Email Address: freshcatchmeister@gmail.com
Affiliation:

Subject: Fishing boats
Comment:
Leave the charter boats alone....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 15:51:06

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Comment Log Display

Below is the comment you selected to display. Comment 2431 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Smith
Email Address: donsmith@leelalb.com
Affiliation:

Subject: Pending CARB regs regarding pleasure and sport fishing boats

Comment:

I do not support pending CARB regulation for pleasure and sport fishing's boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 16:23:15

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**Below is the comment you selected to display.
Comment 2432 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mike
Last Name: Connolly
Email Address: mikeconnolly@yahoo.com
Affiliation:

Subject: Fishing and whale watching.
Comment:
Let us enjoy life again.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:00:22

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Below is the comment you selected to display. Comment 2433 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ken
Last Name: Sakuda
Email Address: Honker477@gmail.com
Affiliation:

Subject: Please protect our sportfishing fleet

Comment:

Please do not vote to put further restrictions on our sport fishing families. We do not have the technology that makes sense economically. You should be measured in your quest for zero emissions!!!

Sincerely,

Ken Sakuda

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:34:22

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Below is the comment you selected to display. Comment 2434 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Switzer
Email Address: SWITZERUSA@GMAIL.COM
Affiliation:

Subject: Please don't kill whale watching and sport fishing in California!!

Comment:

To the attention of the California Air Resources Board
The new CARB emissions requirements for sportfishing
boats are unfairly targeting two distinct classes: people
who want to fish or whale watch but do not own boats and small
family owned sportfishing boats.

A large segment of the population does not own boats and
relies on friends with boats, fishing boats and fishing piers
to get out on the water to fish. 2434.1

Access to sportfishing, diving, whale watching and surfing
the ocean points is a luxury for those boaters that own
boats, whether they are moored, docked or parked in their
drive way.

This very expensive CARB demand targets one of the
smaller vessel groups: family owned sportfishing boats.
The compliance shouldered solely by the sportfishing
industry and coupled with an unreasonable timeline for
compliance with no available parts to remedy the demand.
The technology does not currently exist to accomplish the
new required directives. 2434.2

The majority of sportfishing boats are older, retrofitting
them is not an option, even if the parts were available.
Their power plants run at much lower rpm's than what
would be necessary for air scrubbers to work without
loading up and damaging the engine.

The time table for compliance is unreasonable,
burdensome and prejudicial.

The sportfishing industry somehow survived the pandemic
and complied with health guidelines for very long and
gradual return to "normal" operations. Coupled with no
business for a year, depleting reserves and no
commitment by CARB to fund grant programs how does
CARB justify issuing new, sudden and drastic compliance
laws. Where is the sensible middle ground? 2434.3

One solution would be to grandfather in the sport boats that are operating now and require new sport boat construction to incorporate the new technology and comply with the new air quality emission standards.

2434.4

What is the end game here? Is this an eminent domain staging for a land grab?

Where is the California Coastal Commission's protection and defense of access to the ocean for non-boat owners?

Where is the respect, consideration and accommodation for the sportfishing industry that built and sustained the waterfront as much as the boatyards, the ship chandleries, the yacht clubs, the launch ramps?

Please take a step back and help the sportfishing industry. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:40:41

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Comment Log Display

Below is the comment you selected to display. Comment 2435 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mary
Last Name: Moir
Email Address: Twiggermary123@gmail.com
Affiliation:

Subject: CHC 2021

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. Thank you, mary l. Moir was

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:50:32

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Below is the comment you selected to display. Comment 2436 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jesse
Last Name: Halbig
Email Address: jessejhalbig@gmail.com
Affiliation:

Subject: We all want the same thing

Comment:

Please hear the voice of the people. Sport fishing in San Diego has a very deep history. One that I myself am proud of being part of as well as having my own children make their own mark as well. I work with the air quality resources control board and am on board with the idea and goals they are trying to achieve. However there are other options. We are currently making extraordinary advances daily for the better of all our futures. But we are rushing too fast. The technology isn't economically feasible at this time. Please consider these facts and perhaps give these small businesses the time they need to accommodate such a heavy burden. We all want the same thing but we need to work together to accomplish these goals. Thank you - Jesse Halbig

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:46:11

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Comment Log Display

Below is the comment you selected to display. Comment 2437 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alex
Last Name: Briffett
Email Address: alex.briffett@yahoo.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

The proposed regulations will have a negative trickle down effect on the sport fishing industry and businesses that support it. The	2437.1
proposed passenger boat regulations that require new engines and technology that is not feasible from a safety, financial or operational standpoint.	2437.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 17:57:32

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Comment Log Display

Below is the comment you selected to display. Comment 2438 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Whitcraft
Email Address: mwhitcraft@tfp.org
Affiliation:

Subject: Save California Fishing

Comment:

Please do not shut down California sport fishing. This is a wholesome activity that provides over 40,000 jobs to our crippled economy. The industry will not survive these measures which will do nothing to improve air quality in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 18:37:08

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Comment Log Display

Below is the comment you selected to display. Comment 2439 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rodney
Last Name: Yee
Email Address: Rodney410@gmail.com
Affiliation:

Subject: Ending deep sea charters

Comment:

The new requirement for off shore charter boats will greatly reduce the charter fleet to operate. This would cause deep sea fishing only available to the wealthy due to that they could afford the expensive cost. Plz be realistic as what is affordable and practical. These boat are aren't going out every day . Don't exclude the average joe from enjoying the outdoors.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 18:33:59

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Comment Log Display

Below is the comment you selected to display. Comment 2440 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Al
Last Name: Smetona
Email Address: alsmetona@gmail.com
Affiliation:

Subject: Proposed Amendments to Commercial Harbor Craft Regulation

Comment:

The amendments of requiring Tier 4 engines for all sportfishing boats is too much for the industry to financially endure. You will destroy an industry that barely withstood the pandemic shutdown. Please reconsider these amendments...they are simply unrealistic.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 18:42:13

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Comment Log Display

**Below is the comment you selected to display.
Comment 2441 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Robert
Last Name: DuBois
Email Address: dubois04@comcast.net
Affiliation: SPORT FISHERMEN

Subject: PROPOSED AMENDMENTS TO THE COMMERCIAL HARBIR CRAF

Comment:

THESE AMENDMENTS NOT ONLY HURT THE SPORT FISHING FLEET, BUT TAKE THE ONLY WAY SPORT FISHERMAN HAVE OF FISHING OFF THE CALIFORNIA COAST. THIS ALSO TAKES TAX REVENUE AWAY FROM CALIFORNIA WHICH IS REALLY NEEDED.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 18:50:19

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Comment Log Display

Below is the comment you selected to display. Comment 2442 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ted
Last Name: Schramm
Email Address: schrammtheodore@gmail.com
Affiliation:

Subject: Protect the pasenger sportfishing industry

Comment:

Please maintain the diesel powered sportfishing industry for us private citizens. It has been a big part in raising my two sons. it is a great father son experience.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 18:57:10

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Comment Log Display

Below is the comment you selected to display. Comment 2443 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lee
Last Name: carlson
Email Address: lcboom@verizon.net
Affiliation:

Subject: Sport fishing

Comment:

CARB, please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 19:07:57

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Comment Log Display

Below is the comment you selected to display. Comment 2444 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Taniguchi
Email Address: staniguchi@roadrunner.com
Affiliation:

Subject: Stop the proposed regulations!

Comment:

Your proposed amendments to Harbor Craft regulations threatens the livelihood of thousands of captains, crew, and their families! As well as potentially endangering passengers riding their vessels, if untested new regulatory requirements are imposed.

I strongly OPPOSE your regulations and hope that you RECONSIDER the consequences of your proposed action!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 19:05:09

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Comment Log Display

**Below is the comment you selected to display.
Comment 2445 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Bailey
Email Address: patrickandshari@gmail.com
Affiliation:

Subject: Sportfishing
Comment:
Please save sportfishing in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 19:55:22

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Comment Log Display

Below is the comment you selected to display. Comment 2446 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Ash
Email Address: 530billy@gmail.com
Affiliation:

Subject: Proposals

Comment:

I am a USCG credentialed charter boat Captain and commercial crabber. I am VERY opposed to the new proposed restrictions and removal of any vessels that aren't CARB compliant. The proposed laws are ahead of their time. The economic impact on ports up and down California would be catastrophic to hard working, tax paying citizens that will not be able to continue to operate and make a living. The technology is not yet in place to enact the proposed new regulations. Boats aren't ready for the larger than existing engines in the hulls, the energy grid is not ready to charge the giant batteries and can not keep up with air conditioners in our homes even. The batteries would compromise boats flotation and ability to maneuver which means the possibility of lives lost. I'm opposed to these regulations because they hurt everyone that makes a living from the water, the technology is not even close to acceptable and affordable to anyone. Technology does not support such proposals, the economic costs for boat owners to switch is impossible to sustain any type of profit and will collapse our fisheries and fleets up and down the coast. Please do not allow for support of the proposed regulations. Look what's happened to 18 wheelers and our shipping of common goods.... The supplies are stuck at port because of the trucking regulations that passed way ahead of their appropriate time. Please do not let this happen to our fleet and oppose the legislation.

2446.1

2446.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 20:43:51

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Comment Log Display

Below is the comment you selected to display. Comment 2447 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bruce

Last Name: Heller

Email Address: BruceHeller@hellergroupinc.com

Affiliation:

Subject: Against the proposed regulation

Comment:

I have been fishing for over 60 years and started with my father. The proposed regulation would put the sportfishing industry out of business. Passing this regulation would be a financial tragedy to the men and women who have given their lives to the sportfishing industry.

The saddest part would be the next generation would not have access to the sportfishing boats. Many youth could decide to follow a self-destructive path if they do not have the outlet of going fishing on the sportfishing boats.

I implore you to vote down the proposed regulation that would decimate the sportfishing industry and the next generation of sportfishing enthusiasts.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 21:19:14

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Comment Log Display

Below is the comment you selected to display. Comment 2448 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Barry
Last Name: Nelson
Email Address: barry.nelson.prov.356@gmail.com
Affiliation:

Subject: sports boat fishing

Comment:

To whom it may concern
I'm a part of a fishing ministry at my local church here in capo Beach called Simon's net,we take young kids out on the local sports boats out of Dana point harbor.
These trip are free to the kids and their parents.We take out young kids that are struggling with life. We have see small miracles in these kids lives.They come aboard sullen and withdrawn,we put a fishing rod in there hands a few instructions and away they go.It is such a blessing to see the joy and excitement that they experience, the freedom the struggles of three lives if olny for a few hours. please don't take away this from these young Americans. Thanks for your consideration of this. Barry Nelson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 21:19:00

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Comment Log Display

**Below is the comment you selected to display.
Comment 2449 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jason
Last Name: Rodriguez
Email Address: Jason93021@gmail.com
Affiliation:

Subject: 0

Comment:

Please do not pass this law I have two small boys that have had the chance to go with me yet to experience the thrill of sports fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 22:18:25

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Comment Log Display

Below is the comment you selected to display. Comment 2450 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Kozick
Email Address: jkozick@sbcglobal.net
Affiliation:

Subject: Commercial passenger boat Regulation change

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sport fishing / whale watching / sport diving will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 23:04:40

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Comment Log Display

**Below is the comment you selected to display.
Comment 2451 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Roger
Last Name: Bautista
Email Address: mattrog@hotmail.com
Affiliation:

Subject: Sportfishing

Comment:

Dear Madam or Sir:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

My son and I enjoy fishing on the ocean with these wonderful sportfishing crew.

Thank you for your consideration,

Roger Bautista

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-06 23:25:03

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Comment Log Display

Below is the comment you selected to display. Comment 2452 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bryan
Last Name: Dalton
Email Address: bandddalton@yahoo.com
Affiliation: Angler

Subject: Commercial passenger boats

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 04:49:35

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Below is the comment you selected to display. Comment 2453 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marc
Last Name: Norton
Email Address: marc@marcnortonlaw.com
Affiliation: ATTORNEY AT LAW

Subject: Sport fishing boats

Comment:

Please do not put hundreds of sport fishing boats out of business. The emissions of these boats is negligible compared to the recreational benefits that they provide to hundreds of thousands of Californians and tourists not to mention the economic good of the local communities that they serve.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 05:19:40

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Comment Log Display

Below is the comment you selected to display. Comment 2454 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Shier
Email Address: Sshier@dorjackinc.com
Affiliation:

Subject: No on regulations for harbor craft

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

These regulations will do little to improve air quality and will destroy the sport fishing industry, and others.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 05:47:31

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Comment Log Display

Below is the comment you selected to display. Comment 2455 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dan
Last Name: Collins
Email Address: Ddc3339@gmail.com
Affiliation: Fire Captain

Subject: New Harbor Craft Regulations

Comment:

Please vote no on the amendments to the commercial Harbor craft regulations

Attachment: www.arb.ca.gov/lists/com-attach/2776-chc2021-U2oBNgcwAzECMAU3.jpeg

Original File Name: 916A424B-C7A5-43F4-8FF8-A14ECA32DBED.jpeg

Date and Time Comment Was Submitted: 2021-11-07 06:09:16

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Commercial Products



Comment Log Display

Below is the comment you selected to display. Comment 2456 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randall
Last Name: Scott
Email Address: randallbscott3x777@yahoo.com
Affiliation:

Subject: Do NOT change boating rules for emissions.

Comment:

Do NOT impose more laws for sportfishing boats and anglers please!
Leave everything as is for now. Thank you, Randall Scott

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 06:38:05

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Comment Log Display

Below is the comment you selected to display. Comment 2457 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: MAIA
Last Name: BOURQUE
Email Address: maia.bourque@sbcglobal.net
Affiliation:

Subject: sport fishing

Comment:

Pls vote NO on regulations for sport fishing and whale boats which are not economically feasible.
Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 06:48:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2458 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Greg
Last Name: Eley
Email Address: g.eley@yahoo.com
Affiliation:

Subject: Carb

Comment:

Please don't let them ruin our sportfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 07:19:41

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Comment Log Display

Below is the comment you selected to display. Comment 2459 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kimberly
Last Name: Bennink
Email Address: Kimberlytowertalent@gmail.com
Affiliation:

Subject: Please save sportsfishing

Comment:

As long as I have lived in San Diefo. I have always been so attached to this community. My husband is a fisherman and this is how we put food on our table and provide for our little girl. This is such aimportant job to so many. It is the peaceful recreation that brings joy to so many. Please take action on not letting this happen.

Beat Regards
Kimberly Bennink

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 07:34:45

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Comment Log Display

**Below is the comment you selected to display.
Comment 2460 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Elinor
Last Name: Buchen
Email Address: ebuchen@oaklandca.gov
Affiliation: City of Oakland

Subject: Letter from Mayor Schaaf

Comment:

Please see letter from Mayor Schaaf attached.

Attachment: www.arb.ca.gov/lists/com-attach/2781-chc2021-UDMCbANhVFgGbVA8.docx

Original File Name: CHC MLS Letter 11.4.21.docx

Date and Time Comment Was Submitted: 2021-11-07 08:43:02

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CALIFORNIA 94612



Office of the Mayor
Libby Schaaf
Mayor

(510) 238-3141
FAX: (510) 238-4731
TDD: (510) 238-3254

November 4, 2021

Dear California Air Resources Board:

Harbor craft, such as tugboats, ferries, barges and dredges, contribute to increased health and cancer risks to millions of Californians near the ports and beyond. I am signing my name to support strengthening the Commercial Harbor Craft Regulation (“CHC”) for cleaner air. Harbor craft, many of them old and polluting, emit a toxic brew of diesel particulate matter. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I join fellow public officials to end the continued emissions from harbor craft across the state of California. This proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents nearby our harbors and beyond. This rule avoids 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from air quality experts at the California Air Resources Board. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I’m asking you to strengthen the Commercial Harbor Craft rule:

1. Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories. 2460.1
2. Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035. 2460.2
3. Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 2460.3
4. Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation 2460.4

Let’s keep California on a path towards innovation and clean air.

Sincerely,

A handwritten signature in black ink, appearing to read "Libby Schaaf", written in a cursive style.

Mayor Libby Schaaf
Oakland CA



Comment Log Display

Below is the comment you selected to display. Comment 2461 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Allen
Last Name: Bushnell
Email Address: bushnell@ucsc.edu
Affiliation:

Subject: CARB death sentence for carter boats

Comment:

thousands of lives will be negatively affected, and millions of income dollars erased if CARB goes through with the unfeasible plans requiring premature Tier implementation and enforcement for 'harbor craft,' ie, charter fishing boats whale watchers, tour boats. It is insane to impose these regulations without available, affordable technology available to hard-working operators.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 09:59:38

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Below is the comment you selected to display. Comment 2462 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Vince
Last Name: Masslon
Email Address: vincemasslon@socal.rr.com
Affiliation:

Subject: Proposed Admendments to Commercial Harbor Craft Regulations

Comment:

I generally support the mission and works provided through the California Air Resources Board. That said I oppose any amendments to commercial harbor craft regulations that would make it cost prohibitive for these vessels to operate. They provide substantial tax dollars to the state as well as a significant tourism draw to our beach cities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 10:10:35

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Comment Log Display

Below is the comment you selected to display. Comment 2463 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Capt. Chad
Last Name: Smith
Email Address: smithoenvivo@yahoo.com
Affiliation:

Subject: CARB Boat Regulations

Comment:

If Mr. Newsom thinks that he is going to help the tourism industry and small family fishing businesses up and down the California coast, he needs to understand that this is not going to work to make that happen...As we all see in this country, the people running these Democratic states are dying a slow death...This has to be a NO vote, I don't see how smart thinking people that are supposed to make wise decisions have come to the conclusion that this will work...What we do see is how some are complicit with making the wrong decisions to benefit the draconian tyrants...Now if they are also letting out murdering felons and criminals at an alarming rate, your just letting us all know that there are no consequences for breaking the law..So most will just do what we want, won't pay fines and if jailed, will be released..We all see the picture being painted..You need to make the right decision or deal with the consequences yourselves..Just like the Board of Education situations, we the people have had enough..You work for us, not the other way around..There will be appeals and you will be replaced by someone who can't be persuaded by deep pockets..Newsom will be gone soon so just remember that the RED WAVE is coming, will you be on the sinking ship? VOTE NO on this please...CS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 11:19:08

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Comment Log Display

Below is the comment you selected to display. Comment 2464 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Isaac
Email Address: johnhisaac2000@hotmail.com
Affiliation: Democate

Subject: I oppose the restrictions

Comment:

Clerk of the Board,
I'd like to submit my opposition to the upcoming restriction of
Sport Fishing Boats Let us fish!

Respectively,
John Hart Isaac

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 12:29:15

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Comment Log Display

Below is the comment you selected to display. Comment 2465 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Linc
Last Name: Conard
Email Address: linconard@gmail.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

Given the climate emergency that we are facing, we need bold climate leadership. Im asking you to strengthen the Commercial Harbor Craft rule:

- | | |
|--|--------|
| 1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule | 2465.1 |
| 2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions | 2465.2 |
| 3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation | 2465.3 |

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 12:56:25

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Comment Log Display

Below is the comment you selected to display. Comment 2466 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeremy
Last Name: Estrada
Email Address: jeremyrestrada@gmail.com
Affiliation:

Subject: Please save Sportfishing!

Comment:

Please save Sportfishing and all the life changing experiences that go along with it.

I have been an angler for most of my entire life and now as a father this would be devastating to our future generations but also to all the hard working dedicated family owned businesses that have been providing these experiences for decades. Please take your time with this delicate decision and please save Sportfishing for these hard working businesses and for future generations to come!!!

Thanks,
Jeremy Estrada

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 13:20:58

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Comment Log Display

Below is the comment you selected to display. Comment 2467 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Diehl
Email Address: jbdiehl@cox.net
Affiliation:

Subject: Proposed Amendments to Harbor Craft Regs.

Comment:

Please do not apply the restrictive new rules on harbor craft already in use. These rules could effect an unintended shutdown of the sportfishing and whalewatching industry which is already suffering significantly from the COVID pandemic restrictions that were in place fir do long. Many seniors like myself enjoy sportfishing as on of our retirement activities

Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 14:33:23

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**Below is the comment you selected to display.
Comment 2468 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Paul
Last Name: Mizeur
Email Address: Mizkatpa@frontiernet.net
Affiliation:

Subject: Carb restrictions on sportfishing vessels

Comment:

These new restrictions are going to devastate the sportfishing opportunities for fishermen and make it so expensive to go on a fishing trip for anyone and especially kids! Please do not take away my fishing opportunities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 15:00:50

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Below is the comment you selected to display. Comment 2469 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Millard
Email Address: mmillard@bhs-inc.org
Affiliation:

Subject: Sportfishing

Comment:

This would put several families and lives in jeopardy. This is an unreasonable and maybe government help should be involved. These are US citizens and they contribute greatly to food, recreation Socialization and healthy exercise. Yes if the government wants to give money to non citizens it can help our US citizens. this is untimely and unfair. Imagine all the lives that will be negatively impacted.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 15:06:04

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Comment Log Display

Below is the comment you selected to display. Comment 2470 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: wayne
Last Name: JACKSON
Email Address: wjackson61@hotmail.com
Affiliation: Ventura county sportfishing club

Subject: don't sink sportfishing

Comment:

sportfishing is a valuable outlet for many persons and a chance to teach the children the value of the ocean. the club takes a group of under privileged children as do many other groups and organizations to help them understand the eco system. also the employment of a number of persons that depend on the sportfishing industry to support many small businesses and their family.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 17:11:24

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Comment Log Display

Below is the comment you selected to display. Comment 2471 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mike
Last Name: Hendersen
Email Address: mojoo_jojo@yahoo.com
Affiliation:

Subject: Protect Whale watching, excursions, and sportfishing!

Comment:

Dear CARB Clerk,

Please urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

As is, many cannot afford the beauty and opportunity that the sea has to offer. Passenger harbor craft are doing more good than harm. Vote NO, do it for the children, so they can share in the beauty of the sea, too!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 18:06:40

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Comment Log Display

Below is the comment you selected to display. Comment 2472 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Zenor
Email Address: Pridecharters@gmail.com
Affiliation: CFPV owner

Subject: 11/19/ 21 CARB proposal on TIER 4 engine for CFPVs

Comment:

As a small business owner I am urging CARB to consider accepting SACs proposed compromise on TIER 4 engines. While I do agree and support CARBs mission of improving air quality, this uncompromising approach of requiring TIER 4 engines on CFPVs for the following reasons.

1. TIER 4 engines are unavailable for my size boat. There is not a TIER 4 engine in existence that will fit inside a vessel of my size. CARB acknowledges this, yet still is proposing that we be required to put a piece of technology that doesn't exist in our vessels

2472.1

2. TIER 4 engines that do exist in other capacities are extremely dangerous. These engines produce exhaust gases in excess of 1500 degrees. The fire hazards are extremely high. We have seen the consequences of a fire on a small wooden boat with the recent conception tragedy. If TIER 4 engines are implemented risk of tragedies like the Conception will increase dramatically. In addition the menus one control technology is very unreliable. This isn't acceptable 100 miles out at sea. There are times where my passengers and crews lives are relying on our propulsion to keep us safe. If CARB does implement this rules the board members will have to live with themselves if a tragedy is related to the use of this TIER 4 technology. Business owners faced with the prospect of losing their livelihoods in an effort to comply will put this dangerous technology on their boat.

3. Perhaps the most important and overriding factor as to why people like me are objecting CARBs proposal is the cost . For myself and at least 3/4s of my colleagues the cost of implementation is many times greater then what my business is worth. My vessel of wood and fiberglass construction simply will not be able to handle the extremely hot exhaust gases of a TIER 4 engine without being a fire hazard. The cost of replacing my boat with a new one will be in excess of 2 million dollars and take 2-4 years. That is if I can find a boat yard that is able to build my

2472.2

vessel.

4. Most CFPVs spend less than 20% of their time in state waters. I cannot understand why CARB is willing to put small business owner out of business while hundreds of commercial ships that do not comply with TIER 4 spend days anchored up in state waters producing hundreds or thousands of times of pollutants than a CFPV. If CARB was actually concerned with cleaning the air they would focus on alleviating congestion at our ports.

2472.3

As an alternative to blanket requirements of TIER 4 engines I would like to propose a smart time line of requiring vessels to be fitted with TIER 3 engines. TIER 3 engines are readily available, proven, reliable and safe to use in our vessels. In addition to fitting into our vessels without modification, they are clean. A TIER 3 engine produces about 1/5th the NOX and carbon monoxide of an older pre tier engine. TIER 3 engines are far less polluting than the class of engines on foreign commercial ships that regularly dock in our California ports. This alternative would allow the multi billion dollar Sportfishing business that provides thousands of jobs to stay in business and would allow business owners such as myself to not lose their livelihoods and life's work.

2472.4

Sincerely,
Jason Zenor
Owner/ Operator MV Pride

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 19:43:31

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Below is the comment you selected to display. Comment 2473 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Preston
Email Address: dpreston2@cox.net
Affiliation:

Subject: Keep our oceans open

Comment:

I vote "NO" as i would like to go fishing by boat in our oceans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 20:49:59

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Comment Log Display

Below is the comment you selected to display. Comment 2474 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christine
Last Name: Dabbaghian
Email Address: teentine@gmail.com
Affiliation:

Subject: Sports Fishing

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 22:14:31

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Comment Log Display

Below is the comment you selected to display. Comment 2475 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gayle
Last Name: Cinnamon
Email Address: Gayle.cinnamon@gmail.com
Affiliation: Self

Subject: Don't Sink Sportfishing and Whale Watching--PLEASE!!!

Comment:

I know so many people that rely on these activities for food, not just fun and games. Please help them. This is not some silly new age commercial venture. This is the bread and butter of so many.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-07 23:40:47

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Comment Log Display

Below is the comment you selected to display. Comment 2476 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Philip
Last Name: Jimenez
Email Address: netwerkin_350@yahoo.com
Affiliation:

Subject: Fishing vessels requirements

Comment:

Adding these outrageous change requirements is something that need to be looked at differently. These businesses need to survive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 03:44:20

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Comment Log Display

Below is the comment you selected to display. Comment 2477 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Spencer
Last Name: Wood
Email Address: sk858wood@outlook.com
Affiliation:

Subject: Save a California institution, save the the fishing fleet!

Comment:

I've been an angler in San Diego for over 40 years. I've raised my kids fishing on these boats and I had hoped to see my grandkids get the chance to experience the healthy lifestyle that is California ocean fishing. I know it's a hard business and I've seen the struggles the boat operators, many of them family operations, go through to stay in business and provide a truly unique experience to locals and visitors.

Changing the emission requirements for diesel engines in such a sweeping and dramatic way, and in such a short time period will put many, if not all, of these families out of business and destroy a way of life. Like so many of California's small businesses they simply don't have the capital to purchase, or the means to finance, the required technology. I am asking you to reconsider this law and find a different path that allows this unique industry to survive.

Spencer Wood

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 05:21:46

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Comment Log Display

Below is the comment you selected to display. Comment 2478 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Fred
Last Name: Christensen
Email Address: fredx10sen@hotmail.com
Affiliation:

Subject: SAVE OUR SPORTFISHING

Comment:

Please VOTE NO on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 05:43:15

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Comment Log Display

Below is the comment you selected to display. Comment 2479 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: WILLIAM515686
Last Name: HARRISON
Email Address: HUNTERBILL46@YAHOO.COM
Affiliation:

Subject: more stupid legislation

Comment:

i thought we were free in the us more restrictions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 06:50:17

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Comment Log Display

**Below is the comment you selected to display.
Comment 2480 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ron
Last Name: Rotter
Email Address: rotter.ron@gmail.com
Affiliation:

Subject: we do not like
Comment:
insane stop

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 06:53:09

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Comment Log Display

Below is the comment you selected to display. Comment 2481 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Shane
Last Name: Beck
Email Address: sbeck@mbcaquatic.com
Affiliation: Conshelf Services

Subject: Comments on Comm. Harbor Craft Regulation

Comment:

Please see attached comments from Conshelf Services on the proposed regulations.

Attachment: www.arb.ca.gov/lists/com-attach/2807-chc2021-BWZXPI0yVXULZVM2.pdf

Original File Name: Conshelf CARB Letter_2.pdf

Date and Time Comment Was Submitted: 2021-11-08 07:22:50

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Conshelf Services

8 November 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CARB's Proposed Revisions to the Commercial Harbor Craft Regulations

Dear Madam Chair,

Conshelf Services (Costa Mesa, CA) is a certified small business that owns three commercial harbor craft with diesel engines. These vessels are used by MBC Aquatic Sciences, a certified small business specializing in marine and freshwater studies primarily in California. MBC currently has 23 employees.

Conshelf's vessels are used primarily to collect field data on: bathymetry, water and sediment quality, benthic communities, and kelp beds. These studies are performed to comply with various environmental permits (Waste Discharge Requirements, Clean Water Act §401, California Coastal Development Permits, Army Corps §404, etc.). All three vessels are transported on trailers, which minimizes the travel time on the water and engine hours. Each vessel is unique, and used for specific tasks, but all are 23 to 26 ft in length, and powered by diesel engines.

- Requirements to repower our vessels are excessive for a small business such as ours. The cost to repower one of our vessels would be equivalent to ~20-30% of our annual revenue. The proposed Low Use provisions are vital to small companies. 2481.1
Consider ongoing supply chain delays. The time to order and receive engines and engine parts right now is much longer than it was a few years ago, or even compared to last month. The proposed compliance dates are not likely attainable. 2481.2

Table with 4 columns: Date, Parameter, Port of Los Angeles, Port of Long Beach. Rows include Vessels at Anchor and Average Anchor Time for dates 10/11/21 and 11/5/21.

- Consider incentive funding for small businesses to offset economic impacts. 2481.3

Conshelf Services

I appreciate your time and consideration.

Respectfully,

Conshelf Services

A handwritten signature in blue ink that reads "Shane Beck". The signature is written in a cursive style with a blue highlight behind it.

Shane Beck
President



Comment Log Display

**Below is the comment you selected to display.
Comment 2482 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Tony
Last Name: Darling
Email Address: tonysafe@yahoo.com
Affiliation:

Subject: Sportfishing and Whale Watching Boats

Comment:

vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:24:02

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Comment Log Display

Below is the comment you selected to display. Comment 2483 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Yuhl
Email Address: jyuhl@charter.net
Affiliation:

Subject: Vote No

Comment:

I wish to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:31:00

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Comment Log Display

**Below is the comment you selected to display.
Comment 2484 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: harry
Last Name: adams
Email Address: xgenetics360x@aol.com
Affiliation:

Subject: we need fishing.

Comment:

we need sportfishing as i provide fresh caught fish for my family knowing that no one tampered with unlike store bought and also, it is great for therapy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:42:25

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Comment Log Display

Below is the comment you selected to display. Comment 2485 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Susan
Last Name: Hayes
Email Address: sjhayes777@gmail.com
Affiliation:

Subject: Vote NO on the Amendments to the Commercial Harbor Craft Regulation

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:53:35

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Comment Log Display

**Below is the comment you selected to display.
Comment 2486 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: william
Last Name: morrison
Email Address: william.morrison@kidder.com
Affiliation:

Subject: California air resources board
Comment:
this is a very bad law

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:55:09

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**Below is the comment you selected to display.
Comment 2487 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mary
Last Name: Tigmo
Email Address: Tigma4@gmail.com
Affiliation:

Subject: Vote No

Comment:

No on regulations to stop whale watching and sport fishing. People have the right to access our oceans and need sportfishing services to do so. Sportfishing also provides many local jobs and educates people on marine biology and managing our fisheries.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 07:58:58

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Below is the comment you selected to display. Comment 2488 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Casey
Last Name: Capparelli
Email Address: caseyc99@yahoo.com
Affiliation:

Subject: Boat emission regulations

Comment:

Please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Regards
Casey

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 08:46:02

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**Below is the comment you selected to display.
Comment 2489 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: DAVID
Last Name: LANDERS MD
Email Address: dblmed@earthlink.net
Affiliation:

Subject: Don't Stop Sport Fishing or Responsible Whale Watching

Comment:

Don't Stop Sport Fishing or Responsible Whale Watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 08:54:20

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**Below is the comment you selected to display.
Comment 2490 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Steven
Last Name: Tong
Email Address: shtong001@gmail.com
Affiliation:

Subject: Save Sport Fishing

Comment:

Hello,

I believe sport fishing needs to continue in California. It gives people an escape, a hobby, a passionate recreational activity. It brings more positives than negatives. The fishing community cares about the ocean and wants to keep it healthy. Without the fishing community, I believe the ocean would lose the people that truly care about it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 09:39:49

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Below is the comment you selected to display. Comment 2491 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Glynn
Email Address: Johnglynn225@gmail.com
Affiliation:

Subject: Stop these oppressing regulation so upcoming generations can fish.

Comment:

Hello my name is John Glynn, I've been actively fish the party boats for 8 years now. I've found fishing to be my way of relaxing growing closer with family and friends and loved ones, I have also started a new adventure as a first time father. All I want is to be able to share the experience of fishing on sport boats off shore with my son, if this bill/law were to pass it would not only cripple the industry but would take away and ruin the opportunity for father and families in my position to share this incredible sport with the up coming generations. Asking the sport boat community's to retrofit these boats would leave them one option. TO CLOSE THEIR DOORS, do to astronomical retro fit cost. Please don't ruin the industry for current fisherman but also those that are learning to love fishing and the outdoors. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 09:51:01

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Below is the comment you selected to display. Comment 2492 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Colwell
Email Address: richardacolwell@gmail.com
Affiliation:

Subject: Governor Gavin Newsom PLEASE SAVE SPORTFISHING

Comment:

I Have been sportfishing my entire life with my Grandfather my father and now i am a father and Grandfather I have taught them how to fish and all of my family members fishing has been a big part of our lives. We have had so much fun and good family outings fishing together I have many friends with the same experiences. I ask you Governor Gavin Newsom PLEASE SAVE SPORTFISHING

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 09:53:07

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**Below is the comment you selected to display.
Comment 2493 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Lund
Email Address: bigdavid.lund@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

I am writing to urge you to delay or cancel the proposed amendments to Commercial Harbor Craft regulations.

As an avid boater and marine enthusiast, I see firsthand the benefits that our commercial marine fleets provide to the citizens of California. Every time I am on the water I see countless ways the commercial industry helps Californians. Just last weekend I saw Tugboats, pilot boats, commercial fisherman, party fishing boats, dive boats, oil service boats, ferry boats, research vessel, navy boats, and even various law-enforcement boats. These rules would begin to eliminate the much-needed vessels that are required to support the marine industry and keep us safe. The Costs vs benefits do not make sense to go forward at this time.

Sincerely.

David Lund

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 10:33:59

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Comment Log Display

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First Name: franklin
Last Name: pratto
Email Address: franklinpratto@gmail.com
Affiliation:

Subject: amendments to the commercial harbor craft regulations

Comment:

If this bill is passed, it will cause whale watching and sport fishing to be severely impacted. It will cause a large loss of tax dollars. I sincerely hope you will consider both of these issues before a vote is taken.

Yours truly,
Franklin Pratto

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 10:20:09

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Comment 2495 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: Stamp
Email Address: mark.stamp@sjsu.edu
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Please vote NO on the proposed Tier 4 engines and a diesel filtration system requirements. Thank you.

Mark Stamp

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 10:47:17

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Comment Log Display

Below is the comment you selected to display. Comment 2496 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tim
Last Name: Hayes
Email Address: timothy_john_hayes@yahoo.com
Affiliation:

Subject: Keep sports fishing affordable

Comment:

I love to fish with my sons. I can not afford my own boat. Even commercial sports fishing is expensive but a wonderful family activity.

CARB please vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 10:51:52

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Comment Log Display

**Below is the comment you selected to display.
Comment 2497 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: Schrum
Email Address: mrkschrum@yahoo.com
Affiliation:

Subject: Sportfishing Fleet

Comment:

The Proposed Regulations will Destroy the Sportfishing industry that is still reeling from Covid Restrictions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 11:36:21

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**Below is the comment you selected to display.
Comment 2498 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mindy
Last Name: Hiley
Email Address: mhiley@humboldtby.org
Affiliation: Humboldt Bay Harbor, Recreation and Cons

Subject: CARB Letter

Comment:

Attached

Attachment: www.arb.ca.gov/lists/com-attach/2825-chc2021-VCddMFULWHhXOFcw.pdf

Original File Name: SK Signed CARB Letter - Humboldt Bay Harbor District.pdf

Date and Time Comment Was Submitted: 2021-11-08 11:39:56

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Humboldt Bay
Harbor, Recreation and Conservation District
 (707)443-0801
 P.O. Box 1030
 Eureka, California 95502-1030



Clerk's Office
 California Air Resources Board
 1001 I Street Sacramento, CA
 95814

November 4, 2021

Re: Proposed CARB Commercial Harbor Craft Regulations/Sportfishing Boat Regulations

Dear California Air Resources Board,

On behalf of the Board of Commissioners of the Humboldt Bay Harbor, Recreation and Conservation District, I am providing comments regarding the California Air Resources Board's (CARB) proposed engine emission regulations that would affect charter sportfishing boat operators in Humboldt County, California. CARB staff is in the process of amending or replacing existing regulations to further reduce emissions from charter sportfishing boats and other vessels. We agree about the need to reduce emissions. However, for the following reasons, the currently proposed regulations for charter sportfishing boats are not appropriate.

1. Charter sportfishing boats are currently recovering from lost revenue due to substantially reduced customers during the Covid-19 pandemic. In Humboldt County, revenue has also been lost due to short fishing seasons for Pacific halibut and Chinook salmon. Requiring the fishing fleet to begin costly upgrades to vessels as soon as 2023 may result in closure of many businesses. 2498.1
 2. Humboldt's Charter sportfishing boats are all under 45 feet in length and have relatively small engines which generally carry less than six passengers.
 3. Charter sportfishing and commercial fishing boat engines are technically the same. Historically they shared the same vessel category and were regulated in the same fashion. However, under CARB's proposed regulations, charter sportfishing boats will be disproportionately impacted. In many cases, boats constructed of wood or fiberglass cannot be structurally modified for new and larger engines and will have to be removed from service starting as soon as 2023. The expense of purchasing a new steel vessel is too great for family operated businesses. 2498.2
- We urge CARB to work with the charter sportfishing industry to develop air quality regulations that provide economically feasible incentives for sportfishing boat owners to continue to lower engine emissions. They should once again share the same vessel category as commercial fishing boats and be regulated in the same fashion. 2498.3
- The currently proposed regulations threaten the existence of charter sportfishing businesses in Humboldt County. These businesses are an important part of the region's economy and culture. 2498.4

Sincerely,

Stephen Kullmann
 Board President

cc: State Senator Mike McGuire, 2nd District
 State Assembly Member Jim Wood, 2nd District
 Congressman Jared Huffman, 2nd District
 County of Humboldt Board of Supervisors
 Eureka City Council

Comment Log Display

Below is the comment you selected to display. Comment 2499 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: matt
Last Name: kalla
Email Address: matt@mattkalla.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

At what point do law makers realize the need for common sense? Does the act of forcing the tour operators and fishing fleets to lower emissions on their boats with technology that has not yet been developed make sense? Why risk the livelihoods of so many folks who provide opportunities for so many people to enjoy the bays, harbors and oceans.

It's is absolute economic insanity that CARB would even allow this to pass at a time where enough economic strain has been placed on so many people already.

This has to be addressed in a practical manner where operators can meet emissions guidelines without the threat of being put out of business.

Depriving people out of a job, the educational experiences shared and the the many people that have PTSD and find the waterways a way to overcome their illness just does not make any sense at all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 11:52:21

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Comment Log Display

**Below is the comment you selected to display.
Comment 2500 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: B. G.
Last Name: Williams
Email Address: bgwms1227@verizon.net
Affiliation:

Subject: New boat regulations

Comment:

This requirement or boats should not be adopted.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 12:30:53

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**Below is the comment you selected to display.
Comment 2501 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Scott
Last Name: Cottle
Email Address: Cottlescott@yahoo.com
Affiliation:

Subject: Save our fleet
Comment:
Save our fishing fleet!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 12:34:15

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Below is the comment you selected to display. Comment 2502 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: coleman
Last Name: cosby
Email Address: colemancosby@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

Vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 12:39:19

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Comment Log Display

Below is the comment you selected to display. Comment 2503 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bill
Last Name: Coy
Email Address: wcoyofwcoy@aol.com
Affiliation: none

Subject: Boating emmision regulations

Comment:

I implore you to NOT implement the draconian rules for commercial passenger craft (boats) These vessels are a very small percentage of the emissions package. The expenses associated with your regulations will eliminate most of the businesses as the cost to implement will make their services too expensive for the market. By your past regulation implementation, you probably don't care too much about the little guy trying to run a business, but please try to understand the impact on kids that will not be able to afford seeing whales in the wild or dolphins playing in a bow wave.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 13:20:37

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Comment Log Display

Below is the comment you selected to display. Comment 2504 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Debbie
Last Name: Neel
Email Address: Neel.debbie@yahoo.com
Affiliation:

Subject: Keeping our ocean for all boaters

Comment:

I strongly oppose removing our boating rights to our ocean waters. We have enjoyed the ocean and what it has to offer in fishing and enjoying our many family adventures. We have a great live and respect for our ocean.

Debbie Neel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 14:01:33

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Comment Log Display

Below is the comment you selected to display. Comment 2505 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joel
Last Name: McCabe
Email Address: joelmccabe72@gmail.com
Affiliation:

Subject: California Fishing fleets emissions upgrade

Comment:

To Whom it may concern,

It has been brought to my attention that California Fishing fleets and Charters will be mandated to upgrade their engine fleets to Tier 4 final. I am very familiar with this process as I come from the construction equipment world and have been down the road of moving from Tier zero to Tier 4 Final. At this time, I would ask the powers to be pushing this initiative to be thoughtful and mindful of the state of these fleets. Last year was detrimental to the industry as Covid had the industry completely shut down hurting the bottom line. To take a direct hit with upgrading engines to Tier 4 requirements is a cost impact most fleets cant handle. Please consider options that take the end user into consideration before you take away someone's livelihood. A slow introduction and approach to engine emissions is understandable, but to move to an immediate resolve would be devastating to the industry. I sincerely hope my comments are taken into consideration.

2505.1

2505.2

Thank you
Joel McCabe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 14:55:05

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Comment Log Display

Below is the comment you selected to display. Comment 2506 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Gallia
Email Address: j.g26609@gmail.com
Affiliation: New Easy Rider Sportfishing

Subject: Against Proposed Amendments to the Commercial Harbor Craft Regulation
Comment:

I support cleaner emissions, but this proposed regulation is unreasonable. I am a fisherman and USCG-certified captain of a small sportfishing vessel based in Berkeley. Bringing people out sportfishing is my passion and livelihood. I have worked as a fisherman since I was a teenager and just bought the business this year from my parents. It is a tough business, made tougher by COVID and the increasing challenges to the fisheries. I have a fiberglass boat that I have restored and maintained at great cost and time so that it passes USCG inspection every year and is a safe, clean, efficient passenger and fishing vessel. We already repowered to Tier 2 and are planning to go to Tier 3 in the next year. ■ This proposed regulation would make my vessel obsolete and force me out of business. ■ I don't have investors or access to capital and can't afford the estimated \$1.3 million that the Cal Maritime report cites for me to replace my vessel. ■ For most of my passengers, sportfishing vessels like mine are their only access to saltwater sportfishing. ■ Being out in the ocean, 50 miles from the shore, we need to have proven, reliable technology that works with ocean-running vessels. ■ This proposed regulation calls for dangerous experimentation that is unfeasible for small business owners like me and puts peoples lives at risk.

2506.1

2506.2

2506.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 15:52:03

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Comment Log Display

Below is the comment you selected to display. Comment 2507 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kenneth
Last Name: Neel
Email Address: Neel.debbie@yahoo.com
Affiliation:

Subject: Do not close ocean to fishing. & whale watching

Comment:

I'm an avid fisherman and user of the ocean I scuba dive and fish around the coastline and in my boat and I go to Catalina I do not want these taken away from us.

Ken Neel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 15:47:54

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Below is the comment you selected to display. Comment 2508 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Curt
Last Name: Arakawa
Email Address: Curt@daiwa.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

I am opposed to the Commercial Harbor Craft Regulation. This will cripple our sport Fishing Industry. We need to find a better way of dealing with this problem rather than putting peoples lively hood in jeopardy. Times are hard enough with out farther governmental regulations that will hurt ad take away much needed jobs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 16:04:44

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Comment Log Display

Below is the comment you selected to display. Comment 2509 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rich
Last Name: Green
Email Address: rgagreen@aol.com
Affiliation:

Subject: Sportfishing Boats

Comment:

Good day,

I have sport fished my whole life and have had life long memories fishing in California as well as making lifelong friends. Fishing brings people together instead of tearing us apart. There have been bad days on the water but the worst day fishing beats my best day at work. I hope to bring my son and my grand kids fishing on a charter boat one day able to enjoy everything we could offer them. 2509.1

If there was an alternative to these engines all fishermen and captains would be for it but they do not exist. Almost all fishermen are environmentalist's and have seen first hand what pollution has done to our ocean and at every chance we clean it up such as helium balloons floating in the ocean. I can only pray that 2509.2

your council re-thinks the future of our fishing fleet for Californians and all the tourism and capital that is brought in from out of state. Not to mention all the hard working individuals from reel/ rod mfg., fish processors, tackle stores, ice vendors even, & everyone else effected by the shut down. 2509.3
Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 16:08:06

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Comment Log Display

Below is the comment you selected to display. Comment 2510 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrew
Last Name: Azmi
Email Address: sailor1497@yahoo.com
Affiliation:

Subject: Sportfishing and whale watching emission proposal

Comment:

I am writing this to ask you not to impose harsher regulations on the sportfishing and whale watching fleets. The higher emissions are more likely a result of all these cargo ships and tankers sitting idle outside the ports if anything, not because of the fishing and whale watching industry. Doing this would put thousands out of jobs and cost billions in losses. Covid has already hit the fleets hard enough, dont ruin them with this

2510.1

2510.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 16:30:47

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Comment Log Display

Below is the comment you selected to display. Comment 2511 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Carey
Last Name: Graves
Email Address: cwgraves11@gmail.com
Affiliation: Daiwa Corp

Subject: Stop CARB Plans on Sportfishing Boating

Comment:

Dear CARB Board,

I am concerned that you are trying to put regulations in that will effect the Sport Fishing fleet. As you know this will effect consumers of all back grounds, especially lower income and ethnic background. Have you looked into this? 2511.1

As the proposed guidelines for the Sportfishing fleet are currently not physically possible to comply with I hear, as there are no engines in production that meet both marine and CARB requirements. Is this true? 2511.2

If you have spent time in Long Beach harbor, you would know the big issue you should be looking at is the cargo and cruise ships, as they put out more emissions in a day than the whole sportfishing fleet does in a year! 2511.3

Please let me know on my questions,

Thank you,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 16:21:26

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Comment Log Display

Below is the comment you selected to display. Comment 2512 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: GARY
Last Name: VOETS
Email Address: gary@polariselectric.com
Affiliation: Fisherman

Subject: save our fishing fleet

Comment:

Please consider helping these poor hard working tax paying men & women.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 16:40:51

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Comment Log Display

Below is the comment you selected to display. Comment 2513 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alexander
Last Name: Viera
Email Address: AViera1@oxnardunion.org
Affiliation:

Subject: Recall of sport fishing and whale watching boats.

Comment:

I don't think that they should recall sport fishing and whale watching boats. I say this because I love to fish with my dad. Also my teacher could lose his job and I know he loves it very much as well as fishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 18:27:12

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Comment Log Display

Below is the comment you selected to display. Comment 2514 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Anderson
Email Address: rahavik25@yahoo.com
Affiliation:

Subject: Stop unrealistic regulations

Comment:

Stop unrealistic regulations that can harm many families and small business owners. My family and I support small fishing charter companies by implementing your unrealistic regulations you will kill the sport fishing industry and cause many individuals to lose their livelihood. Provide a cost effective means before implementing such regulations. Save sport-fishing for future generations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 18:40:32

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Comment Log Display

Below is the comment you selected to display. Comment 2515 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Julia
Last Name: Kalez
Email Address: kalezjulia@gmail.com
Affiliation:

Subject: STOP

Comment:

Hello Governor,

I am writing to you regarding your recent to decision to move forward with such a hurtful piece of legislation. My families business has been impacted in more then one way from you and your lack of leadership. Moving forward with such extreme measures is only going to hurt the small fishing businesses like my families that have been so impacted by the pandemic but now have made it through one of the hardest times in history. I am asking you to please stop with your parties agenda it is only hurting the most dedicated and hardworking people. I ask you to think like you are in the shoes of small business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 19:09:03

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Below is the comment you selected to display. Comment 2516 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Satoshi
Last Name: Ito
Email Address: halibut102cm@gmail.com
Affiliation:

Subject: Don't sink sportsfishing

Comment:

Dear California Governor Newsom,

Sports fishing creates revenue to the state California for selling fishing licenses. Those sports fishing businesses create a lot of jobs locally and support good causes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-08 21:40:20

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Comment Log Display

Below is the comment you selected to display. Comment 2517 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Hinton
Email Address: jw_hinton@yahoo.com
Affiliation:

Subject: Save sport fishing and whale watching

Comment:

To whom it may concern, I am sending this message in hopes that I make a big difference. I am a fisherman and a huge fan of the ocean as are the men and women I am supporting I disagree on how you think this will help the environment why don't you go get the real polluters the people making these machines make them cough up the money to clean what comes with their product. The hard working Americans that took that leap and opened up their businesses on the water they are about to lose everything they worked for from the ground up what about them ? When all these banks folded and housing crashed a while back why did they get bailed out and restored but no one else? What I'm trying to get at is these men and women truly care about the environment they speak up if they see someone toss a piece of trash in the ocean that is top priority when we go out TO BRING EVERYTHING WE TOOK WITH US BACK 100%. I don't think they deserve a knife in the back we can help make it greener out there but destroying hard working families dreams is not the way. Please don't take this from us find another way thank you for your consideration.

2517.1

2517.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 01:14:36

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Comment Log Display

**Below is the comment you selected to display.
Comment 2518 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Brian
Last Name: O'Dea
Email Address: bigdaddyodea@gmail.com
Affiliation:

Subject: chc2021

Comment:

Please vote NO!! These intended regulations are UNNECESSARY AND
WILL END SPORTFISHING! VOTE NO! DO TE RIGHT THING FOR ONCE!!

BRIAN O'DEA
AVID SPORTFISHERMAN

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 03:47:34

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Comment Log Display

Below is the comment you selected to display. Comment 2519 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Guerra
Email Address: Topsirloin@sbcglobal.net
Affiliation:

Subject: Commercial Harbor Regulations for whale and passenger boats

Comment:

Gov Newsom,
I do not agree with your plan and or opinion regarding the harbor regulations for older boats/ newer engines. Many of these commercial boats are small family operators that help fund the commercial fishery. To remove these boats from usage wouldn't solve anything.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 04:37:55

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**Below is the comment you selected to display.
Comment 2520 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Matt
Last Name: Johnson
Email Address: sdguyforfun@yahoo.com
Affiliation:

Subject: CARB proposal of changes

Comment:

People, please understand that this will sink quit a few people. We are cleaning up the environment, but we need to not leave the average less than middle class fishermen in the position you are wanting to leave them in.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 05:46:42

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Below is the comment you selected to display. Comment 2521 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Woolley
Email Address: brianwoolley@cox.net
Affiliation: CPFV boat captain

Subject: CHC2021 Harbor Craft designation

Comment:

To whom it may concern-

I am a 45 year resident of the state of California and love living here. I have a career running a passenger fishing vessel and whale watching boat in Dana Point , CA. The business I work for is Dana Wharf Sportfishing and they have been in business in South Orange Country for 50 years and take thousands of people whale watching and sportfishing each year.

The proposed CARB designation of our fleet of already emission compliant boats would be severely impacted by the new proposal. Our fleet of boats would be unable to make the huge and quite honestly ridiculous retrofit changes to accommodate Tier 4 systems that do not exist. ■ These changes would require major funding that would I turn have to be passed on to our passenger base. ■ This would take the affordability and value out of the equation for a vast majority of our hard working passengers. ■ The financial impact would be far reaching.

2521.1

Please reconsider your plans by not including whale watching boats, CPFV charter boats in your designations with other harbor craft.

2521.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 07:07:40

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Below is the comment you selected to display. Comment 2522 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hiroshi
Last Name: Nishine
Email Address: hiroshi@nishinefishing.com
Affiliation:

Subject: Regarding Amendments to the Commercial Harbor Craft Regulation

Comment:

Dear sir,

It probably give a big damage to many industries.
Boat manufacturer, marine business, sports fishing, tour business
etc.
I'm working in sports fishing industry and feel it not make sense
to me.
You need reconsider about this.

Hiroshi Nishine
Nishine Lure Works Ltd.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 07:23:32

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Comment Log Display

Below is the comment you selected to display. Comment 2523 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ruben
Last Name: Ornelas
Email Address: rubeno93247@yahoo.com
Affiliation:

Subject: Sport fishing/Whale watching

Comment:

I do agree with the thought of changing the technology but it should only be put into Law when it is fess able for everyone . Making at Law that is not for the good of all people is just simply wrong. Please consider what your actions are that are going to affect all the people for just the lobbyist.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 07:57:23

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Comment Log Display

Below is the comment you selected to display. Comment 2524 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: CHRISTOPHER
Last Name: MARTIN
Email Address: CMJHARDMONEY@GMAIL.COM
Affiliation:

Subject: Sportfishing should Not only be for the Very Weathy!

Comment:

With the price of boats, gas, insurance, storage and maintenance, the only people in San Diego who can afford to fish on their own boats are wealthy.

Just 1 weekly trip on your own boat will cost est \$2,000 per month if you are financing a seaworthy vessel- maybe 1/2 of your annual income.

Coastal access to fishing is limited, impractical and offers limited results.

Offshore fishing on 'affordable' party boats allows you to fill your freezer to offset the cost.

2425.1

The recent dramatic increase in ticket prices- due to expenses including bait, gas prices, labor costs and being forced to limit loads due to the pandemic makes even this less expensive option unaffordable for many. I now fish much less frequently as it costs at least 30% more than pre-pandemic. I could take a kid fishing for maybe \$80 and now it is closer to \$150!

The party boat operators are on a shoestring budget and do it out of love for the sport and their customers. Nobody is getting rich and most are just surviving.

Most are still using boats built in the 1940s-1970s with a rare vessel built in recent decades. These boats will be virtually worthless and have to be sold for scrap or to out of country buyers.

Forcing operators to buy new vessels or refit with new technology will bankrupt almost all of them. The few that may survive by taking massive loans will be forced to raise prices so much they

will lose their customers.

No kids will fish. No busy working class folks will fish. There will be no next generation of working class fishermen. Everyone will just spend more time watching TV and less time appreciating nature.

2425.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:02:29

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Comment Log Display

Below is the comment you selected to display. Comment 2525 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: COREY
Last Name: HALL
Email Address: corey.hall@cox.net
Affiliation: Current Sportfishing

Subject: Purposed commercial Harbor craft rule

Comment:

My name is Corey Hall , My family owns and operates Current Sportfishing in Dana Point, Ca. We have been in business 6 years, Our boat operates out of Dana Wharf Sportfishing within Dana Point Harbor but we are only inside the Harbor for 5 minutes before we are out into open seas. Also we never run our boats while docked. All engines are turned off and plugged into a shore power at end of day.

- We are a struggling small business and nothing has threatened to close our business for good except two things Covid 19 followed by the new rule for Harbor Craft proposed by CARB . Shutting down a business because of a pandemic like COVID 19 no one could have predicted and it was out of our control, I survived and continue to operate, So now why the push to put me out of business? The general public who is our passengers, love the outdoors and fishing once permitted after COVID shutdowns is a safe outdoor recreation practiced and loved by so many from all communities and also provides food to feed their families . Whale Watching allows people to be connected to nature and is a relaxing, very stress reducing activity enjoyed by thousands every single day in California , these customers cannot afford their own private vessels and we are their access. This new Carb proposed harbor craft rule will sink my business , I believe that your board and staff do not fully understand what it means to put all Sportfishing / and Whale Watching boats out of business along the coast of California . We along with so many can not comply with a new proposed rule to make our boat little to no emissions, we are all for reducing emissions and always have been, our boat has the most up to date engines that are available to us, we repower as new tier engines become available and also apply for grants from the South Coast AQMD, this has always been how we operate. We simply can't comply with the new rule in its current state. We need unlimited time to comply for when new technology

2525.1
- 2525.2
- 2525.3
- 2525.4
- 2525.5

exists and is available, also we need grant funds to remain available to us to complete future re-powers and to retrofit if we can ever even do that, building a new vessel is also out of the question for a business like mine currently. Carb staff have said they understand some boats will be retired, that is a very sad statement, we believe not some but all boats like ours would be retired. Our boats can't just be retired, they have no pension they have no retirement the boats are the retirement for families like ours. Everyday it's a struggle we have been dealing with since the onset of COVID and to disregard those hardships and put this new proposal on us, does not make sense, this new proposed rule will be hurting so many communities at a time when California is supposed to champion small business. It even further does not make sense especially for the fact that commercial fishing harbor craft get an unlimited extension, our passengers can not afford a higher ticket they deserve an extension too, we were told that the belief that our passengers can pay more for tickets was the only reason we were told that we were not put into that same category with commercial fishing. Our customers deserve access to affordable boating. We are offering public access everyday to the great outdoors. Once you retire boats you put family businesses like ours out of business. Please help us to include boats like ours in the commercial fishing carve out. This carve out allows for extensions while new engines can be created. Thank you for reading this email.

2525.6

2525.7

2525.8

2525.9

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:17:40

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Comment Log Display

Below is the comment you selected to display. Comment 2526 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Scott
Email Address: richard@scottequip.com
Affiliation:

Subject: Boat regulations

Comment:

The State has done enough damage. we do not need to force out the boating community. All that will happen is we move boats to other states and or to Mexico. This is extreme over reach of the Govenor. !!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:36:27

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Below is the comment you selected to display. Comment 2527 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alexandre
Last Name: Rosales
Email Address: alexandrerosales@aol.com
Affiliation:

Subject: The removal of access to the great American outdoors.

Comment:

Please refrain from such extreme measures. Want to kill jobs save trees, and cut down significantly air pollutants, 3D Print homes.

Vie con Dios

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:40:13

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**Below is the comment you selected to display.
Comment 2528 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jeffrey
Last Name: Ciallella
Email Address: jeff@perfectnutritioninc.com
Affiliation:

Subject: CHC2021 Save Our Boats
Comment:
CHC2021 Save Our Boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:51:15

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Below is the comment you selected to display. Comment 2529 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrew
Last Name: Lewis
Email Address: Pbdrew@yahoo.com
Affiliation: Taxpayer

Subject: Harbor Craft Regulation

Comment:

I ask that you please reconsider the pending Harbor Craft Regulation. Passing legislation that will predominantly hurt small businesses will do nothing in the bigger picture to improve the environment. This is the equivalent of using a cotton ball and piece of chewing gum to stop a flash flood. This measure will do far more harm than it will provide benefits. Please do not allow this ridiculous measure to pass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 08:58:43

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Below is the comment you selected to display. Comment 2530 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clay
Last Name: Basil
Email Address: scrsq.cb@gmail.com
Affiliation:

Subject: Carb Emissions Requirements For Sport Fishing Fleet

Comment:

Good morning,

Are you really that out of touch with reality? If you impose the new regulations on the the Sportfishing fleet you will kill the industry. You should be looking at the shipping vessels off our coast. The amount of pollutants they spew into the air is far greater than the combined SoCal fleet. Be realistic!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 09:05:55

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**Below is the comment you selected to display.
Comment 2531 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Janet
Last Name: Durkos
Email Address: mamadurkos@yahoo.com
Affiliation:

Subject: inconvenient "inconvenient truth"

Comment:

when I go out on a sport fishing boat, I fish with black, white, brown, and yellow people and all shades in between. The common bond among us is we all love fishing and most of us aren

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 09:21:59

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**Below is the comment you selected to display.
Comment 2532 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Bill
Last Name: Hayes
Email Address: lonewolfwch@gmail.com
Affiliation:

Subject: Sport fishing boats

Comment:

Keep your hands off the boats!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 09:46:27

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Below is the comment you selected to display. Comment 2533 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Stout
Email Address: stoutster@msn.com
Affiliation:

Subject: Stop the regulation for passenger boats

Comment:

We love to sportfish and drive personal water craft. The actual environmental impact for this is minimal. please do not ruin this critical fishing industry with over regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 09:56:11

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Comment Log Display

Below is the comment you selected to display. Comment 2534 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Matthew
Last Name: Brinkmeier
Email Address: brinkmeiermatthew@gmail.com
Affiliation:

Subject: Save fishing

Comment:

If this law is passed there will be countless jobs that will be lost along with many small businesses that revolve around the fishing industry that will close due to this law being passed. Please do not pass this law because of the terrible outcomes for the economy it will cause.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 10:03:32

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Below is the comment you selected to display. Comment 2535 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Partipilo
Email Address: ajparti@aol.com
Affiliation:

Subject: New harbor boat regulations

Comment:

I don't believe that sports fishing boats should be limited any further by new harbor regulations. Let science determine how fish and wildlife are controlled not political considerations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 10:05:18

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Comment Log Display

Below is the comment you selected to display. Comment 2536 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Victor
Last Name: Vasquez
Email Address: Victorvasquezdaniel000@gmail.com
Affiliation:

Subject: Save Sportfishing

Comment:

Hi,

My name is Victor Vasquez and I am a fellow angler located in Southern California and I truly believe that sportfishing out in the coast has become a sort of tradition for many anglers like myself. With this being said I believe this call to halt all sportfishing is totally unfair and should not be done. Thank you and I hope to hear great news on this situation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 10:18:38

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Comment Log Display

Below is the comment you selected to display. Comment 2537 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Glenn
Last Name: Sugiki
Email Address: capoaeditor@yahoo.com
Affiliation:

Subject: Veto Commercial Harbor Craft Regulations

Comment:

All commercial fishing boats should be exempt from the future unproven technology of electric engines for sportfishing commercial boats. The boating and fishing industry provide millions of dollars for the tourist industry and citizens of California. There are no alternatives to the fishing sport boats to go fishing in the ocean and would deny millions of people the pleasure of ocean fishing for future generations. I have been ocean fishing for over 50 years and will continue until I die.

Glenn Sugiki

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 10:23:23

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Below is the comment you selected to display. Comment 2538 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christian
Last Name: Totten
Email Address: 19tottenct@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

Do not ban California sport fishing. There are enough rules and regulations. You will be taking jobs and fun from millions of people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 10:43:42

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Below is the comment you selected to display. Comment 2539 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nick
Last Name: Musgrave
Email Address: Nickradius@gmail.com
Affiliation:

Subject: SAVE CALIFORNIA SPORTFISHING

Comment:

Putting a regulation on sportboats to modify engines is not thoughtful or smart. It can raise costs of operating and ticket prices. Conducting this will cause a loss of jobs, loss of family business, and less passengers going on sport boats. Whale watching boats and Sportfishing boats that conduct school science trips to be put out of business in 3-6 years. The conducted engine changes will also impact the boat's stability, CARB proposes that boats hulls will have to undergo massive reconstruction, boat owners will also have to reduce passengers to account for heavier engines. higher operational costs and fewer passengers will put many boat owners out of business within 3-6 years and put out family owned business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 11:02:09

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Below is the comment you selected to display. Comment 2540 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Melinda
Last Name: Rogers
Email Address: melbarr3485@gmail.com
Affiliation:

Subject: Sports fishing

Comment:

As a voter here in California, I find it quite distressing that Newson would propose such drastic restrictions on Sportfishing boats. I don't believe this kind of regulation is very well thought out. As an avid boating enthusiast I'm not sure this is a very smart move. Wood and fiberglass boats have been used forever. They have things that could be improved. Metal boats you will find that they will present you with a whole new set of problems. Please do not rush into these foolish "cure all" schemes. Not only will you hurt the local economy of sports fishing and whale watching but your hurting the families and all involved in this trade. Not to mention the tourist industry in these fields. We've lost enough industries and people to these not very well thought out regulations.. One need only look to the "Port of Los Angeles " and the mess they are in to know that this is not very well thought out. Let's get smart and logical. Small steps instead of these huge mistakes.!I'm against your proposal!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 11:44:45

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Comment 2541 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jeff
Last Name: Allred
Email Address: jeffallred16@yahoo.com
Affiliation:

Subject: NO !

Comment:

NO! Please don't kill out family business , this would really hurt us

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 12:38:33

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Comment Log Display

Below is the comment you selected to display. Comment 2542 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Luka
Last Name: Milenkovic
Email Address: lukamilenkovic100@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

Please reconsider the new CARB regulations as they will be greatly detrimental to the lives of thousands of people. With the new regulations, owners of sport boats will be forced to completely redo their engines which will put them out of work for a long time. To add to that, ticket prices will increase drastically in order to fund these restoration projects which will ultimately keep people off the water due to the higher price of entry.

2542.1

Sport fishing as an industry employs hinders of people who have dedicated their lives to pursuing their passion and by implementing these new regulations they will almost certainly see the ends of their careers and be forced to move to a state where they can continue their craft, or in worst possible cases be forced to start a new one.

Additionally, it will affect the lives of thousands of customers who find happiness in going out on one of these boats. Myself and countless of my friends who I've met through sportfishing, constantly comment on how this is our therapy. Being on the water helps clear our mind of all the negativity that we deal with when on land. With the prices of tickets going up due to the regulations, we will either be forced out of going, or drastically decrease the amount of times we can go.

2542.2

Please, reconsider these regulations as the economic impact, and the emotional impact this will have drastically outweighs any benefit created.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 12:51:59

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Below is the comment you selected to display. Comment 2543 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jess
Last Name: Feddersen
Email Address: yesca1@mac.com
Affiliation:

Subject: UNREASONABLE!

Comment:

We cannot expect an industry that is operating on a paper thin profit margin to shoulder expenses in such a way, or at such a pace, as what is being proposed. This will effectively mean the end of the ability of most people to experience the wonders of the California coast, and thus the Pacific Ocean, while also putting the hard working people of many coastal tourism related industries and family owned and operated businesses past the point of being able to operate successfully. There are other options, ways to both protect our environment and the people that depend on it for their livelihoods, which are more intelligent and better suited for all parties involved. We need reasonable ideas from reasonable people to prevail!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 12:48:21

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Below is the comment you selected to display. Comment 2544 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: henry
Last Name: haynes
Email Address: btbqqq@gmail.com
Affiliation:

Subject: harbor craft

Comment:

I object to the the above proposed amendments--the assumptions that provide the basis for them is factually flawed--and subject to the ongoing hysteria about the falling sky--

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 13:26:29

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Comment Log Display

**Below is the comment you selected to display.
Comment 2545 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Richard
Last Name: Tucker
Email Address: SIKSTWIST@YAHOO.COM
Affiliation:

Subject: protect sportsfishing
Comment:
Please vote no to ban sportsfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 14:29:08

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Comment Log Display

**Below is the comment you selected to display.
Comment 2546 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Clark
Last Name: Richardson
Email Address: rialclark@gmail.com
Affiliation: OSA

Subject: abandon draconian engine regulations
Comment:
abandon draconian engine regulations

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 15:02:42

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Comment Log Display

Below is the comment you selected to display. Comment 2547 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Frank
Last Name: Licata
Email Address: fplspider@aol.com
Affiliation:

Subject: New boat regulations

Comment:

As someone who has been a participant in both open party boat fishing and whale watching trips I find the new proposed regulations, which effectively ban wooden and fiberglass boats (80% of the current fleet) to be both financially and socially unfeasible. If you want to basically kill an industry and the jobs they produce not to mention the enjoyment it brings to people one could not find a more effective means.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 15:22:37

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Comment Log Display

Below is the comment you selected to display. Comment 2548 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: mike
Last Name: doherty
Email Address: mesmd91@gmail.com
Affiliation: marine engine service inc

Subject: tier 4 engines in fishing vessels

Comment:

Hello I want to make some points about tier 4 engines in fishing vessels

tier 4 engines produce excessive amounts of heat and can not be in confined spaces there is the likelihood of a fire at sea this happens to trucks quite often

2548.1

tier 4 engines are meant to run at high load factors to make the emissions and aftertreatment equipment work properly fishing vessels run at low speed and load factors when fishing or trolling this will lead to 2 things fire at sea or engines going into a limp mode when the emission control equipment malfunctions lets think about this if bad weather comes up and you're coming home and the engines go to limp mode then you have a boat load of people in danger

2548.2

bottom line I have been in the engine business for 30 years these engine are nothing but trouble in the on road equipment they will be even more problematic in the marine industry these facts above are based on industry experience I have attended some of these online meetings I was curious if any of the carb staff has any diesel engine background I have not seen any practical application reviews of these engines in this type of vessel thank you for your time in considering my comments
Mike Doherty Marine Engine Service Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 15:43:40

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Comment Log Display

Below is the comment you selected to display. Comment 2549 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hal
Last Name: Millar
Email Address: halgordonmillar@gmail.com
Affiliation:

Subject: Effect of CHC2021 on Sportfishing

Comment:

My family has been sportfishing on commercial boats for 4 generations. My daughter and I would like to continue that tradition, which will be very hard to do if new state regulations make captains unable to ply their trade because of the enormous cost of questionable "upgrades" or entirely new propulsion systems.

And, by the way, who gave the state the right to effectively steal from its citizens through regulation without compensation?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 16:03:22

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Below is the comment you selected to display. Comment 2550 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Grant
Last Name: Hill
Email Address: granthill1@prodigy.net
Affiliation:

Subject: CARB Regulations hurt the Commercial passenger fishing boats.

Comment:

While the clear air and water initiative is a step we all want for future generations, it must be worked together with all the stakeholders.

To push regulation onto small private companies, would drive out many businesses and the loss of thousands of jobs. the State or the Feds should provide low cost funding for these improvements, with a rational time table.

And get the Coast Guard involve, as they ultimately would be the enforcement are of these new regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 16:17:33

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Comment Log Display

Below is the comment you selected to display. Comment 2551 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tyler
Last Name: Brandon
Email Address: Tylerbrandon7@icloud.com
Affiliation: Deck hand

Subject: Please do notttt!!!

Comment:

Please do not let this pass because this will ruin fisherman livelihood and this is how people come out on boats have fun and catch fish the all the crew members on each boat work so hard to make sure everyone on board is ok and having a good time please donor ruin this for the fisherman' that make a living off of fishing there is no need for any of thiss and. No need to stress every now net captain out thier any ways TB out .

Attachment: www.arb.ca.gov/lists/com-attach/2888-chc2021-AjZcPwczWG9RZQU0.jpeg

Original File Name: 4E5D210F-21F1-4C51-B478-EED5767857D5.jpeg

Date and Time Comment Was Submitted: 2021-11-09 18:04:53

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Day 5 so my fiesty one threw a pillow at me and got upset at so... [See More](#)

35

12 Comments

Like

Comment

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Below is the comment you selected to display. Comment 2552 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brett
Last Name: B
Email Address: Brettb@gmail.com
Affiliation:

Subject: Save our fishing!

Comment:

Do NOT remove charter boat or private boat fishing! This is a livelihood for many and is very important to our communities. The government is already ruining our state, don't be stupid and make it worse.

Sincerely,
SoCal Fisherman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 18:44:06

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Comment Log Display

Below is the comment you selected to display. Comment 2553 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Ghobrial
Email Address: Oldcarchaser@gmail.com
Affiliation:

Subject: Sportfishing and whale watching

Comment:

To whom it may concern,
Please vote no on the 19th of November. As a father and husband who loves to enjoy our ocean, wether whale watching or sportfishing with the kids. I fear this will dramatically impact our ability to enjoy our ocean. It will also double if not triple the cost that we cannot afford. Please vote no and save our ability to enjoy our ocean.

Thank you,

Steve Ghobrial

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-09 18:57:58

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Comment Log Display

Below is the comment you selected to display. Comment 2554 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Geller
Email Address: doradoben@verizon.net
Affiliation:

Subject: chc2021

Comment:

I am a long time resident of Southern California and have fished here for approximately forty (40) years. I've enjoyed taking my children when they were young and then as adults. I respectfully request that sportfishing remain in it's current state off the California coast.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 04:48:46

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Comment Log Display

Below is the comment you selected to display. Comment 2555 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Darryl
Last Name: Bentley
Email Address: dcbchrisbentley@gmail.com
Affiliation: CCA CAL, Oceanside Senior Anglers

Subject: chc2021

Comment:

Ms. Liane Randolph,

As a native Californian, life long fisherman, and member of Oceanside Senior Anglers, I am writing in opposition of the California Air Resource Board's Proposed Amendments to the Commercial Harbor Craft Regulation.

The proposal is totally unrealistic and would negatively impact or destroy the ability of thousands of people of all ages to enjoy fishing, diving, or exploring the ocean's ecosystems.

2555.1

If the modifications required were possible to implement in existing vessels, the costs that would need to be passed down would make passenger costs unaffordable to most. The moth-balling of existing vessels and purchase of new "compliant" vessels would generate the same results.

2555.2

Forcing these commercial craft to either drastically increase their costs or close their business, in turn, is an economic disaster for countless other individuals in related industries, as well as conservation efforts supported by those that currently enjoy the services these vessels provide.

Oceanside Senior Anglers is a non-profit organization that raises funds to take kids and military personnel out on recreational fishing trips at no charge. We charter many day trips every year to provide these life changing experiences. We also charter many vessels throughout the year for our members to affordably enjoy the opportunity to fish for sport and table fare.

2555.3

Implementation of the proposed emission regulations would severely restrict or render our club's ability to continue.

The Board should rescind this proposal and thoughtfully create a plan that the industry will be able to implement without creating an economic disaster.

Sincerely

DC Bentley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 06:27:47

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Comment 2556 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ryan
Last Name: Beiter
Email Address: Rb22892@icloud.com
Affiliation:

Subject: Sports fishing

Comment:

As a 15 year old that loves fishing this would destroy my futer of fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 07:39:20

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**Below is the comment you selected to display.
Comment 2557 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ian
Last Name: Farrell
Email Address: ianfarrell976@gmail.com
Affiliation:

Subject: Gavin Newsom's fishing boat regulations

Comment:

I don't support what he's gonna do to the fishing industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 08:00:03

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Below is the comment you selected to display. Comment 2558 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Ohlman
Email Address: peowv5@yahoo.com
Affiliation:

Subject: Please No!

Comment:

Please do not make this a requirment as it will put many people out of business and create more emissions by retiring good machinery.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 08:05:47

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Below is the comment you selected to display. Comment 2559 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kurt
Last Name: Schindler
Email Address: kurtschindler@hotmail.com
Affiliation:

Subject: Sportfishing

Comment:

These new regulations that are up for discussion will kill sportfishing and environmental tours (whale watching). The technology is not really there for such a dramatic change for these boats and the increase in cost would be prohibitive for most people. I guess the rich people could still afford it, and who cares about all the others. I'm someone who does 90 percent of my fishing from a kayak, but not everyone can do that. Being out on the water is a great way for people to spend time, so let's be reasonable in our requirements for these on the water businesses. Thank you.

2559.1

2559.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 08:50:55

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Below is the comment you selected to display. Comment 2560 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Troy
Last Name: Hardy
Email Address: thardy2013@yahoo.com
Affiliation:

Subject: Save sport fishing

Comment:

To whom this may concern,

The sport boat fishing culture has allowed families to expose their children and other new anglers to fishing at a fraction of a cost vs chartering a private boat. My grandpa got me into fishing on these boats 20 plus years ago. My father and I still take multiple trips every year on the sport boats. We can get more trips with our money this way. It is also a good way for recreational anglers to get sushi grade fish on their tables and feed their families. I do not think it is fair imposing the CARB restrictions to sport fishing and whale watching boats. Most of these boats are family owned, they would have to take on the cost of repowering their boats. If the boats can even be configured for the new engines. That cost will reflect down on the customer. The emissions from the sport boats is nothing compared to the cargo fleet. I hope we can save sport fishing. It is my passion and my escape. I hope an exception can be made to save sport fishing for both the angles and business owners.

2560.1

2560.2

2560.3

2560.4

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:12:11

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Below is the comment you selected to display. Comment 2561 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: LILA
Last Name: MARTIN
Email Address: im4damail@yahoo.com
Affiliation:

Subject: Save California sport fishing

Comment:

Please save our California sport fishing industry. This is the only way for may of us to enjoy our coastal waters. People like myself can't afford our own boats so we depend on the local commercial boats. Over the years they have become family. Please do not destroy their livelihoods.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:20:57

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Below is the comment you selected to display. Comment 2562 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kenneth
Last Name: Hardy
Email Address: Kingcornea@gmail.com
Affiliation:

Subject: Commercial Harbor Craft regulations

Comment:

As a California native for over 60 years, I've witnessed the improvements to our environment first hand. I was competing in swimming and water polo during the 70s when practices would be cut short due to smog alerts. Where on good days there would be a tickle in your lungs and a shallow cough all evening.

Those days are long gone. Improved management of air pollution can be seen on a daily basis by every California resident. But every industry is not contributing to air pollution equally. The small number of watercraft in the sport fishing fleets are not causing enough impact on our air quality to shut them down permanently. One container ship from a foreign country without regulations will discharge more pollutants than an entire harbor of fishing boats. If new regulations are proposed for new boats to be added to fleets, that would be understandable..

2562.1

Please allow our sport fishing fleets to continue to operate without undue regulations or changes.

2562.2

Kenneth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 09:09:48

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Comment Log Display

Below is the comment you selected to display. Comment 2563 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Skyler
Last Name: Rangel
Email Address: rangel.skyler199@gmail.com
Affiliation:

Subject: Save sportfishing !

Comment:

Sportfishing has been around for years on public vessels ,this does not deeply affect our ocean waters like oil leaks and contamination leaks do from el segundo plant and vessels that rip apart pipes on the ocean floor releasing oil into the environment of the ocean. Put bigger laws on those guys ,not the families who own and operate fishing vessels . This is all we have as fishermen who can't afford boats,don't take it away from us!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 10:17:18

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Comment 2564 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Bradley
Last Name: Morales
Email Address: bradleyisthebest@gmx.com
Affiliation:

Subject: Fishing

Comment:

Please don't remove sportfishing/ whale watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 10:21:41

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**Below is the comment you selected to display.
Comment 2565 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: michael
Last Name: Thompson
Email Address: mthompson041@cox.net
Affiliation: NEWPORT LANDING SPRORTFISHING

Subject: HARBOR CRAFT RULE
Comment:
SEE ATTACHMENT

Attachment: www.arb.ca.gov/lists/com-attach/2907-chc2021-AWIUM1MgVGUAaVAi.pdf

Original File Name: HARBOR CRAFT RULE.pdf

Date and Time Comment Was Submitted: 2021-11-10 11:24:19

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Liane Randolph

California Air Resources Board

1001 I st.

Sacramento, CA. 95814

My name is Mike Thompson and I am the owner of Newport Landing Sportfishing and Daveys Locker Sportfishing and Whale Watching in Newport Beach, CA.. I have participated in recreational and commercial fisheries for my entire adult life. This letter is in response to the CARB proposed Harbor Craft Rule.

I am going to be brief as you have heard from many others in the marine community regarding the potential consequences to industrial and recreational small businesses and the associated coastal communities they help support.

Your proposed rule shows no consideration whatsoever for the economic consequences of this action. You will, quite simply, be eliminating many small businesses in what you claim is for the "greater good". Remember we are also part of the coastal population you claim to defend. All you are really doing is putting many people out of work with some demonstrably suspicious data analysis. This is not the way government should operate. ALL downstream affects should be considered and this you have not done.

2565.1

Telling a small business that their equipment must be retired because they cannot comply to rules that are impossible to comply with is not the way our government should work. The technology does not yet exist and there is no guarantee of when it will exist. Your pipe dream of zero emissions is just that, a pipe dream, FOR NOW.

2565.2

My recommendation is that you shelve this proposal until there is some progress in a proven technology that will move a vessel through the water efficiently and safely. Your claims of "the technology is coming" is not good enough. The technology must be here and proven before you should propose changes. Anything else is massive government overreach, pure and simple.

With regard to the data that CARB is basing their conclusions on:

1 - The stated benefits are greatly overstated.

2 - The cost of retrofit or replacement of vessels is greatly understated.

2565.1 continued

Corporate Office: 949.566.9025

309 Palm • Suite A • Newport Beach • California 92661 • 949.675.0550 • Fax 949.675.0557

The data gaps and glaring inaccuracies in your analysis have all been provided to you by others so I will not delve into that here. A lot of very smart people have shown that the CARB analysis flawed in many ways. Bottom line, you are just putting a lot of people out of work and out of business just so you can check a box and pat yourselves on the back. A truly sad situation.

That is all I have to say so please consider a "stay of execution" for the small business marine industries which this rule, as currently proposed, will be crippling. THINK ABOUT IT! 2565.3

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Thompson", with a long horizontal flourish extending to the right.

Mike Thompson NEWPORT LANDING / DAVEYS LOCKER

Comment Log Display

Below is the comment you selected to display. Comment 2566 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Howell
Last Name: Poe
Email Address: tpoe31@verizon.net
Affiliation: NONE

Subject: CHC2021

Comment:

- Please provide a exemption for EXISTING "Commercial Passenger Fishing" vessels from this regulation. At Least consider a longer timeline for compliance for the owners of these business as I believe if the regulation is passed as presented to the public will
- 2566.1
1. Harm the business owners financially
- 2566.2
2. Harm the Public from having access to fishing in California near shore water.
- 2566.3
3. Harm the industries that serve all the "Commercial Passenger Fishing" fleets due the major reduction in available boats for The Public to use for their gathering of fish for food and enjoyment in our great State of California.
- 2566.4

Sincerely

Howell Poe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 12:24:01

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Comment Log Display

Below is the comment you selected to display. Comment 2567 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Proud
Email Address: waterfront@redondo.org
Affiliation:

Subject: Proposed Commercial Harbor Craft Regulations

Comment:

Please see the attached letter from the Redondo Beach Harbor Commission.

Attachment: www.arb.ca.gov/lists/com-attach/2910-chc2021-WjZVNgZzWH9VNgh6.pdf

Original File Name: Letter to CARB - FINAL SIGNED.pdf

Date and Time Comment Was Submitted: 2021-11-10 12:14:15

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Waterfront & Economic
Development

415 Diamond Street, P.O. Box 270
Redondo Beach, California 90277-0270
www.redondo.org

tel 310 372-1171
fax 310 937-6621

November 8, 2021

Liane M. Randolph
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Commercial Harbor Craft Regulations

Dear Chair Randolph:

The Harbor Commission for the City of Redondo Beach submits its comments on the proposed amendments to the Commercial Harbor Craft (CHC) Regulation, which is scheduled for hearing by the California Air Resources Board (CARB) on **November 19, 2021**. While our Harbor Commission supports CARB's goals of improving statewide air quality, we question the need to expand state regulations well beyond existing U.S. EPA engine standards for all affected vessels,¹ including non-profits, local municipalities, family-owned businesses and other small enterprises, such as, sportfishing, charter boats, whale watching, sightseeing, educational, research, construction, training and similar activities.

2567.1

As summarized below, our Harbor Commission has numerous concerns regarding inequitable regulation of different vessel categories, considerable expense of vessel upgrades, viability of current pollution controls and other concerns. Consequently, the Harbor Commission strongly urges CARB to conduct further detailed analysis of socioeconomic impacts on small enterprises, and work with industry associations and stakeholders to provide exemptions, deferrals, financial assistance and other regulatory relief until such time compliance can be feasibly achieved.

PROPOSED AMENDMENTS ARE EXTENSIVE AND INEQUITABLE

Even though U.S. EPA applies its strictest diesel particulate and other pollution standards to marine engines that are rated above 600 kW,² CARB seeks to expand its CHC regulations well

¹ CARB Proposed Amendments to the Commercial Harbor Craft Regulation, Staff Report: Initial Statement of Reasons, September 21, 2021, Page ES-2

² 40 CFR §1042.101, et. seq.

beyond such federal requirements. Specifically, CARB proposes several significant changes that will adversely impact small enterprises, including:

- Affected vessels with the strictest emission standards will be expanded to include Commercial Passenger Fishing Vessels (CPFVs or sportfishing), tank barges, research, hydrographic surveys, training, construction and other workboats;³
- CARB proposes Tier 3 and Tier 4 engine standards plus use of diesel particulate filters (DPF) which exceed U.S. EPA standards for affected vessels;
- There are significant inequities in compliance timeframes and emission standards for commercial fishing versus sportfishing, research, workboats and other affected vessels;
- CARB proposes to change the “recreational vessel” exemption to no longer include passenger capacity thresholds, and therefore will regulate any diesel-powered vessel engaged in commercial service as a charter or hired to carry any number of passengers;
- CARB proposes to remove an existing exemption for small diesel marine engines that are less than 50 hp (or 37 kW).

Further, CARB staff anticipates the most common pathway for meeting its strict engine performance standards would be repowering or rebuilding existing marine engines and installing a Level 3 DPF that can achieve greater than 85% diesel particulate reduction.⁴ In those cases where engine and DPF retrofits are not feasible, CARB anticipates that existing vessels must be retired, and new vessels will need to be purchased at significant costs in order for operators to comply with the proposed amendments.⁵

LOCAL COMMUNITY IMPACTS

The city of Redondo Beach has harbor operations and local businesses that will be impacted by the proposed CHC amendments. King Harbor and Redondo Pier occupies over 150 acres of land and coastal areas with various tourist, recreational and commercial activities. Within King Harbor, there are four marinas providing approximately 1,400 slips for personal, commercial and municipal uses. In addition, there are major hotel chains, dozens of small and franchise restaurants, retail stores, banquet facilities, parks and open space and numerous other uses. As a result, King Harbor and Redondo Pier provide significant beneficial public and commercial uses which draw tourists from all over the world, support local jobs and generate tax revenue for public services.

2567.2

³ CARB Proposed Regulation Order, Page 33 – Definition of “Workboats” will include self-propelled vessel that is used to perform any duty not specifically listed by another category of commercial harbor craft, including but not limited to duties such as fire/rescue, law enforcement, research, hydrographic surveys, spill/response, school training, marketing, and construction (including drilling). Workboat can include vessels owned by public, private, and not-for-profit organizations.

⁴ CARB Proposed Amendments to the Commercial Harbor Craft Regulation, Staff Report: Initial Statement of Reasons, September 21, 2021, Page III-3

⁵ Id. at Page III-3

Moreover, Redondo Beach and its local businesses are still recovering from the impacts of COVID-19, which our Harbor Commission is concerned the proposed CHC amendments will further delay our recovery. In addition, sportfishing, charter boats, sightseeing and other similar operations provide the only means for those who cannot afford their own boats for a cost-effective way to access, enjoy and learn about our coastal waters, flora and fauna. King Harbor is the only harbor in the 25 miles of coastline between Marina Del Rey and the Port of Los Angeles. With this central location it is a critical access point for a large segment of LA County. King Harbor's proximity to key fishing and marine mammal areas off of Redondo and the northern end of the Palos Verdes Peninsula adds to the attraction for those who cannot afford their own vessels.

2567.3

2567.4

POLLUTION CONTROLS FOR SMALL VESSELS ARE NOT VIABLE

As noted above, CARB staff anticipates the most common compliance pathway would be repowering or rebuilding existing marine engines and installing a Level 3 DPF, or otherwise new vessels must be purchased. However, despite Level 3 DPFs as the primary pollution controls to comply with proposed emission standards, CARB has reported that there are no such DPFs currently available for marine engines.⁶ Moreover, the Cal Maritime Academy confirmed in a report to CARB that the size and weight of such DPFs and other engine retrofits would render CPFVs and other small vessels unstable, and also pose significant safety concerns for passengers and crew. As we understand these concerns, existing boat hulls for sportfishing, charters and other smaller vessels were not originally designed to accommodate the additional size and weight of expected engine retrofits and DPFs. In addition, operational issues with the DPFs could result in unexpected equipment failure when the boats are out at sea with passengers. While such equipment failure is manageable on land, such circumstances at sea may pose life threatening and other safety concerns for passengers and crews that could be adrift for hours.

2567.5

Further, our Harbor Commission views many of the proposed amendments as being inequitable in their regulation of different vessel categories. For example, sportfishing, research, educational, construction and other workboats have stricter emission standards with compliance dates beginning as early as 2023 while commercial fishing has less stringent emission standards with compliance dates starting in 2030.⁷ As another example, the Sportfishing Association of California estimates these amendments could impact 174+ sportfishing vessels statewide, which are principally small business operators.⁸ Although these vessels spend minimal time in harbors with their engines running, and typically spend much of their time operating miles offshore with negligible adverse impact to local air quality, sportfishing vessels will be subject to the most stringent emission standards. In our view, there is no justification for such unfair treatment, as all affected vessels should have the same engine standards and maximum allowable time.

2567.6

⁶ CARB Proposed Amendments to the Commercial Harbor Craft Regulation, Staff Report: Initial Statement of Reasons, September 21, 2021, Page I-35

⁷ CARB Proposed Regulation Order, September 21, 2021, Tables 16, 17, 18, 19, 21 – Compliance Dates

⁸ CARB Standardized Regulatory Impact Assessment, July 7, 2021, Page 101, Table C-37 - CARB estimates 292 affected vessels classified as Commercial Passenger Fishing Vessels (CPFVs, i.e., sportfishing, charters)

SMALL ENTERPRISE IMPACTS ARE SIGNIFICANT

For the typical small enterprise that provides sportfishing, sightseeing or similar activities, CARB's economic analysis estimates over \$1.8 million of non-amortized costs for the average vessel replacement, which is nearly 2x the average annual revenues for such enterprises.⁹ Moreover, CARB's economic models assume affected businesses will be able to pass along amortized compliance costs for new vessels or engine retrofits onto customers, however, CARB offers no technical, industry or other support for this key assumption.¹⁰ Despite these estimates, CARB concludes the CHC amendments are unlikely to have a significant impact on the overall California economy.¹¹ However, it is our view CARB's conclusions do not reflect the financial impacts on individual small enterprises and niche market segments, which are likely to be significant given the above economic analysis.

2567.7

Within a matter of a few years, the vast majority of newly affected vessels will have to be taken out of service as vessels that are made of wood and fiberglass cannot be modified as steel hulls can. Consequently, affected businesses will incur significant costs to modify existing vessels and engines, or otherwise be forced to purchase a new vessel. Assuming such modifications can be made to existing vessels, another impact to affected businesses will be reductions of passenger loads by over 40 percent to account for engine modifications that are greater in size and weight. On the other hand, for boat owners required to purchase a new vessel, the option of financing new vessels is not possible when existing boats will have little to no resale value once deemed noncompliant in California. Consequently, the proposed regulations force these enterprises into an untenable position. They cannot afford to purchase new vessels while reconstructed vessels are too expensive to operate with reduced passenger loads that generate lower revenue. As a result, many industry experts strongly believe that these new regulations will force boat owners out of business within 3-6 years after implementation, which CARB's economic analysis also does not adequately address.

CONCLUSION – FURTHER STUDY IS REQUIRED

Redondo Beach is economically dependent on strong and vibrant hospitality, tourism and other commercial activities from its harbor. As noted, our Harbor Commission shares the CARB's objective to improve statewide air quality, however, it is our view the proposed CHC regulations will adversely affect potentially thousands of family owned businesses, non-profits and other small enterprises across the state. As a consequence, we request that CARB conduct more detailed socioeconomic analysis on the impacts of the proposed amendments on affected small enterprises and coastal communities that rely on such commercial activities. Further, we strongly urge CARB to work with industry associations and other stakeholders to develop exemptions, remove regulatory inequities, offer financial assistance and provide other relief until such time compliance can be reasonably achieved for these vulnerable enterprises.

2567.8

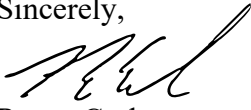
⁹ Id. at Page 110, Table C-32 – Compliance Cost Analysis for Small Business, Commercial Passenger Fishing Vessel

¹⁰ CARB Standardized Regulatory Impact Assessment, July 7, 2021, Page 110

¹¹ CARB Proposed Amendments to the Commercial Harbor Craft Regulation, Staff Report: Initial Statement of Reasons, September 21, 2021, Page ES-6

The Redondo Beach Harbor Commission appreciates the opportunity to comment on the proposed CHC regulations, and thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Carlson', written in a cursive style.

Roger Carlson
Chair
Harbor Commission
City of Redondo Beach



Comment Log Display

Below is the comment you selected to display. Comment 2568 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dina
Last Name: Grivetto
Email Address: dgrivetto@gmail.com
Affiliation: Ocean Odyssey, Inc.

Subject: CHC2021

Comment:

Please see attached letter on behalf of CPFV Ocean Odyssey and San Diego Floating Lab.

Attachment: www.arb.ca.gov/lists/com-attach/2911-chc2021-BWZQN1AjBzZSCwd3.pdf

Original File Name: CARB proposal.pdf

Date and Time Comment Was Submitted: 2021-11-10 14:39:08

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Dina Grivetto
Ocean Odyssey, Inc.
2803 Emerson Street
San Diego, CA 92106
(619) 889-4535
dgrivetto@gmail.com

November 9, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CARB's Proposed Revisions to the Commercial Harbor Craft Regulations

Dear Ms. Randolph:

I am the owner of Ocean Odyssey in San Diego, CA. Ocean Odyssey is a passenger vessel that specializes in sportfishing for 6 months out of the year and marine education for the other half. Ocean Odyssey has been in my family since 1995 and prior to that we owned 3 other multi use commercial passenger vessels.

Ocean Odyssey is unique to other charter boats in the aspect that it holds a contract with the San Diego County Office of Education to provide marine education field trips to students during the school year. We have offered these field trips on Ocean Odyssey and our boats prior since 1981. This educational experience is exemplary in every facet. Many students that board Ocean Odyssey experience a series of firsts: First boat trip, first ocean trip, first sea life experience. This field trip is remembered for generations as the best field trip of their

2568.1

educational years and parents and grandparents reach out to me often to ask about taking their child's class on the Floating Lab field trip. In the 40 years that the Floating Lab has operated out of San Diego Harbor we can easily estimate accommodating over 1 million students. These students range from grade K through college level with some classes training to become marine biologists and environmental scientists.

The proposed engine replacement program that you are suggesting is such a bad proposal that I don't even know where to begin. But first and foremost it would put an end to the Floating Lab field trips. The proposition of raising the ticket price to accommodate the modifications or rebuilding of vessels would not be feasible to Ocean Odyssey and the Floating Lab. Many classes have to raise funds to attend the Floating Lab onboard Ocean Odyssey as the school does not have the money in their budget for offsite activities. A fee increase to support the vessel retrofit or rebuilding process is not attainable. The closure of this educational program would be yet another loss to California students. The onboard, hands on experience is the key to making this field trip so memorable.

The fact that the required machinery needed to repower my existing vessel is not even available for purchase in a marinized version is a very irresponsible oversight in your proposal. In closing I ask that you please reconsider your proposal.

2568.2

Sincerely,

Dina Grivetto
Owner



Comment Log Display

Below is the comment you selected to display. Comment 2569 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Rimel
Email Address: Lovetohunt44@yahoo.com
Affiliation:

Subject: Environment

Comment:

I understand the motive is to protect our world and our fisheries electric conversion systems for boats . So that we may continue to enjoy our environment . Thank you for your time and consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 14:35:34

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Below is the comment you selected to display. Comment 2570 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: DENNIS
Last Name: GREEN
Email Address: degbti@gmail.com
Affiliation:

Subject: sport fishing boats

Comment:

I am very concerned regarding the possibility of losing sport fishing boats off the coast of southern California as well as the entire state. This is not the answer and an over reaction. Please look for new ways to reach your goal. By not allowing boats to fish that support families and communities is not the answer!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 15:28:58

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**Below is the comment you selected to display.
Comment 2571 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Max
Last Name: Patron
Email Address: patronmax7@gmail.com
Affiliation:

Subject: Save sportfishing and whale watching

Comment:

Don't get rid of these two activities, many people enjoy these both activities and is a main tourist attraction for California and plus people who enjoy sportfishing is a lively hood to them, so please don't get rid of sportfishing and whale watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 15:51:38

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**Below is the comment you selected to display.
Comment 2572 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Lis
Last Name: Perry
Email Address: lperry@sम्म.org
Affiliation:

Subject: chc2021 - SBMM letter

Comment:

See attached letter referring to chc2021 on behalf of the Santa Barbara Maritime Museum.

Attachment: www.arb.ca.gov/lists/com-attach/2916-chc2021-VyRUMFQ4VmgDWgVp.pdf

Original File Name: SBMM Letter - chc2021.pdf

Date and Time Comment Was Submitted: 2021-11-10 16:24:23

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November 2, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814



Dear Chairwoman Randolph,

The Santa Barbara Maritime Museum is the leading provider of marine science education in Santa Barbara County to school age children. Each winter, the Museum takes low income, at-risk, and disadvantaged youth out on the water aboard local sportfishing boats during their "off" season. The purpose of the trips is to provide hands-on, authentic marine science education to Central Coast students. A lab is set up on board the boats for students to study phytoplankton and zooplankton. A live otter trawl is also used to collect specimens as part of the program. A marine scientist and a marine naturalist from the Maritime Museum conduct scientific lessons.

2572.1

During the winter season of 2020 (January-February), the Museum delivered science programs to 28 classes (696 students), with 22 of those being Title 1 schools. Additionally, four groups were from after-school at-risk youth programs. Students who participated in the program were from Carpinteria, Santa Barbara, Goleta, Santa Ynez, and Santa Maria. The program has been in place for many years and continues to grow and serve additional students.

In addition to a high quality and unique marine science program, students are exposed to the world of non-commercial sportfishing. Students interact with scientists and work side-by-side with local fishermen running a small business. Along with scientists, students are able to engage with the boat captain and crew to learn and understand different professions. The opportunity to expose students to a variety of unique careers is a valuable component.

Both the mission at the Maritime Museum and our marine science program are completely dependent on our relationship with the small family business that operates the local sport fishing boats. It is a mutually beneficial relationship that has developed and expanded over many years in the Santa Barbara Harbor. There is no other option for our marine science program. The California Air Resources Board (CARB) has proposed impractical and cost prohibitive engine emission regulations. Enforcement of these proposed regulations will end our marine science program. The real cost to the children of the greater Santa Barbara area is immeasurable. We sincerely hope a solution to reduce emissions can be reached without putting our small local fleet of sportfishing boats out of business. Our Marine Science program depends on it.

2572.2

Thank you for your consideration.

Sincerely,



Linda Stirling
Board of Directors
Chair, Education Committee



Holly Lohuis
Marine Biologist/Naturalist
Education Committee



Lis Perry
Director of Education



Comment Log Display

**Below is the comment you selected to display.
Comment 2573 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: ALLAN
Last Name: HERBERT
Email Address: THEHERBZ@AOL.COM
Affiliation:

Subject: I SUPPORT RECREATIONAL SALTWATER FISHING
Comment:
I SUPPORT RECREATIONAL SALTWATER FISHING

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 16:28:36

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**Below is the comment you selected to display.
Comment 2574 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: McManus
Email Address: john@goldenstatesalmon.org
Affiliation: Golden State Salmon Association

Subject: chc2021
Comment:
see attachment

Attachment: www.arb.ca.gov/lists/com-attach/2918-chc2021-Wj1WlwR2AjAEXQRn.pdf

Original File Name: GSSA comments on proposed comm harborcraft regs.pdf

Date and Time Comment Was Submitted: 2021-11-10 17:32:36

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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"A Voice for Salmon"
365 Days a Year

November 9, 2021

Liane Randolph, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA. 95812

RE: Need to ensure practicable requirements within CARB's commercial harbor craft regulations

Dear Chairwoman Randolph,

The Golden State Salmon Association (GSSA) writes to express our concerns over the Air Board's pending airborne toxic control measures for commercial harbor craft ('CHC'). GSSA has thousands of members throughout California who are commercial and sport fishermen and women, fishing and coastal businesses, a native tribe, and others.

As currently proposed, these pending regulations would have significant and irreparable negative impacts on the commercial charter fishing and whale watching vessel owners, ports, and coastal communities, many of whom are members of GSSA. These regulations would adversely impact public access to the natural beauty and bounty of California's magnificent coastal waters because operators wouldn't be able to comply. They can't comply because the technology required to do so literally doesn't work.

2574.1

We believe there is time for remedial actions to ensure that your vital work to protect public health, air quality, and our climate doesn't impose impracticable or even impossible burdens on residents.

The Legislature and Governor Newsom have recognized the importance of maintaining coastal community health and public access to the ocean resources the State painstakingly conserves and manages. The state worked during the protracted COVID-19 emergency to restore tourism-based jobs and support small business recovery. These are some of the same jobs and businesses that would be shut down if this rule is now forced on them.

2574.2

Commercial Passenger Fishing Vessels (CPFV), also known as charter fishing vessels, are a critical part of coastal economies and community recovery. These businesses are the primary means by which the public, including disadvantaged communities, who do not themselves own a boat, have access to the living marine resources of our state through fishing and whale watching. CPFV operators also partner in research and marine education. Federal, state, and university researchers (including students) utilize, often at no cost, CPFVs to conduct research on the health of marine waters and fisheries. In addition, vessel owners work with schools and nonprofits

2574.3

(including Title 1 schools, disadvantaged youth, and veterans) to provide education and access to many that would not be able to access our marine environment any other way.

State law ensures that regulatory burdens are feasible and equitable both on implementation and for continuing to expand access opportunities for disadvantaged communities. Unfortunately, rather than enhance access to the ocean and economic recovery, the proposed rule would impede coastal communities by putting many family-owned and operated CPFV out of business and reducing affordable access to marine recreation. These requirements are not practicable, they are not cost-effective, and they are not technologically feasible. So, again, the solution the agency is seeking to implement on these vessels truly doesn't work.

2574.4

These requirements would require the installation of Tier 4 marine diesel engines and diesel particulate filters within CPFV that have been acknowledged by agency staff to be either impossible to acquire because they are not available on the open market, infeasible to install because operators cannot conform to US Coast Guard vessel safety requirements, or unsafe to operate because they run at operating temperatures that preclude their installation in wood and fiberglass hulls.

2574.5

The proposed rule separates, for the first time, CPFV and commercial fishing vessels (CFV), which we believe is inappropriate. Both CPFV and CFV require operators to purchase commercial fishing licenses. Operators have used similar sizes and types of boats that operate in similar offshore areas, both spending most of their operating time far away from population centers. Unfortunately, the current structure of the proposed rule would separate these two classifications of harbor craft and, in so doing, require CPFV to conform to impracticable requirements that are neither cost-effective nor technologically feasible.

2574.6

The Legislature has directed your agency to take prudent action to reduce airborne toxins with the further direction that implementation programs be 'practicable' (HSC §39650(k)) as well as 'cost-effective, and technologically feasible' (HSC §43013(a)). We appreciate CARB's efforts to implement policies to reduce emissions that impact climate change and reduce criteria pollutants. However, the proposed rule does not conform to the Legislature's statutory guidance for regulatory practicability.

2574.7

Implementing the proposed rule would bankrupt hundreds of businesses and cause thousands of Californians to lose access to the ocean. Therefore, we respectfully request that CARB amend the proposed rule to place CPFV back with CFV to provide an achievable, feasible, and equitable compliance pathway to reduce emissions. This is something all sides can support.

2574.8

Thank you for your attention to this critical matter.

Sincerely,



John McManus, president
Golden State Salmon Association

Comment Log Display

Below is the comment you selected to display. Comment 2575 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Hancock
Email Address: spiderj1970@gmail.com
Affiliation: None

Subject: CHC2021

Comment:

In 1975, I moved to San Diego having graduated from college in an adjoining state. Shortly thereafter, I began an active sport fishing life first experiencing half-day trips and working up through full day and later a 10-day trip all originating out of San Diego.

It is remarkable that so many of the boats that brought me countless hours of enjoyment still serve the fishing public.

I appreciate and understand environmental concerns. My understanding is that modification of the existing fishing boats is difficult, if not impossible, to achieve. With it goes the livelihood of the captain, crew, dock workers, potential reductions in salt water gear sales to name a few.

2575.1

I do not pretend nor have the knowledge to recommend modifications in the proposal to put the fleet in "compliance." I ask that the fishing community be heard and together with engineering scientists and environmental watch groups be heard and come together to find reasonable approaches to continue this great sport.

Children and Wounded Warriors to name a few, deserve the opportunity to enjoy the splendors of ocean fishing. The success of events like "Day At the Docks" demonstrates the huge interest in the sport.

2575.2

My days enjoying it have ended as I now live out my final days in Montana, I still wanted to voice my support to the vast network of people who gave me the opportunity to explore American and Mexican waters from a fishing perspective.

Sincerely,

John Hancock
Missoula, Montana

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 17:29:33

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Comment Log Display

Below is the comment you selected to display. Comment 2576 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: matthew
Last Name: davault
Email Address: mdoka.matt@gmail.com
Affiliation:

Subject: Charter Boat Engine Regulations

Comment:

Please dont eliminate the charter boat fleet with these new restrictions. These boats are the only way for the a large portion of the community to go ocean fishing. This restriction would effectively end sport fishing for all but the wealthy who can afford private boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 19:37:19

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Below is the comment you selected to display. Comment 2577 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Zak
Last Name: Fritz
Email Address: Captainzakf@gmail.com
Affiliation:

Subject: CHC2021

Comment:

I've been fishing nearly my entire life with much of that time being on the local sport boats here in southern California. I've worked on said boats and continue to enjoy the lifestyle that comes with it. I I've many friends who continue to make a living working on these boats and have truly invested their entire careers into these boats. The mandates that are being attempted to be enforced will destroy many of my friends lives and truly break many hearts. I am very aware that the operators and customers of these boats are much more in tune with environment than most of the extremist environmentalists who solely seek to force political policies with no regard for human life or environmental impact. Shutting down these boats will really make no difference as most of the pollution in my experience comes from tourists to our locale. These boats are a perfect platform in educating said tourists in doing the right thing because we the operators and crew live this everyday and respect our homes. This is not the correct course of action if you truly want to make a change for the better. I would suggest your efforts be put in to helping educate the true polluters who really do not feel the impacts as they don't live here.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-10 21:01:16

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Comment Log Display

Below is the comment you selected to display. Comment 2578 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryder
Last Name: Greyshock
Email Address: fishing3boats@gmail.com
Affiliation:

Subject: Save Fishing in CA.

Comment:

The fisheries home to our west coast our some of mother nature's greatest natural resources. They provide for families to eat, fisherman to sell, and their life plays a major roll in the ecosystem's stability. Without charter fishing in California, many of us will lose our favorite pass time hobby. Additionally many people, including myself, do or have at one point, made their living from the fishing industry. Why would we crush the American Dream for California's fishermen.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 05:56:13

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Below is the comment you selected to display. Comment 2579 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jim
Last Name: Stewart
Email Address: drjimstewart@gmail.com
Affiliation:

Subject: Protect our health! Reduce emissions on harborcraft NOW!

Comment:

You can smell the bad pollution from harborcraft that is killing fishers, boaters and anyone living or working near the shore. Please protect our health! Reduce emissions on harborcraft NOW!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 07:57:55

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Below is the comment you selected to display. Comment 2580 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: RAY
Last Name: ORTIZ
Email Address: ray@rayortizgroup.com
Affiliation:

Subject: Sportfishing in So Cal

Comment:

Good Morning,

When I was a kid my Mom and I would go out on the Half Day boats out of Seal Beach and have the best time fishing. I remember her helping me bait the hook and me getting super excited to catch any fish at all it didn't matter we were together spending time with each other and creating memories. I am 46 years old and she has passed away 5 years ago now and I can still see her smiling and laughing and having an amazing time with me on our many fishing adventures.

Now I take my 16 year old son out of 22nd St Landing, Pier point Landing and Davies Locker. We have been fishing these sport boats together for well over 9 years now and building those great memories together like I built with my Mother. Memories that will last a lifetime.

I am also part of a non-profit organization that takes kids out fishing that would otherwise not have the opportunity to experience catching their first fish out in the open Southern California Waters. If you have ever seen a young person catch a fish for the first time you know what I am talking about when I tell you it is pure joy and excitement all over their face when they are reeling that fish up and then when it hits the deck watch out they are jumping around, screaming and having an Amazing time. If you haven't experienced what I am talking about you should try it.

If this law passes it will shut down a lot of these sport fishing boats and my son will not have the opportunity to take his kids out fishing and build those amazing experiences together.

I agree that there needs to be measures to keep our oceans clean but putting the sportfishing industry out of business is not the answer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 08:49:44

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Below is the comment you selected to display. Comment 2581 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: ROBERT
Last Name: DAVENPORT
Email Address: r.davenport@cox.net
Affiliation:

Subject: Proposed Regulations

Comment:

Please vote NO on the proposed sport fishing regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 10:24:39

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Below is the comment you selected to display. Comment 2582 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chase
Last Name: Moore
Email Address: chasemoore95@gmail.com
Affiliation:

Subject: Boat smog regulations

Comment:

All I ever wanted to do was work on the water with animals and driving boats. Please don't put me out of a job and passion. Exclude passenger fishing and whale watching vessels from New smog requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 11:07:58

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Below is the comment you selected to display. Comment 2583 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rich
Last Name: Pope
Email Address: grnhead@pacbell.net
Affiliation:

Subject: Chc2021

Comment:

The regulations as drafted require technology that has not been developed or proven safe at sea, and consequently are economically and structurally impossible to comply with - requiring boats constructed of wood/fiberglass to be removed from service as soon as 2031.

2583.1

Historically, CARB has regulated commercial fishing/whale watching boats

and commercial passenger boats the same way - their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that we can continue to transition to lower emission engines as it is economically feasible.

2583.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 12:17:08

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Comment Log Display

Below is the comment you selected to display. Comment 2584 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Fred
Last Name: Tempas
Email Address: ftempas@suddenlink.net
Affiliation:

Subject: CHC2021

Comment:

The regulations as drafted require technology that has not been developed or proven safe at sea, and consequently are economically and structurally impossible to comply with - requiring boats constructed of wood/fiberglass to be removed from service as soon as 2031.

Historically, CARB has regulated commercial fishing/whale watching boats

and commercial passenger boats the same way - their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that we can continue to transition to lower emission engines as it is economically feasible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 12:19:05

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Below is the comment you selected to display.
Comment 2585 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ross
Last Name: Melvin
Email Address: rovinroun2@yahoo.com
Affiliation: Fishing Charter Customer

Subject: CHC2021

Comment:

Regulations as drafted require technology that has not been developed or proven safe at sea, and consequently are economically and structurally impossible to comply with - requiring boats constructed of wood/fiberglass to be removed from service as soon as 2031.

Historically, CARB has regulated commercial fishing/whale watching boats

and commercial passenger boats the same way - their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that we can continue to transition to lower emission engines as it is economically feasible.

Ross Melvin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 12:24:09

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Below is the comment you selected to display. Comment 2586 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: McCormick
Email Address: kmcflow@gmail.com
Affiliation:

Subject: Save Our Charter Boats

Comment:

Please do not pass the new regulation for our charter boats.

The regulation will prevent many small businesses from continuing their services. they will not be able to afford the new regulation.

Thank you for your consideration

Kevin McCormick

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 12:36:03

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Comment Log Display

Below is the comment you selected to display. Comment 2587 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Estupinian
Email Address: estees2426@gmail.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

It's crazy that California AB32 caused the trucking crisis we are dealing with now. I saw so many small businesses go under because they could not afford new trucks. You say you're for small business but we all now that's not true. The big guys can afford it, the little mom and pops go out of business. Now you're attacking the boat charter business, Whale watching and the fishing industry. The low-income families will now not be able to experience our coastal waters because you will drive the business out once again.

Shame on you,

Mark

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 13:17:22

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October 19, 2021
Sent Electronically

Liane M. Randolph
Chair, California Air Resources Board
1001 I street
P. O. Box 2815
Sacramento, California 95812

Subject: Comments Regarding the Proposed Amendments to the Commercial Harbor Craft Regulation

Dear: Chairperson Randolph

My name is Markus Medak, and I am the majority owner of New Lo-An Sportfishing Inc. We operate a single 64' CPFV out of Point Loma Sportfishing in San Diego, and have been operational since early 2004. We carry a crew of 6, and normally support 7-8 full time employees (including myself). The proposed harbor craft rules will be disastrous for my company and employees. Unfortunately, CARB staff has made a number of incorrect assumptions regarding the operating areas, pricing structure, costs of replacement equipment, and availability of capital financing loans. The end result of this rule will be the loss of the CPFV fleet in California, with the accompanying loss of jobs, and income to ancillary businesses (fuel docks, insurance, fish processors, tackle shops, etc).

Staff have correctly pointed out that many CPFVs will need to be replaced in order to comply with the proposed rules. Due to the Jones Act, and constantly evolving Coast Guard regulations, new builds in the CPFV fleet have generally not been economically feasible for decades. The majority of the fleet was built in the 1970s and 1980's, along with a significant number of vessels built in the 1960s and even into the 1940s. A handful of boats were built in the 1990s and up into the early 2000s. The age of this fleet is simply a factor of economic realities. There are very few captains that would not love the opportunity to build and operate a new vessel if it was possible to still make a living while doing so!

2588.1

The CPFV industry in Southern California is a very high cost, low profit margin business. The New Lo-An has been averaging approximately \$1,000,000 in annual gross revenue for the last 5 years. However, labor, maintenance, insurance, bait, landing, galley supplies, and fuel account for 90% of my annual revenue, which leaves only \$100,000 to cover any finance costs and profits for me and the minority owner (the other captain).

In Appendix C-1, Table C-32, Staff assume vessel replacement cost of a CPFV that is compliant with proposed rules and current USCG regulations to be \$1,883,524. This appears to be a wildly optimistic number. I am attaching a current quote for a Southern California style new charter vessel by Snow and Company (www.snowboatbuilding.com) (Appendix 1). Their quote for a traditional propulsion package (shafts and props), is \$4.1 million. However, this quote does not include overnight passenger accommodations nor enough fish hold, nor bait capacity. The New Lo-An has

2588.2

40 overnight passenger bunks, and 6 crew bunks, while the quoted vessel only has overnight berthing for 3 crew. The New Lo-An has bait tanks holding 3000 gallons of water and 290 scoops of bait, while the quoted vessel only carries 365 gallons and 24 scoops of bait. The quoted vessel has one fish hold with a single 5 ton refrigeration system. The New Lo-An has three separate holds with three separate 3 ton refrigeration systems. These are major structural changes which will increase the cost of the vessel by hundreds of thousands of dollars in order to build a replacement that can equal the New Lo-An's current revenue.

Staff also assume that the current CPFV can be sold in a different market other than California in order to recoup some capital for a down payment on a new build. However, the majority of these vessels were built and optimized for the Southern California live bait CPFV fleet and have little to no value out of state. These types of vessels have not been successfully sold in other markets to date. 2588.3

If we (optimistically), assume that a new vessel can be built for \$4.5 million, and we are able to finance 97.5%,¹ the revenue will still not support this business. A 20 year note at 5% will have a monthly payment of \$29,000, or an annual finance cost of \$348,000. A business that normally provides its owners with approximately \$100,000 in salary and disbursements, cannot possibly support a new annual finance cost of \$348,000. If we use the Staff assumption, that a new vessel can be built and financed for \$1,888,816 (Table C-32), we still have an annual cost of \$91,406. Since both of the owners of this business normally split \$100,000 in profits, this business will not be viable. It is also important to note that revenues and profits fluctuate dramatically in this industry depending on both fishing and economic conditions. In 2009 and 2010, gross annual CPFV revenues of New Lo-An Sportfishing fell below \$400,000. The only thing that kept the business solvent is the fact that I reinvested all of my revenue in the business and was able to support my family by commercial fishing during the off season. 2588.4

Staff assume that the majority of these excess costs can be passed on to the customer. We don't believe this will be successful. The New Lo-An operates approximately 120 days per year (when fishing is good). If we use the more realistic numbers of a \$4.5 million replacement cost, we will need to raise our ticket prices by \$156/day and still not see any reduction in demand. In reality, we have found that demand is extremely closely related to price, with price increases as low as \$10/day having significant and immediate reductions in ticket sales. Sportfishing is a classic example of a service that exhibits very elastic demand in response to price, which makes it very difficult for the industry to pass additional costs on to their customers. If we use Staff's unrealistic number of \$1.8 million in replacement cost, we must still raise the ticket price by \$42/day without any reduction in demand in order to pay the excess cost. It is also important to note that the California increase in minimum wage has significantly raised our labor costs, and will continue to do so until 2023. We are already in a position where we are raising prices at double the rate of inflation in order to recoup our increased labor costs. 2588.5

Staff assume that conventional financing will be available from financial institutions for new vessel construction. This is not likely to be the case. Banner Bank holds many of the current mortgages in the CPFV fleet, but they have no mechanisms in place for financing new construction. My company and I have excellent credit, but I have yet to find a bank that would finance more than 60% of an 2588.6

¹ This type of financing is not available on the commercial market, and would require a government backed loan of some type

existing vessel, let alone finance the construction of a new vessel. It is likely that the State of California would have to guarantee these loans if they wish to keep these businesses solvent.

When making the calculations for their inventory and health analysis, Staff once again used incorrect assumptions. According to Wei Liu of the ARB, they used AIS (Automatic Identification System) data to calculate what portion of vessel activity was occurring within 24 nm of the California coast.² However, AIS is not required on vessels of less than 65 feet unless they are operating in a Vessel Traffic Service (VTS). A majority of the CPFV fleet is less than 65 feet, and the 2 VTS areas in California are directly offshore of the Golden Gate and LA/Long beach harbors, thus AIS is not required for the majority of the CPFV fleet. The CPFV fleets of San Francisco Bay and LA/Long Beach harbors tend to spend more time fishing inshore than significant portions of the CPFV fleet. Because of this, any use of AIS data to show area of operation will bias the data towards a more inshore area of operation than actually occurs as a whole. A more accurate method of determining area of operations of the CPFV fleet would be to use log book data from the California Department of Fish and Wildlife (CDFW). All CPFVs must submit daily logs of times and location they spent fishing. Why was this method not used? 2588.7

CARB staff also used a second method in determining area of operation of CPFVs. This method consisted of a survey that was required by operators of commercial vessels in California. Unfortunately, the public outreach for this effort was not very robust and this resulted in an incomplete data set. I remember filling my report out, but it was not clear at all that ONLY hours and fuel burned in California regulated waters were to be reported. Since there had been new requirements for hour meters that could not be shut off, I, along with many of my colleagues (incorrectly) assumed that we were being asked for total hours of operation annually. Staff acknowledges this issue in Appendix H, where they nevertheless decide to assume that ALL hours reported are from regulated waters. By not correcting this issue, the data are significantly biased towards showing higher emissions in regulated waters than there actually are. Once again, CDFW logs are legal documents that show positions and time spent operating in certain geographical areas. By not using these data, CARB staff are not using the best available science in the assumptions for their analysis. 2588.7

Much of the CPFV fleet from San Diego spends the majority of their time in the Mexican EEZ where AIS is not required on vessels of less than 150 tons, thus the AIS data is not usable. Most of the CPFV fleet that has AIS has only class B transponders, which are lower powered and less likely to be accurately received by shore stations. Relying on Marine Cadastre (Vessel Traffic information) for accurate locations of the CPFV fleet will not yield accurate results.

When calculating total emissions, Staff used the baseline number of 274 vessels in the CPFV fleet with diesel engines. However, the Sportfishing Association of California and Golden Gate Fisherman's Association conducted joint surveys of ports and were only able to account for 174 inspected CPFVs. It is likely that the remaining vessels are 6 pack charter boats, but the calculations of fuel burn should be different for these vessels as they tend to be smaller and operate much less. Once again, CDFW log book data should be used to quantify where and when these vessels operated. 2588.7

² email Wei.Liu@arb.ca.gov 04/07/2021

Since CDFW logbook data was not used in order to determine operating areas for CPFVs, I downloaded the logbook data from the CDFW for my vessel (Appendix 2). The logbook data is considered proprietary, so I am not able to access any of the information from the rest of the fleet, but the data is available to other government agencies. My vessel, the New Lo-An, is very representative of the overnight fleet in San Diego. We run a mix of single day and multi day trips targeting pelagic species. The majority of our fishing is done in Mexico, with a significant minority occurring in the offshore waters of the US EEZ off California.

2588.7

I found that from January 1, 2016 to October 1 2021, we fished for a total of 585 days. Of these days, 312 were spent fishing entirely in the Mexican EEZ, 230 days were spent fishing in the US EEZ more than 24 miles off the mainland shore, and 43 were spent fishing within 24 miles of the California coast. Since our homeport is San Diego, we do spend a portion of every trip operating in regulated waters. When fishing in Mexico, the distance from the harbor entrance to the international border is approximately 6 nautical miles, and the distance from the dock to entrance is approximately 6 miles. We spend significant time (30 minutes-1 hour) loading bait in the harbor, but at that time the main engines are off, and the only machinery operating is a 35 kW generator. Our standard cruising speed is 10 knots, so this means that we will operate approximately 2-3 hours per trip in regulated waters while we are en route to and from the Mexican EEZ. When heading to the US EEZ, we can assume a total travel time of 6 hours per trip in regulated waters (3 hours each way), and when fishing within 24 miles, we can assume that the entire trip took place in regulated waters. Since we run a mix of single day and multi-day trips, I totaled the number of trips that traveled to each area. I found that we ran 278 trips to Mexico and 156 trips to the offshore (outside of 24 nm) waters of California. Seven trips went to both areas (they started in Mexico and finished in the US or vice versa). This makes a total of 844.5 hours traveling to and from Mexico and 946.5 hours to and from the US offshore waters. We will assume that 12 hours per day were spent operating in regulated waters when fishing within 24 miles of the coast. The remaining hours are counting for passenger loading/unloading, bait loading and fishing. When fishing, the boat is generally anchored, or drifting with no engines running except for the generator. This will add an additional 516 hours of operation in regulated water. During this time frame (5+ years), the boat operated a total of 14,040 hours. If we do the math, we find that the New Lo-An operates 16.28% of the time in regulated waters, not the 83% of the time that Staff calculates using faulty AIS and survey data.

2588.7

It should be noted that the New Lo-An is a typical overnight/short range CPFV of the San Diego fleet. There are 12 long range CPFVs in San Diego that run a much higher percentage of their trips in Mexico, with a commensurately lower percentage of operating time in regulated waters. Most, if not all of these vessels will be eligible for an exemption based on low operating hours in regulated waters, but it does not appear that these vessels were excluded from the analysis by CARB staff. Of the San Diego fleet, only the 1/2 day boats spend the majority of their time operating in regulated waters. This is a total of 4 boats in San Diego and Mission Bay out of a total fleet of approximately 70 inspected CPFVs operating out of these two harbors.

Staff also assert that the reason that commercial fishing vessels will only be required to have Tier 2 engines without a DPF is because they are unable to pass on the extra cost, and they have a small profit margin. There is no data to back this up, and I believe this assertion shows a lack of understanding of the economics of both of these industries. I contend that neither industry can afford to comply with these regulations. I have owned a CPFV for 17 years and a commercial fishing boat for 13 years. While my gross revenue has been much higher on the CPFV, the profit margin while

2588.8

commercial fishing is higher. As previously mentioned, CPFVs are expensive to maintain and operate. Not only do they have numerous fixed costs built into the pricing structure (bait, landing, port), but insurance, maintenance and crew costs tend to be dramatically higher. Over the last 17 years, I typically have an approximate 10% profit margin on my CPFV, and a 60+% profit margin while commercially lobster fishing. I have had years with a \$1,000,000 gross on the CPFV and a \$100,000 gross on the commercial boat and my take home was the same (\$60-70,000) from each business. 2588.8

Staff also fail to account for how many associated businesses will be affected or forced out of business. I am a 25% owner of a fish processing business where 100% of our revenue is derived from processing sport caught fish. The vast majority of our business comes from CPFVs with less than 5 percent from recreational boats. This business supports 8 full time employees and an additional 42 seasonal employees. Without the CPFV fleet we will not survive. Many of our employees live in one of the Disadvantaged Communities that we are trying to protect. There are numerous businesses on the waterfront that depend on the CPFV fleet to attract customers from the entire country. Some examples are: fuel docks, sport fishing landings, boat yards, tackle shops, hotels and restaurants. 2588.8

Staff proposes to separate CPFVs from commercial fishing boats, but there is no clear direction as to how this will be done. Many CPFVs participate in various commercial fisheries throughout the state when it is economically advantageous to do so. In Southern California they participate in the squid, bluefin tuna and rockfish fisheries, while in Northern California many CPFVs participate in the Dungeness crab, salmon, rockfish or albacore fisheries. For many of us, the CPFV license is just one of many commercial fishing licenses that we hold. Under the proposed rules, it is unclear if a vessel that does both commercial fishing and CPFV fishing will be allowed to participate in both fisheries without complying with the new rules.

It is also important to note that recreational boats are exempt from these proposed rules. Thus, under the proposed rules, yachts of all sizes will still be allowed to operate in California waters. Many of these yachts have much larger engines and burn orders of magnitude more fuel per hour than a typical CPFV. For most Californians, CPFVs are one of the only ways to access the ocean. This rule will make it the exclusive domain of a very small minority of economically privileged Californians. 2588.9

The CDFW derive much of their operating budget from the sale of sport fishing licenses. In 2020, sport fishing license sales generated over \$72 million. These are funds that are used directly in the conservation and protection of California's natural resources. The loss of a significant portion of the CPFV fleet would jeopardize a major source of this revenue stream. 2588.10

When building mathematical models, such as those for calculating economic impacts of various emissions scenarios, it is critical to have accurate baseline data of the actual operating parameters of the vessels involved rather than using incorrect assumptions. "The appropriate use of models and their output can contribute to effective policy making, but misuse of models or misrepresentation of their output can mislead decision-making."³ Staff did not use the correct operating parameters for the San Diego fleet when building their model showing CPFV emissions statewide. San Diego 2588.11

³ Richardson, B.C. 1979. Limitations on the use of mathematical models in transportation policy analysis. University Microfilms International, Ann Arbor, Mich.

accounts for a very significant portion (perhaps even the majority) of CPFV operations in California. Without logbook data for the entire fleet this number is impossible to quantify. As a government agency, CARB has access to this data, but elected not to use it.

2588.11

In their cost/benefit analysis, CARB staff relied on faulty data from AIS and the CHC reporting form. Because they did not use the most robust data set available, the conclusions reached by staff are flawed. The CPFV fleet, as a whole, spends less time operating and emitting in regulated waters than is assumed in the analysis. Since not as many emissions occur in the regulated waters as assumed, the health cost and associated monetary savings to the California population from the CPFV fleet will be significantly lower than concluded in the analysis. Because unrealistic figures were used in the economic analysis of the CPFV industry, the economic costs to the industry, associated businesses and waterfront community will be much higher than the cost/benefit analysis shows. In conclusion, the net result of this proposed rule is likely to have a high economic cost, a loss of access to the ocean for most Californians, and have a negligible impact on the public health of coastal communities.


Chair Randolph, Vice Chair Berg, and all members of the Board, please consider the impact of this proposed rule change on the California waterfront community, small businesses, the California Department of Fish and Wildlife, and the potential loss of access to the ocean for the California public before adopting this proposed rule. Working towards a net zero emission future is an important and laudable goal of the California Air Resources Board. Forcing CPFVs to comply with this rule is not accomplishing this goal and can serve as a distraction on the way to meaningful change. Please continue to consider all commercial fishing vessels the same whether they have a CPFV license or not.

Respectfully,

Markus Medak

Markus Medak
New Lo-An Sportfishing

Appendix 1

From: Frank Ursitti frank@hmlanding.com 
Subject: FW: Snow & Co Charter boat Specifications and Price
Date: September 25, 2021 at 7:16 AM
To: info@newloansportfishing.com



From: Chris Watson <ChrisW@snowboatbuilding.com>
Sent: Tuesday, September 21, 2021 4:18 PM
To: Frank Ursitti <frank@hmlanding.com>
Cc: Brett Snow <brett@snowboatbuilding.com>
Subject: Snow & Co Charter boat Specifications and Price

Frank,

Attached you will find our specifications for an 80' charter vessel for your review.

This specification is for a diesel electric drive system using multiple (3) generators to provide the required power. When more power is needed such as cruising to and from the fishing grounds additional generators come online, when less power is needed such as when on the grounds or maneuvering in/out of harbor fewer generators will be running reducing fuel consumption. The diesel electric design was utilized to allow for future improvements when new power generation or storage technology becomes available without requiring complete vessel restructuring.

The budgetary estimate for this vessel with the diesel electric propulsion is 4.6 million Using a conventional power package (diesel w/ shafts & props) budgetary would be 4.1 million.

Feel free to call anytime if you have any questions or concerns.

Regards,

Chris Watson

Estimating & Project Mgmt

Snow & Company, Inc.
469 NW Bowdoin Place
Seattle, WA 98107
Mobile: 206-351-9556
Direct: 206-2582091
Main line: 206-953-7676
www.snowboatbuilding.com



Charter boat
Specifi...n.docx



SOCAL Charter Vessel Specification

Proposed concept is to provide a diesel electric drive charter fishing/sightseeing vessel. The diesel electric design was chosen to “futureproof” the vessel to allow for upgrades to power system as new and more reliable technology becomes available. Electrical power is generated via multiple diesel generators, the decision was made to not use battery storage system due to the current inefficiency in energy storage.

Vessel to be designed and built to all class requirement (Sub-Chapter T, ABS etc)

100 Design & Structure

General

Length overall,	80'
Beam overall	25
Crew	3 person
Passengers maximum	40 person
Fuel capacity, useable	1000 US gal.
Fresh water capacity	1000 US gal.

Hull materials

- Option #1 Steel
- Option #2 Fiberglass
- Option #3 Aluminum

House design

- Material same as hull
- Interior dining/seating area
- Galley for food preparation and concessions sales
- ADA compliant
 - Head
 - Doorway
 - Seating area
- Crew member berth and head w/ shower



SOCAL Charter Vessel Specification

200 Propulsion Systems

Propulsion to be provide by twin electrically powered azimuth pod type motors. This propulsion system combines steering along with propulsion making the vessel highly maneuverable and controllable. Electrical power is provide by multiple generators, operating together as power is required and shutting down during low power consumption operations(in/out port, trolling or “idling”)

Azimuth Thruster

- SCHOTTEL SRE
- EcoPeller 150 L-Drive
- 1200 mm Fixed Pitch Propeller
- Offshore duty rating
 - 3000 to 5500 annual thruster operating hours
- Freshwater cooled motor



Azimuth steering

- Electrical
- Steering time 10 seconds for 180°

Generators

- Three Northern Lights 300kw w/ SCR & wet exhaust
- Multiple generators to be started & paralleled as electrical demands increase
 - Utilize generator power efficiently to reduce, fuel consumption, noise and engine wear

300 Electrical Systems

Vessel is equipped with multiple electrical systems of AC & DC power. Electrical control cabinets are used to properly protect components and personnel. All systems to be grounded at one single point as required.

- Schneider frequency converters for control of propulsion motors
- Generator control systems
- Led lighting throughout vessel
- Generators individual start battery bank
- House emergency power battery bank
- Shore power connection 50 amp minimum



SOCAL Charter Vessel Specification

400 Command & Control Systems

Full suite of Furuno Navnet electronics system along with communication radios and satellite phone.
Schottel drive controls

Electronics

- Furuno radar radome
- Furuno radar open array
- Furuno Navnet system
- Dual GPS chart plotters
- Satellite phone
- Dual VHF
- Sideband radio
- Wesmar HD860 Color side-scanning sonar
- Fathometer
- Loud hailer
- PA system

Alarm system

- Bilge high water
- Fire
- Propulsion motors
- Generator monitoring



SOCAL Charter Vessel Specification

500 Auxiliary Systems

Auxiliary system components are selected for longevity and where possible duplicated between system to reduce spare requirements

- HVAC
 - TECHNICOLD CHILLED WATER MARINE AIR CONDITIONING
 - 90,000 btu
 - Multi zone system
 - Bridge
 - Galley
 - Mess deck
- RSW
 - Integrated Marine Systems 5 ton system
 - Electric drive
- Bait tanks
 - FWD
 - 65 gallon / 4 Scoop
 - AFT
 - 300 gallon / 20 scoop
- Fish Hold
 - Size TBD
- Washdown pumps FWD & AFT
- Potable water
 - 1000 gallon tank
 - Pressure pump
 - Hot water heater
- Waste system
 - 500 gal black water
 - 500 gal grey water
 - Deck pump out connection
 - Macerator pump and overboard connection
- Bilge System
 - Individual bilge pumps located in all water tight compartments



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting

All decking, paneling, cabinetry, and seating for passengers made of materials selected for ease of cleaning and durability

Galley & Concessions equipment

- Under counter top load Beverage cooler
 - 25 cases of bottles
- Refrigerator
- Flat top grill
- Vent hood
- Warming pan
- Coffee maker

Seating area

- ADA compliant doorway
- Easy clean booth type seating
 - ADA compliant section
- USB charging ports
- (2) 42 " flat screen TV's w/ dvd player
 - Optional satellite TV

Passenger heads

- Two individual heads
- ADA compliant
 - Dooway
 - Grab bar
 - Toilet height
- Easy clean with deck drain
- Raw water toilet

Insulation

- Passenger and pilot house areas to be thermally insulated
- Engine room to be acoustically insulated



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting (CONT)

Crew Stateroom & head

- Separate from the guest areas
- Sleeping bunk
- Full head w/shower

Railing

- Continuous railing with movable sections as required for boarding
- Height TBD

Paint/gelcoat

- Paint
 - If vessel is steel or aluminum
- Gelcoat
 - If vessel is fiberglass

Decks

- All walkways and decks shall be covered in Nonskid

Windows

- All windows to be direct bonded frameless windows

Appendix 2



California Department of Fish and Wildlife
 Marine Logs System
 Commercial Passenger Fishing Vessel Report
 Confidential Records for Vessel
 12842 NEW LO AN

Report Date: 10/10/2021 12:04:21 PM

Serial Num	Log Date	Create Date	Port	Trip Type	Non Paying	Dep Time	Ret Time	Time Fished	Num Fishers	Block	Target Species	Fishing Method	Species	Kept	Released
S01213E	05-04-2016		880	Multi-Day		1900	2599	0000	026			Drifting			
S00G0XE	05-13-2016		880	Multi-Day		2000	2599	0000	022		Tuna	Other			
S00G0YE	05-14-2016		880	Multi-Day		2599	2599	1500	022	0910	Tuna	Drifting	Tuna, bluefin	8	0
S00G0ZE	05-15-2016		880	Multi-Day		2599	0600	0000	022		Tuna	Other			
S00G10E	05-20-2016		880	Multi-Day		2000	2599	0000	020		Tuna	Trolling			
S00G11E	05-21-2016		880	Multi-Day		2599	2599	1500	020	0910	Tuna	Drifting	Tuna, bluefin	1	0
S00G12E	05-22-2016		880	Multi-Day		2599	0500	0000	020		Tuna	Other			
S00GFXE	05-28-2016		880	Multi-Day		2100	2599	0000	042		Rockfishes	Other			
S00GFVE	05-29-2016		880	Multi-Day		2599	1900	1400	042	0842	Rockfishes	Anchored, Drifting	Rockfish, unspecified	66	10
													Rockfish, bocaccio	44	0
S00GFWE	05-29-2016		880	Multi-Day		2100	2599	0000	016		Tuna	Other			
S00GFUE	05-30-2016		880	Multi-Day		2599	1839	1200	016	0910	Tuna	Drifting	Tuna, bluefin	4	0
S00GRSE	06-03-2016		880	Multi-Day		2100	2599	0000	029		Other, Tuna	Other			
S00GRRE	06-04-2016		880	Multi-Day		2599	2599	1400	029	0910	Other	Anchored, Trolling	Lingcod	2	0
													Yellowtail	108	0
													Whitefish, ocean	5	3

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00GRQE	06-05-2016		880	Multi-Day		2599	0630	0000	029		Other	Other			
S00H7CE	06-05-2016		880	Multi-Day		2100	2599	0000	017		Tuna	Other			
S00H7DE	06-06-2016		880	Multi-Day		2599	2599	1600	017	0910	Tuna	Drifting	Tuna, bluefin	10	0
S00H7EE	06-07-2016		880	Multi-Day		2000	2599	0000	017		Tuna	Other			
S00H7FE	06-07-2016		880	Multi-Day		2599	0545	0000	017		Tuna	Other			
S00H7GE	06-08-2016		880	Multi-Day		2599	2599	1600	017	0910	Tuna	Drifting	Tuna, bluefin	12	0
S00H7HE	06-09-2016		880	Multi-Day		2100	2599	0000	028		Tuna	Other			
S00H7JE	06-09-2016		880	Multi-Day		2599	0600	0000	018		Tuna	Other			
S00H7KE	06-10-2016		880	Multi-Day		2100	2599	0000	027		Tuna	Other			
S00H7LE	06-10-2016		880	Multi-Day		2599	2000	1200	028	0910	Tuna	Drifting, Trolling			
S00H7ME	06-11-2016		880	Multi-Day		2599	2599	1500	027	0910	Other, Rockfishes, Tuna	Drifting, Trolling	Bonito, Pacific Yellowtail Rockfish, unspecified Lingcod	21 22 64 6	10 0 0 0
S00H7NE	06-12-2016		880	Multi-Day		2599	0600	0000	027		Other, Tuna	Other			
S00HGQE	06-12-2016		880	Multi-Day		2000	2599	0000	013		Tuna	Other			
S00HGPE	06-13-2016		880	Multi-Day		2599	2599	1400	013	0883	Tuna	Drifting	Yellowtail	5	0
S00HGNE	06-14-2016		880	Multi-Day		2599	0600	0000	013		Tuna	Other			
S00HGSE	06-14-2016		880	Multi-Day		2000	2599	0000	016		Tuna	Drifting, Trolling			
S00HGTE	06-15-2016		880	Multi-Day		2599	2599	1500	016	0882	Tuna	Drifting, Trolling	Tuna, bluefin	1	0
S00HGRE	06-16-2016		880	Multi-Day		2599	0530	0000	016		Tuna	Other			
S00HV4E	06-17-2016		880	Multi-Day		1800	2599	0000	020		Other	Other			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00HV3E	06-18-2016		880	Multi-Day		2599	2599	1400	020	0910	Lingcod, Other, Rockfishes	Anchored, Drifting	Lingcod Yellowtail	5 38	0 0
S00HV2E	06-19-2016		880	Multi-Day		2599	2599	1200	020	0910	Lingcod, Other, Rockfishes	Anchored, Drifting	Yellowtail Seabass, white Rockfish, unspecified	7 1 100	0 0 10
S00HV1E	06-20-2016		880	Multi-Day		2599	0631	0000	020		Other	Other			
S00HV6E	06-20-2016		880	Multi-Day		2000	2599	0000	006		Tuna	Other			
S00HV5E	06-21-2016		880	Multi-Day		2599	2000	1200	006	0845	Tuna	Drifting	Tuna, yellowfin	1	0
S00KV6E	06-23-2016		880	Multi-Day		2000	2599	0000	012		Tuna	Other			
S00KV7E	06-24-2016		880	Multi-Day		2100	2599	0000	019		Tuna	Other			
S00KV8E	06-24-2016		880	Multi-Day		2599	2000	1000	012	0864	Tuna	Drifting, Trolling	Rockfish, canary Yellowtail Rockfish, bocaccio	0 25 0	1 0 2
S00KV9E	06-25-2016		880	Multi-Day		2599	2599	1500	019	0882	Other, Tuna	Drifting, Trolling	Yellowtail	24	2
S00KVAE	06-26-2016		880	Multi-Day		2599	0600	0000	019		Other, Tuna	Other			
S00KVBE	06-30-2016		880	Multi-Day		2000	2599	0000	019		Tuna				
S00KVCE	07-01-2016		880	Multi-Day		2100	2599	0000	022		Tuna	Drifting			
S00KVDE	07-01-2016		880	Multi-Day		2599	2000	1200	019	0864	Tuna	Drifting, Trolling	Tuna, bluefin	4	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00KVEE	07-02-2016		880	Multi-Day		2599	2599	1500	022	0864	Tuna	Drifting, Trolling	Yellowtail	30	15
													Tuna, bluefin	4	0
													Dolphin (fish)	1	0
S00KVFE	07-03-2016		880	Multi-Day		2000	2599	0000	013		Tuna	Other			
S00KVGE	07-03-2016		880	Multi-Day		2599	0600	0000	022		Tuna	Other			
S00KVHE	07-04-2016		880	Multi-Day		2599	2599	1600	013	0864	Tuna	Anchored, Drifting, Trolling	Rockfish, bocaccio	0	15
													Tuna, bluefin	1	0
													Yellowtail	2	1
S00KVJE	07-05-2016		880	Multi-Day		2599	0530	0000	013		Tuna	Other			
S00KVKE	07-06-2016		880	Multi-Day		2000	2599	0000	019		Tuna	Other			
S00KVLE	07-07-2016		880	Multi-Day		2599	2599	1800	019	0881	Tuna	Drifting	Yellowtail	3	0
													Tuna, bluefin	16	0
S00KVME	07-08-2016		880	Multi-Day		2100	2599	0000	015		Tuna	Other			
S00KVNE	07-08-2016		880	Multi-Day		2599	0600	0000	019		Tuna	Other			
S00KVPE	07-09-2016		880	Multi-Day		2000	2599	0000	027		Tuna	Other			
S00KVQE	07-09-2016		880	Multi-Day		2599	1900	0800	015	0910	Tuna	Drifting, Trolling	Yellowtail	20	2
													Tuna, yellowfin	10	0
													Dolphin (fish)	1	0
S00KVRE	07-10-2016		880	Multi-Day		2599	2599	1800	027	0863	Tuna	Drifting, Trolling	Tuna, yellowfin	3	0
													Tuna, bluefin	18	0
S00KVSE	07-11-2016		880	Multi-Day		2599	0600	0000	027		Tuna	Other			
S00KVTE	07-12-2016		880	Multi-Day		2599	2599	1800	030	0880	Tuna	Drifting	Tuna, bluefin	6	0
S00KVUE	07-13-2016		880	Multi-Day		2000	2599	0000	031		Tuna	Other			

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num. Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00KVVE	07-13-2016		880	Multi-Day		2599	0600	0000	030		Tuna	Other			
S00KVWE	07-14-2016		880	Multi-Day		2599	2599	1800	031	0863	Tuna	Drifting, Trolling	Tuna, bluefin	6	0
S00KVXE	07-15-2016		880	Multi-Day		2599	0600	0000	031		Tuna	Other			
S00KVYE	07-16-2016		880	Single Day		0000	2100	1200	028	0863	Tuna	Drifting, Trolling	Tuna, bluefin	8	0
S00KVZE	07-17-2016		880	Single Day		0000	1900	0000	028	0864	Tuna	Drifting, Trolling			
S00KW0E	07-17-2016		880	Multi-Day		2000	2599	0000	023		Tuna	Other			
S00KW1E	07-18-2016		880	Multi-Day		2599	2599	1500	023	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin Dolphin (fish)	24 31 1	0 0 0
S00KW2E	07-19-2016		880	Multi-Day		2000	2599	0000	023		Tuna	Other			
S00KW3E	07-19-2016		880	Multi-Day		2599	0600	0000	023		Tuna	Other			
S00KW4E	07-20-2016		880	Multi-Day		2599	0910	0100	023	0863	Tuna	Drifting	Tuna, bluefin	1	0
S00QALE	07-22-2016		880	Single Day		0000	2000	1200	017	0864	Tuna	Trolling	Tuna, bluefin	1	0
S00QAME	07-23-2016		880	Single Day		0000	2000	1000	030	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	10	
S00QANE	07-24-2016		880	Single Day		0020	2000	1000	015	0864	Tuna	Drifting, Trolling	Tuna, bluefin	1	0
S00QAPE	07-25-2016		880	Multi-Day		0000	2599	1400	019	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin	1 24	0 0
S00QAQE	07-26-2016		880	Multi-Day		2599	2599	1400	019	0864	Tuna	Drifting, Trolling	Tuna, yellowfin	90	0
S00QARE	07-27-2016		880	Multi-Day		2599	0600	0000	019		Tuna	Other			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00QASE	07-28-2016		880	Single Day		0000	2000	1000	030	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	32	0
S00QATE	07-29-2016		880	Single Day		0000	2000	1000	025	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	12	0
S00QAUE	07-30-2016		880	Single Day		0000	2000	1000	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	2 5	0 0
S00QAVE	07-31-2016		880	Multi-Day		0000	2599	1400	020	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin	2 14	0 0
S00Qawe	08-01-2016		880	Multi-Day		2000	2599	0000	018		Tuna	Drifting, Trolling			
S00QAXE	08-01-2016		880	Multi-Day		2599	0600	0000	020		Tuna	Trolling			
S00QAYE	08-02-2016		880	Multi-Day		2599	2599	1400	018	0910	Tuna	Drifting, Trolling	Dolphin (fish) Yellowtail	9 58	5 15
S00QAZE	08-03-2016		880	Multi-Day		2599	0530	0000	018		Tuna	Trolling			
S00QB0E	08-10-2016		880	Multi-Day		2100	2599	0000	031		Tuna	Drifting, Trolling			
S00QB1E	08-11-2016		880	Multi-Day		2599	2599	1400	031	0910	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin Yellowtail	2 91 5	0 0 5
S00QB2E	08-12-2016		880	Multi-Day		2599	0600	0000	031		Tuna	Drifting, Trolling			
S00QB3E	08-13-2016		880	Multi-Day		0000	2599	1400	023	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	43	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00QB4E	08-14-2016		880	Multi-Day		2599	2000	1200	023	0882	Tuna	Drifting, Trolling			
S00QB5E	08-15-2016		880	Multi-Day		0000	2599	1500	027	0910	Tuna	Drifting, Trolling	Dolphin (fish)	3	0
													Tuna, yellowfin	19	0
S00QB6E	08-16-2016		880	Multi-Day		0000	2599	0000	027		Tuna				
S00QB7E	08-16-2016		880	Multi-Day		2599	0600	0000	027		Tuna				
S00QB8E	08-17-2016		880	Multi-Day		0000	2599	1400	023	0910	Other, Tuna	Drifting, Trolling	Yellowtail	20	10
S00QB9E	08-18-2016		880	Multi-Day		2599	2000	1200	023	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	41	0
S00QBAE	08-19-2016		880	Single Day		0000	2000	1200	030	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	71	0
S00QBBE	08-20-2016		880	Multi-Day		0000	2599	1400	023	0882	Tuna	Drifting, Trolling	Tuna, bluefin	2	0
													Tuna, yellowfin	3	0
S00QBCE	08-21-2016		880	Multi-Day		2599	2599	1400	023	0882	Tuna	Drifting	Tuna, yellowfin	2	0
													Tuna, bluefin	16	0
S00QBDE	08-22-2016		880	Multi-Day		2000	2599	0000	032		Tuna	Drifting, Trolling			
S00QBEE	08-22-2016		880	Multi-Day		2599	0600	0000	023		Other	Other			
S00QBFE	08-23-2016		880	Multi-Day		2599	1705	1000	032	0864	Tuna	Drifting	Tuna, bluefin	5	0
													Tuna, yellowfin	6	0
													Dolphin (fish)	1	0
S00QBGE	08-24-2016		880	Multi-Day		2000	2599	0000	019		Tuna	Drifting			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00QBHE	08-25-2016		880	Multi-Day		2599	2599	1600	019	0867	Tuna	Drifting	Tuna, bluefin	9	0
													Tuna, yellowfin	2	0
S00QBJE	08-26-2016		880	Multi-Day		2000	2599	0000	020		Tuna	Other			
S00QBKE	08-26-2016		880	Multi-Day		2599	0600	0000	019		Tuna	Other			
S00QBLE	08-27-2016		880	Multi-Day		2599	2599	1800	020	0867	Tuna	Anchored, Drifting	Tuna, yellowfin	20	0
													Tuna, bluefin	30	0
S00QBME	08-28-2016		880	Multi-Day		2599	1830	1000	020	0867	Tuna	Anchored	Tuna, yellowfin	14	0
													Tuna, bluefin	14	0
S00QBNE	08-29-2016		880	Multi-Day		0000	2599	1400	025	0867	Tuna	Anchored, Drifting	Yellowtail	2	0
													Tuna, bluefin	44	0
S00QAKE	08-30-2016		880	Multi-Day		2599	1915	1000	025	0867	Tuna	Anchored, Drifting	Tuna, yellowfin	1	0
													Tuna, bluefin	16	0
													Yellowtail	2	0
S00QBPE	08-30-2016		880	Multi-Day		2000	2599	0000	032		Tuna	Trolling			
S00QBQE	08-31-2016		880	Multi-Day		2599	2599	1200	032	0880	Tuna	Anchored, Drifting	Tuna, bluefin	23	0
S00QBRE	09-01-2016		880	Multi-Day		2599	0700	0000	032		Tuna	Anchored, Drifting			
S0120QE	09-01-2016		880	Multi-Day		2200	2599	0000	032		Tuna	Anchored, Drifting			
S00QBSE	09-02-2016		880	Multi-Day		2100	2599	0000	032		Tuna	Anchored			
S00QBTE	09-02-2016		880	Multi-Day		2599	2000	0700	032	0867	Tuna	Anchored, Drifting	Tuna, bluefin	2	0
S00QBUE	09-04-2016		880	Single Day		0000	2100	1000	023	0867	Tuna	Anchored	Tuna, bluefin	16	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S00QBVE	09-05-2016		880	Single Day		0000	2100	1000	032	0867	Tuna	Anchored	Tuna, bluefin	23	0
S00QBWE	09-06-2016		880	Multi-Day		2599	2599	1400	026	0867	Tuna	Other	Tuna, bluefin	32	0
S00QBXE	09-07-2016		880	Multi-Day		2599	0700	0000	026		Tuna	Other			
S00QBYE	09-08-2016		880	Multi-Day		2599	2599	1400	023	0867	Tuna	Anchored			
S00QBZE	09-09-2016		880	Multi-Day		2599	2000	1200	023	0880	Tuna	Drifting, Trolling	Tuna, yellowfin	48	0
S00QC0E	09-10-2016		880	Single Day		0000	2100	1000	023	0880	Tuna	Drifting	Tuna, yellowfin	12	0
S0120RE	09-11-2016		880	Single Day		0000	2100	1100	027	0880	Tuna	Drifting	Tuna, yellowfin	33	0
S00QC1E	09-12-2016		880	Single Day		0000	1750	1100	026	0846	Tuna	Drifting	Tuna, yellowfin	200	0
S0120SE	09-12-2016		880	Multi-Day		2000	2599	0000	032		Tuna	Other			
S0120TE	09-13-2016		880	Multi-Day		2599	2599	1600	032	0845	Tuna	Drifting	Tuna, yellowfin	180	0
S0120UE	09-14-2016		880	Multi-Day		2000	2599	0000	020		Tuna	Drifting			
S0120WE	09-14-2016		880	Multi-Day		2599	0600	0000	032		Tuna	Other			
S0120VE	09-15-2016		880	Multi-Day		2599	2599	1600	020	0863	Tuna	Drifting	Tuna, bluefin	2	0
													Tuna, yellowfin	42	0
S0120XE	09-17-2016		880	Single Day		0000	2000	1200	017	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	68	0
S0120YE	09-18-2016		880	Multi-Day		0000	2599	1600	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	160	0
S0120ZE	09-19-2016		880	Multi-Day		2599	0600	0000	032		Tuna	Other			
S01210E	09-20-2016		880	Multi-Day		0000	2599	1600	031	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	12	0
													Dolphin (fish)	62	10

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S01211E	09-21-2016		880	Multi-Day		2599	0600	0000	031		Tuna	Other			
S01214E	09-21-2016		880	Multi-Day		2100	2599	0000	031		Other, Tuna	Drifting, Trolling			
S01215E	09-22-2016		880	Multi-Day		2599	2599	1200	031	0861	Tuna	Drifting, Trolling	Tuna, yellowfin	34	0
S01216E	09-23-2016		880	Multi-Day		2100	2599	0000	032		Tuna	Drifting, Trolling			
S01217E	09-23-2016		880	Multi-Day		2599	0500	0000	031		Tuna	Trolling			
S01218E	09-24-2016		880	Multi-Day		2599	2006	1200	031	0816	Tuna	Drifting, Trolling	Tuna, yellowfin	9	0
S01219E	09-25-2016		880	Multi-Day		0000	2599	1600	032	0910	Tuna	Drifting, Trolling	Dolphin (fish)	48	0
													Tuna, yellowfin	12	0
													Yellowtail	52	250
S0121BE	09-26-2016		880	Multi-Day		2599	0700	0000	032		Other	Other			
S0121CE	09-27-2016		880	Multi-Day		0000	2599	1600	023	0910	Tuna	Drifting, Trolling	Dolphin (fish)	42	0
													Tuna, yellowfin	115	0
													Yellowtail	0	200
													Tuna, skipjack	20	0
S0121DE	09-28-2016		880	Multi-Day		2000	2599	0000	023		Tuna	Anchored, Trolling			
S0121EE	09-28-2016		880	Multi-Day		2599	0700	0000	023		Tuna	Drifting, Trolling			

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S0121FE	09-29-2016		880	Multi-Day		2599	2599	1200	023	0910	Other, Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin Dolphin (fish)	45 94 18	
S0121GE	09-30-2016		880	Multi-Day		2000	2599	0000	032		Tuna	Trolling			
S0121HE	10-01-2016		880	Multi-Day		2599	2000	1200	032	0844	Sharks	Drifting			
S0121JE	10-02-2016		880	Multi-Day		2000	2599	0000	024		Tuna	Trolling			
S0121KE	10-02-2016		880	Multi-Day		2599	1841	0800	031	0904	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin Dolphin (fish)	1 75 15	60 0
S0121LE	10-03-2016		880	Multi-Day		2599	2599	1200	024	0904	Tuna	Trolling	Yellowtail Tuna, yellowfin	20 70	200 0
S0121ME	10-04-2016		880	Multi-Day		2599	2599	1200	024	0904	Tuna	Trolling	Yellowtail Tuna, yellowfin Dolphin (fish)	30 40 10	70 0 0
S0121NE	10-05-2016		880	Multi-Day		2000	2599	0000	011		Tuna	Trolling			
S0121PE	10-05-2016		880	Multi-Day		2599	0547	0000	024		Tuna	Trolling			
S0121QE	10-06-2016		880	Multi-Day		2599	2599	1400	011	0904	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin Yellowtail	12 21 32	0 0 50
S0121RE	10-07-2016		880	Multi-Day		2000	2599	0000	032		Tuna	Trolling			

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

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S0121SE	10-07-2016		880	Multi-Day		2599	0600	0000	011		Tuna	Drifting, Trolling			
S0121TE	10-08-2016		880	Multi-Day		2100	2599	0000	022		Tuna	Trolling			
S0121UE	10-08-2016		880	Multi-Day		2599	1630	0900	032	0904	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin	92 31	0 0
S0121VE	10-09-2016		880	Multi-Day		2000	2599	0000	011		Tuna	Trolling			
S0121WE	10-09-2016		880	Multi-Day		2599	1725	0800	022	0904	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin	120 18	50 0
S0121XE	10-10-2016		880	Multi-Day		2599	2599	1300	011	0850	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	1 18	0 0
S0121YE	10-11-2016		880	Multi-Day		2599	0800	0000	011		Tuna	Trolling			
S0121ZE	10-14-2016		880	Multi-Day		2100	2599	0000	032		Tuna	Drifting			
S01220E	10-16-2016		880	Multi-Day		2599	2599	1200	012	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	30	0
S01221E	10-17-2016		880	Multi-Day		2599	0545	0000	012		Tuna	Anchored, Drifting			
S01229E	10-21-2016		880	Multi-Day		2143	2599	0000	006		Tuna				
S01222E	10-22-2016		880	Multi-Day		2599	2599	1200	006	0868	Tuna	Anchored	Tuna, yellowfin	14	
S01223E	10-23-2016		880	Multi-Day		2599	2221	1200	006	0868	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	21 2	
S01224E	10-27-2016		880	Multi-Day		2100	2599	0000	022		Tuna	Drifting, Trolling			
S01225E	10-28-2016		880	Multi-Day		2207	2599	0000	024		Tuna				

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

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S01226E	10-28-2016		880	Multi-Day		2599	2130	1200	022	0860	Tuna	Drifting	Tuna, yellowfin	42	
S01227E	10-29-2016		880	Multi-Day		2599	2599	1200	024	0860	Tuna	Anchored, Drifting, Trolling	Tuna, yellowfin	13	
S01228E	10-30-2016		880	Multi-Day		2599	0600	0000	024						
S0122AE	11-11-2016		880	Multi-Day		0800	2599	0000	032		Tuna	Drifting			
S0122BE	11-12-2016		880	Multi-Day		2599	2599	1000	032	0853	Tuna	Drifting	Tuna, bluefin	18	0
S0122CE	11-13-2016		880	Multi-Day		2599	0720	0000	032		Tuna	Drifting			
S0122DE	11-14-2016		880	Multi-Day		2000	2599	0000	020		Tuna	Drifting			
S0122EE	11-15-2016		880	Multi-Day		2599	2599	1200	020	0871	Tuna	Drifting	Tuna, bluefin	13	0
S0122FE	11-16-2016		880	Multi-Day		2599	0430	0000	020		Tuna	Drifting			
S0122GE	11-25-2016		880	Multi-Day		1700	2599	0000	030		Tuna	Drifting			
S0122HE	11-26-2016		880	Multi-Day		2599	2599	1500	030	0870	Tuna	Drifting	Tuna, bluefin	4	0
S0122JE	11-27-2016		880	Multi-Day		2599	0700	0000	030		Tuna	Drifting			
S0122KE	12-03-2016		880	Multi-Day		1900	2599	0000	025		Tuna				
S0122LE	12-04-2016		880	Multi-Day		2599	2599	1200	025	0897	Tuna	Drifting	Tuna, bluefin	1	
S0122ME	12-05-2016		880	Multi-Day		2599	0700	0000	025		Tuna	Drifting			
S0122NE	05-03-2017		880	Multi-Day		2100	2599	0000	028		Tuna	Drifting			
S0122PE	05-04-2017		880	Multi-Day		2030	2599	0000	023		Tuna	Drifting			
S0122QE	05-04-2017		880	Multi-Day		2599	2000	1200	028	0904	Tuna	Drifting	Yellowtail Tuna, bluefin	63 8	25 0
S0122RE	05-05-2017		880	Multi-Day		2599	2100	1200	023	0904	Tuna	Drifting	Yellowtail Tuna, bluefin	8 4	
S01238E	05-11-2017		880	Multi-Day		2100	2599	0000	015		Tuna	Drifting			
S0122SE	05-12-2017		880	Multi-Day		2599	1954	1300	015	0910	Tuna	Drifting	Yellowtail	75	20
S0122TE	05-18-2017		880	Multi-Day		2100	2599	0000	019		Tuna	Drifting			

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S0122UE	05-19-2017		880	Multi-Day		2100	2599	0000	013		Tuna	Drifting			
S0122VE	05-19-2017		880	Multi-Day		2599	2030	1200	019	0910	Tuna	Drifting	Yellowtail	52	20
S0122WE	05-20-2017		880	Multi-Day		2599	2599	1200	013	0910	Tuna	Drifting, Trolling	Tuna, bluefin Yellowtail	2 50	0 10
S0122XE	05-21-2017		880	Multi-Day		2599	0900	0000	013		Tuna	Drifting			
S0122YE	05-23-2017		880	Multi-Day		2100	2599	0000	019		Tuna	Drifting			
S0122ZE	05-24-2017		880	Multi-Day		2599	2599	1400	019	0910	Tuna	Drifting	Tuna, bluefin	29	0
S01230E	05-25-2017		880	Multi-Day		2599	0600	0000	019						
S01231E	05-26-2017		880	Single Day		0000	2000	0800	017	0910	Tuna	Drifting, Trolling	Tuna, bluefin	25	0
S01232E	05-27-2017		880	Single Day		0001	1830	0800	025	0867	Lingcod, Other, Rockfishes	Anchored, Drifting	Whitefish, ocean Yellowtail Lingcod Rockfish, unspecified Scorpionfish, California Barracuda, California Sheephead, California Rockfish, bocaccio Bass, kelp	18 1 4 120 1 4 4 14 3	0 0 0 0 0 0 0 0 0
S01233E	05-27-2017		880	Multi-Day		2100	2599	0000	025		Tuna	Drifting			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01234E	05-28-2017		880	Multi-Day		2599	2599	1400	025	0910	Tuna	Drifting	Yellowtail Tuna, yellowfin	11 1	
S01235E	05-29-2017		880	Multi-Day		2599	0600	0000	025		Tuna	Anchored			
S01236E	05-30-2017		880	Multi-Day		2100	2599	0000	014		Tuna	Drifting			
S01237E	05-31-2017		880	Multi-Day		2599	2599	1400	014	0910	Tuna	Drifting	Tuna, bluefin	11	0
S01239E	06-01-2017		880	Multi-Day		2599	0607	0000	014		Tuna	Drifting			
S0123AE	06-09-2017		880	Multi-Day		2100	2599	0000	021		Tuna	Drifting			
S0123BE	06-10-2017		880	Multi-Day		2599	2599	1500	021	0910	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	1 4	0 0
S0123CE	06-11-2017		880	Multi-Day		2599	0600	0000	021		Tuna	Drifting			
S0123DE	06-13-2017		880	Multi-Day		2100	2599	0000	011		Tuna	Drifting			
S0123EE	06-14-2017		880	Multi-Day		0000	2599	1400	015	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	1	0
S0123FE	06-14-2017		880	Multi-Day		2599	2000	1400	011	0910	Tuna	Drifting, Trolling	Tuna, bluefin	1	0
S0123GE	06-16-2017		880	Multi-Day		1400	2599	0000	021		Tuna	Other			
S0123HE	06-16-2017		880	Multi-Day		2599	0006	0000	015		Tuna	Other			
S0123JE	06-17-2017		880	Multi-Day		2599	2599	1400	021	0910	Rockfishes	Anchored, Drifting	Lingcod Rockfish, unspecified Barracuda, California	42 105 6	20 20 20
S0123KE	06-18-2017		880	Multi-Day		2599	2599	1400	021	0910	Tuna	Drifting, Trolling	Tuna, yellowfin Yellowtail	1 1	0 0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01212E	06-19-2017		880	Multi-Day		2599	0500	0000	021		Other	Other			
S0198BE	07-03-2017		880	Single Day		0000	1800	0900	032	0910	Tuna	Drifting, Trolling	Dolphin (fish)	3	0
													Yellowtail	42	0
S0123LE	07-07-2017		880	Multi-Day		2100	2599	0000	014		Tuna	Drifting			
S0123ME	07-08-2017		880	Multi-Day		2100	2599	0000	009		Tuna	Drifting, Trolling			
S0123NE	07-08-2017		880	Multi-Day		2599	2030	0800	014	0867	Rockfishes	Anchored, Drifting	Lingcod	2	0
													Rockfish, copper	12	0
													Rockfish, vermilion	30	0
S0123PE	07-09-2017		880	Multi-Day		2599	2599	1500	009	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	1	0
													Tuna, bluefin	4	0
S0123QE	07-10-2017		880	Multi-Day		2100	2599	0000	011						
S0123RE	07-10-2017		880	Multi-Day		2599	0600	0000	009		Tuna	Drifting, Trolling			
S0123SE	07-11-2017		880	Multi-Day		2599	2599	2100	011	0910	Tuna	Anchored, Drifting, Trolling	Tuna, bluefin	1	0
S0123TE	07-12-2017		880	Multi-Day		2599	0600	0000	011						
S0121AE	07-15-2017		880	Single Day		1200	2000	0800	016	0910	Tuna	Drifting, Trolling	Dolphin (fish)	3	0
													Yellowtail	75	0
													Bonito, Pacific	8	0
S0198CE	07-26-2017		880	Multi-Day		2100	2599	0000	027		Tuna	Drifting, Trolling			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S0198DE	07-27-2017		880	Multi-Day		2599	2599	0800	027	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	3	0
													Yellowtail	97	30
S0198EE	07-28-2017		880	Single Day		0000	2000	0800	032	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	8	0
													Yellowtail	160	0
S0198FE	08-03-2017		880	Multi-Day		0000	2599	1400	020	0910	Tuna	Drifting, Trolling	Dolphin (fish)	50	0
													Yellowtail	84	20
S0198GE	08-04-2017		880	Multi-Day		2599	0600	0000	020		Tuna	Drifting, Trolling			
S0198HE	08-05-2017		880	Multi-Day		0000	2599	1400	021	0910	Other, Tuna	Drifting, Trolling	Yellowtail	65	0
													Tuna, bluefin	14	0
S0198JE	08-06-2017		880	Multi-Day		2599	1900	1200	021	0910	Other, Tuna	Drifting, Trolling	Yellowtail	145	20
S0198KE	08-07-2017		880	Multi-Day		0000	2599	1000	020	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	0
S0198LE	08-08-2017		880	Multi-Day		2599	2599	1200	020	0910	Tuna	Drifting, Trolling	Yellowtail	65	10
													Tuna, yellowfin	100	0
													Dolphin (fish)	20	0
S0198ME	08-09-2017		880	Multi-Day		2599	0500	0000	020		Tuna	Trolling			
S0198NE	08-10-2017		880	Single Day		0000	1900	1000	032	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	64	0
													Yellowtail	44	0
													Tuna, bluefin	1	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S0198PE	08-11-2017		880	Single Day		0000	1900	1000	032	0910	Other, Tuna	Drifting, Trolling	Opah	1	0
													Tuna, bluefin	1	0
													Dolphin (fish)	60	0
													Yellowtail	47	0
S0198QE	08-12-2017		880	Multi-Day		0000	2599	0800	025	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	122	0
S0198RE	08-13-2017		880	Multi-Day		2599	1830	1200	025	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	45	0
													Tuna, yellowfin	5	0
													Yellowtail	21	0
S0198SE	08-14-2017		880	Single Day		0000	1845	1000	031	0910	Other, Tuna	Drifting, Trolling	Tuna, bluefin	9	0
													Dolphin (fish)	64	0
													Yellowtail	3	0
S0198TE	08-15-2017		880	Single Day		0000	1819	1200	016	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	25	0
													Tuna, yellowfin	1	0
													Yellowtail	3	0
S0198UE	08-18-2017		880	Single Day		0000	1820	1000	028	0910	Other, Tuna	Drifting, Trolling	Yellowtail	31	5
													Dolphin (fish)	62	0
													Tuna, yellowfin	1	0
													Tuna, skipjack	1	1

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S0198VE	08-19-2017		880	Single Day		0000	2100	1200	028	0910	Tuna	Drifting, Trolling	Dolphin (fish)	4	0
													Yellowtail	6	0
S0198WE	08-21-2017		880	Single Day		0000	2100	1200	027	0910	Tuna	Drifting, Trolling	Tuna, skipjack	30	0
													Dolphin (fish)	3	0
S0198XE	08-21-2017		880	Single Day		0000	2100	1200	028	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	2	0
													Tuna, bluefin	31	0
													Dolphin (fish)	2	0
S0198YE	08-22-2017		880	Single Day		0000	2100	1200	018	0867	Tuna	Drifting	Tuna, bluefin	4	0
S0198ZE	08-23-2017		880	Single Day		0000	2000	1200	027	0867	Tuna	Drifting, Trolling	Tuna, bluefin	5	0
S01990E	08-23-2017		880	Multi-Day		2100	2599	0000	032						
S01991E	08-24-2017		880	Multi-Day		2599	2599	1200	032	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	3	0
													Tuna, bluefin	66	0
													Dolphin (fish)	1	0
													Yellowtail	2	0
S01992E	08-25-2017		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting			
S01993E	08-26-2017		880	Single Day		0000	2100	1200	032	0867	Tuna	Drifting, Trolling	Rockfish, vermilion	100	0
S01994E	08-27-2017		880	Single Day		0000	2000	1000	021	0882	Tuna	Drifting, Trolling	Tuna, bluefin	6	0
S01995E	08-28-2017		880	Multi-Day		0000	2599	1200	026	0882	Tuna	Drifting, Trolling	Dolphin (fish)	1	0
													Tuna, bluefin	15	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01996E	08-29-2017		880	Multi-Day		2599	1930	1000	026	0882	Tuna	Drifting	Tuna, bluefin	2	0
S01997E	08-31-2017		880	Single Day		0000	2000	1000	032	0882	Tuna	Drifting	Tuna, bluefin	23	0
S01998E	09-01-2017		880	Single Day		0000	2000	1100	032	0882	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	1 28	0 0
S01999E	09-02-2017		880	Single Day		0000	2000	1000	032	0861	Tuna	Anchored, Trolling	Dolphin (fish)	2	0
S0199AE	09-03-2017		880	Single Day		0000	2100	1000	027	0864	Tuna	Anchored	Tuna, bluefin	24	0
S0199BE	09-04-2017		880	Multi-Day		0000	2599	1200	021	0867	Tuna	Anchored	Tuna, bluefin	23	0
S0199CE	09-05-2017		880	Multi-Day		2599	0600	0000	027						
S0199DE	09-06-2017		880	Single Day		0000	2100	0000	025	0880	Tuna	Anchored			
S0199EE	09-07-2017		880	Multi-Day		0000	2599	1200	032	0867	Tuna	Drifting, Trolling	Tuna, bluefin	5	
S0199JE	09-08-2017		880	Multi-Day		2599	0600	0000	032						
S0199KE	09-09-2017		880	Multi-Day		0000	2599	1200	023	0885	Tuna	Anchored, Trolling	Yellowtail Tuna, bluefin	5 4	0 0
S0199LE	09-10-2017		880	Multi-Day		2599	2599	1200	023	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	49	0
S0199ME	09-11-2017		880	Multi-Day		2599	0600	0000	023						
S0199NE	09-12-2017		880	Single Day		0000	2000	1000	032	0910	Tuna	Drifting	Tuna, yellowfin	170	30
S0199PE	09-13-2017		880	Single Day		0000	2100	1000	023	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	93	0
S0199QE	09-14-2017		880	Multi-Day		0000	2599	1200	019	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	0
S0199RE	09-15-2017		880	Multi-Day		2599	0600	0000	019						

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S0199SE	09-16-2017		880	Single Day		0000	1930	1100	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	5 126	15 0
S0199TE	09-17-2017		880	Multi-Day		0000	2599	1500	031	0867	Tuna	Drifting, Trolling	Tuna, bluefin Dolphin (fish)	2 16	10 0
S01EL3E	09-18-2017		880	Multi-Day		2599	0600	0000	031		Tuna				
S01EL4E	09-19-2017		880	Single Day		0000	2000	1000	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	0
S01EL5E	09-20-2017		880	Multi-Day		0000	2599	1200	018	0867	Tuna	Drifting, Trolling	Tuna, bluefin	26	0
S01EL6E	09-21-2017		880	Multi-Day		2599	1700	0700	018	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	180	0
S01EL7E	09-22-2017		880	Single Day		0000	2000	1000	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	40 160	0 0
S01EL8E	09-23-2017		880	Single Day		0000	2100	0900	032	0910	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin	13 12	
S01EL9E	09-24-2017		880	Single Day		0000	2000	1000	035	0910	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin	1 5	0 0
S01ELAE	09-25-2017		880	Single Day		0000	1800	1000	018	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	20 90	0 0
S01ELBE	09-26-2017		880	Multi-Day		0000	2599	1200	015	0867	Tuna	Anchored, Drifting, Trolling	Tuna, bluefin Yellowtail	3 53	

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01ELCE	09-27-2017		880	Multi-Day		2599	2100	0000	015		Tuna	Anchored, Trolling			
S01ELDE	09-28-2017		880	Single Day		0000	2100	0900	025	0910	Tuna	Drifting	Dolphin (fish)	7	
S01ELEE	09-29-2017		880	Single Day		0000	2100	0900	027	0910	Tuna	Drifting, Trolling			
S01ELFE	09-30-2017		880	Single Day		0000	2100	0800	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	88	
S01ELGE	10-01-2017		880	Single Day		0000	2000	0800	032	0910	Tuna	Drifting, Trolling	Dolphin (fish)	38	0
													Tuna, yellowfin	118	0
S01ELHE	10-02-2017		880	Multi-Day		0000	2599	1100	022	0867	Tuna	Anchored, Drifting, Trolling	Tuna, bluefin	57	
S01ELJE	10-03-2017		880	Multi-Day		2599	2599	0900	022	0867	Tuna	Anchored, Drifting, Trolling	Yellowtail	27	
													Tuna, bluefin	10	
S01ELKE	10-04-2017		880	Multi-Day		2599	0600	0000	022		Tuna	Drifting			
S01ELLE	10-05-2017		880	Multi-Day		0000	2599	1000	030	0867	Tuna	Anchored	Tuna, yellowfin	108	
S01ELME	10-06-2017		880	Multi-Day		2599	0600	0000	030		Tuna	Anchored, Drifting, Trolling			
S01ELNE	10-07-2017		880	Single Day		0000	2100	0800	029	0910	Tuna	Drifting, Trolling	Yellowtail	2	
													Tuna, yellowfin	14	
													Tuna, skipjack	45	
S01ELPE	10-08-2017		880	Multi-Day		0000	2599	0900	032	0867	Tuna	Anchored, Trolling	Yellowtail	75	

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01ELQE	10-09-2017		880	Multi-Day		2599	0600	0000	032						
S01ELRE	10-09-2017		880	Multi-Day		1900	2599	0000	010		Tuna	Anchored, Trolling			
S01ELSE	10-10-2017		880	Multi-Day		2599	2599	1200	010	0867	Tuna	Anchored, Trolling	Yellowtail	30	0
S01ELTE	10-11-2017		880	Multi-Day		2599	0600	0000	010		Other, Tuna	Anchored, Trolling			
S01ELUE	10-14-2017		880	Single Day		0000	2000	0800	032	0910	Other, Tuna	Trolling	Tuna, yellowfin	12	0
													Dolphin (fish)	48	0
													Yellowtail	10	0
S01ELVE	10-14-2017		880	Multi-Day		2100	2599	0000	009		Tuna	Anchored, Trolling			
S01ELWE	10-15-2017		880	Multi-Day		2599	2599	1300	009	0867	Tuna	Drifting, Trolling	Yellowtail	5	0
S01ELXE	10-16-2017		880	Multi-Day		2599	0600	0000	009		Tuna	Anchored			
S0199HE	10-21-2017		880	Multi-Day		2100	2599	0000	008		Tuna	Trolling			
S01ELYE	10-21-2017		880	Single Day		0000	1900	1100	031	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	1	
S01ELZE	10-21-2017		880	Multi-Day		2100	2599	0000	008		Tuna	Anchored, Trolling			
S0199GE	10-22-2017		880	Multi-Day		2599	2599	1000	008	0854	Tuna	Trolling	Sheephead, California	5	0
													Yellowtail	3	0
S01EM0E	10-22-2017		880	Multi-Day		2599	2599	1200	008	0867	Tuna	Anchored, Trolling	Yellowtail	5	
S0199FE	10-23-2017		880	Multi-Day		2599	0630	0000	008						

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01EM1E	10-23-2017		880	Multi-Day		2599	0600	0000	008		Tuna	Anchored			
S01EM2E	10-27-2017		880	Multi-Day		1900	2599	0000	026		Tuna	Drifting, Trolling			
S01EM3E	10-28-2017		880	Multi-Day		2599	2599	1200	026	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	1	0
													Tuna, bluefin	49	0
S01EM4E	10-29-2017		880	Multi-Day		1900	2599	0000	015		Tuna	Drifting			
S01EM5E	10-29-2017		880	Multi-Day		2599	0600	0000	026		Tuna	Drifting, Trolling			
S01EM6E	10-30-2017		880	Multi-Day		2599	2599	1200	015	0867	Tuna	Drifting	Yellowtail	45	0
													Tuna, bluefin	37	0
S01EM7E	10-31-2017		880	Multi-Day		2599	0600	0000	015		Tuna	Drifting			
S01EM8E	11-01-2017		880	Multi-Day		1900	2599	0000	027		Tuna				
S01EM9E	11-02-2017		880	Multi-Day		2599	2599	1200	027	0867	Tuna	Drifting, Trolling	Yellowtail	34	0
													Tuna, bluefin	37	0
S01EMAE	11-03-2017		880	Multi-Day		2599	0600	0000	027		Tuna	Drifting			
S01EMBE	11-09-2017		880	Multi-Day		1900	2599	0000	010		Tuna	Drifting, Trolling			
S01EMCE	11-10-2017		880	Multi-Day		2100	2599	0000	014		Tuna				
S01EMDE	11-10-2017		880	Multi-Day		2599	2030	1100	010	0867	Tuna	Drifting, Trolling	Tuna, bluefin	30	0
S01EMEE	11-11-2017		880	Multi-Day		2599	2599	1300	014	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	108	0
S01EMFE	11-12-2017		880	Multi-Day		2599	0600	0000	014						
S01EMGE	11-15-2017		880	Multi-Day		2100	2599	0000	032						
S01EMHE	11-16-2017		880	Multi-Day		2599	2599	1200	032	0867	Tuna	Drifting	Tuna, yellowfin	10	0
													Tuna, bluefin	12	0

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01EMJE	11-17-2017		880	Multi-Day		2599	0600	0000	032						
S01EMKE	11-18-2017		880	Multi-Day		0000	2599	1600	032	0950	Tuna	Anchored	Tuna, bluefin	32	0
S01EMLE	11-19-2017		880	Multi-Day		2599	0500	0000	032		Tuna	Other			
S01EMME	11-20-2017		880	Multi-Day		0000	2599	1600	033	0950	Tuna	Anchored	Tuna, bluefin	40	0
S01EMNE	11-21-2017		880	Multi-Day		2599	0500	0000	033		Tuna	Other			
S01EMPE	11-24-2017		880	Multi-Day		2000	2599	0000	032						
S01EMQE	11-25-2017		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Anchored	Tuna, bluefin	25	0
S01EMRE	11-26-2017		880	Multi-Day		1900	2599	0000	021						
S01EMSE	11-26-2017		880	Multi-Day		1900	2599	0000	021		Tuna	Anchored			
S01EMTE	11-26-2017		880	Multi-Day		2599	0600	0000	032						
S01EMUE	11-27-2017		880	Multi-Day		2599	2599	1200	021	0860	Tuna	Anchored	Tuna, bluefin	30	0
S01EMVE	11-28-2017		880	Multi-Day		2599	0600	0000	021		Tuna	Anchored			
S01EMWE	11-29-2017		880	Multi-Day		0700	2599	0000	020		Tuna	Anchored			
S01EMXE	11-30-2017		880	Multi-Day		2599	2599	1500	020	0950	Tuna	Anchored	Tuna, bluefin	40	0
S01EMYE	12-01-2017		880	Multi-Day		0600	2599	0000	025						
S01EMZE	12-01-2017		880	Multi-Day		2599	0600	0000	020		Tuna	Anchored			
S01EN0E	12-02-2017		880	Multi-Day		2599	2599	1300	025	0950	Tuna	Anchored	Tuna, bluefin	6	0
S01EN1E	12-03-2017		880	Multi-Day		1900	2599	0000	012		Tuna	Anchored			
S01EN2E	12-03-2017		880	Multi-Day		2599	0600	0000	025						
S01EN3E	12-04-2017		880	Multi-Day		2599	2599	1300	012	0950	Tuna	Anchored	Tuna, bluefin	24	
S01EN4E	12-05-2017		880	Multi-Day		2599	0600	0000	012		Tuna	Anchored			
S01EN5E	12-08-2017		880	Multi-Day		1900	2599	0000	011		Tuna				
S01EN6E	12-09-2017		880	Multi-Day		2599	2599	1300	011	0950	Tuna	Anchored	Tuna, yellowfin	4	0
													Tuna, bluefin	21	0
S01EN7E	12-10-2017		880	Multi-Day		2599	0600	0000	011		Tuna	Anchored			
S01EN8E	12-15-2017		880	Single Day		0000	1945	0900	017	0950	Tuna	Anchored	Tuna, bluefin	34	0

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

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S01EN9E	12-16-2017		880	Single Day		0000	1945	0700	018	0950	Tuna	Anchored	Tuna, bluefin	36	
S01ENAE	01-05-2018		880	Multi-Day		1800	2599	0000	026		Tuna	Drifting, Trolling			
S01ENBE	01-06-2018		880	Multi-Day		2599	2599	1100	026	0910	Tuna	Drifting, Trolling	Tuna, bluefin	52	0
S01ENCE	01-07-2018		880	Multi-Day		2599	0600	0000	026						
S01ENDE	01-12-2018		880	Multi-Day		1800	2599	0000	032		Tuna				
S01ENEE	01-13-2018		880	Multi-Day		2599	2599	1100	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin	13	0
S01ENFE	01-14-2018		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting, Trolling			
S01ENGE	01-16-2018		880	Multi-Day		1800	2599	0000	018		Tuna				
S01ENRE	01-17-2018		880	Multi-Day		2599	2599	1200	018	0910	Tuna	Drifting, Trolling	Tuna, bluefin	36	0
S01ENHE	01-18-2018		880	Multi-Day		2599	0600	0000	018		Tuna				
S01ENJE	01-26-2018		880	Multi-Day		1800	2599	0000	031			Drifting, Trolling			
S01ENKE	01-27-2018		880	Multi-Day		2599	2599	1200	031	0910	Tuna	Drifting, Trolling	Tuna, bluefin	11	0
S01ENLE	01-28-2018		880	Multi-Day		2599	0600	0000	031		Tuna				
S01ENNE	03-30-2018		880	Multi-Day		1800	2599	0000	022		Tuna				
S01ENPE	03-31-2018		880	Multi-Day		2599	2599	1200	022	0910	Tuna	Drifting, Trolling	Tuna, bluefin	56	0
S01ENQE	04-01-2018		880	Multi-Day		2599	0600	0000	021		Tuna				
S01SKQE	04-02-2018		880	Multi-Day		1800	2599	0000	032		Tuna				
S01SKPE	04-03-2018		880	Multi-Day		2599	2599	1000	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin	15	
S01SKNE	04-04-2018		880	Multi-Day		2599	0900	0000	032		Tuna	Drifting			
S01SKME	04-13-2018		880	Multi-Day		1800	2599	0000	032		Tuna				

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S01SKLE	04-14-2018		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin Bonito, Pacific	12 3 25	
S01SKKE	04-15-2018		880	Multi-Day		2599	0530	0000	032						
S01SKJE	04-20-2018		880	Multi-Day		0600	2599	0000	032		Tuna	Drifting			
S01SKHE	04-21-2018		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Drifting	Tuna, bluefin	16	0
S01SKGE	04-22-2018		880	Multi-Day		1800	2599	0000	018			Drifting			
S01SKFE	04-23-2018		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Drifting	Tuna, bluefin	10	
S01SKDE	04-24-2018		880	Multi-Day		2599	0600	0000	018		Tuna	Drifting			
S01SKEE	04-24-2018		880	Multi-Day		1800	2599	0000	011		Tuna	Drifting			
S01SKCE	04-25-2018		880	Multi-Day		2599	2599	1200	011	0910	Tuna	Drifting, Trolling	Tuna, bluefin	4	0
S01SKBE	04-26-2018		880	Multi-Day		2599	0600	0000	011		Tuna	Drifting, Trolling			
S01SKAE	04-27-2018		880	Multi-Day		1800	2599	0000	032		Tuna	Drifting, Trolling			
S01SK9E	04-28-2018		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin	27	0
S01SK8E	04-29-2018		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting, Trolling			
S01SK7E	05-02-2018		880	Multi-Day		1800	2599	0000	022		Tuna	Drifting, Trolling			
S01SK6E	05-03-2018		880	Multi-Day		2599	2599	1200	022	0910	Tuna	Drifting, Trolling	Tuna, bluefin	10	0
S01SK4E	05-04-2018		880	Multi-Day		2599	0600	0000	022						
S01SK5E	05-04-2018		880	Multi-Day		1800	2599	0000	032		Tuna				
S01SK3E	05-05-2018		880	Multi-Day		2599	2599	1200	032	0910	Tuna	Trolling	Tuna, bluefin	1	0
S01SK1E	05-06-2018		880	Multi-Day		2599	0600	0000	032		Tuna				

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

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S01SK2E	05-06-2018		880	Multi-Day		1800	2599	0000	011						
S01SK0E	05-07-2018		880	Multi-Day		2599	2599	1200	011	0910	Tuna	Drifting, Trolling	Yellowtail	55	0
S01SJZE	05-08-2018		880	Multi-Day		2599	0600	0000	011						
S01SJXE	05-11-2018		880	Multi-Day		1800	2599	0000	025		Tuna				
S01SJYE	05-11-2018		880	Single Day		0000	2015	1200	022	0910	Tuna	Drifting, Trolling	Yellowtail	113	0
S01SJWE	05-12-2018		880	Multi-Day		2599	2599	1000	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	19	0
S01SJUE	05-13-2018		880	Multi-Day		2599	0600	0000	025		Tuna				
S01SJVE	05-13-2018		880	Multi-Day		2000	2599	0000	016						
S01SJTE	05-14-2018		880	Multi-Day		2599	2599	1100	016	0910	Tuna	Drifting, Trolling	Tuna, bluefin	1	0
S01SJRE	05-15-2018		880	Multi-Day		2599	0600	0000	016						
S01SJSE	05-15-2018		880	Multi-Day		2000	2599	0000	009						
S01SJQE	05-16-2018		880	Multi-Day		2599	2599	1000	009	0910	Tuna	Drifting	Tuna, bluefin	2	
S01SJPE	05-18-2018		880	Single Day		0000	2000	1200	014	0910	Tuna	Trolling	Tuna, bluefin	1	
													Yellowtail	12	
S01SJNE	05-19-2018		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Trolling	Tuna, bluefin	1	
													Yellowtail	76	
S01SJME	05-20-2018		880	Multi-Day		2599	0600	0000	032		Tuna				
S01SJLE	05-26-2018		880	Multi-Day		0000	2599	1200	007	0910	Tuna	Drifting	Yellowtail	12	
													Tuna, bluefin	1	
S01SJKE	05-27-2018		880	Multi-Day		2599	2599	1200	007	0910	Rockfishes, Tuna	Drifting			
S01SJJE	05-28-2018		880	Multi-Day		2599	0600	0000	007						
S01SJHE	05-29-2018		880	Multi-Day		0000	2599	0000	012		Tuna	Anchored			
S01SJGE	05-30-2018		880	Multi-Day		2599	0600	0000	012						

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S01SJFE	06-02-2018		880	Multi-Day		0000	2599	1200	027	0910	Rockfishes, Tuna	Anchored, Drifting, Trolling	Yellowtail Rockfish, vermilion	3 100	
S01SJEE	06-03-2018		880	Multi-Day		2599	0600	0000	027						
S01SJDE	06-06-2018		880	Multi-Day		0000	2599	1200	019	0910	Tuna	Anchored, Drifting	Tuna, bluefin	3	
S01SJCE	06-07-2018		880	Multi-Day		2599	0600	0000	019						
S01SJBE	06-08-2018		880	Single Day		0000	2100	1100	018	0910	Tuna	Drifting	Tuna, bluefin	11	
S01SJAE	06-09-2018		880	Single Day		0000	2100	1100	031	0910	Tuna	Drifting	Yellowtail Tuna, bluefin	12 12	
S01SJ9E	06-10-2018		880	Multi-Day		0000	2599	1200	014	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin	25 2	
S01SJ8E	06-11-2018		880	Multi-Day		2599	0600	0000	014						
S01SJ7E	06-12-2018		880	Multi-Day		0000	2599	1200	012	0910	Tuna	Drifting, Trolling	Yellowtail	16	
S01SJ6E	06-13-2018		880	Multi-Day		2599	0600	0000	012						
S01SJ5E	06-14-2018		880	Single Day		0000	2100	1200	022	0910	Tuna	Drifting	Tuna, bluefin	9	
S01SJ4E	06-16-2018		880	Single Day		0000	1915	1100	032	0910	Tuna	Drifting	Tuna, bluefin	4	
S01SJ3E	06-17-2018		880	Multi-Day		0000	2599	1200	011	0910	Tuna	Drifting	Tuna, bluefin	4	
S01SJ2E	06-18-2018		880	Multi-Day		2599	0600	0000	011						
S01SJ1E	06-19-2018		880	Multi-Day		0000	2599	1500	017	0882	Tuna	Drifting	Tuna, bluefin	7	0
S01SJ0E	06-20-2018		880	Multi-Day		2599	0600	0000	017		Tuna	Drifting			
S01SHZE	06-21-2018		880	Single Day		0000	2000	1200	025	0882	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin	1 2	0 0
S01SHYE	06-22-2018		880	Single Day		0000	2100	1200	021	0882	Tuna	Drifting	Tuna, bluefin	1	0
S01SHXE	06-23-2018		880	Single Day		0000	1900	0000	032	0882	Tuna	Drifting			

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S01SHWE	06-24-2018		880	Multi-Day		0000	2599	1400	020	0867	Other, Tuna	Anchored, Drifting, Trolling	Bass, kelp Yellowtail	60 9	10 0
S01SHVE	06-25-2018		880	Multi-Day		2599	0600	0000	020		Other, Tuna	Other			
S01SHUE	06-26-2018		880	Multi-Day		0000	2599	1400	007	0910	Tuna	Drifting	Tuna, bluefin	3	0
S01SHTE	06-28-2018		880	Single Day		0000	2000	1000	019	0910	Tuna	Drifting, Trolling	Tuna, bluefin	17	0
S01SHSE	06-29-2018		880	Single Day		0000	1830	1200	032	0910	Tuna	Drifting	Tuna, bluefin	22	0
S01SHRE	06-30-2018		880	Single Day		0000	2000	1200	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin	13	
S01SHQE	07-01-2018		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	1 6	
S01SHPE	07-02-2018		880	Multi-Day		2599	0600	0000	032						
S01SHNE	07-03-2018		880	Multi-Day		0000	2599	1200	027	0910	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	1 11	
S01SHME	07-04-2018		880	Multi-Day		2599	0600	0000	027						
S01SHLE	07-05-2018		880	Single Day		0000	2000	1200	027	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin Yellowtail	6 5 36	0 0 0
S01SHKE	07-06-2018		880	Single Day		0000	1921	1200	032	0910	Tuna	Drifting	Tuna, bluefin	15	
S01SHJE	07-08-2018		880	Multi-Day		0000	2599	1400	014	0910	Tuna	Drifting	Tuna, bluefin	4	
S01SHHE	07-09-2018		880	Multi-Day		2599	0555	0000	014		Tuna	Drifting			
S01SHGE	07-10-2018		880	Multi-Day		0000	2599	1400	017	0882	Tuna	Drifting, Trolling	Tuna, bluefin	7	0
S01SHFE	07-11-2018		880	Multi-Day		2599	0600	0000	017		Tuna	Other			

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S01SHEE	07-12-2018		880	Multi-Day		0000	2599	1400	019	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	5	0
													Tuna, bluefin	5	0
													Bonito, Pacific	2	0
S01SHDE	07-13-2018		880	Multi-Day		2599	0600	0000	019		Tuna	Other			
S01SHCE	07-14-2018		880	Single Day		0000	2100	1200	032	0884	Tuna	Drifting	Tuna, bluefin	1	
S01SHBE	07-15-2018		880	Multi-Day		0000	2599	1500	032	0884	Tuna	Drifting, Trolling	Tuna, bluefin	3	
S01SHAE	07-16-2018		880	Multi-Day		2599	0600	0000	032		Tuna				
S01SH9E	07-19-2018		880	Single Day		0000	2100	1200	024	0867	Tuna	Drifting, Trolling	Yellowtail	1	
													Tuna, bluefin	1	
S01SH8E	07-20-2018		880	Single Day		0000	2000	1200	025	0867	Tuna	Drifting, Trolling	Yellowtail	1	
													Tuna, bluefin	1	
S01SH7E	07-22-2018		880	Single Day		0020	2020	1000	027	0910	Tuna	Drifting, Trolling	Yellowtail	18	
S01SH6E	07-26-2018		880	Single Day		0000	2000	1200	032	0910	Tuna	Drifting, Trolling	Yellowtail	3	
													Tuna, bluefin	1	
S01SH5E	07-27-2018		880	Single Day		0000	2000	1200	032	0910	Tuna	Drifting, Trolling			
S01SH4E	07-28-2018		880	Single Day		0000	2000	1200	029	0910	Tuna	Drifting, Trolling	Dolphin (fish)	3	
													Yellowtail	60	
S01SH3E	07-29-2018		880	Multi-Day		0000	2599	1400	018	0910	Tuna	Drifting	Yellowtail	20	0
													Tuna, yellowfin	50	0
													Dolphin (fish)	3	0

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S01SH2E	07-31-2018		880	Multi-Day		0000	2599	1400	032	0850	Tuna	Anchored, Drifting	Tuna, bluefin	6	0
S01SH1E	08-02-2018		880	Single Day		0000	2000	1000	023	0910	Other, Tuna	Drifting, Trolling	Yellowtail	1	0
S01SH0E	08-03-2018		880	Single Day		0000	2000	1000	026	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	3	0
													Yellowtail	8	0
													Dolphin (fish)	1	0
S01SGZE	08-04-2018		880	Multi-Day		0000	2599	1400	023	0910	Other, Tuna	Drifting, Trolling	Yellowtail	115	0
S01SFTE	08-05-2018		880	Multi-Day		2599	2000	1000	023	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	46	0
													Yellowtail	115	0
S01SGYE	08-06-2018		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting, Trolling	Yellowtail	10	
													Dolphin (fish)	25	
S01SGXE	08-07-2018		880	Multi-Day		2599	0600	0000	032						
S01SGWE	08-08-2018		880	Multi-Day		0000	2599	1400	032	0867	Tuna	Drifting, Trolling	Tuna, bluefin	20	
S01SGVE	08-09-2018		880	Multi-Day		2599	0700	0000	032						
S01SGUE	08-10-2018		880	Single Day		0000	2000	1000	029	0910	Tuna	Drifting, Trolling	Dolphin (fish)	48	
													Tuna, yellowfin	25	
													Tuna, skipjack	50	
													Yellowtail	3	
S01SGTE	08-11-2018		880	Multi-Day		0000	2599	1400	023	0868	Tuna	Drifting	Tuna, bluefin	8	0
S01SGSE	08-12-2018		880	Multi-Day		2599	2000	1200	023	0867	Tuna	Drifting			

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S01SGRE	08-13-2018		880	Multi-Day		0000	2599	1200	024	0897	Tuna	Anchored	Yellowtail	36	0
													Tuna, bluefin	45	0
													Tuna, yellowfin	1	0
S01SGQE	08-14-2018		880	Multi-Day		2599	1700	1000	024	0850	Tuna	Drifting, Trolling			
S01SGPE	08-15-2018		880	Multi-Day		0000	2599	2000	033	0850	Tuna	Drifting, Trolling	Yellowtail	1	0
													Tuna, bluefin	2	0
													Whitefish, ocean	5	0
S01SGNE	08-16-2018		880	Multi-Day		2599	0600	0000	033		Tuna	Other			
S01SGME	08-17-2018		880	Single Day		0000	1845	0900	029	0910	Tuna	Drifting, Trolling	Dolphin (fish)	3	
													Tuna, yellowfin	61	0
													Tuna, skipjack	55	
S01SGLE	08-18-2018		880	Single Day		0000	1845	0900	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack	55	
													Tuna, yellowfin	72	
													Dolphin (fish)	10	
S01SGKE	08-19-2018		880	Single Day		0000	2359	1400	033	0910	Tuna	Drifting, Trolling	Tuna, skipjack	124	0
													Tuna, yellowfin	101	0
													Yellowtail	9	0
													Dolphin (fish)	5	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01SGJE	08-21-2018		880	Multi-Day		0000	2599	1200	028	0910	Tuna	Drifting, Trolling	Dolphin (fish)	25	
													Tuna, yellowfin	140	0
													Tuna, skipjack	50	
S01SGHE	08-22-2018		880	Multi-Day		2599	0600	0000	028		Tuna	Drifting, Trolling			
S01SGGE	08-23-2018		880	Single Day		0000	2000	1200	032	0910	Tuna	Drifting, Trolling	Dolphin (fish)	30	
													Tuna, yellowfin	55	
													Tuna, skipjack	75	
S01SGFE	08-24-2018		880	Single Day		0000	1830	1200	023	0910	Tuna	Drifting, Trolling	Dolphin (fish)	27	
													Tuna, yellowfin	55	
													Tuna, skipjack	30	
S01SGEE	08-25-2018		880	Single Day		0000	2000	1000	025	0910	Tuna	Drifting, Trolling	Tuna, skipjack	65	0
													Tuna, yellowfin	54	0
													Dolphin (fish)	1	0
S01SGDE	08-26-2018		880	Single Day		0000	1800	1000	031	0910	Tuna	Drifting, Trolling	Tuna, skipjack	74	0
													Tuna, yellowfin	71	0
													Dolphin (fish)	2	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01SGCE	08-27-2018		880	Multi-Day		0000	2599	1400	025	0850	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, skipjack, black	200 1	0 0
S01SGBE	08-28-2018		880	Multi-Day		2599	1830	1030	025	0910	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin Tuna, skipjack	8 56 125	0 0 0
S01SGAE	08-31-2018		880	Multi-Day		0000	2599	1200	025	0867	Tuna	Drifting, Trolling	Tuna, bluefin	7	
S01SG9E	09-01-2018		880	Multi-Day		2599	2100	1200	025	0867	Tuna	Drifting			
S01SG8E	09-02-2018		880	Single Day		0000	1900	1100	017	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin Dolphin (fish)	60 32 5	
S01SG7E	09-03-2018		880	Multi-Day		0000	2599	0000	020		Tuna	Drifting, Trolling			
S01SG6E	09-05-2018		880	Multi-Day		0000	2599	1200	032	0867	Tuna	Drifting	Dolphin (fish) Tuna, bluefin Yellowtail Tuna, skipjack	20 12 10 50	
S01SG5E	09-06-2018		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting			
S01SG4E	09-07-2018		880	Single Day		0000	2000	1000	020	0910	Tuna	Drifting, Trolling	Tuna, skipjack	100	0
S01SG3E	09-08-2018		880	Multi-Day		0000	2599	0000	024		Tuna	Drifting, Trolling			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01SG2E	09-09-2018		880	Multi-Day		2599	2000	1000	020	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin Dolphin (fish)	100 56 8	0 0 0
S01SG1E	09-10-2018		880	Multi-Day		0000	2599	1400	020	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, yellowfin Dolphin (fish) Tuna, skipjack	55 14 18 50	30 0 0 0
S01SFZE	09-11-2018		880	Multi-Day		2599	0700	0000	020		Tuna	Trolling			
S01SFYE	09-12-2018		880	Multi-Day		0000	2599	1700	032	0850	Other, Tuna	Anchored, Drifting, Trolling	Tuna, yellowfin Tuna, bluefin Yellowtail	1 21 24	0 0 0
S01SG0E	09-13-2018		880	Multi-Day		2599	0700	0000	032		Other	Other			
S01SFXE	09-14-2018		880	Single Day		0000	1800	1000	020	0910	Tuna	Drifting, Trolling	Dolphin (fish) Tuna, yellowfin Tuna, skipjack	1 94 100	0 0 30
S01SFWE	09-15-2018		880	Single Day		0000	2000	1000	025	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	100 94	0 0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S01SFVE	09-16-2018		880	Multi-Day		0000	2599	1300	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin Dolphin (fish)	150 160 1	100 20 0
S01SFUE	09-17-2018		880	Multi-Day		2599	0600	0000	032		Tuna	Other			
S024WSE	09-18-2018		880	Multi-Day		0000	2599	1200	030	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	25 107	
S024WRE	09-19-2018		880	Multi-Day		2599	0600	0000	030						
S024WQE	09-20-2018		880	Single Day		0000	2000	0800	026	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	50 130	
S024WPE	09-22-2018		880	Multi-Day		0000	2599	1800	020	0868	Tuna	Drifting	Tuna, bluefin	20	0
S024WNE	09-23-2018		880	Multi-Day		2599	1755	0800	020	0867	Tuna	Trolling	Tuna, bluefin	2	0
S024WME	09-24-2018		880	Multi-Day		0000	2599	1400	032	0950	Other, Tuna	Anchored, Drifting, Trolling	Bonito, Pacific Yellowtail Tuna, bluefin	35 12 18	
S024WLE	09-25-2018		880	Multi-Day		2599	0600	0000	032		Other, Tuna				
S024WKE	09-26-2018		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	125	
S024WJE	09-27-2018		880	Multi-Day		2599	0600	0000	025		Tuna				
S024WGE	09-28-2018		880	Multi-Day		2100	2599	0000	020		Tuna	Drifting, Trolling			
S024WHE	09-28-2018		880	Single Day		0000	1900	1000	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	110 185	

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S024WFE	09-29-2018		880	Multi-Day		2599	2599	1200	020	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	
S024WEE	09-30-2018		880	Multi-Day		2599	2599	1200	020	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	
S024WCE	10-01-2018		880	Multi-Day		2599	0600	0000	020		Tuna				
S024WDE	10-01-2018		880	Multi-Day		2100	2599	0000	015		Tuna	Drifting			
S024WBE	10-02-2018		880	Multi-Day		2599	2599	1200	015	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	75	
S024WAE	10-03-2018		880	Multi-Day		2599	0600	0000	015		Tuna	Drifting, Trolling			
S024W9E	10-04-2018		880	Single Day		0000	2000	1200	029	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	140	
S024W8E	10-06-2018		880	Multi-Day		2599	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	100 85	20
S024W7E	10-07-2018		880	Multi-Day		2599	0600	0000	024						
S024W6E	10-08-2018		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Drifting	Tuna, bluefin	44	
S024W5E	10-09-2018		880	Multi-Day		2599	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	44	
S024W4E	10-10-2018		880	Multi-Day		2599	0600	0000	022						
S024W3E	10-12-2018		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Drifting	Tuna, bluefin	33	
S024W2E	10-13-2018		880	Multi-Day		2599	2599	1200	022	0867	Tuna	Drifting	Tuna, bluefin	20	
S024W1E	10-14-2018		880	Multi-Day		0000	2599	1200	024	0867	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	1 1	
S024W0E	10-16-2018		880	Multi-Day		2599	2599	1200	024	0910	Tuna	Drifting	Dolphin (fish) Tuna, yellowfin	39 120	

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S024VZE	10-17-2018		880	Multi-Day		2599	0600	0000	024						
S024VYE	10-18-2018		880	Multi-Day		0000	2599	1500	024	0867	Tuna	Drifting	Tuna, bluefin	43	
S024VXE	10-19-2018		880	Multi-Day		2599	0600	0000	024		Tuna				
S024VWE	10-20-2018		880	Multi-Day		0000	2599	1300	032	0867	Tuna	Drifting			
S024VVE	10-21-2018		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting			
S024VUE	10-22-2018		880	Multi-Day		0000	2599	1200	021	0867	Tuna	Drifting	Tuna, bluefin	12	
S024VTE	10-23-2018		880	Multi-Day		2599	2599	1400	021	0867	Tuna	Drifting	Tuna, bluefin	12	
S024VSE	10-24-2018		880	Multi-Day		2599	0600	0000	021						
S024VRE	10-27-2018		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	30	
S024VQE	10-28-2018		880	Multi-Day		2599	2599	1500	022	0867	Tuna	Drifting	Tuna, yellowfin	1	
													Tuna, bluefin	7	
													Tuna, bigeye	1	
S024VPE	10-29-2018		880	Multi-Day		2599	0600	0000	022						
S024VNE	10-30-2018		880	Multi-Day		0000	2599	1300	025	0867	Tuna	Drifting	Tuna, bluefin	17	
S024VME	10-31-2018		880	Multi-Day		2599	0600	0000	025						
S024VLE	11-02-2018		880	Multi-Day		1200	2599	0000	020		Tuna	Drifting			
S024VKE	11-03-2018		880	Multi-Day		2599	2599	1400	020	0897	Tuna	Drifting	Tuna, bluefin	13	0
S024VHE	11-04-2018		880	Multi-Day		2599	0600	0000	020		Tuna	Drifting			
S024VJE	11-04-2018		880	Multi-Day		1200	2599	0000	022		Tuna	Drifting			
S024VFE	11-05-2018		880	Multi-Day		2599	2599	1400	022	0897	Tuna	Drifting	Tuna, bluefin	38	0
S024VEE	11-06-2018		880	Multi-Day		2599	2599	1400	022	0897	Tuna	Drifting	Tuna, bluefin	30	0
S024VDE	11-07-2018		880	Multi-Day		2599	0600	0000	022		Tuna	Drifting			
S024VCE	11-08-2018		880	Multi-Day		0000	2599	1300	032	0897	Tuna	Drifting	Tuna, bluefin	34	0
S024VBE	11-10-2018		880	Multi-Day		0000	2599	1200	031	0897	Tuna	Drifting	Tuna, bluefin	70	0
S024V9E	11-11-2018		880	Multi-Day		2599	0600	0000	031		Tuna	Drifting			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S024VAE	11-11-2018		880	Multi-Day		1200	2599	0200	018	0882	Tuna	Drifting	Tuna, bluefin	13	0
S024V8E	11-12-2018		880	Multi-Day		2599	2599	1200	018	0897	Tuna	Drifting	Tuna, bluefin	36	0
S024V2E	05-10-2019		880	Multi-Day		2000	2599	0000	016		Tuna	Drifting			
S024V1E	05-11-2019		880	Multi-Day		2599	2599	1200	016	0910	Tuna	Drifting	Tuna, bluefin	32	0
S024V0E	05-12-2019		880	Multi-Day		2599	0600	0000	016						
S024UZE	05-13-2019		880	Multi-Day		1900	2599	0000	016						
S024UYE	05-14-2019		880	Multi-Day		2599	2599	1200	016	0910	Tuna	Drifting	Tuna, bluefin	18	0
S024UXE	05-15-2019		880	Multi-Day		2599	0600	0000	016						
S024UWE	05-17-2019		880	Multi-Day		2000	2599	0000	020						
S024UVE	05-18-2019		880	Multi-Day		2599	2599	1200	020	0910	Tuna	Drifting	Tuna, bluefin	40	0
S024UUE	05-19-2019		880	Multi-Day		2599	0600	0000	020						
S024UTE	05-22-2019		880	Multi-Day		1900	2599	0000	012						
S024VGE	05-23-2019		880	Multi-Day		2599	2599	1200	012	0910	Tuna	Drifting	Yellowtail Tuna, bluefin	33 1	
S024USE	05-24-2019		880	Multi-Day		2599	0600	0000	012						
S024URE	05-25-2019		880	Single Day		0000	1900	1200	032	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin	42 1	
S024UQE	05-26-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting	Yellowtail Tuna, bluefin Bonito, Pacific	4 6 1	
S024UPE	05-27-2019		880	Multi-Day		2599	0600	0000	032						
S024UNE	05-30-2019		880	Multi-Day		0000	2599	1200	017	0910	Tuna	Drifting	Tuna, bluefin	34	0
S024ULE	05-31-2019		880	Multi-Day		2599	0600	0000	017						
S024UME	05-31-2019		880	Multi-Day		2000	2599	0000	030		Tuna				
S024UKE	06-01-2019		880	Multi-Day		2599	2599	1300	030	0910	Tuna	Drifting	Tuna, bluefin	18	
S024UHE	06-02-2019		880	Multi-Day		2599	0600	0000	030						

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S024UJE	06-02-2019		880	Multi-Day		1900	2599	0000	018						
S024UGE	06-03-2019		880	Multi-Day		2599	2599	1200	018	0910	Tuna	Drifting	Tuna, bluefin	12	
S024UFE	06-04-2019		880	Multi-Day		2599	0600	0000	018						
S024UEE	06-05-2019		880	Multi-Day		0000	2599	1200	030	0910	Tuna	Drifting	Tuna, yellowfin	20	
													Tuna, bluefin	18	
S024UDE	06-06-2019		880	Multi-Day		2599	0600	0000	030						
S024UCE	06-07-2019		880	Multi-Day		0000	2599	1200	031	0910	Tuna	Drifting	Tuna, bluefin	6	
S024UBE	06-08-2019		880	Multi-Day		2599	0600	0000	031						
S024UAE	06-09-2019		880	Multi-Day		2599	0600	0000	031						
S024U8E	06-10-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting	Tuna, bluefin	4	
S024U9E	06-10-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Anchored	Tuna, yellowfin	22	
													Tuna, bluefin	7	
S024U7E	06-11-2019		880	Multi-Day		2599	0600	0000	032						
S024U5E	06-12-2019		880	Multi-Day		0000	2599	1200	023	0910	Tuna	Drifting	Tuna, bluefin	2	
S024U6E	06-13-2019		880	Multi-Day		2599	0600	0000	023		Tuna				
S02AWCE	06-13-2019		880	Multi-Day		2216	2599	0000	031		Tuna	Drifting			
S02AWDE	06-14-2019		880	Multi-Day		2212	2599	0000	032		Tuna	Drifting			
S02AWEE	06-14-2019		880	Multi-Day		2599	2100	0900	031	0910	Tuna	Drifting	Tuna, bluefin	4	0
S02AWFE	06-15-2019		880	Multi-Day		2599	2599	1500	032	0910	Tuna	Drifting	Yellowtail	26	0
													Tuna, yellowfin	21	0
													Tuna, bluefin	5	0
													Bonito, Pacific	24	26
S02AWGE	06-16-2019		880	Multi-Day		1910	2599	0000	023		Tuna	Drifting			
S02AWHE	06-16-2019		880	Multi-Day		2599	0534	0000	032		Tuna				

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02AWJE	06-17-2019		880	Multi-Day		2599	2599	1400	023	0910	Tuna	Drifting	Tuna, yellowfin	5	0
													Yellowtail	93	0
													Tuna, bluefin	7	0
S02AWKE	06-18-2019		880	Multi-Day		2599	0549	0000	023		Tuna	Drifting			
S02AWLE	06-19-2019		880	Multi-Day		0000	2599	1400	018	0910	Tuna	Drifting, Trolling	Tuna, bluefin	30	
S02AWME	06-21-2019		880	Single Day		0000	2100	0700	020	0910	Tuna	Drifting, Trolling	Tuna, bluefin	26	
S02AWNE	06-22-2019		880	Single Day		0000	2000	0800	020	0910	Tuna	Diving, Trolling			
S02AWPE	06-23-2019		880	Multi-Day		0000	2599	1200	020	0910	Tuna	Drifting, Trolling	Tuna, bluefin	17	
S02AWQE	06-24-2019		880	Multi-Day		2599	0600	0000	020		Tuna	Diving, Trolling			
S02AWRE	06-25-2019		880	Single Day		0000	2000	0800	020	0910	Tuna	Drifting, Trolling	Tuna, bluefin	9	
S02AWSE	06-26-2019		880	Multi-Day		0000	2599	1200	023	0910	Tuna	Drifting, Trolling	Tuna, bluefin	20	
S02AWTE	06-27-2019		880	Single Day		0000	1900	0700	032	0910	Tuna	Drifting, Trolling	Tuna, skipjack, black	3	
S02AWUE	06-29-2019		880	Multi-Day		0000	2599	0700	031	0910	Tuna	Drifting, Trolling	Tuna, bluefin	12	
S02AWVE	06-30-2019		880	Multi-Day		2599	0600	0000	031						
S02AWWE	07-01-2019		880	Multi-Day		0000	2599	1200	032	0867	Tuna	Trolling	Tuna, bluefin	9	
S02AWXE	07-02-2019		880	Multi-Day		2599	0600	0000	032						
S02AWYE	07-03-2019		880	Multi-Day		0000	2599	1200	031	0910	Tuna	Drifting, Trolling	Tuna, bluefin	15	

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02AWZE	07-04-2019		880	Multi-Day		2599	0600	0000	031						
S02AX0E	07-05-2019		880	Single Day		0000	2000	0700	032	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin	1 5	
S02AX1E	07-06-2019		880	Single Day		0000	2000	0700	026	0910	Tuna	Drifting, Mooching	Tuna, bluefin	1	
S02AX2E	07-07-2019		880	Single Day		0000	2000	0700	012	0910	Tuna	Drifting, Trolling	Tuna, bluefin	1	
S02AX3E	07-08-2019		880	Multi-Day		2599	0600	0000	012						
S02AX4E	07-09-2019		880	Multi-Day		0000	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, bluefin	1	
S02AX5E	07-10-2019		880	Multi-Day		2599	0600	0000	024						
S02AX6E	07-11-2019		880	Multi-Day		0000	2599	1200	014	0910	Tuna	Drifting, Trolling	Tuna, bluefin	13	
S02AX7E	07-12-2019		880	Multi-Day		2599	0600	0000	014		Tuna	Drifting, Trolling			
S02AX8E	07-13-2019		880	Single Day		0000	2000	0700	012	0910	Tuna	Drifting, Trolling	Tuna, bluefin	15	
S02AX9E	07-14-2019		880	Multi-Day		0000	2599	1200	008	0910	Tuna	Drifting, Trolling	Tuna, bluefin	20	
S02AXAE	07-18-2019		880	Multi-Day		0000	2599	1200	020	0910	Tuna	Drifting, Trolling	Tuna, bluefin	36	
S02AXBE	07-19-2019		880	Multi-Day		2599	0600	0000	020						
S02AXCE	07-20-2019		880	Single Day		0000	2000	0800	032	0910	Tuna	Drifting	Tuna, bluefin	9	
S02AXDE	07-21-2019		880	Multi-Day		0000	2599	1300	020	0910	Tuna	Drifting, Trolling	Tuna, bluefin	20	
S02AXEE	07-22-2019		880	Multi-Day		2599	0537	0000	020						
S02AXFE	07-23-2019		880	Multi-Day		0000	2599	1200	028	0910	Tuna	Drifting, Trolling	Tuna, bluefin	13	
S02AXGE	07-24-2019		880	Multi-Day		2599	0600	0000	028						

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02AXHE	07-25-2019		880	Single Day		0000	2000	0800	019	0910	Tuna	Drifting, Trolling	Yellowtail Tuna, bluefin	12 1	
S02AXJE	07-26-2019		880	Single Day		0000	2000	0700	029	0910	Tuna	Drifting, Trolling	Tuna, bluefin	7	
S02AXKE	07-27-2019		880	Single Day		0000	2000	0700	073	0910	Tuna	Drifting, Trolling	Tuna, bluefin	7	
S02AXLE	07-28-2019		880	Single Day		0000	2000	0000	032	0910	Tuna	Drifting, Trolling			
S02AXME	07-29-2019		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting, Trolling	Yellowtail	125	
S02AXNE	07-30-2019		880	Multi-Day		2599	2599	1200	025	0910	Tuna	Drifting, Trolling	Yellowtail	125	
S02AXPE	07-31-2019		880	Multi-Day		2599	0600	0000	025						
S02AXQE	08-01-2019		880	Single Day		0000	1900	0800	012	0910	Tuna	Drifting, Trolling	Yellowtail	60	
S02AXRE	08-02-2019		880	Single Day		0000	1900	0700	018	0910	Tuna	Drifting, Trolling	Dolphin (fish) Yellowtail	10 90	
S02AXSE	08-03-2019		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting, Trolling	Dolphin (fish) Yellowtail	31 125	
S02AXTE	08-04-2019		880	Multi-Day		2599	2599	1200	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin Yellowtail	4 125	
S02AXUE	08-05-2019		880	Multi-Day		2599	0600	0000	025						
S02AXVE	08-06-2019		880	Multi-Day		0000	2599	1200	023	0910	Tuna	Drifting, Trolling	Yellowtail	4	
S02AXWE	08-07-2019		880	Multi-Day		2599	0600	0000	023		Tuna	Drifting, Trolling			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02AXXE	08-09-2019		880	Single Day		0000	1900	0800	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin	4	
S02AXZE	08-10-2019		880	Multi-Day		0000	2599	1500	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	4	
S02AXYE	08-11-2019		880	Multi-Day		2599	1900	0700	025	0910	Tuna	Anchored, Drifting, Mooching	Tuna, bluefin	4	
S02AY0E	08-12-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	29 67	
S02AY1E	08-13-2019		880	Multi-Day		2599	0600	0000	032						
S02AY2E	08-15-2019		880	Multi-Day		0001	2599	1200	023	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	29 115	
S02AY3E	08-16-2019		880	Multi-Day		2599	0600	0000	023						
S02AY4E	08-17-2019		880	Single Day		0000	1900	0800	032	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	5 22	
S02BXBE	08-18-2019		880	Multi-Day		0000	2599	1200	028	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	130	
S02BXCE	08-19-2019		880	Multi-Day		2599	0600	0000	028						
S02BXDE	08-20-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Diving, Mooching	Tuna, yellowfin Tuna, bluefin	160 1	
S02BXEE	08-22-2019		880	Single Day		0000	2000	0800	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	160	
S02BXFE	08-22-2019		880	Multi-Day		2599	0600	0000	032						

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02FPTE	08-24-2019		880	Multi-Day		0000	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	33 33	
S02BXGE	08-31-2019		880	Single Day		0000	1900	1100	018	0879	Tuna	Drifting	Tuna, yellowfin	33	0
S02BXHE	09-01-2019		880	Single Day		0000	2000	0800	028	0910	Tuna	Drifting	Tuna, bluefin Tuna, yellowfin	6 18	0 0
S02BXJE	09-02-2019		880	Multi-Day		0000	2599	1400	020	0910	Tuna	Trolling	Tuna, bluefin Tuna, yellowfin	27 120	0 0
S02BXKE	09-03-2019		880	Multi-Day		2599	0600	0000	020		Tuna	Other			
S02FPUE	09-04-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Trolling	Tuna, yellowfin	160	
S02FPVE	09-05-2019		880	Multi-Day		2599	0600	0000	032						
S02FPWE	09-06-2019		880	Single Day		0000	2100	0900	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	103	
S02FPXE	09-07-2019		880	Multi-Day		0000	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	48 120	
S02FPYE	09-08-2019		880	Multi-Day		2599	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	45 120	
S02FPZE	09-09-2019		880	Multi-Day		2599	0600	0000	024						
S02FQ0E	09-10-2019		880	Multi-Day		0000	2599	1200	028	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	150	
S02FQ1E	09-11-2019		880	Multi-Day		2599	2599	1200	028	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	55	
S02FQ2E	09-12-2019		880	Multi-Day		2599	0600	0000	028						

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02FQ3E	09-13-2019		880	Multi-Day		0000	2599	1200	024	0910	Tuna	Trolling	Tuna, bluefin Tuna, yellowfin	3 8	
S02FQ4E	09-14-2019		880	Multi-Day		1200	2599	0600	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	2	
S02FQ5E	09-14-2019		880	Multi-Day		2599	0530	0000	024		Tuna	Trolling			
S02FQ6E	09-15-2019		880	Multi-Day		2599	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	1	
S02FQ7E	09-16-2019		880	Multi-Day		2599	2599	1500	022	0867	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	2 9	
S02FQ8E	09-17-2019		880	Multi-Day		2599	0600	0000	022		Tuna				
S02FQ9E	09-18-2019		880	Multi-Day		0000	2599	1200	032	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	88	
S02FQAE	09-19-2019		880	Multi-Day		2599	0600	0000	032						
S02FQBE	09-20-2019		880	Single Day		0000	1900	0700	019	0910	Tuna	Drifting, Trolling	Tuna, skipjack Tuna, yellowfin	65 95	
S02FQCE	09-21-2019		880	Multi-Day		0000	2599	1200	024	0910	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin Tuna, skipjack	1 72 2	0 0 0
S02FQDE	09-22-2019		880	Multi-Day		2599	1950	1000	024	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	32	0
S02FQEE	09-24-2019		880	Multi-Day		0000	2599	1200	020	0867	Tuna	Trolling	Tuna, yellowfin	100	
S02FQFE	09-25-2019		880	Multi-Day		2599	0600	0000	020						

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02FQGE	09-26-2019		880	Single Day		0000	2000	0800	032	0867	Tuna	Anchored, Drifting, Trolling	Tuna, yellowfin	150	
S02FQHE	09-27-2019		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	14	
S02FQJE	09-28-2019		880	Multi-Day		2599	2000	1200	022	0867	Tuna	Anchored, Drifting, Trolling	Tuna, bluefin	14	
S02FQKE	09-29-2019		880	Multi-Day		0000	2599	1200	032	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	150	
S02FQLE	09-30-2019		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting, Trolling			
S02FQME	10-01-2019		880	Multi-Day		0000	2599	0500	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	3	
S02FQNE	10-02-2019		880	Multi-Day		2599	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	85	
													Tuna, bluefin	30	
S02FQPE	10-03-2019		880	Multi-Day		2599	0600	0000	022						
S02FQQE	10-04-2019		880	Multi-Day		0000	2599	1200	025	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	125	
S02FQRE	10-05-2019		880	Multi-Day		2599	2599	1200	025	0867	Tuna	Drifting, Trolling	Tuna, bluefin	29	
													Tuna, yellowfin	125	
S02FQSE	10-06-2019		880	Multi-Day		2599	0600	0000	025						
S02FQTE	10-07-2019		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Trolling	Tuna, yellowfin	110	
S02FQUE	10-08-2019		880	Multi-Day		2599	2599	1400	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	44	
													Tuna, yellowfin	110	
S02FQVE	10-09-2019		880	Multi-Day		2599	0600	0000	022						

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02FQWE	10-10-2019		880	Single Day		0000	2100	0800	032	0867	Tuna	Drifting, Trolling	Tuna, yellowfin	165	
S02FQXE	10-11-2019		880	Multi-Day		0000	2599	1200	018	0867	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	31 100	
S02FQYE	10-12-2019		880	Multi-Day		2599	2000	0800	018	0867	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	30 50	
S02FQZE	10-13-2019		880	Multi-Day		0000	2599	1200	032	0867	Tuna	Drifting, Trolling	Tuna, bluefin Tuna, yellowfin	59 67	
S02FR0E	10-14-2019		880	Multi-Day		2599	0600	0000	032		Tuna	Drifting, Trolling			
S02FR1E	10-15-2019		880	Multi-Day		0000	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, bluefin	29	
S02FR2E	10-16-2019		880	Multi-Day		2599	2599	1200	022	0867	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	18 20	
S02FR3E	10-17-2019		880	Multi-Day		2599	0600	0000	022						
S02QBDE	11-15-2019		880	Multi-Day		1200	2599	0000	018		Tuna	Drifting			
S02QBEE	11-16-2019		880	Multi-Day		2599	2599	1200	018	0882	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin Tuna, skipjack	78 7 1	0 0 5
S02QBFE	11-17-2019		880	Multi-Day		2599	2599	1200	018	0882	Tuna	Drifting	Tuna, yellowfin	115	0
S02QBGE	11-18-2019		880	Multi-Day		2599	0500	0000	018		Tuna	Other			
S02QBHE	06-09-2020		880	Multi-Day		0000	2599	1600	017	0910	Tuna	Drifting	Tuna, bluefin	31	0
S02QBJE	06-10-2020		880	Multi-Day		2599	0600	0000	017		Tuna	Other			

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S02QBKE	06-11-2020		880	Multi-Day		0000	2599	1800	022	0910	Tuna	Drifting	Tuna, bluefin	27	0
S02QBLE	06-12-2020		880	Multi-Day		2599	0600	0000	022		Tuna				
S02QBME	06-13-2020		880	Multi-Day		0000	2599	1600	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	12	0
S02QBNE	06-14-2020		880	Multi-Day		2599	0600	0000	025		Tuna	Other			
S02QBPE	06-19-2020		880	Single Day		0000	1900	1200	026	0910	Tuna	Drifting	Tuna, bluefin	1	
S02QBQE	06-20-2020		880	Multi-Day		0000	2599	1400	025	0910	Other, Tuna	Drifting, Trolling	Bonito, Pacific Yellowtail	32	0
S02QBRE	06-21-2020		880	Multi-Day		2599	0600	0000	025		Tuna	Trolling			
S02QBSE	06-22-2020		880	Multi-Day		0000	2599	1400	018	0910	Tuna	Drifting	Tuna, bluefin	5	0
S02QBTE	06-23-2020		880	Multi-Day		2599	0600	0000	018		Tuna	Other			
S02QBUE	06-24-2020		880	Multi-Day		0000	2599	1600	025	0910	Tuna	Drifting	Tuna, bluefin	5	0
S02QBVE	06-25-2020		880	Multi-Day		2599	0600	0000	025		Tuna	Other			
S02QBWE	06-26-2020		880	Single Day		0000	1900	0800	026	0910	Tuna	Drifting	Tuna, yellowfin	7	0
													Tuna, bluefin	4	0
S02QBXE	06-27-2020		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	3	0
													Tuna, bluefin	2	0
S02QBYE	06-28-2020		880	Multi-Day		2599	0600	0000	025		Tuna	Other			
S02QBZE	06-29-2020		880	Single Day		0000	1900	1000	012	0864	Tuna	Drifting, Trolling	Tuna, bluefin	6	0
S02QCOE	06-30-2020		880	Single Day		0000	1900	1000	018	0864	Tuna	Drifting, Trolling	Tuna, bluefin	1	0

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S02QC1E	07-01-2020		880	Multi-Day		0000	2599	1600	025	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	18	0
													Yellowtail	60	0
													Dolphin (fish)	1	0
													Bonito, Pacific	10	8
S02QC2E	07-03-2020		880	Single Day		0000	2000	0800	026	0910	Tuna	Drifting	Tuna, bluefin	13	
S02QC3E	07-04-2020		880	Single Day		0000	2000	0800	017	0910	Tuna	Drifting, Trolling	Tuna, bluefin	14	
S02QC4E	07-05-2020		880	Multi-Day		0000	2599	1200	021	0910	Tuna	Drifting, Trolling	Tuna, bluefin	21	
S02QC5E	07-06-2020		880	Multi-Day		2599	0600	0000	021						
S02QC6E	07-07-2020		880	Multi-Day		0000	2599	1200	023	0950	Tuna	Drifting, Trolling	Tuna, bluefin	26	
S02QC7E	07-08-2020		880	Multi-Day		2599	0600	0000	023						
S02QC8E	07-09-2020		880	Multi-Day		0000	2599	1200	018	0950	Tuna	Drifting, Trolling			
S02QC9E	07-10-2020		880	Multi-Day		2599	0600	0000	018						
S02QCAE	07-11-2020		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	50	
S02QCBE	07-12-2020		880	Multi-Day		2599	0600	0000	025						
S02QCCE	07-13-2020		880	Single Day		0000	2000	1000	024	0910	Tuna	Drifting	Tuna, bluefin	48	0
S02QCDE	07-14-2020		880	Single Day		0000	2000	1100	020	0910	Tuna	Drifting	Yellowtail	11	0
													Tuna, bluefin	9	0
													Tuna, yellowfin	1	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02QCEE	07-15-2020		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting	Bonito, Pacific Tuna, bluefin Tuna, yellowfin	2 33 3	0 0 0
S02QCFE	07-16-2020		880	Multi-Day		2599	0600	0000	025		Other	Other			
S02QCGE	07-17-2020		880	Single Day		0000	1820	1200	026	0910	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	2 18	0 0
S02QCHE	07-18-2020		880	Single Day		0000	2000	1000	026	0883	Tuna	Drifting	Yellowtail Tuna, bluefin	2 7	0 0
S02QCJE	07-19-2020		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin Yellowtail	6 20 1	0 0 0
S02QCKE	07-20-2020		880	Multi-Day		2599	0600	0000	025		Other	Other			
S02QCLE	07-21-2020		880	Multi-Day		0000	2599	1400	022	0910	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin Yellowtail Dolphin (fish) Bonito, Pacific	56 45 3 1 2	0 0 0 0 0
S02QCME	07-22-2020		880	Multi-Day		2599	0600	0000	022		Other	Other			
S02QCNE	07-23-2020		880	Multi-Day		0000	2599	1400	025	0882	Tuna	Drifting	Tuna, yellowfin Tuna, bluefin	8 18	0 0
S02QCPE	07-24-2020		880	Multi-Day		2599	0600	0000	025		Tuna	Other			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02QCQE	07-25-2020		880	Single Day		0000	2100	1000	025	0910	Tuna	Drifting	Yellowtail	1	0
													Tuna, bluefin	9	0
													Dolphin (fish)	1	0
S02QCRE	07-26-2020		880	Multi-Day		0000	2599	1400	012	0910	Tuna	Drifting	Tuna, bluefin	10	0
													Yellowtail	26	0
S02QCSE	07-27-2020		880	Multi-Day		2599	0500	0000	012		Tuna	Drifting			
S02VEZE	07-28-2020		880	Multi-Day		0000	2599	1200	023	0810	Tuna	Drifting, Trolling	Tuna, bluefin	46	
S02VF0E	07-29-2020		880	Multi-Day		2599	0600	0000	023						
S02VF1E	07-30-2020		880	Single Day		0000	2000	0800	018	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	8	
													Tuna, bluefin	6	
													Yellowtail	8	
S02VF2E	07-31-2020		880	Single Day		0000	2000	1000	026	0910	Tuna	Drifting, Trolling	Yellowtail	30	
S02VF3E	08-01-2020		880	Multi-Day		0000	2599	1200	016	0850	Tuna	Drifting, Trolling	Tuna, bluefin	32	
S02VF4E	08-02-2020		880	Multi-Day		2599	2000	0500	016	0850	Tuna	Drifting, Trolling	Yellowtail	5	
													Tuna, bluefin	27	
S02VF5E	08-03-2020		880	Multi-Day		0000	2599	1200	025	0850	Tuna	Drifting, Trolling	Tuna, bluefin	24	
S02VF6E	08-04-2020		880	Multi-Day		2599	0600	0000	025						
S02VF7E	08-05-2020		880	Multi-Day		0000	2599	1400	023	0910	Tuna	Drifting	Yellowtail	1	0
													Tuna, yellowfin	11	0
S02VF8E	08-06-2020		880	Multi-Day		2599	0530	0000	023		Other	Other			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02VF9E	08-07-2020		880	Single Day		0000	1500	0400	026	0866	Tuna	Drifting	Tuna, yellowfin	1	0
													Tuna, bluefin	8	0
S02VGVE	08-08-2020		880	Multi-Day		0000	2599	1100	024	0910	Tuna	Drifting, Trolling	Yellowtail	1	
S02VGUE	08-09-2020		880	Multi-Day		2599	2599	1200	024	0849	Tuna	Trolling	Tuna, bluefin	8	
S02VGTE	08-10-2020		880	Multi-Day		2599	0500	0000	024						
S02VGSE	08-11-2020		880	Multi-Day		0000	2599	1200	023	0762	Tuna	Drifting, Trolling	Tuna, bluefin	46	
S02VGRE	08-12-2020		880	Multi-Day		2599	0500	0000	023						
S02VGQE	08-13-2020		880	Multi-Day		0000	2599	1200	019	0762	Tuna	Drifting, Trolling	Tuna, bluefin	38	
S02VGPE	08-14-2020		880	Multi-Day		2599	0500	0000	019		Tuna				
S02VGNE	08-15-2020		880	Single Day		0000	1700	1000	014	0910	Rockfishes, Tuna	Drifting, Trolling	Rockfish, vermilion	40	
													Tuna, yellowfin	1	
S02VGLE	08-16-2020		880	Multi-Day		0000	2599	1400	025	0910	Other	Drifting, Trolling	Dolphin (fish)	50	0
													Yellowtail	125	10
S02VGME	08-17-2020		880	Multi-Day		2599	0600	0000	025		Other	Other			
S02VGKE	08-18-2020		880	Multi-Day		0000	2599	1400	025	0910	Other	Drifting, Trolling	Dolphin (fish)	50	40
													Yellowtail	125	0
S02VGJE	08-19-2020		880	Multi-Day		2599	0530	0000	025		Other	Other			
S02VGHE	08-20-2020		880	Single Day		0000	2015	0800	026	0910	Other	Drifting, Trolling	Dolphin (fish)	14	0
													Yellowtail	47	8

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02VGGE	08-22-2020		880	Multi-Day		0000	2599	1400	023	0871	Tuna	Drifting	Yellowtail	10	0
													Tuna, bluefin	46	10
S02VGFE	08-23-2020		880	Multi-Day		2599	2000	0300	023	0871	Tuna	Anchored	Yellowtail	13	0
													Tuna, bluefin	50	10
													Rockfish, unspecified	20	0
S02VGEE	08-24-2020		880	Single Day		0000	2359	1400	024	0889	Tuna	Anchored, Drifting	Yellowtail	1	0
													Tuna, bluefin	60	3
S02VGDE	08-26-2020		880	Multi-Day		0000	2599	1200	022	0886	Tuna	Trolling	Tuna, bluefin	44	
S02VGCE	08-27-2020		880	Multi-Day		2599	0600	0000	022						
S02VGBE	08-28-2020		880	Single Day		0000	2000	0400	026	0866	Tuna	Anchored	Tuna, bluefin	14	
S02VGAE	08-29-2020		880	Multi-Day		0000	2599	1400	022	0889	Other, Tuna	Anchored, Drifting	Yellowtail	1	0
													Tuna, bluefin	44	2
													Rockfish, unspecified	60	15
S02VG9E	08-30-2020		880	Multi-Day		2599	1900	0800	022	0882	Other, Tuna	Drifting	Yellowtail	9	2
													Tuna, bluefin	18	0
													Dolphin (fish)	5	0
S02VG8E	08-31-2020		880	Multi-Day		0000	2599	1400	026	0857	Tuna	Drifting, Trolling	Tuna, bluefin	29	
S02VG7E	09-01-2020		880	Multi-Day		2599	0600	0000	025						
S02VG6E	09-02-2020		880	Multi-Day		0000	2599	1400	025	0857	Tuna	Drifting, Trolling	Tuna, bluefin	54	
S02VG5E	09-03-2020		880	Multi-Day		2599	0600	0000	025						

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S02VG3E	09-04-2020		880	Single Day		0001	2000	1200	026	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	26	0
													Dolphin (fish)	52	20
													Yellowtail	10	30
													Tuna, skipjack	3	
													Bonito, Pacific	2	
S02VG4E	09-05-2020		880	Single Day		0001	2000	1200	026	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	3	0
													Dolphin (fish)	52	20
													Yellowtail	1	0
													Tuna, skipjack	1	0
S02VG2E	09-06-2020		880	Single Day		0000	1825	0700	025	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	64	
S02VG1E	09-07-2020		880	Multi-Day		0000	2599	1800	017	0850	Tuna	Drifting	Tuna, yellowfin	1	1
													Tuna, bluefin	26	0
S02VG0E	09-08-2020		880	Multi-Day		2599	0600	0000	017		Other	Other			
S02VFZE	09-09-2020		880	Multi-Day		0000	2599	1200	026	0857	Tuna	Drifting	Tuna, yellowfin	1	
													Tuna, bluefin	52	
S02VFYE	09-10-2020		880	Multi-Day		2599	0600	0000	026						
S02VFWE	09-11-2020		880	Single Day		0001	2000	1100	026	0910	Tuna	Drifting, Mooching, Trolling	Tuna, skipjack	8	
													Tuna, yellowfin	42	0
S02VFXE	09-11-2020		880	Single Day		0000	1900	1000	026	0910	Tuna	Drifting	Tuna, skipjack	8	0
													Tuna, yellowfin	42	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S02VFVE	09-12-2020		880	Multi-Day		0000	2599	1400	023	0867	Tuna	Drifting	Tuna, bluefin	42	0
S02VFUE	09-13-2020		880	Multi-Day		2599	2599	1400	023	0830	Tuna	Drifting	Tuna, bluefin	46	0
S02VFTE	09-14-2020		880	Multi-Day		2599	0005	0000	023		Tuna	Drifting			
S02VFSE	09-15-2020		880	Multi-Day		0000	2599	1500	020	0857	Tuna	Drifting	Tuna, bluefin	13	
S02VFRE	09-16-2020		880	Multi-Day		2599	2599	1200	022	0857	Tuna	Drifting	Tuna, bluefin	17	
S02VFQE	09-17-2020		880	Multi-Day		2599	0600	0000	020						
S02VFPE	09-18-2020		880	Single Day		0000	2000	0700	020	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	85	
S02VFNE	09-19-2020		880	Single Day		0000	2000	0000	015	0910		Drifting, Trolling			
S02VFME	09-20-2020		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	52	
													Dolphin (fish)	52	
S02VFLE	09-21-2020		880	Multi-Day		2599	0600	0000	025						
S02VFKF	09-22-2020		880	Multi-Day		0000	2599	1400	022	0857	Tuna	Drifting	Tuna, bluefin	4	
													Tuna, yellowfin	58	
S02VFJE	09-23-2020		880	Multi-Day		2599	2599	1200	022	0857	Tuna	Drifting, Trolling	Tuna, bluefin	13	
S02VFHE	09-24-2020		880	Multi-Day		2599	0600	0000	022						
S02VFGE	09-25-2020		880	Single Day		0000	2000	1000	026	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	26	0
													Dolphin (fish)	52	0
													Tuna, skipjack	16	0
													Yellowtail	2	0

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S02VFFE	09-26-2020		880	Single Day		0000	1900	1000	026	0882	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	13	0
													Dolphin (fish)	38	0
													Tuna, skipjack	4	0
S02VFEE	09-27-2020		880	Multi-Day		0000	2599	1400	026	0851	Tuna	Drifting	Tuna, yellowfin	3	0
S02VFDE	09-28-2020		880	Multi-Day		2599	0600	0000	025		Other	Other			
S02VFCE	09-29-2020		880	Multi-Day		0000	2599	1400	016	0830	Tuna	Drifting, Trolling	Tuna, bluefin	1	0
S02VFB E	09-30-2020		880	Multi-Day		2599	2599	1400	016	0910	Tuna	Drifting, Trolling	Yellowtail	12	20
													Tuna, yellowfin	66	0
													Dolphin (fish)	38	0
													Tuna, skipjack	8	5
S02VFAE	10-01-2020		880	Multi-Day		2599	0600	0000	016		Other	Other			
S039S2E	10-16-2020		880	Multi-Day		0000	2599	1500	012	0889	Tuna	Anchored, Drifting	Yellowtail	7	0
													Tuna, bluefin	16	2
													Sheephead, California	1	0
S039S1E	10-17-2020		880	Multi-Day		2599	1900	0800	012	0884	Tuna	Drifting, Trolling	Yellowtail	13	10
													Dolphin (fish)	31	0
													Tuna, skipjack	2	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S039S0E	10-18-2020		880	Single Day		0000	1800	0800	026	0910	Other, Tuna	Drifting, Trolling	Yellowtail Dolphin (fish) Tuna, skipjack	1 6 3	0 0 0
S039RZE	10-19-2020		880	Multi-Day		0000	2599	1200	022	0807	Tuna	Drifting	Tuna, bluefin	37	
S039RYE	10-21-2020		880	Multi-Day		0000	2599	1200	025	0807	Tuna	Drifting	Tuna, bluefin	39	
S039RXE	10-22-2020		880	Multi-Day		2599	0600	0000	025						
S039RWE	10-23-2020		880	Multi-Day		0900	2599	0200	020	0849	Tuna	Anchored, Drifting	Bonito, Pacific	0	115
S039RVE	10-24-2020		880	Multi-Day		2599	2599	1600	020	0897	Tuna	Drifting	Tuna, bluefin	40	0
S039RUE	10-25-2020		880	Multi-Day		2599	2599	0900	020	0897	Tuna	Anchored, Drifting	Tuna, bluefin Yellowtail	24 52	0 0
S039RTE	10-26-2020		880	Multi-Day		2599	0600	0000	020		Tuna	Other			
S039RSE	10-27-2020		880	Multi-Day		0000	2599	1600	025	0889	Tuna	Drifting	Tuna, bluefin	29	0
S039RRE	10-28-2020		880	Multi-Day		2599	0600	0000	025		Other	Other			
S039RQE	10-29-2020		880	Single Day		0000	2000	1000	026	0910	Other, Tuna	Drifting, Trolling	Tuna, skipjack Dolphin (fish) Tuna, yellowfin	20 30 10	0 0 0
S039RPE	10-30-2020		880	Multi-Day		0000	2599	1600	012	0889	Tuna	Drifting	Tuna, bluefin	12	0
S039RNE	10-31-2020		880	Multi-Day		2599	2599	1400	012	0889	Tuna	Drifting	Tuna, bluefin	12	0
S039RME	11-01-2020		880	Multi-Day		2599	0700	0000	012		Other	Other			
S039RLE	11-02-2020		880	Multi-Day		0000	2599	1600	016	0889	Tuna	Drifting	Tuna, bluefin	20	0
S039RKE	11-03-2020		880	Multi-Day		2599	2599	1600	016	0889	Tuna	Drifting	Tuna, bluefin	16	0
S039RJE	11-04-2020		880	Multi-Day		2599	0800	0000	016		Other	Other			
S039RHE	11-09-2020		880	Multi-Day		0000	2599	1600	020	0889	Tuna	Drifting	Tuna, bluefin	7	0

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

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S039RGE	11-10-2020		880	Multi-Day		2599	2599	1600	020	0889	Tuna	Drifting	Tuna, bluefin	9	0
S039REE	11-11-2020		880	Multi-Day		2599	0700	0000	020		Other	Other			
S039RFE	11-11-2020		880	Multi-Day		1200	2599	0000	016		Tuna	Other			
S039RDE	11-12-2020		880	Multi-Day		2599	2599	1600	016	0882	Tuna	Drifting	Tuna, bluefin	4	0
S039RCE	11-13-2020		880	Multi-Day		2599	2599	1400	016	0882	Other, Tuna	Anchored, Drifting	Yellowtail	4	0
S039RBE	11-14-2020		880	Multi-Day		2599	0600	0000	016		Other	Other			
S039RAE	11-15-2020		880	Multi-Day		0000	2599	1200	020	0910	Tuna	Drifting, Trolling	Tuna, yellowfin	100	
S039R3E	06-02-2021		880	Multi-Day		0000	2599	1400	026	0910	Tuna	Drifting, Trolling	Tuna, bluefin	44	0
S039R2E	06-03-2021		880	Multi-Day		2599	0600	0000	026		Tuna	Drifting, Trolling			
S039R1E	06-04-2021		880	Single Day		0000	2000	0800	025	0910	Tuna	Drifting	Tuna, bluefin	17	0
S039R0E	06-05-2021		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting	Tuna, bluefin	34	
S039QZE	06-06-2021		880	Multi-Day		2599	0600	0000	025		Tuna	Drifting			
S039QYE	06-07-2021		880	Multi-Day		0000	2599	2000	025	0910	Tuna	Drifting	Tuna, bluefin	32	0
S039QXE	06-08-2021		880	Multi-Day		2599	0700	0000	025		Tuna	Other			
S039QWE	06-09-2021		880	Multi-Day		0000	2599	2000	021	0910	Tuna	Drifting	Tuna, bluefin	46	
S039QVE	06-10-2021		880	Multi-Day		2599	0500	0000	021		Tuna	Other			
S039QUE	06-11-2021		880	Single Day		0600	1800	1000	020	0910	Other, Tuna	Drifting, Trolling	Bonito, Pacific Yellowtail	26	41
S039QTE	06-12-2021		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting	Tuna, bluefin	16	
S039QSE	06-13-2021		880	Multi-Day		2599	0600	0000	025		Tuna	Drifting			
S039QRE	06-14-2021		880	Multi-Day		0000	2599	2200	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	33	
S039QQE	06-15-2021		880	Multi-Day		2599	0600	0000	025		Tuna	Diving, Trolling			

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S039QPE	06-16-2021		880	Multi-Day		0000	2599	1200	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	29	
S039QNE	06-17-2021		880	Multi-Day		2599	0600	0000	025						
S039QME	06-18-2021		880	Single Day		0000	1900	0800	026	0910	Tuna	Drifting	Tuna, bluefin	52	0
S039QLE	06-19-2021		880	Multi-Day		0000	2599	1600	025	0910	Tuna	Drifting	Tuna, bluefin	30	0
S039QKE	06-20-2021		880	Multi-Day		2599	0700	0000	025		Tuna	Drifting			
S039QJE	06-21-2021		880	Multi-Day		0000	2599	1400	025	0910	Tuna	Drifting	Tuna, bluefin	31	0
S039QHE	06-22-2021		880	Multi-Day		2599	0700	0000	025		Tuna	Drifting			
S03AX8E	06-23-2021	07-02-2021	880	Multi-Day		0000	2599	1500	025	0910	Tuna	Drifting	Tuna, bluefin	20	0
S03AX7E	06-24-2021	07-02-2021	880	Multi-Day		2599	0600	0000	025		Tuna	Drifting			
S03AX6E	06-25-2021	07-02-2021	880	Single Day		0000	2000	1200	025	0910	Tuna	Drifting	Tuna, bluefin	8	0
S03AX5E	06-26-2021	07-02-2021	880	Multi-Day		0000	2599	1600	025	0910	Tuna	Drifting	Tuna, bluefin	50	
S03AX4E	06-27-2021	07-02-2021	880	Multi-Day		2599	0600	0000	025						
S03AX3E	06-28-2021	07-02-2021	880	Multi-Day		0000	2599	1800	022	0910	Tuna	Drifting	Tuna, bluefin	21	
S03AX2E	06-29-2021	07-02-2021	880	Multi-Day		2599	0600	0000	022						
S03BD4E	06-30-2021	07-02-2021	880	Multi-Day		0000	2599	1200	024	0910	Tuna	Drifting	Tuna, bluefin	12	
S03AX1E	07-01-2021	07-02-2021	880	Multi-Day		2599	0600	0000	024						
S03JYLE	07-01-2021	07-24-2021	880	Multi-Day		2599	0600	0000	025		Tuna				
S03AWZE	07-02-2021	07-02-2021	880	Single Day		0000	1800	1200	026	0910	Tuna	Drifting	Tuna, bluefin	15	0
S03JYKE	07-02-2021	07-24-2021	880	Single Day		0000	2000	1200	026	0910	Tuna	Drifting, Trolling	Tuna, bluefin	15	
S03JYJE	07-03-2021	07-24-2021	880	Multi-Day		0000	2599	1200	026	0910	Tuna	Drifting, Trolling	Tuna, bluefin	25	
S03JYHE	07-04-2021	07-24-2021	880	Multi-Day		2599	0600	0000	026						
S03JYGE	07-05-2021	07-24-2021	880	Multi-Day		0000	2599	1700	025	0910	Tuna	Drifting	Tuna, bluefin	27	
S03JYFE	07-06-2021	07-24-2021	880	Multi-Day		2599	0600	0000	025		Tuna	Drifting			

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S03JYEE	07-07-2021	07-24-2021	880	Multi-Day		0000	2599	1300	025	0910	Tuna	Drifting, Trolling	Tuna, bluefin	41	
S03JYDE	07-08-2021	07-24-2021	880	Multi-Day		2599	0600	0000	025		Tuna	Drifting, Trolling			
S03JYCE	07-09-2021	07-24-2021	880	Single Day		0000	2000	0900	026	0910	Tuna	Drifting, Trolling	Tuna, bluefin	13	
S03BUGE	07-10-2021	07-11-2021	880	Multi-Day		0000	2599	1800	024	0910	Tuna	Drifting	Yellowtail	11	0
													Tuna, bluefin	1	0
S03JYBE	07-10-2021	07-24-2021	880	Multi-Day		0000	2599	1900	025	0910	Tuna	Drifting	Tuna, bluefin	1	
S03BUFE	07-11-2021	07-11-2021	880	Multi-Day		2599	0600	0000	024		Tuna	Other			
S03JYAE	07-11-2021	07-24-2021	880	Multi-Day		2599	2000	0000	025						
S03JY9E	07-12-2021	07-24-2021	880	Multi-Day		0000	2599	1900	025	0843	Tuna	Drifting	Tuna, bluefin	48	
S03JY8E	07-13-2021	07-24-2021	880	Multi-Day		2599	0600	0000	026						
S03JY7E	07-14-2021	07-24-2021	880	Multi-Day		0000	2599	2200	026	0843	Tuna	Drifting	Tuna, bluefin	52	
S03JY6E	07-15-2021	08-23-2021	880	Multi-Day		2599	0006	0000	026						
S03JY5E	07-16-2021	08-23-2021	880	Single Day		0000	2000	0800	026	0862	Tuna	Drifting	Tuna, bluefin	20	
S03JY4E	07-17-2021	08-23-2021	880	Single Day		0000	2000	0800	026	0862	Tuna	Drifting	Tuna, bluefin	35	
S03JY3E	07-18-2021	08-23-2021	880	Multi-Day		0000	2599	1200	025	0866	Tuna	Drifting	Tuna, bluefin	19	
S03JY2E	07-19-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025						
S03JY1E	07-20-2021	08-23-2021	880	Multi-Day		0000	2599	1200	025	0860	Tuna	Drifting	Tuna, bluefin	4	
													Yellowtail	60	
S03JY0E	07-21-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025						
S03JXZE	07-22-2021	08-23-2021	880	Multi-Day		0000	2599	1100	025	0860	Tuna	Drifting	Yellowtail	125	
S03JXYE	07-23-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025						
S03JXXE	07-24-2021	08-23-2021	880	Single Day		0000	2008	0700	018	0860	Tuna	Drifting	Yellowtail	90	
S03JXWE	07-25-2021	08-23-2021	880	Multi-Day		0000	2599	1200	013	0860	Tuna	Drifting	Yellowtail	75	
S03JXVE	07-26-2021	08-23-2021	880	Multi-Day		2599	0600	0000	013						

California Department of Fish and Wildlife, Confidential Records for Vessel

12842 NEW LO AN

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S03JXUE	07-27-2021	08-23-2021	880	Multi-Day		0000	2599	1000	025	0860	Tuna	Drifting	Yellowtail	91	
S03JXTE	07-28-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025		Tuna	Drifting, Trolling			
S03JXSE	07-29-2021	08-23-2021	880	Multi-Day		0000	2599	1200	025	0860	Tuna	Drifting, Trolling	Yellowtail	125	
S03JXRE	07-30-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025						
S03JXQE	07-31-2021	08-23-2021	880	Single Day		0000	1800	0600	026	0860	Tuna	Drifting	Yellowtail	12	
S03JXPE	08-01-2021	08-23-2021	880	Single Day		0000	1900	0700	025	0860	Tuna	Drifting	Yellowtail	48	
S03ELME	08-02-2021	08-06-2021	880	Multi-Day		0000	2599	1400	020	0805	Tuna	Drifting, Trolling	Tuna, yellowfin	1	0
													Tuna, bluefin	12	0
													Yellowtail	1	0
S03ELLE	08-03-2021	08-06-2021	880	Multi-Day		2599	2599	1400	020	0805	Tuna	Drifting	Tuna, bluefin	5	0
S03ELKE	08-04-2021	08-06-2021	880	Multi-Day		2599	0700	0000	020		Tuna	Other			
S03JXNE	08-05-2021	08-23-2021	880	Single Day		0000	2000	0700	026	0824	Tuna	Drifting	Tuna, bluefin	29	
S03JXME	08-06-2021	08-23-2021	880	Multi-Day		0000	2599	1400	017	0824	Tuna	Drifting, Trolling	Tuna, bluefin	30	
S03JXLE	08-07-2021	08-23-2021	880	Multi-Day		2599	2599	1700	017	0824	Tuna	Drifting	Tuna, bluefin	37	
S03JXKE	08-08-2021	08-23-2021	880	Multi-Day		2599	0600	0000	017						
S03JXJE	08-09-2021	08-23-2021	880	Multi-Day		0000	2599	1200	025	0860	Tuna	Drifting	Tuna, bluefin	50	
S03JXHE	08-10-2021	08-23-2021	880	Multi-Day		2599	0600	0000	025						
S03JXGE	08-11-2021	08-23-2021	880	Multi-Day		0000	2599	1200	026	0807	Tuna	Drifting	Tuna, yellowfin	38	
													Tuna, bluefin	52	
S03JXFE	08-12-2021	08-23-2021	880	Multi-Day		2599	0600	0000	026						
S03JXEE	08-14-2021	08-23-2021	880	Multi-Day		2599	1800	0500	013	0760	Tuna	Drifting, Trolling	Tuna, bluefin	25	
S03JXDE	08-15-2021	08-23-2021	880	Multi-Day		0000	2599	1400	013	0830	Tuna	Drifting	Tuna, bluefin	17	

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep. Time</u>	<u>Ret. Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S03JXCE	08-16-2021	08-23-2021	880	Multi-Day		2599	0600	0000	013						
S03JXBE	08-17-2021	08-24-2021	880	Multi-Day		0000	2599	1200	020	0887	Tuna	Anchored, Drifting, Trolling	Yellowtail	52	
S03JXAE	08-18-2021	08-24-2021	880	Multi-Day		2599	2599	1200	020	0860	Tuna	Anchored	Dolphin (fish)	54	
													Yellowtail	62	
S03JX9E	08-19-2021	08-24-2021	880	Multi-Day		2599	0600	0000	020		Tuna	Drifting			
S03JX8E	08-20-2021	08-24-2021	880	Single Day		0000	2000	0800	026	0860	Tuna	Drifting, Trolling	Dolphin (fish)	68	
S03JX7E	08-21-2021	08-24-2021	880	Multi-Day		0000	2599	1800	024	0870	Tuna	Drifting, Trolling	Tuna, bluefin	39	
S03JX6E	08-22-2021	08-24-2021	880	Multi-Day		2599	2000	0500	024	0870	Tuna	Drifting	Tuna, bluefin	25	
S03JX5E	08-23-2021	08-24-2021	880	Multi-Day		0000	2599	1200	025	0870	Tuna	Drifting	Tuna, yellowfin	5	
													Tuna, bluefin	62	
													Dolphin (fish)	1	
S03JX4E	08-24-2021	08-26-2021	880	Multi-Day		2599	0600	0000	024						
S03JX3E	08-25-2021	08-26-2021	880	Multi-Day		0000	2599	1500	018	0829	Tuna	Drifting, Trolling	Tuna, bluefin	46	
S03JX2E	08-26-2021	08-26-2021	880	Multi-Day		2599	0600	0000	018						
S03GBME	08-27-2021	08-27-2021	880	Single Day		0000	1830	0800	026	0910	Other, Tuna	Drifting, Trolling	Dolphin (fish)	10	0
S03GTME	08-28-2021	08-29-2021	880	Multi-Day		0000	2599	1400	023	0910	Other, Tuna	Drifting, Trolling	Yellowtail	1	1
													Dolphin (fish)	62	2
S03GTLE	08-29-2021	08-29-2021	880	Multi-Day		2599	1715	0800	023	0910	Other, Tuna	Drifting, Trolling	Tuna, yellowfin	9	0

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S03GTKE	08-30-2021	08-31-2021	880	Multi-Day		0000	2599	1400	024	0889	Other, Tuna	Anchored, Drifting, Trolling	Yellowtail Tuna, bluefin Bonito, Pacific	9 10 10	0 0 0
S03GTJE	08-31-2021	08-31-2021	880	Multi-Day		2599	0540	0000	024		Other	Other			
S03H2PE	09-01-2021	09-02-2021	880	Multi-Day		0000	2599	1600	020	0882	Tuna	Drifting, Trolling	Tuna, yellowfin Tuna, bluefin	10 22	0 0
S03H2NE	09-02-2021	09-02-2021	880	Multi-Day		2599	0830	0000	020		Other	Other			
S03J40E	09-09-2021	09-12-2021	880	Single Day		0000	1900	1000	025	0910	Tuna	Drifting	Tuna, yellowfin	30	0
S03J3ZE	09-10-2021	09-12-2021	880	Multi-Day		0000	2599	1500	024	0871	Other, Tuna	Drifting, Trolling	Tuna, bluefin	36	0
S03J3YE	09-11-2021	09-12-2021	880	Multi-Day		2599	2599	1500	024	0871	Other, Tuna	Anchored, Drifting, Trolling	Rockfish, vermilion Tuna, bluefin	90 15	0 0
S03J3XE	09-12-2021	09-12-2021	880	Multi-Day		2599	0530	0000	024		Other	Other			
S03JVLE	09-28-2021	09-28-2021	880	Multi-Day		0000	2599	1400	025	0889	Other, Tuna	Anchored	Yellowtail Tuna, bluefin Bonito, Pacific Tuna, yellowfin	15 51 5 2	0 0 12 0
S03JVME	09-29-2021	09-29-2021	880	Multi-Day		2599	0600	0000	025		Tuna	Other			

<u>Serial Num</u>	<u>Log Date</u>	<u>Create Date</u>	<u>Port</u>	<u>Trip Type</u>	<u>Non Paying</u>	<u>Dep Time</u>	<u>Ret Time</u>	<u>Time Fished</u>	<u>Num Fishers</u>	<u>Block</u>	<u>Target Species</u>	<u>Fishing Method</u>	<u>Species</u>	<u>Kept</u>	<u>Released</u>
S03K1NE	09-30-2021	10-01-2021	880	Multi-Day		0000	2599	1400	025	0889	Tuna	Anchored, Drifting	Tuna, yellowfin	1	0
													Tuna, bluefin	44	0
													Yellowtail	2	0
													Lingcod	1	0
													Sheephead, California	20	2
													Rockfish, vermilion	20	0
													Rockfish, group bocaccio/chili	10	10
													Rockfish, copper	1	0
													Rockfish, starry	10	0
S03K1ME	10-01-2021	10-01-2021	880	Multi-Day		2599	0815	0000	025		Other	Other			



Comment Log Display

Below is the comment you selected to display. Comment 2589 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Tepper-Weise
Email Address: christepperweise0718@gmail.com
Affiliation:

Subject: Showing Support for our SoCal fishing fleet.

Comment:

Just wanted to show my support with our soCal Fishing fleet. From what I understand about this new bill it seems unfair and asking too much too quick. Lets give our fleet more time to adapt and work towards a better solution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:28:31

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Comment Log Display

**Below is the comment you selected to display.
Comment 2590 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: JAMES
Last Name: Degner
Email Address: jimdegner@gmail.com
Affiliation:

Subject: Commercial Sportfishing Boats CHC2021

Comment:

I am a 73 year old retired man who likes to fish in the ocean.	2590.1
Please consider that the extra cost of new regulation compliance and enforcement will make fishing too expensive for me. It will put many people out of work. It will reduce tourism and state revenues	2590.2
Please give us a break. There are many GIANT tankers out there polluting the ocean a million times more than a few fishing and whale watching boats.	2590.3

We are all concerned about the environment. I drive an electric car to the boat landing to fish. Please don't shut us down. - Jim Degner

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 16:22:14

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Comment Log Display

Below is the comment you selected to display. Comment 2591 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: VanVoorhis
Email Address: Earthhealing1@aol.com
Affiliation:

Subject: Fishing

Comment:

Please protect our ability to fish in both fresh and saltwater in California. Thankfully yours, David Van Voorhis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:19:58

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Comment Log Display

Below is the comment you selected to display. Comment 2592 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hal
Last Name: Anderson
Email Address: Hal.snowboard@gmail.com
Affiliation:

Subject: A sad time we are in

Comment:

Hoping CARB compliance that didn't work for the California big rigs and the billion dollar industry behind it. It drove MILLIONS of business tax dollars out of California and into many other local states. Meaning the same trucks still drive here in California but are registered out of state and don't need to comply to CARB. The fishing industry is probably about a fraction of the size. There's no money for any cash cows to grab. All they're doing is ruining the livelihoods of an insanely small industry of Southern California . One so small with a specialized niche that rivals NONE in the entire world. It's incredible feat we have accomplished that will hopefully not be wiped from us.

Sincerely,
Hal Anderson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 17:49:32

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Comment Log Display

Below is the comment you selected to display. Comment 2593 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Fred
Last Name: Reichert
Email Address: constructionworks@cox.net
Affiliation: Constructionworks

Subject: New California regulations

Comment:

The new requirements being proposed for charter boats makes absolutely no sense! It will make charters unattainable for the majority of the public & will have severe negative impacts on many businesses communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 18:24:31

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Comment Log Display

Below is the comment you selected to display. Comment 2594 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jonathon
Last Name: Smith
Email Address: jonathonsmith92@gmail.com
Affiliation: Happy Hooker Sportfishing

Subject: 3rd generation career fisherman fighting for his career and family income

Comment:

Ms. Liane Randolph, Chair
California Air Resources Board,
c/o Harborcraft
1001 I Street
Sacramento, CA 95814

RE: Proposed Harbor Craft Engine Emission Regulations/Commercial Passenger Vessels

Dear Madam Chair,

My name is Jonathon Smith, I co own the charter boats: Happy Hooker and Pacific Dream in the Berkeley Marina with my Dad Chris. I am third generation captain of the Happy Hooker. My Father, Uncles and Grandfather all worked commercial passenger fishing or commercial fishing their whole lives. We have always had good years and lean years of fishing, It is a trade I am passionate about. I take a lot of pride in taking up my family trade. I take a lot of joy in putting people on fish and watching them catch something that goes straight to the dinner table. We provide people a means to access a natural recourse.

Living in California the last 11 years, I've been conditioned to California's different ways to reduce emissions and carbon footprint. We have ran a tier 2 engine in the Happy Hooker since 2010. We have a tier 3 replacement on order. Hopefully we will repower by January 2023.

My Engine data states that my idle time accounts for 67% of the entire operating time. Idle is when the engine is at 0% load factor in neutral at 600 RPM. As business owners in California, I can agree with having standards for emissions, as long as they are reasonable for the application. Everything I have read about the proposed regulations are far from reasonable. I never thought in my

2594.1

life that I would be faced with a decision to have to scrap my boat someday.

The proposed regulations require me to install marine engines that have not been designed or tested yet, because the application is not practical or safe. ■ A tier 3 engine or tier 4 engine with the new exhaust system with DEF would run so hot that there would almost certainly be a fire in the engine room. Our fiberglass boats are made with polyester resin, which is flammable. I'm not a scientist but I'm sure that my boat would be at risk of fire at sea with passengers onboard. That's assuming the coast guard would approve the changes. ■ As CARB is well aware, this new exhaust requirement would render my vessel obsolete. ■ I am horrified that my government is willing to put me out of business to pursue a green peace crusade. To have a new boat built to meet compliance and coast guard standards in 8 years, with the way inflation is rising, I'm looking at raising 2.5 to 3.8 million dollars to build.

2594.2

2594.3

We have had some good fishing seasons in the bay area the last few years. Good fish scores put the passengers on the boat, but please consider that fishing could take a hit at any time. If people aren't catching many fish, most of them don't book. ■ In 2019 we took a pretty large hit with the covid 19 government shut downs. We lost nearly 3 months of fishing season on a projected record profit year. We then increased our price by 30% and limited our passenger count to social distance. Fortunately we are an outdoor business and able to be open under our county mandates. We still took a permanent loss in business. Since covid happened, a lot of passengers just don't come out anymore. ■ I've also had to give full refunds on charters because of covid exposure. ■ Almost 2 years later after April 2019 and our business has not recovered to full capacity. ■ Covid 19 and government shut down is responsible for decline in business over the last year and a half. And now my government wants me to double prices to pay for brand new boats. No one will pay to fish with me if I double my prices. If this bill is passed, I will be trying to save money to buy one boat to replace 2 of them. 2-4 million dollars is a lot of money to save in the bank, especially when profits every year go towards other engine repowers and maintenance. Charter fishing is an expensive business and we do not have a lot of capitol at the beginning of every year. It seems like a slap in the face to get hit with regulations like this after the covid 19 virus has damaged our business.

2594.4

2594.5

What bank in their right mind would give me a loan for a 2-4 million dollar boat, just to meet emission standards? No financial institution will fund our boat builds. They will probably laugh and say, what happens when the state makes you go electric? Need another million to upgrade? ■ I'm looking at having to raise funds on my own on top of two different boat mortgages and 2 home mortgages. ■ Our new engine projects also have to come out of pocket. Happy Hooker being close to 200K and Pacific Dream costing over a half million to upgrade to tier 3, all to appease CARB. ■ The business expense and debt is a never ending tunnel so long than we have to possibly consider selling our boats out of state or scrapping. ■ I might have to take up a different career after my

2594.6

boat loans are paid off and start out fresh in a red state. I guess you will decide my fate though. That's what you do best, dictating and shutting down a family business that's been in place and paying California taxes for 40+ years in the name of clean air.

Regulating our business out of California will not only destroy mine and my family's life, but will effect the entire fishing community. We take out boy scout charters every year and familys book our charters to bond and teach their children how to fish and have healthy family fun. We are not just a business. We provide a means to access a natural resource of ocean fresh fish, straight to the table. And everyone has a fun time participating. Just read our facebook or yelp reviews, you might be touched. You will end the next generations chance of ever knowing about the joys of charter fishing in California.

2594.7

Why are we being singled out for new regulations? Traditionally commercial passenger fishing vessels are in the same class as commercial fishing vessels. I feel like we are an easy target for CARB because there is so little of us, (174) vessels. We need to be held to the same standards as all of the other commercial fishing vessels. Commercial fishing vessels will only have to upgrade to tier 2 engines? Or keep mechanical? Black smoke from commercial fishing vessels, tug boats, tractor tugs, commercial ship traffic, why are we being singled out? We are small business owners. We pay our taxes and we provide a service to the community. This new standard is not right.

2594.8

My business means the world to me and my family and our customers. With the suicide rate at an all time high, I'd hate to see my family or customers suffer in the future because something they love was regulated out.

2594.9

I can show you engine data from the happy hooker C18 computer that shows that 67% of our engines lifetime is idle time. Just drifting barely putting anything in the air. This is the same for a lot of charter boats in my area. Its not right to target us. I want to meet CARB in the middle somewhere. Your terms are way too steep and too irrational.

2594.10

Please have a heart and don't destroy a family trade and tradition for many families in California.

Thank you for your consideration
Jonathon Smith

If I do have to dispose of my Investments that I will have worked off for 12 years, hopefully the state will compensate me or help me invest in something new and more California approved.

2594.11

Happy Hooker Sportfishing
Pacific Dream Sportfishing

Attachment: www.arb.ca.gov/lists/com-attach/2950-chc2021-UTICZV0uUGEDWIU5.docx

Original File Name: CARB letter jonathon.docx

Date and Time Comment Was Submitted: 2021-11-11 20:36:36

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Ms. Liane Randolph, Chair
California Air Resources Board,
c/o Harborcraft
1001 I Street
Sacramento, CA 95814

RE: Proposed Harbor Craft Engine Emission Regulations/Commercial Passenger Vessels

Dear Madam Chair,

My name is Jonathon Smith, I co own the charter boats: Happy Hooker and Pacific Dream in the Berkeley Marina with my Dad Chris. I am third generation captain of the Happy Hooker. My Father, Uncles and Grandfather all worked commercial passenger fishing or commercial fishing their whole lives. We have always had good years and lean years of fishing, It is a trade I am passionate about. I take a lot of pride in taking up my family trade. I take a lot of joy in putting people on fish and watching them catch something that goes straight to the dinner table. We provide people a means to access a natural recourse.

Living in California the last 11 years, I've been conditioned to California's different ways to reduce emissions and carbon footprint. We have ran a tier 2 engine in the Happy Hooker since 2010. We have a tier 3 replacement on order. Hopefully we will repower by January 2023. My Engine data states that my idle time accounts for 67% of the entire operating time. Idle is when the engine is at 0% load factor in neutral at 600 RPM. As business owners in California, I can agree with having standards for emmissions, as long as they are reasonable for the application. Everything I have read about the proposed regulations are far from reasonable. I never thought in my life that I would be faced with a decision to have to scrap my boat someday.

The proposed regulations require me to install marine engines that have not been designed or tested yet, because the application is not practical or safe. A tier 3 engine or tier 4 engine with the new exhaust system with DEF would run so hot that there would almost certainly be a fire in the engine room. Our fiberglass boats are made with polyester resin, which is flammable. I'm not a scientist but I'm sure that my boat would be at risk of fire at sea with passengers onboard. That's assuming the coast guard would approve the changes. As CARB is well aware, this new exhaust requirement would render my vessel obsolete. I am horrified that my government is willing to put me out of business to pursue a green peace crusade. To have a new boat built to meet compliance and coast guard standards in 8 years, with the way inflation is rising, I'm looking at raising 2.5 to 3.8 million dollars to build.

We have had some good fishing seasons in the bay area the last few years. Good fish scores put the passengers on the boat, but please consider that fishing could take a hit at any time. If people aren't catching many fish, most of them don't book. In 2019 we took a pretty large hit with the covid 19 government shut downs. We lost nearly 3 months of fishing season on a projected record profit year. We then increased our price by 30% and limited our passenger

count to social distance. Fortunately we are an outdoor business and able to be open under our county mandates. We still took a permanent loss in business. Since covid happened, a lot of passengers just don't come out anymore. I've also had to give full refunds on charters because of covid exposure. Almost 2 years later after April 2019 and our business has not recovered to full capacity. Covid 19 and government shut down is responsible for decline in business over the last year and a half. And now my government wants me to double prices to pay for brand new boats. No one will pay to fish with me if I double my prices. If this bill is passed, I will be trying to save money to buy one boat to replace 2 of them. 2-4 million dollars is a lot of money to save in the bank, especially when profits every year go towards other engine repowers and maintenance. Charter fishing is an expensive business and we do not have a lot of capitol at the beginning of every year. It seems like a slap in the face to get hit with regulations like this after the covid 19 virus has damaged our business.

What bank in their right mind would give me a loan for a 2-4 million dollar boat, just to meet emission standards? No financial institution will fund our boat builds. They will probably laugh and say, what happens when the state makes you go electric? Need another million to upgrade? I'm looking at having to raise funds on my own on top of two different boat mortgages and 2 home mortgages. Our new engine projects also have to come out of pocket. Happy Hooker being close to 200K and Pacific Dream costing over a half million to upgrade to tier 3, all to appease CARB. The business expense and debt is a never ending tunnel so long than we have to possibly consider selling our boats out of state or scrapping. I might have to take up a different career after my boat loans are paid off and start out fresh in a red state. I guess you will decide my fate though. That's what you do best, dictating and shutting down a family business that's been in place and paying California taxes for 40+ years in the name of clean air.

Regulating our business out of California will not only destroy mine and my family's life, but will effect the entire fishing community. We take out boy scout charters every year and familys book our charters to bond and teach their children how to fish and have healthy family fun. We are not just a business. We provide a means to access a natural resource of ocean fresh fish, straight to the table. And everyone has a fun time participating. Just read our facebook or yelp reviews, you might be touched. You will end the next generations chance of ever knowing about the joys of charter fishing in California.

Why are we being singled out for new regulations? Traditionally commercial passenger fishing vessels are in the same class as commercial fishing vessels. I feel like we are an easy target for CARB because there is so little of us, (174) vessels. We need to be held to the same standards as all of the other commercial fishing vessels. Commercial fishing vessels will only have to upgrade to tier 2 engines? Or keep mechanical? Black smoke from commercial fishing vessels, tug boats, tractor tugs, commercial ship traffic, why are we being singled out? We are small business owners. We pay our taxes and we provide a service to the community. This new standard is not right.

My business means the world to me and my family and our customers. With the suicide rate at an all time high, I'd hate to see my family or customers suffer in the future because something they love was regulated out.

I can show you engine data from the happy hooker C18 computer that shows that 67% of our engines lifetime is idle time. Just drifting barely putting anything in the air. This is the same for a lot of charter boats in my area. Its not right to target us. I want to meet CARB in the middle somewhere. Your terms are way too steep and too irrational.

Please have a heart and don't destroy a family trade and tradition for many families in California.

Thank you for your consideration
Jonathon Smith

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Happy Hooker Sportfishing
Pacific Dream Sportfishing



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Below is the comment you selected to display. Comment 2595 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Koichi
Last Name: Yamaguchi
Email Address: penguinyellowhand@gmail.com
Affiliation:

Subject: Sports fishing boat should be exempt from carb regulation

Comment:

Ocean is large and forgiving. it's unnecessary to weed out old wooden sports fishing boats. Instead, you can do smog checking for boat to make sure hydrocarbon is not emitted. Requires maintenance on diesels engine to reduce pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:22:12

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Below is the comment you selected to display. Comment 2596 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregory
Last Name: Kring
Email Address: masonsdad.gk@gmail.com
Affiliation:

Subject: Closing passenger sportfishing

Comment:

To whom it may concern,

I am a 41 year old, and worked on So Cal sport boats from the age of 14 to 23. Working and fishing those boats have given me great memories fishing with friends, and more importantly my father. Working these boats gave me a work ethic like no other. It taught me discipline, customer service, how to cook, housekeeping...the list goes on and on. I've made lifelong friends with my coworkers, and passengers as well.

I started sportfishing, with my father (who is diagnosed with Alzheimers), when I was 8 years old. My first trip was aboard the Matt Walsh out of LA Harbor Sportfishing. Capt Ray Duane was the first to greet me, and made sure that his deck hands would have me catch fish. And they did not disappoint. From that trip, my love for fishing blossomed. At 10, I went on my first overnight trip, on the Searcher, in San Diego. Captain Art Taylor did the same thing as Captain Ray did. And I got my first Yellowtail and Dorado on that trip. From then on, I begged my dad to take me fishing. We went on so many trips, that my memory bank is full of memories, stories, and bonding that only fishing can bring. Even though, he doesn't remember his grandkids, and has a hard time remembering his own kids. He can tell you about fishing trips, that he and I went on, like it was yesterday. Canceling sport fishing, would be a generational disgrace.

As I mentioned above,, the skills I learned working these boats, I moved on into the trades. Without these skills, I never would have flourished in the plumbing trade. I currently work for LADWP, making 6 figures, and supporting my family of 6. 3 of my 4 boys have already gone out in trips with me. And they bug me, the same way I begged my father, to take them again. I never realized the bonding a father and son can have on the water, but as a father, my

eyes are open. To see the 3 of them, light up with joy when they catch a fish, and the high fives we give each other after landing the fish, are memories that will never be erased. The same memories, that my father created with me, and his father with him.

Shutting this industry down, is catastrophic to our youth, families, and the men/women who work this job. Shutting this industry down will bring more California's the option to leave. I can't afford a boat to fish, this is why I pay for this service. I can pay a nominal fee, and not worry about a thing, except what burger I want to eat. Please, I beg you, a man, from a family of fisherman, do not pass this law. It will have generational impact.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 21:55:36

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Below is the comment you selected to display. Comment 2597 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Preston
Last Name: Girard
Email Address: prestong82@gmail.com
Affiliation: Fisherman

Subject: DO NOT ALLOW THIS TO PASS

Comment:

If this passes thousands of families and fisheries will suffer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 22:33:39

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Below is the comment you selected to display. Comment 2598 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: peter
Last Name: ciaramitaro
Email Address: peterc1050@gmail.com
Affiliation:

Subject: chc2021

Comment:

let the people continue to fish
quit putting hard working fisherman out of business!
Stop the amendments to the commercial harbor craft regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 22:36:52

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Below is the comment you selected to display. Comment 2599 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: FERHAT
Last Name: ACUNER
Email Address: ferhata@navtek.net
Affiliation:

Subject: Available zero-emissions technology for the Commercial Harbour Carfts

Comment:

to whom it may concern,

We urge CARB to require 100% zero-emissions deadline for all vessel segments of the Commercial Harbor Craft Rule, with a waiver for specific vessel segments as needed.

2599.1

NAVTEK Naval Technologies Inc. is a R&D based naval engineering and design company committed to transforming the carbon intensive shipping to near-future zero-emission maritime sector. Over 40 years, NAVTEK has grown into a highly specialist naval engineering, design, and shipbuilding company, guided by a commitment to technological excellence and an innovative forward-looking approach. NAVTEK is a well experienced company in the maritime sector and in innovative marine technologies including energy, fully electrical marine vessels, renewable energy, low carbon shipping-port development.

The electrification for marine vessels has now been considered as a proven technology contributing to a decarbonized sustainable maritime sector. We are witnessing a fast-evolving climate friendly global technological shift that requires more integrated approaches entailing alternative fuels, wind and solar energy, renewable hydrogen, fuel-cell technologies, zero emission dockyards, autonomous vessels, and many more to overcome the evidence based expected ecological catastrophe.

2599.2

NAVTEK was the builder and designer of the all-electric GisasPower tugboat (ZEETUG30). The prototype has been delivered in early 2020 and successfully delivered the heavy-duty daily operations since then. We have 3 more ZEETUG's under construction.

NAVTEK ZEE-TECH represents the new generation green and high technology by being re-chargeable and fully electric with almost no

noise and vibration. This innovative design allows the vessels to operate powerful with higher efficiency in line with not harming the environment (emission free). The NAVTEK rechargeable and all electric battery driven technology can be adapted to any short distance operation profiled vessel (ferry, sea-taxi, workboats and such) .

We appreciate the work that CARB staff have done on the proposal. However, the draft rule as written is short-sighted. The rule does not reduce greenhouse gas emissions and risks creating a stranded asset scenario for harbour craft owners who may pay to retrofit to Tier 3 and 4 engines only to be forced to make a full zero-emission transition in quickly proceeding years later. For the marine sector, a strong but achievable standard would be that all harbour craft operating in the state must be zero emission.

2599.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-11 23:32:34

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Below is the comment you selected to display. Comment 2600 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Albert
Last Name: Pepi
Email Address: Alpeezee@Yahoo.com
Affiliation:

Subject: Harbor Craft Regulation

Comment:

It would be really disappointing to not be able to hand down and teach my grandsons and youth of all ages the experience and pleasure of fishing off shore. Thank you .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 07:58:05

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Below is the comment you selected to display. Comment 2601 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tyler
Last Name: Shoff
Email Address: Shoffboy02@gmail.com
Affiliation:

Subject: Save sport fishing

Comment:

Please do not regulate the emissions with boats. You need to think about the people that this is going to effect. It is going to put people out of business and you are going crazy increase unemployment. Think about other people for once.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 08:10:06

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Below is the comment you selected to display. Comment 2602 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Timothy
Last Name: French
Email Address: tfrench@clpchicago.com
Affiliation: Truck & Engine Manufacturers Association

Subject: EMA Comments - Proposed Amendments to the CHC Regulation; ISOR

Comment:

The Truck and Engine Manufacturers Association (EMA) hereby submits the attached comments on CARB's proposed amendments to the regulations applicable to commercial harbor craft (CHCs) operating in California waters.

Attachment: www.arb.ca.gov/lists/com-attach/2962-chc2021-WzhcNQBsvGoGZVA+.pdf

Original File Name: Comments to CARB - Proposed Amendments to CHC Reg.pdf

Date and Time Comment Was Submitted: 2021-11-12 08:28:49

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**STATE OF CALIFORNIA
AIR RESOURCES BOARD**

Proposed Amendments to the)	Board Hearing Date:
Commercial Harbor Craft Regulation;)	November 19, 2021
Initial Statement of Reason)	Agenda Item: 21-12-6

**COMMENTS OF THE
TRUCK AND ENGINE MANUFACTURERS ASSOCIATION**

November 12, 2021

Timothy A. French
Truck & Engine Manufacturers Association
333 West Wacker Drive, Suite 810
Chicago, IL 60606

**STATE OF CALIFORNIA
AIR RESOURCES BOARD**

Proposed Amendments to the)	Board Hearing Date:
Commercial Harbor Craft Regulation;)	November 19, 2021
Initial Statement of Reason)	Agenda Item: 21-12-6

The Truck and Engine Manufacturers Association (EMA) appreciates the opportunity to submit these comments on CARB’s proposed amendments to the regulations applicable to commercial harbor craft (CHCs) operating in California waters. EMA is the trade association that represents the world’s leading manufacturers of internal combustion engines, including the diesel-fueled marine engines used to power commercial harbor craft. Consequently, EMA has a direct and significant interest in the proposed amendments at issue.

1. Introduction and Background

As an initial matter, our understanding of the proposed amendments to the CHC regulations is summarized below.

- Pursuant to the proposed amendments, CARB is planning to adopt new unique emissions performance standards for marine engines used in CHCs operated in California waters. Engines below 600kW will need to meet Tier 3 or 4 standards (if applicable), and also will need to include diesel particulate filter (DPFs) add-ons. For engines above 600kW, they will need to meet Tier 4 standards, and also will need to be equipped with DPFs.
- The proposed NO_x requirements are equivalent to the existing Tier 3 or Tier 4 marine engine standards. The proposed PM standards are approximately equivalent to a level that is 85 percent lower than the Tier 4 PM standards.
- The specific proposed PM performance standards for CHC engines range from 0.005 to 0.010 (g/bhp-hr) for Category 1 engines, depending on the particular engine-power subcategory.
- CARB is proposing the following pathways for meeting the unique Tier 3/4 plus DPF performance standards:
 - Repowering or rebuilding engines to meet Tier 3 or Tier 4 marine diesel engine standards, plus installing a CARB-verified Level 3 (85% reduction) DPF;
 - Installing Tier 3 or Tier 4 EPA-certified engines and adding a DPF from the OEM;
or
 - Demonstrating, presumably through in-use testing, that the reconfigured marine CHC engines otherwise meet the revised performance standards.
- As noted, the mandated DPFs must be Level 3-verified and capable of reducing diesel PM by 85 percent or more.

- The draft regulatory language includes a new Method C2 for retrofitting a CHC engine with a DPF to meet the proposed performance standards.
- The proposed implementation period for the revised marine engine performance standards ranges from 2023 to 2032, with opportunities for additional extensions of the compliance deadlines based on product availability.
- CARB has provided the following table (see Table III-8, ISOR, p. III-16) explaining the major compliance requirements of the proposed regulatory revisions.

Table III-8. Major Compliance Requirements of Existing and Proposed Amendments

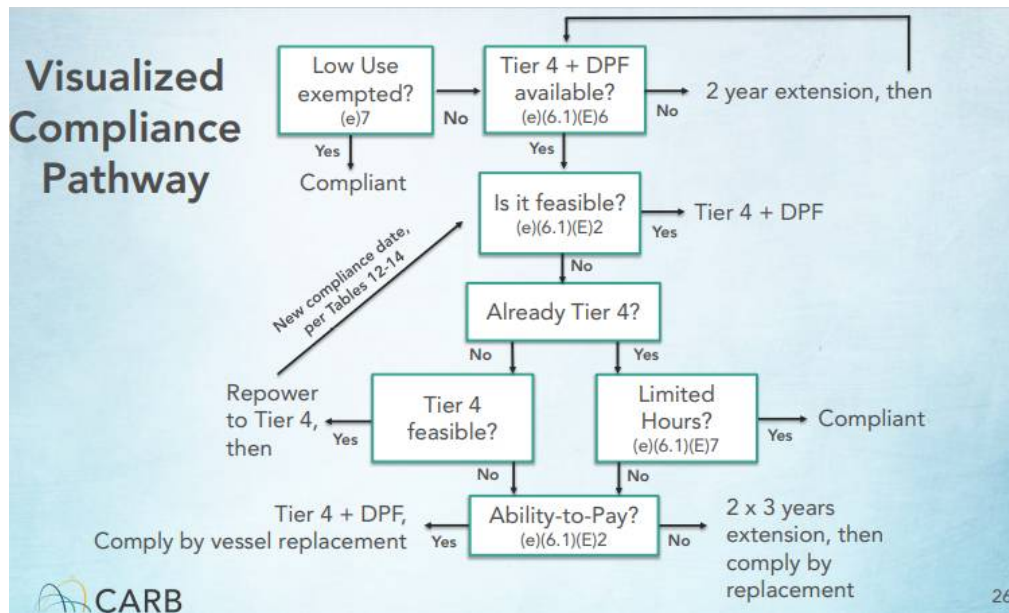
Current Regulation		Proposed Amendments (Implementation Dates) – December 31 st of compliance year										
2021 & Earlier	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	
IN-USE VESSEL REQUIREMENTS												
Tier 2 or 3 (Tugs, Ferries, Excursion, Crew & Supply, Barge, Dredge)	Any Pre-Tier 1 and 1 → Tier 4* (generally Workboats, Research, Pilot, Tank Barges, and CPFV)											
	≤ MY 1993	MY 1994-2001	MY 2002-2006									
	Tier 2, 3, 4 → Tier 4*+DPF** Ferries (Except Short Run), Pilot***, All Tugs			MY 2007-2009	MY 2010-2012	MY 2013-2015	MY 2016-2019	MY 2020-2021	MY 2022+			
	Tier 2, 3, 4 → Tier 4*+DPF** Research, CPFV, Excursion			MY 2007-2010	MY 2011-2012	MY 2013-2014	MY 2015-2017	MY 2018+				
	Tier 2, 3, 4 → Tier 4*+DPF** Dredges, Barges, Crew & Supply, Workboats			MY 2007-2009	MY 2010-2013	MY 2014-2017	MY 2018+					
		Any Pre-Tier 1 and 1 → Tier 2 or Cleaner Commercial Fishing			≤ MY 1987	MY 1988-1997	MY 1998+					
Other VESSEL REQUIREMENTS												
Tier 2, 3, or 4 All New Vessels Tier 3 + BACT New Ferries Carrying 75+ Passengers	New Excursion: Zero-Emission Capable (e.g., Plug-in Hybrid) 30% or more of power must be derived from a zero-emission tailpipe source											
	New and In-Use Short-Run Ferries: Zero-Emission											

*All engines ≥600 kW would be required to be certified to Tier 4. For engines <600 kW, a Tier 4 certified engine would be required if certified by U.S. EPA or CARB and available by the compliance date.

**Retrofit DPF requirements would apply to all Tier 3 and Tier 4 engines.

***Pilot vessels at Tier 2, 3, or 4 with MY 2007-2009 would not need to comply until December 31, 2025

- CARB also previously provided the following flow chart to explain the implementation of the proposed revised CHC emission-performance standards:



2. Remaining Issues Regarding the Proposed Amendments

EMA members acknowledge that additional emission reductions from CHCs can and should be achieved to help address NAAQS-attainment, climate change, and environmental justice issues in California. However, there are a number of issues that call into question whether the proposed CHC amendments are feasible and cost-effective means to advance CARB's goals.

- As an initial matter, it is unclear whether CARB has the authority to regulate marine vessels as opposed to marine engines used in vessels. CARB needs to clarify the extent of its regulatory authority, and the critical role that the United States Coast Guard (USCG) will play in implementing the proposed regulatory amendments. 2602.1
- With respect to existing CHC vessels, CARB claims that there are a number of pathways to compliance, but, in actuality, most of those pathways appear to lead to a mandate to “comply by vessel replacement.” That result seems largely preordained, since Tier 4 repowers and/or DPF retrofits likely are not feasible for many in-use CHC vessels, given space constraints, safety issues (including those relating to DPF regenerations and surface temperatures), and product availability concerns. In addition, no CARB-verified Level 3 DPFs that are suitable for use with commercial marine engines are currently available. CARB staff have estimated that only 15% of the covered CHC vessels will need to be replaced under the proposed amendments, but that percentage figure seems unreasonably and unrealistically low. 2602.2
- New Tier 3-plus and Tier 4-plus marine engines and aftertreatment systems are not available and likely will remain unavailable for installation in existing CHC vessels. Similarly, as noted, the necessary supply of Level 3 DPFs does not exist. Even if products were available, it is unclear whether the USCG would approve the modification of CHC vessels with such significant retrofits, given the likely impacts on vessel weight, displacement, balance, safety, hull integrity and sea-worthiness. 2602.3
- During prior meetings with CARB and USCG representatives, the Coast Guard representatives raised a number of key points that CARB staff have not addressed adequately. More specifically, USCG personnel noted that they will need to review the design specifications for any modifications that vessel owners propose to make to the exhaust systems of their in-use vessels to comply with the revised CHC regulations. In that regard, USCG personnel will need to assess and approve any exhaust-system redesign features that impact surface temperatures, air handling, auxiliary loads, heat-rejection systems, safety, fire protection, vessel balance and stability, as well as vessel weight and displacement, especially if any machinery spaces or bulkheads are relocated, or if other structural changes are involved. To the extent that fiberglass-hull vessels are involved, additional concerns will come into play. The necessary USCG approvals will need to be made on a case-by-case bases, and any approved redesigns, once completed, will need to be verified by local USCG inspection officers. CARB's proposed regulatory amendments will need to (but as yet do not) account fully for the Coast Guard's critical role, which, in essence, will make the retrofitting of in-use vessels that much more difficult and expensive. 2602.4
- In light of the foregoing, CARB should be more transparent regarding the fact that its revised CHC regulations are likely to lead, as a practical matter, to a requirement for the replacement of the majority of the covered in-use CHCs (not just 15%) with new CHC

vessels powered by unique Tier 4-plus systems within the next 10 years. The actual costs of that actual regulatory mandate will be massive.

- Input from U.S. EPA staff has revealed other significant relevant issues that CARB staff have not fully accounted for. The bottom line conclusion from EPA’s input and comments is that CARB’s CHC regulations will need to specify that any DPF add-ons must be installed downstream of any SCR system (i.e., “after the box”). Otherwise, those add-ons could result in a number of issues that might cause violations of EPA’s regulations, including those pertaining to tampering, defeat devices, emissions warranties, delegated assembly, IRAFs, and durability issues. 2602.5
- CARB also should further delineate the very significant economic impacts that its proposed rulemaking will have on CHC vessel owners and operators. In particular, CARB should clarify the scale and sources of incentive funding that will be necessary to implement the proposed new vessel-replacement mandates in a cost-effective manner. Without very significant incentive funding, the proposed amendments will not be implementable. 2602.6
- CARB also needs to evaluate and explain more fully the risks of whether the proposed regulations will result in a lack of compliant marine engines available in California for CHC vessels, since the proposed revisions to the CHC regulations would force OEMs to manufacture unique marine engines and aftertreatment systems solely for the California CHC market. That market is simply not large enough to justify or sustain a separate and unique marine engine product line. 2602.7
- CARB’s underlying inventory analysis appears to use deterioration factors associated with older outdated marine engine technologies. In that regard, it is the case that NOx emissions tend to decrease as current marine engines age, not increase. In addition, it also appears that CARB’s analysis fails to account for the reduced emissions rates that result after engine rebuilds. To fix these problems, CARB should use the applicable deterioration factors from EPA’s certification database, and then CARB should make the necessary corresponding adjustments to its inventory analysis and cost-benefit calculations. 2602.8
- With respect to CARB’s cost-benefit calculations, it appears that CARB is improperly applying a twenty-times (20x) multiplier to the estimated reductions of PM_{2.5} (See SRIA, p. 163.) That 20x multiplier, however, was developed for assessing how to allocate Carl Moyer incentive funds, not for assessing the monetized health benefits of a proposed CARB regulation as a component of an actual regulatory cost-benefit analysis. Thus, through the improper application of an arbitrary 20x multiplier to the estimated reductions of PM_{2.5}, CARB has vastly and unreasonably overstated the putative benefits, and has similarly vastly understated the costs of the proposed CHC regulations. More specifically, if the 20x factor is backed out of CARB’s cost-benefit analysis (as it should be), the cost-per-ton of the proposed rulemaking would increase from \$28,878/ton to \$577,560/ton. To address this fundamental flaw in the rulemaking record, CARB will need to redo the cost-benefit analysis for the proposed CHC amendments without using the 20x multiplier, and instead using CARB’s established quantitative risk assessment procedures (which should be based on the most relevant and current epidemiology studies and relative risk factors) for monetizing the benefits of potential avoided health effects due to marginal reductions in emissions. 2602.9

- Without addressing all of the foregoing issues, CARB cannot demonstrate that its proposed revisions to the CHC regulations are viable and cost-effective.

3. EMA's Potential Alternative Proposal

- European Stage 5 marine engine requirements, which took effect in 2020, include DPF-forcing particle number (PN) standards. Those Stage 5 marine engines could be deployed in the U.S market to help achieve a portion of CARB's CHC-related objectives. However, there are several issues that would need to be addressed, including how to coordinate U.S. EPA certification of EU Stage 5 engines.
- Instead of adopting unique standards for California-deployed CHC marine engines that OEMs will not be able to build given the low sales volume of CHC marine engines in California, CARB should encourage the use of Tier 4 engines, and should work with EPA to streamline the certification of EU Stage 5 marine engine configurations for use in the U.S. by treating those engines, in effect, as non-credit-generating engines with Family Emissions Limits (FELs) below the Tier 4 standard. The streamlined EPA certification process would need to apply a PM certification metric (assessed in gravimetric terms of g/bhp-hr, and not in terms of PN) consistent with US regulations. The streamlined EPA certification also would need to cover deterioration factor (DF) issues as well. (Note: there is a 1.5 MW power limit for the EU Stage 5 standards.) Importantly, this recommended approach would utilize the certification procedures and requirements under the existing Tier 4 regulation, and so would obviate the need for unique CARB standards and retrofit requirements. CARB's incentive programs could apply to engines with EU and US certifications below the Tier 4 FELs. 2602.10
- EPA certification requires some form of marine engine durability demonstration. Typically, a DF is used, which requires thousands of durability test hours in an engine laboratory.
- Under various test engine exemptions, some marine engine manufacturers have accrued significant in-use durability hours from engines installed in vessels. Perhaps those sources of durability data (or assigned DFs) could be used in the US EPA streamlined certification of Stage 5 engines under the current Tier 4 certification protocols.
- US EPA and CARB also should consider promoting the availability of remanufacturing kits for marine engines as additional means to lower emissions from in-use vessels. Further, ARB could work with EPA to upgrade the existing US EPA marine engine remanufacturing requirements to include requirements to meet Tier 3 or Tier 4 emission levels. While that may not be a near-term priority for EPA, it is an issue that warrants additional consideration. 2602.11
- As noted, CARB will need to identify and implement the necessary incentive programs to cover the significant costs of what could amount to a CHC vessel-replacement program, or to subsidize the installation of Tier 4 or EU Stage 5 engine configurations (certified by US EPA to emission levels below Tier 4 standards) in existing vessels where it is practical. Without those necessary incentive programs and funds, this rulemaking will not be viable. 2602.12

4. EPA's Authorization is Required

- As a final matter, and, as noted in EMA's earlier comments, an EPA preemption waiver will be required for all aspects of CARB's proposed CHC amendments as drafted, since CARB is, in essence, proposing to adopt new "Tier 5" standards and other requirements for new and non-new marine engines in California. See CAA Section 209(e). In that regard, CARB will need to assess whether the contemplated rulemaking schedule will allow sufficient time for EPA's review (which includes a notice and comment process) of the multiple preemption issues, including cost and safety considerations, implicated by the CHC proposal. CARB may need to adjust its rulemaking schedule accordingly, since CARB will be barred from attempting to enforce any of the proposed amendments until after CARB receives a preemption waiver and enforcement authorization from EPA.

2602.13

5. Conclusion

EMA remains willing to work with CARB on a path forward that builds off and aligns with existing regulations, while allowing for improvements to accommodate lower emissions solutions in California. That said, EMA believes that the current proposal may, in fact, reduce product choices in the California marine market, which may yield counter-productive results for air quality.

Respectfully Submitted,

TRUCK AND ENGINE
MANUFACTURERS ASSOCIATION

Comment Log Display

Below is the comment you selected to display. Comment 2603 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Hubbell
Email Address: dhubbell@oceanconservancy.org
Affiliation: Ocean Conservancy

Subject: Comments in support of a strong harbor craft rule

Comment:

Dear Chair Randolph and Members of the Board,
On behalf of Ocean Conservancy, please find attached 244 comments from Ocean Conservancy's Californian ocean advocates encouraging adoption of a strong harbor craft rule.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we do not act. I urge CARB to take action now to

tackle this global threat.

Thank you for your consideration,
Dan Hubbell

Attachment: www.arb.ca.gov/lists/com-attach/2964-chc2021-UzBWMQFyVmcKUwdo.pdf

Original File Name: CARB OC Harbor Craft Rule Comments.pdf

Date and Time Comment Was Submitted: 2021-11-12 09:04:07

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Sent from Michael Bertrams to California Air Resources Board on 2021-11-08 21:33:13

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Michael Bertrams
1733 Myers Street
Oroville, CA 95966

Sent from Kris Kelly to California Air Resources Board on 2021-11-08 21:33:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kris Kelly
48 Ramon St
Sonoma, CA 95476

Sent from Janet Howe to California Air Resources Board on 2021-11-08 21:32:51

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Janet Howe

25928 Richville Dr
Torrance, CA 90505

Sent from Ian McCurry to California Air Resources Board on 2021-11-08 21:33:21

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ian McCurry

2866
Magnolia Ave
Long Beach, CA 90806

Sent from Nikki Nafziger to California Air Resources Board on 2021-11-08 21:33:16

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nikki Nafziger

1101 Porter St
Apt G
Vallejo, CA 94590

Sent from Anita Youabian to California Air Resources Board on 2021-11-08 21:33:25

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Anita Youabian

10725 Ohio Ave
Los Angeles, CA 90024

Sent from ANGELA CLAYTON to California Air Resources Board on 2021-11-08 21:33:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
ANGELA CLAYTON

1580 Shadowridge Drive Apartment 157, Vista, Vista
vista
Vista, CA 92081

Sent from Shane Reardon to California Air Resources Board on 2021-11-08 21:33:54

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Shane Reardon

3310 Stonehedge Pl
Concord, CA 94518

Sent from Cosima Hopper to California Air Resources Board on 2021-11-08 21:33:36

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cosima Hopper

319 Lilac Drive
Los Osos, CA 93402

Sent from Patricia Ashton to California Air Resources Board on 2021-11-08 21:34:00

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Patricia Ashton

260 E Crescent Avenue
E Crescent Ave
Redlands, CA 92373

Sent from Sandy Jones to California Air Resources Board on 2021-11-08 21:34:04

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sandy Jones

PO Box 219
Cedar Ridge, CA 95924

Sent from Disa Balderama to California Air Resources Board on 2021-11-08 21:33:59

Dear California Air Resources Board,

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I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Disa Balderama

10411 Haledon Ave
Downey , CA 90241

Sent from Kathryn Mookini to California Air Resources Board on 2021-11-08 21:34:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kathryn Mookini

2801 Nye St
San Diego , CA 92111

Sent from Christine Sunna to California Air Resources Board on 2021-11-08 21:34:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Christine Sunna

17415 Montoya Circle
Morgan Hill , CA 95037

Sent from Kat Davidson to California Air Resources Board on 2021-11-08 21:34:29

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kat Davidson

431 Beaver St
309
Santa Rosa, CA 95404

Sent from Christine Goodstein to California Air Resources Board on 2021-11-08 21:34:31

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Christine Goodstein

Ventura Blvd
Studio City , CA 91604

Sent from Jamie Green to California Air Resources Board on 2021-11-08 21:34:06

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jamie Green

9727 Sweetwater Ln
Ventura , CA 93004

Sent from Laura Edgar to California Air Resources Board on 2021-11-08 21:34:40

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Laura Edgar

3729 Casanova Drive
San Mateo, CA 94403

Sent from Lydia Good to California Air Resources Board on 2021-11-08 21:34:42

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lydia Good

3009 Ramsgate Way
Rancho Cordova, CA 95670-5326

Sent from Catherine Homsey to California Air Resources Board on 2021-11-08 21:34:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Catherine Homsey

140 Bella Vista Way
San Francisco, CA 94127

Sent from Lisa Phenix to California Air Resources Board on 2021-11-08 21:34:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lisa Phenix

5181 Finlandia Way
Carmichael, CA 95608

Sent from Me to California Air Resources Board on 2021-11-08 21:34:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Me

13051 Cortez Ave
Turlock, CA 95380

Sent from Sonya Gorniowsky to California Air Resources Board on 2021-11-08 21:34:51

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sonya Gorniowsky

170 South Spring Street
Apt 58
Blythe , CA 92225

Sent from Mark Hubbell to California Air Resources Board on 2021-11-08 21:34:44

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Mark Hubbell

1064 Everglades
Pacifica, CA 94044

Sent from Consuelo Valenzuela to California Air Resources Board on 2021-11-08 21:35:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Consuelo Valenzuela

3039 5th St
Biggs, CA 95917

Sent from Nancy Spejcher to California Air Resources Board on 2021-11-08 21:35:16

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nancy Spejcher

6350 Genesee Ave
San Diego, CA 92122-3451

Sent from Delia Cuellar to California Air Resources Board on 2021-11-08 21:35:25

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Delia Cuellar

13567 Louvre St
Pacoima , CA 91331

Sent from Jayne Cerny to California Air Resources Board on 2021-11-08 21:35:52

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Jayne Cerny

12845 Sir Francis Drake Blvd
Inverness, CA 94937

Sent from Alexandra Saunders to California Air Resources Board on 2021-11-08 21:35:56

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Alexandra Saunders

190 Camino Encanto
Danville, CA 94526

Sent from Ken Zamvil to California Air Resources Board on 2021-11-08 21:35:35

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ken Zamvil

2009 Willow Dr.
Petaluma, CA 94954

Sent from Dixie Pond to California Air Resources Board on 2021-11-08 21:35:53

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Dixie Pond

25742 La Serra
Laguna Hills, CA 92653

Sent from Marina Dias to California Air Resources Board on 2021-11-08 21:35:58

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Marina Dias

26326 Fairview Ave
Lomita , CA 90717

Sent from Ali Van Zee to California Air Resources Board on 2021-11-08 21:36:00

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ali Van Zee

545 N Harold St
Fort Bragg , CA 95437

Sent from Marge Kelley to California Air Resources Board on 2021-11-08 21:36:16

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Marge Kelley

24425 #D107
Skyview Ridge Drive
Murrieta, CA 92562

Sent from Peter Taylor to California Air Resources Board on 2021-11-08 21:36:20

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Peter Taylor

128 Rankin Street
Santa Cruz , CA 95060

Sent from Noah Youngelson to California Air Resources Board on 2021-11-08 21:36:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Noah Youngelson

2449 Walgrove Ave
Los Angeles, CA 90066

Sent from Alyssa Bell to California Air Resources Board on 2021-11-08 21:36:32

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Alyssa Bell

1774 SUNNY HEIGHTS DRIVE
Los Angeles, CA 90065

Sent from Jamie Miller to California Air Resources Board on 2021-11-08 21:36:53

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jamie Miller

7015 Cavitt Stallman Rd
Granite Bay, CA 95746

Sent from Kristin Young to California Air Resources Board on 2021-11-08 21:37:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Thank you for your time and consideration.

Sincerely,
Kristin Young

8484 San Carlos Way
Buena Park, CA 90620

Sent from Janice Schkloven-Friedman to California Air Resources Board on 2021-11-08 21:36:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Janice Schkloven-Friedman

2419 Sheridan Way
Stockton , CA 95207

Sent from Marina Campbell to California Air Resources Board on 2021-11-08 21:37:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Marina Campbell

209 N Goodhope Ave
Los Angeles, CA 90732

Sent from Leah Myers to California Air Resources Board on 2021-11-08 21:37:39

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Leah Myers

1003 Sunnyside Dr.
Healdsburg, CA 95448

Sent from Lisa Melendy to California Air Resources Board on 2021-11-08 21:38:02

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lisa Melendy

3150 Hoover Street
Redwood City, CA 94063

Sent from Jensen Fiskin to California Air Resources Board on 2021-11-08 21:38:13

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Jensen Fiskin

44555 San Pascual Ave
Palm Desert , CA 92260

Sent from Cheryl McGhan to California Air Resources Board on 2021-11-08 21:37:03

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cheryl McGhan

1559 Costa Street
Seaside, CA 93955

Sent from Elizabeth Balvin to California Air Resources Board on 2021-11-08 21:38:18

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Elizabeth Balvin

7576 Parkway Drive
2M
La Mesa, CA 91941

Sent from Val Farrelly to California Air Resources Board on 2021-11-08 21:39:05

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Val Farrelly

1125 Park Place
#408
San Mateo, CA 94403

Sent from Michelle Biondini to California Air Resources Board on 2021-11-08 21:39:11

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Michelle Biondini

239 Teddy Ave
San Francisco , CA 94134

Sent from Anthony Palesano to California Air Resources Board on 2021-11-08 21:37:21

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Anthony Palesano

17350 Temple Ave
SpC 73
La Puente, CA 91744

Sent from Jay Baum to California Air Resources Board on 2021-11-08 21:41:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jay Baum

3405 South Kerckhoff Avenue
Los Angeles, CA 90731

Sent from Karen Osmundson to California Air Resources Board on 2021-11-08 21:41:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Karen Osmundson

143 West Fifth St Unit A
Watsonville, CA 95076

Sent from Rachel Grusin to California Air Resources Board on 2021-11-08 21:39:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Rachel Grusin

8319 Serenity Court
El Cajon , CA 92021

Sent from Melyssa Howe to California Air Resources Board on 2021-11-08 21:41:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Melyssa Howe

28507 Bud Court
Saugus, CA 91350

Sent from Selene Nunez to California Air Resources Board on 2021-11-08 21:39:56

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Selene Nunez

115 S Robin Rd
West Covina, CA 91791

Sent from Jimmie Lunsford to California Air Resources Board on 2021-11-08 21:42:48

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jimmie Lunsford

3288 Adams Ave. #16642
San Diego, CA 92176

Sent from Madison Mitchell to California Air Resources Board on 2021-11-08 21:43:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Madison Mitchell

4514 Lubbock Street
Simi Valley, CA 93063

Sent from Jennifer Huffsmith to California Air Resources Board on 2021-11-08 21:42:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jennifer Huffsmith

44709 Alexandria Vale
Indio, CA 92201

Sent from Wendy Vandenbrock to California Air Resources Board on 2021-11-08 21:44:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Wendy Vandenbrock

1 McGwire Road
219
Ladera Ranch, CA 92694

Sent from Robert Kolesnik to California Air Resources Board on 2021-11-08 21:43:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Robert Kolesnik

1174 West 23rd Street
Upland, CA 91784

Sent from Abby Rizzo to California Air Resources Board on 2021-11-08 21:45:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Abby Rizzo

1048 Southhampton Dr.
Chico, CA 95926

Sent from Deanna Antonian to California Air Resources Board on 2021-11-08 21:42:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Deanna Antonian

500 E Lexington Dr
311
Glendale , CA 91206

Sent from Alan Robinson to California Air Resources Board on 2021-11-08 21:45:22

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Alan Robinson

39400 Desert Greens Dr E
Palm Desert, CA 92260

Sent from Lisa Van Poyck to California Air Resources Board on 2021-11-08 21:46:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lisa Van Poyck

28401 Los Alisos Blvd
Apt 9107
Mission Viejo, CA 92692

Sent from CARL LUHRING to California Air Resources Board on 2021-11-08 21:47:48

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
CARL LUHRING

376 Ferrara Way
Vista, CA 92083

Sent from Lacey Hicks to California Air Resources Board on 2021-11-08 21:47:36

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lacey Hicks

4463 Hyde
218
Fremont , CA 94538

Sent from Lars Kallman to California Air Resources Board on 2021-11-08 21:47:52

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lars Kallman

735 San Rafael Pl
Stanford, CA 94305

Sent from Ramona Evans to California Air Resources Board on 2021-11-08 21:45:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ramona Evans

3333 Pacific Pl
Apt 221
Long Beach, CA 90806

Sent from David Quermbach to California Air Resources Board on 2021-11-08 21:48:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
David Quermbach

1585 S. Calle Marcus
Palm Springs, CA 92264

Sent from Vicki Di Paolo to California Air Resources Board on 2021-11-08 21:48:29

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Vicki Di Paolo

15622 Sunburst Ln
Huntington Beach, CA 92737

Sent from Scott Van Fossen to California Air Resources Board on 2021-11-08 21:50:48

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Scott Van Fossen

2674 East Main Street Suite E #442
Ventura, CA 93003

Sent from Gordon Reed to California Air Resources Board on 2021-11-08 21:51:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Gordon Reed

101 Scholz Plaza 223
Newport Beach, CA 92663

Sent from Stephanie Charles to California Air Resources Board on 2021-11-08 21:50:15

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stephanie Charles

436 Yosemite
Court
Petaluma, CA 94954

Sent from Debra Hodgen to California Air Resources Board on 2021-11-08 21:51:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Debra Hodgen

2349 Mapleleaf Drive
Vista, CA, CA 92081

Sent from Sandy Banks to California Air Resources Board on 2021-11-08 21:52:02

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sandy Banks

7118 Trask Ave
Playa Del Rey , CA 90293

Sent from Amir Niknam to California Air Resources Board on 2021-11-08 21:58:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Amir Niknam

9332 zelzah avenue
Northridge , CA 91325

Sent from Julie Sanford to California Air Resources Board on 2021-11-08 21:52:10

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Julie Sanford

15418 Gault Street
Van Nuys, CA 91406

Sent from Narcissa Enzmann to California Air Resources Board on 2021-11-08 21:58:15

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Narcissa Enzmann

5136 Tierra Granada Drive
Whittier , CA 90601

Sent from Richard Behymer to California Air Resources Board on 2021-11-08 21:55:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Richard Behymer

2612
Latham Drive
Sacramento, CA 95864

Sent from Lauren OKeefe to California Air Resources Board on 2021-11-08 21:59:58

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lauren OKeefe

1525 Merkley Ave Apt 216
216
West Sacramento, CA 95691

Sent from Annette Benton to California Air Resources Board on 2021-11-08 22:01:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Annette Benton

3041 Peppermill Cir
Pittsburg , CA 94565

Sent from Jessica Silva to California Air Resources Board on 2021-11-08 22:00:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jessica Silva

881 Thomas Ave
5
San Diego, CA 92109

Sent from Stephanie Nunez to California Air Resources Board on 2021-11-08 22:01:41

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stephanie Nunez

7034 Tyrone Ave
Van Nuys, CA 91405

Sent from Laurence Curtis to California Air Resources Board on 2021-11-08 22:02:34

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Laurence Curtis

2325 California Street
Oceanside, CA 92054-5711

Sent from Kendrick Davis to California Air Resources Board on 2021-11-08 22:03:04

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kendrick Davis

17300 Riva Ridge Dr.
Moreno Valley, CA 92555

Sent from Drew Johnson to California Air Resources Board on 2021-11-08 22:04:44

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Drew Johnson

98 Ashcat Way
Folsom , CA 95630

Sent from Suzanne Deerlyjohnson to California Air Resources Board on 2021-11-08 22:05:06

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Suzanne Deerlyjohnson

2121 Locust Ave
Long Beach, CA 90806

Sent from Jillian Dale to California Air Resources Board on 2021-11-08 22:04:13

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jillian Dale

175 Kingswood
Irvine, CA 92620

Sent from Kathryn Reichard to California Air Resources Board on 2021-11-08 22:05:42

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kathryn Reichard

9709 Hirsch Rd
Santee , CA 92071

Sent from Desiree Herrera to California Air Resources Board on 2021-11-08 22:12:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Desiree Herrera

26385 Scots Gln
Lake Forest , CA 92630

Sent from SandraKanela Barton to California Air Resources Board on 2021-11-08 22:13:34

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
SandraKanela Barton

350 E Palm Canyon Dr Apt
#11
Palm Springs, CA 92264

Sent from Pilar Zorrilla to California Air Resources Board on 2021-11-08 22:13:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Pilar Zorrilla

22946 Cantlay
West hills , CA 91307

Sent from Geraldine Card to California Air Resources Board on 2021-11-08 22:09:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Geraldine Card

237 N D St
Exeter, CA 93221

Sent from Jill Hartman to California Air Resources Board on 2021-11-08 21:55:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jill Hartman

2631 Meander
Simi, CA 93065

Sent from Ana Millaruelo to California Air Resources Board on 2021-11-08 22:14:47

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ana Millaruelo

10318 Hillhaven Avenue
Tujunga, CA 91042

Sent from Steve Weiss to California Air Resources Board on 2021-11-08 22:16:35

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Steve Weiss

1122 W Palm Ave
Burbank, CA 91506

Sent from Bridgett Heinly to California Air Resources Board on 2021-11-08 22:15:24

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Bridgett Heinly

4440 Brindisi
San Diego, CA 92107

Sent from Martha Utz to California Air Resources Board on 2021-11-08 22:14:52

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Martha Utz

1118 Allston Ct
San Jose, CA 95120

Sent from Carla Urquides to California Air Resources Board on 2021-11-08 22:16:56

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Carla Urquides

2334 96th Ave
Oakland, CA 94603

Sent from Warren M. Gold to California Air Resources Board on 2021-11-08 22:20:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Warren M. Gold

300 Monte Vista Avenue
Mill Valley, CA 94941

Sent from Nicholas Andritch to California Air Resources Board on 2021-11-08 22:17:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nicholas Andritch

2525 N Harrison Ave
Fresno, CA 93704

Sent from Michelle Titmus to California Air Resources Board on 2021-11-08 22:20:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Michelle Titmus

1050 Franklin St
San Francisco, CA 94109

Sent from Laura Altman to California Air Resources Board on 2021-11-08 22:23:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Laura Altman

1112 N. Adler
Clovis , CA 93611

Sent from Mason Griffith to California Air Resources Board on 2021-11-08 22:22:17

Dear California Air Resources Board,

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Sincerely,
Mason Griffith

1111 Alturas Road
Fallbrook, CA 92028

Sent from Chris Rose to California Air Resources Board on 2021-11-08 22:24:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Chris Rose

304 Sherri Court
Petaluma , CA 94952

Sent from Mara Mayfield to California Air Resources Board on 2021-11-08 22:26:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Mara Mayfield

1917 Ebers St
San Diego, CA 92107

Sent from Alex Nadolishny to California Air Resources Board on 2021-11-08 22:25:53

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Alex Nadolishny

16459 W Sunset Blvd
Apt 3
Pacific Palisades , CA 90272

Sent from Sam Butler to California Air Resources Board on 2021-11-08 22:34:46

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sam Butler

8134 Westlawn Ave
Los Angeles , CA 90045

Sent from Jody Isenberg to California Air Resources Board on 2021-11-08 22:36:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Jody Isenberg

1278 Andreas Ave
San Bernardino , CA 92404

Sent from Eddie Gutierrez to California Air Resources Board on 2021-11-08 22:36:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Eddie Gutierrez

1805 De Anza Way
Los Banos , CA 93635

Sent from James Mulligan to California Air Resources Board on 2021-11-08 22:47:39

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
James Mulligan

115 E. Oak Park Drive
Claremont , CA 91711

Sent from Michael Dean Michel to California Air Resources Board on 2021-11-08 22:48:17

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Michael Dean Michel

28224 Mariners Way
Menifee, CA 92584-8008

Sent from Lisa Rosa to California Air Resources Board on 2021-11-08 22:49:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lisa Rosa

610 McCarran Drive
Imperial, CA 92251

Sent from Angelica Tercero to California Air Resources Board on 2021-11-08 23:01:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Angelica Tercero

1066 EMERALD CT
B
Santa Rosa, CA 95407

Sent from Nelson Molina to California Air Resources Board on 2021-11-08 23:03:33

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nelson Molina

8157 Cyclamen Way
Buena Park, CA 90620

Sent from Rebecca Mubarak to California Air Resources Board on 2021-11-08 23:03:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Rebecca Mubarak

1522 McKinnon Avenue
San Francisco, CA 94124

Sent from Jasmine Vaught to California Air Resources Board on 2021-11-08 23:08:35

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jasmine Vaught

1515 Warm Springs Rd. #5
Unit #5
Glen Ellen, CA 94552

Sent from Mark Avila to California Air Resources Board on 2021-11-08 23:15:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Mark Avila

9720 Mira Del Rio Dr
Sacramento, CA 95827

Sent from Shellie Vann-Volk to California Air Resources Board on 2021-11-08 23:16:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Shellie Vann-Volk

1160 Valley Oak Dr
Chico, CA 95926

Sent from Randy McNea to California Air Resources Board on 2021-11-08 23:17:21

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel. They are a prime example of how easy it could be to transition to Hydrogen powering all of them.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

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Sincerely,
Randy McNea

3387 Chicago st
San Diego, CA 92117

Sent from Desmond Temmer to California Air Resources Board on 2021-11-08 23:15:15

Dear California Air Resources Board,

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Sincerely,
Desmond Temmer

13351 Riverside Dr, #645
#645
Sherman Oaks, CA 91423

Sent from Erin Mullin to California Air Resources Board on 2021-11-08 23:28:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Erin Mullin

5513 SAN JUAN AVE
CITRUS HEIGHTS, CA 95610

Sent from Kristine Andarmani to California Air Resources Board on 2021-11-08 23:31:28

Dear California Air Resources Board,

I urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kristine Andarmani

19616 Ladera Ct.
Saratoga, CA 95070

Sent from Charles Warner to California Air Resources Board on 2021-11-08 23:34:17

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Charles Warner

12020 Sherwood Ct
Fontana, CA 92337

Sent from Denise Mayosky to California Air Resources Board on 2021-11-08 23:33:47

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Denise Mayosky

3422 Duchess Ct
San Jose, CA 95132

Sent from Leslie Pike to California Air Resources Board on 2021-11-08 23:36:42

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Leslie Pike

3176 St. Martin Wy.
Sebastopol, CA 95472

Sent from GERALYN GULSETH to California Air Resources Board on 2021-11-08 23:37:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Geraldyn Gulseth

110 Lagunaria
Alameda , CA 94502

Sent from Sheryl Hamblin to California Air Resources Board on 2021-11-08 23:37:40

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sheryl Hamblin

1711 Pepper Tree Drive
#303
Hemet, CA 92545

Sent from Stacy Sharber to California Air Resources Board on 2021-11-08 22:27:38

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stacy Sharber

10 Christopher Alan Ln
Chico, CA 95928

Sent from Joanne Bradley to California Air Resources Board on 2021-11-08 23:38:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Joanne Bradley

Mesa Road
Nipomo, CA 93444

Sent from Marybeth Bowman to California Air Resources Board on 2021-11-08 23:42:35

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Marybeth Bowman

560 Caprice Court
Morgan Hill, CA 95037

Sent from Silvia Rocha to California Air Resources Board on 2021-11-08 23:41:41

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Silvia Rocha

900 W Sierra Madre Ave
Unit 60
Azusa , CA 91702

Sent from John Pasqua to California Air Resources Board on 2021-11-08 23:41:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
John Pasqua

843 S Escondido Blvd
Escondido, CA 92025

Sent from Carol Gignoux to California Air Resources Board on 2021-11-08 23:50:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Carol Gignoux

177 N Hudson Ave
303
Pasadena, CA 91101

Sent from Paul Ramos to California Air Resources Board on 2021-11-08 23:50:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Paul Ramos

1530 N Refugio Rd
Santa Ynez, CA 93460

Sent from Harry Davis to California Air Resources Board on 2021-11-09 00:00:41

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Harry Davis

557 Alvarado St
Brisbane , CA 94005

Sent from Nicolette Moore to California Air Resources Board on 2021-11-09 00:02:16

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nicolette Moore

1 Bennington
Irvine, CA 92620

Sent from Ann Anterasian to California Air Resources Board on 2021-11-09 00:07:19

Dear California Air Resources Board,

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Sincerely,
Ann Anterasian

4122
Prado De Las Cabras
Calabasas, CA 91302

Sent from Llinda Arouh to California Air Resources Board on 2021-11-09 00:08:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Llinda Arouh

19169 Lahey Stt
4
Porter Ranch, CA 91326

Sent from Emily Robledo to California Air Resources Board on 2021-11-09 00:34:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Emily Robledo

65 water st
Baypoint, CA 94565

Sent from Amy Brezovec to California Air Resources Board on 2021-11-09 00:06:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Amy Brezovec

212 30th St
Manhattan Beach , CA 90266

Sent from Shannon Keifner to California Air Resources Board on 2021-11-09 00:40:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Shannon Keifner

22254 Marilla St.
Chatsworth, CA 91311-4745

Sent from Theresa Winters to California Air Resources Board on 2021-11-09 00:35:53

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Theresa Winters

13126 Bromont Ave, Unit 28
Unit 28
Sylmar, CA 91342

Sent from Robert Longer to California Air Resources Board on 2021-11-09 00:36:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Robert Longer

3201 Normington Dr
Sacramento, CA 95833

Sent from Yolanda Acevedo to California Air Resources Board on 2021-11-09 00:53:29

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Yolanda Acevedo

4166 Somers Ave
Los Angeles , CA 90065

Sent from John Everett to California Air Resources Board on 2021-11-09 00:54:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
John Everett

1028 Pampas Dr
Grass Valley, CA 95945

Sent from Monique Koller to California Air Resources Board on 2021-11-09 00:46:38

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Monique Koller

1981 McAllister Street
San Francisco, CA 94115

*Sent from James Michael 'Mike' Henderson to California Air Resources Board on 2021-11-09
00:55:38*

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
James Michael 'Mike' Henderson

55 Broad Street
Apt. 252
San Luis Obispo, CA 93405

Sent from Barbara Mieirs to California Air Resources Board on 2021-11-08 23:58:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Barbara Mieirs

9340 ORANGEVALE AVE
SPC 16
ORANGEVALE, CA 95662-4249

Sent from Claire Chambers to California Air Resources Board on 2021-11-09 01:18:51

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Claire Chambers

550 Clydesdale Dr
Oakdale, CA 95361

Sent from Janet Melton to California Air Resources Board on 2021-11-09 00:59:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Janet Melton

8580 Harbor View Dr.
Kelseyville, CA 95451

Sent from Cm Liotta to California Air Resources Board on 2021-11-09 00:56:40

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cm Liotta

264 Grand St
Redwood City , CA 94062

Sent from Lori Kegler to California Air Resources Board on 2021-11-09 01:29:31

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lori Kegler

810 W 27th St
San Pedro, CA 90731-6213

Sent from Cynthia Currie to California Air Resources Board on 2021-11-09 02:13:31

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cynthia Currie

3642 2nd Ave
Sacramento, CA 95817

Sent from Isaac Wollman to California Air Resources Board on 2021-11-09 01:36:15

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Isaac Wollman

73 Contenta Ct
San Luis Obispo, CA 93401

Sent from Sharon Hagen to California Air Resources Board on 2021-11-09 03:10:06

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Sharon Hagen

217 Outlook Hts Ct
Pacifica , CA 94044

Sent from Alan P. Socol to California Air Resources Board on 2021-11-09 01:42:33

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Alan P Socol

1245 S Norton Ave
Los Angeles, CA 90019

Sent from Shirley Shelangoski to California Air Resources Board on 2021-11-09 01:54:30

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Shirley Shelangoski

159 Southwind Drive
Pleasant Hill , CA 94523

Sent from Cindy Stein to California Air Resources Board on 2021-11-09 03:22:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cindy Stein

647 Flaming Star Ave
Thousand Oaks, CA 91360

Sent from Diana L Bodine to California Air Resources Board on 2021-11-09 03:29:13

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Diana L Bodine

3019 Twin Creeks Ln, Rocklin
Rocklin
Rocklin, CA 95677

Sent from Utkarsh Nath to California Air Resources Board on 2021-11-09 03:43:22

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Utkarsh Nath

34462 Alberta Terrace
Fremont , CA 94555

Sent from Stacy Linn to California Air Resources Board on 2021-11-09 05:45:38

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stacy Linn

505 Sunrise Ave
Roseville , CA 95661

Sent from Lillian Valverde to California Air Resources Board on 2021-11-09 08:26:44

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lillian Valverde

788 S Millard Ave
Fresno , CA 93727

Sent from Barbara Idso to California Air Resources Board on 2021-11-09 05:49:25

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Barbara Idso

478 Bolero Drive
Danville, CA 94526

Sent from Alan Townsend to California Air Resources Board on 2021-11-09 08:49:32

Dear California Air Resources Board,

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Sincerely,
Alan Townsend

520 S. Van Ness Ave #281
San Francisco, CA 94110

Sent from Carolyn Doswell to California Air Resources Board on 2021-11-09 08:20:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Carolyn Doswell

72630 Ramon Rd. # 995
Thousand Palms, CA 92276

Sent from Julie Armbruster to California Air Resources Board on 2021-11-09 08:51:49

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Julie Armbruster

10624 Bernabe Drive
San Diego , CA 92129

Sent from Karen Stanovich to California Air Resources Board on 2021-11-09 09:14:47

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Karen Stanovich

1725 Rockville Rd
Fairfield, CA 94534

Sent from Kathleen Fernandez to California Air Resources Board on 2021-11-09 08:54:20

Dear California Air Resources Board,

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Sincerely,
Kathleen Fernandez

8205 Pennington Dr
Huntington Beach, CA 92646-6739

Sent from Linda Alvarado to California Air Resources Board on 2021-11-09 03:31:03

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Linda Alvarado

216 17th Street
Apt. B
Bakersfield, CA 93301

Sent from Mark Crane to California Air Resources Board on 2021-11-09 09:23:05

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Mark Crane

2101 N. Highland Avenue
Los Angeles, CA 90068-2661

Sent from Lisa Breslauer to California Air Resources Board on 2021-11-09 09:34:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lisa Breslauer

320 W. Court Street
#128
Woodland, CA 95695

Sent from Sonya Hanlon to California Air Resources Board on 2021-11-09 09:34:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Sonya Hanlon

11505 Culver Park Drive
Culver City, CA 90230

Sent from Diane Martin to California Air Resources Board on 2021-11-09 10:09:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Diane Martin

8712 N Magnolia Ave
Space 6
Santee, CA 92071

Sent from Rick Larsen to California Air Resources Board on 2021-11-09 10:13:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Rick Larsen

612 Windsor St
Santa Cruz Ca 95062, CA 95062

Sent from Lily Van to California Air Resources Board on 2021-11-09 10:19:26

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lily Van

5336 Laurel Street
San Diego, CA 92105

Sent from Ellen McCann to California Air Resources Board on 2021-11-09 10:22:45

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ellen McCann

1262 Amalfi Pl
Escondido , CA 92027

Sent from Victoria Shankling to California Air Resources Board on 2021-11-09 10:31:05

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Victoria Shankling

34 Veneto Lane
Aliso Viejo , CA 92656

Sent from Kimberly Thompson to California Air Resources Board on 2021-11-09 10:44:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kimberly Thompson

6400 Christie Ave.#5302
Emeryville, CA 946081047

Sent from Marivee Frayer to California Air Resources Board on 2021-11-09 10:58:37

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Marivee Frayer

380 Ridge Dr
Boulder Creek, CA 95006

Sent from Allan Campbell to California Air Resources Board on 2021-11-09 11:09:45

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Allan Campbell

3162 Isadora
San Jose, CA 95132

Sent from Tim Maurer to California Air Resources Board on 2021-11-09 09:56:32

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Tim Maurer

8528 E Canyon Vista Dr
Anaheim, CA 92808

Sent from Stacey Johnson to California Air Resources Board on 2021-11-09 11:35:08

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stacey Johnson

16536 Masline St.
Covina, CA 91722

Sent from Maria Rodriguez to California Air Resources Board on 2021-11-09 11:46:06

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Maria Rodriguez

2977 Olympic View Dr
Chino Hills, CA 91709

Sent from Pamela Lewis to California Air Resources Board on 2021-11-09 11:51:11

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Pamela Lewis

419 Sundance St.
Thousand Oaks, CA 91360

Sent from Martha Aubin to California Air Resources Board on 2021-11-09 11:46:56

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Martha Aubin

1328 Kenwood Rd
Santa Barbara, CA 93109

Sent from Rodrigo Franco to California Air Resources Board on 2021-11-09 11:27:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Rodrigo Franco

4444 W Point Loma Blvd
San Diego, CA 92107

Sent from Deborah Durbin to California Air Resources Board on 2021-11-09 11:50:36

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Deborah Durbin

PO Box, 283030
SF, CA 94128

Sent from Heather McHugh to California Air Resources Board on 2021-11-09 12:10:45

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Heather McHugh

14 Blachford Court
Oakland , CA 94611

Sent from Lucy Neale to California Air Resources Board on 2021-11-09 12:26:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Lucy Neale

3525 Alabama St
San Diego, CA 92104

Sent from Kathryn Reichard to California Air Resources Board on 2021-11-09 12:36:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kathryn Reichard

9709 Hirsch Rd
Santee , CA 92071

Sent from Michael Bertrams to California Air Resources Board on 2021-11-09 12:29:29

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Michael Bertrams

1733 Myers Street
Oroville, CA 95966

Sent from FRANCIS ROBERTS to California Air Resources Board on 2021-11-09 13:04:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
FRANCIS ROBERTS

108 4th Street
Apt. B 35
Eureka, CA 95501

Sent from Hunter Wallof to California Air Resources Board on 2021-11-09 12:47:11

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Hunter Wallof

17250 Monte Grande Road
Soulsbyville , CA 95372

Sent from ANGELA CLAYTON to California Air Resources Board on 2021-11-09 13:30:43

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
ANGELA CLAYTON

1580 Shadowridge Drive Apartment 157, Vista, Vista
157
Vista, CA 92081

Sent from Nancy Petersen to California Air Resources Board on 2021-11-09 13:31:51

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Nancy Petersen

753 Valparaiso Dr
Claremont , CA 91711

Sent from Caitlin Schwerin to California Air Resources Board on 2021-11-09 12:52:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Caitlin Schwerin

2930 Morseman Ave
Unit 6
Chico, CA 95973

Sent from ADAM BERNSTEIN to California Air Resources Board on 2021-11-09 14:21:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
ADAM BERNSTEIN

222 S Figueroa Street
1221
Los Angeles, CA 90012

Sent from Maryann Infield to California Air Resources Board on 2021-11-09 13:38:00

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Maryann Infield

1133 Laurel Ln
San Luis Obispo , CA 93401

Sent from Claire Ackland to California Air Resources Board on 2021-11-09 14:51:31

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Claire Ackland

3123 Lake Drive
Marina, CA 93933

Sent from ROBERT ESCUDERO to California Air Resources Board on 2021-11-09 14:56:47

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
ROBERT ESCUDERO

110 7th St. C5
Ramona, CA 92065

Sent from Stefanie Hidalgo to California Air Resources Board on 2021-11-09 14:56:47

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Stefanie Hidalgo

160vVista Circle Dr
Sierra Madre, CA 91024

Sent from Share Coughlin to California Air Resources Board on 2021-11-09 15:31:17

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Share Coughlin

1441 Main Street #146
#146
Ramona, CA 92065

Sent from Summer Alcalá to California Air Resources Board on 2021-11-09 15:31:58

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Summer Alcalá

5975 California Ave.
Long Beach, CA 90805

Sent from Diane Benzler to California Air Resources Board on 2021-11-09 15:40:19

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Diane Benzler

3908 N. Fruit Ave
103
Fresno, CA 93705

Sent from Mary Ann Allen to California Air Resources Board on 2021-11-09 16:09:20

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Mary Ann Allen

4693 Maple Trail
Redding , CA 0

Sent from Glenn Mullins to California Air Resources Board on 2021-11-09 16:21:40

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Glenn Mullins

7650 Puerto Rico Dr
Buena Park, CA 90620

Sent from Xuan Mai Pham to California Air Resources Board on 2021-11-09 16:35:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Xuan Mai Pham

1648 Midfield Ave
San Jose , CA 95122

Sent from Barbara Mieirs to California Air Resources Board on 2021-11-09 16:53:58

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Barbara Mieirs

9340 ORANGEVALE AVE
SPC 16
ORANGEVALE, CA 95662-4249

Sent from Gabriel Amaro to California Air Resources Board on 2021-11-09 17:00:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Gabriel Amaro

24701 Raymond Way #22
Lake Forest, CA 92630

Sent from Hiranya Abeysekara to California Air Resources Board on 2021-11-09 17:23:22

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Hiranya Abeysekara

8670 Camino Colegio Apt 84
Rohnert Park, CA 94928

Sent from Robert Loucks to California Air Resources Board on 2021-11-09 17:48:37

Dear California Air Resources Board,

I am writing today to implore you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Robert Loucks

15787 McIntosh Avenue
Chino, CA 91708

Sent from Gwen Richards to California Air Resources Board on 2021-11-09 18:52:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Gwen Richards

330 E. DelaGuerra St
#L
Santa Barbara, CA 93101

Sent from Noah Haydon to California Air Resources Board on 2021-11-09 20:08:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Noah Haydon

405 91st St
Daly City , CA 94015

Sent from Ann Marie Murphy to California Air Resources Board on 2021-11-09 17:52:56

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Ann Marie Murphy

5021 McCloskey Ct
Santa Rosa, CA 95409

Sent from Gayle Davis-Culp to California Air Resources Board on 2021-11-09 20:04:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Gayle Davis-Culp

1845 Saragossa St
Pomona, CA 91768

Sent from Elizabeth Jache to California Air Resources Board on 2021-11-09 20:31:53

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Elizabeth Jache

2151 Glencoe Dr
Lemon Grove , CA 91945

Sent from Kathryn Reichard to California Air Resources Board on 2021-11-09 20:39:06

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Kathryn Reichard

9709 Hirsch Rd
Santee , CA 92071

Sent from John Cameron to California Air Resources Board on 2021-11-09 23:24:00

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
John Cameron

6876 Langmuir Lane
Dublin, CA 94568

Sent from Margarita Perez to California Air Resources Board on 2021-11-09 20:48:29

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Margarita Perez

13859 Graber Ave
Sylmar, CA 91342

Sent from Ellen McCann to California Air Resources Board on 2021-11-09 20:50:54

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Ellen McCann

1262 Amalfi Pl
Escondido , CA 92027

Sent from Shauna Solace to California Air Resources Board on 2021-11-09 23:38:59

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Shauna Solace

P O Box 6021
VENTURA, CA 93006

Sent from Jessica Powers to California Air Resources Board on 2021-11-09 23:32:28

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jessica Powers

7141 Chaney Court
7141 Chaney Court
Rancho Cucamonga, CA 91739-1815

Sent from Carol Leuenberger to California Air Resources Board on 2021-11-09 23:53:07

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Carol Leuenberger

8742 Gladiola Way
Elk Grove, CA 95624

Sent from Erin Rupp to California Air Resources Board on 2021-11-10 00:10:57

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Erin Rupp

30450 Napa St
Menifee, CA 92584

Sent from Tami McCready to California Air Resources Board on 2021-11-10 01:36:15

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Tami McCready

6278 Cynthia St
Simi Valley , CA 93063

Sent from Karla Macias to California Air Resources Board on 2021-11-10 02:46:11

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Karla Macias

960 Governor St
Costa Mesa , CA 92627

Sent from Deborah Black to California Air Resources Board on 2021-11-10 09:49:50

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Deborah Black

3990 Reynolds Road
Apt 313
Riverside , CA 92503

Sent from Debra Robinson to California Air Resources Board on 2021-11-10 07:43:36

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Debra Robinson

2355 Osbun Rd
44
San Bernardino , CA 92404

Sent from Cristina Amarillas to California Air Resources Board on 2021-11-10 10:07:23

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Cristina Amarillas

3109 Rocklin Drive
Santa Rosa , CA 95405

Sent from B Sandow to California Air Resources Board on 2021-11-10 04:38:12

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
B Sandow

540 29th St.
Richmond, CA 94804

Sent from Jane Buchta to California Air Resources Board on 2021-11-10 11:44:09

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jane Buchta

3132 Pasternack Place
San Diego , CA 92123

Sent from Anne Sciara to California Air Resources Board on 2021-11-10 10:11:33

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Anne Sciara

212 Cedar Street #B
B
Santa Cruz, CA 95060

Sent from Martin Christopherson to California Air Resources Board on 2021-11-10 12:42:32

Dear California Air Resources Board,

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Sincerely,
Martin Christopherson

2501 Hayden Parkway
1232
Roseville , CA 95747

Sent from Wendy Dapore to California Air Resources Board on 2021-11-10 12:20:15

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Wendy Dapore

6221 Swan Ct
Rocklin, CA 95765

Sent from Jacqui Bradshaw to California Air Resources Board on 2021-11-10 12:58:34

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Jacqui Bradshaw

855 S Curry St
Tehachapi, CA 93561

Sent from Elodie Patarias to California Air Resources Board on 2021-11-10 14:51:33

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I appreciate that this rule includes a first-in-the-nation requirement for almost 200 vessels to zero-emissions vessels by 2030. While this is a key step, CARB should expand the scope of their considerations to include other harbor craft segments such as ferries, tugboats, dredges, and barges. Giving these segments a zero-emissions target by 2035 would provide a clear regulatory trajectory for owners. Taking this step, and ultimately taking similar steps for all components of the maritime sector as this becomes technologically feasible, is essential to the ultimate decarbonization of the maritime sector. It is also essential that CARB provides the necessary avenues to funding or grants for all vessel types to meet compliance.

Creating a market for zero-emissions harbor craft will build a strong market for next generation vessels here in the United States, creating new jobs while reducing our impact on the climate and air quality. Rather than prolonging the use of dirty diesel engines, California and other states must chart a rapid course away from fossil fuels altogether. Properly supported by CARB, this transition can be done smoothly and quickly. There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. The cost of inaction far outweighs the price of implementation for this rule, which could save billions of dollars in averted negative health outcomes alone.

Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Elodie Patarias

4278 Eastwood Drive
Santa Maria, CA 93455

Sent from Carla Urquides to California Air Resources Board on 2021-11-10 16:33:05

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Carla Urquides

2334 96th Ave
Oakland, CA 94603

Sent from Megan to California Air Resources Board on 2021-11-10 17:52:52

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Megan Robbins

1205 Bodega Avenue
Bodega Bay, CA 94923

Sent from Rosemary Everett to California Air Resources Board on 2021-11-11 14:45:55

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Rosemary Everett

43 W Rincon Ave
Campbell, CA 95008

Sent from Laelonnie Boughton to California Air Resources Board on 2021-11-11 20:51:35

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Laelonnie Boughton

1655 3rd Street
APT 35
Lincoln, CA 95648

Sent from Christine Oldfield to California Air Resources Board on 2021-11-11 14:51:41

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Christine Oldfield

1912 E. El Norte Parkway
Escondido, CA 92027

Sent from Christine Ranney to California Air Resources Board on 2021-11-10 18:43:14

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Sincerely,
Christine Ranney

967 56th Street
Oakland , CA 94608

Sent from Morgan Idso to California Air Resources Board on 2021-11-12 01:31:05

Dear California Air Resources Board,

I am writing today to urge you to strengthen the Commercial Harbor Craft Regulation for the sake of our climate and public health. Harbor craft, such as tugboats, ferries, barges and dredges, produce particulate matter and nitrous oxide due to their use of dirty fossil fuels. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

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Climate change and its ocean impacts are here now, and promise to get worse if we don't act. I urge CARB to take action now to tackle this global threat.

Sincerely,
Morgan Idso

478 Bolero Drive
Danville, CA 94526



Comment Log Display

Below is the comment you selected to display. Comment 2604 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Anoba
Email Address: manoba70@gmail.com
Affiliation:

Subject: Please reject the CARB act

Comment:

This regulation seems unfair to the local sportfishing operation given cost and implication to implement. I am a long time angler, and would like to continue enjoying the resources here in California. Please reject this proposal

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:29:53

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

**Below is the comment you selected to display.
Comment 2605 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Bob
Last Name: Jarvis
Email Address: boaterbob86@gmail.com
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft
Re

Comment:

Dear Sirs ,

Really a bad idea !! Will put thousands of hard working
people out of work with families to support .

What are you thinking ?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 09:34:15

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

Below is the comment you selected to display. Comment 2606 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lara
Last Name: Larramendi
Email Address: Lara.Larramendi@bizfed.org
Affiliation: Los Angeles County Business Federation

Subject: Proposed Amendments to The Regulations to Reduce Emissions from Diesel Engines on Commercial Harbor Crafts

Comment:

We are expressing our concerns on the proposed amendments to the regulations to reduce emissions from diesel engines on commercial harbor crafts operating within California waters and 24 nautical miles of the California shoreline.

Attachment: www.arb.ca.gov/lists/com-attach/2967-chc2021-WjkCZQZ1BDUAWQR3.pdf

Original File Name: CARB Sportfishing Regulation_Randolph_11-12-2021.pdf

Date and Time Comment Was Submitted: 2021-11-12 09:56:43

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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November 12, 2021

Liane Randolph, Chair
California Air Resources Board
1001 "I" St.
Sacramento, CA 97814

RE: Proposed Amendments to The Regulations to Reduce Emissions from Diesel Engines on Commercial Harbor Craft Operating Within California Waters And 24 Nautical Miles of The California Shoreline

Dear Chairwoman Randolph,

On behalf of the Los Angeles County Business Federation, BizFed, a grassroots alliance of more than 215 business organizations representing 410,000 employers with over 4 million employees in Los Angeles County, advocating for policies and projects that strengthen our regional economy, we are expressing our concerns on the proposed amendments to the regulations to reduce emissions from diesel engines on commercial harbor crafts operating within California waters and 24 nautical miles of the California shoreline.

Los Angeles County marinas and ports are home to sportfishing and whale watching boats, a major source of tourism dollars and jobs. Additionally, our county holds the distinction of having the largest population of recreational anglers in the State of California.

Before the sportfishing industry and our coastal communities can recover their financial losses from the COVID-19 pandemic, the California Air Resources Board (CARB) has proposed impractical and cost prohibitive engine emission regulations. The proposed rule specifies technology that has not yet been manufactured or tested safe for these small passenger vessels. 2606.1

By CARB's own admission, the proposed regulations are not compatible with many vessels, especially those constructed of wood and fiberglass. When this occurs, boats will be removed from service, impacting over 80 percent of California's sportfishing and whale watching boats. 2606.2

These regulations as drafted, deliver severe economic consequences for coastal communities that depend on outdoor recreation for economic activity and jobs. It denies anglers of modest and lower economic means access to the sea at a time when fishing participation is experiencing a 12-year high among younger and urban residents, women, African Americans, and Hispanics. In addition, it will make many of the marine education programs that are operated in partnership with vessel owners, schools, and non-profit organizations infeasible or unavailable. 2606.3

Boat owners have been upgrading to lower emission engines for years and this trend should continue, but without putting vessels out of business and causing economic harm. We are calling on you to intervene on behalf of boat owners seriously concerned for the well-being of their families and crew. 2606.4

Thank you for your consideration of our concerns. If you have any questions, please do not hesitate to contact us.

Sincerely,



BizFed Chair
Torrance Area Chamber



BizFed Founding Chair



BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

7-Eleven Franchise Owners Association of Southern California
Action Apartment Association
Alhambra Chamber of Commerce
American Beverage Association
American Institute of Architects - Los Angeles
Apartment Association of Greater Los Angeles
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian Trade and Labor Association
Associated Builders & Contractors, Inc. Southern California Chapter
Association of Club Executives
Association of Independent Commercial Producers
Azusa Chamber of Commerce
Bell Gardens Chamber of Commerce
Beverly Hills Bar Association
Beverly Hills Chamber of Commerce
Black Business Association
BNI4SUCCESS
Bowling Centers of Southern California
Boyle Heights Chamber of Commerce
Building Industry Association - Baldyview
Building Industry Association - LA/Ventura Counties
Building Industry Association - Southern California
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of REALTORS
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CA Natural Resources Producers Assoc
CalAsian Chamber
Calabasas Chamber of Commerce
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Business Properties Association
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Construction Industry and Materials Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Restaurant Association
California Retailers Association
California Small Business Alliance
California Self Storage Association
California Society of CPAs - Los Angeles Chapter
California Trucking Association
Californians for Balanced Energy Solutions
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
CDC Small Business Finance
Central City Association
Century City Chamber of Commerce
Cerritos Regional Chamber of Commerce
Chatsworth/Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Claremont Chamber of Commerce
Coalition for Renewable Natural Gas
Coalition for Small Rental Property Owners
Commercial Industrial Council/Chamber of Commerce
Construction Industry Air Quality Coalition

Construction Industry Coalition on Water Quality
Council on Trade and Investment for Filipino Americans
Covina Chamber
Crescenta Valley Chamber of Commerce
Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Encino Chamber of Commerce
Engineering Contractor's Association
EXP
F.A.S.T.- Fixing Angelenos Stuck in Traffic FilmLA
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Leimert Park Village Crenshaw Corridor Business Improvement District
Greater Los Angeles African American Chamber
Greater Los Angeles Association of REALTORS
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Regional Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
Independent Cities Association
Industrial Environmental Association
Industry Business Council
Inland Empire Economic Partnership
International Cannabis Business Women Association
Irwindale Chamber of Commerce
La Cañada Flintridge Chamber
LA Fashion District BID
LA South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Long Beach Economic Partnership
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
MADIA Tech Launch
Malibu Chamber of Commerce
Marketplace Industry Association
Motion Picture Association of America, Inc.
MoveLA
Multicultural Business Alliance
NAIOP Southern California Chapter
Nareit
National Association of Tobacco Outlets

National Association of Waterfront Employers
National Association of Women Business Owners - CA
National Association of Women Business Owners - LA
National Federation of Independent Business
National Hookah Community Association
National Latina Business Women's Association
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PhRMA
Planned Parenthood Affiliates of California
Pomona Chamber
Propel LA
Rancho Southeast Association of Realtors
ReadyNation California
Recording Industry Association of America
Regional Black Chamber-San Fernando Valley
Regional Hispanic Chamber of Commerce
Regional San Gabriel Valley Chamber
Rosemead Chamber
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Torrance Area Chamber
Town Hall Los Angeles
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers - San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Vermont Slauson Economic Development Corporation
Vernon Chamber
Veterans in Business Network
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Electrical Contractors Association
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Whittier Chamber of Commerce
Wilmington Chamber
World Trade Center



Comment Log Display

Below is the comment you selected to display. Comment 2607 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dike
Last Name: Anyiwo
Email Address: danyiwo@sdchamber.org
Affiliation: San Diego Regional Chamber of Commerce

Subject: RE: Proposed CARB Engine Emission Regulations; Sportfishing/Whale Watching Vessels
Comment:

Dear Madam Chair,

On behalf of the San Diego Regional Chamber of Commerce (Chamber), whose mission is to make San Diego the best place to do business in California, I write to you to express our grave concern regarding the engine emission regulations proposed by the Administration that will decimate recreational fishing's \$5.6 billion annual contribution to our State's economy and undermine the Administration's efforts to restore half of the 1.2 million hospitality and tourism related jobs lost during the COVID-19 pandemic.

The Chamber represents almost 2,500 businesses in the region, translating to approximately 300,000 jobs. As you well know, sportfishing and whale watching boats provide coastal communities a valued source of outdoor recreation and tourism dollars. Their boat owners are in the business of introducing millions of Americans a year to the splendor of the open sea and its wildlife.

However, before these boat owners can recover from financial losses associated with the pandemic, the California Air Resources Board (CARB) has proposed costly engine emission regulations that require technology that has not been developed or tested safe on passenger harbor crafts. Similar technology used on trucks and farm equipment has been known to stall engines for hours at a time to clean emission control systems, and in worst case scenarios, catch fire. On land, a stalled engine or fire is a serious economic disruption; at sea, it is life threatening to both passengers and crew.

CARB readily admits the proposed regulations are not compatible with some vessels, specifically stating that "vessel replacement will be likely, especially the categories with wood or fiberglass vessels." When more than 80 percent of vessels are constructed with these materials, industry leaders have reasonably concluded that many, if not most, boat owners will go out of business within 6 years from the adoption of the proposed regulations due to the cost of vessel replacement.

Moreover, CARB's expectation that these small business owners can easily finance new steel vessels is simply unrealistic. Even during the best of economic times, no business can lose its most valuable asset long before the end of its useful life and have to completely replace that asset within six years, especially if their existing vessels, many of which are still being financed via loans, are deemed illegal and have no resale value in California.

We share your desire to reduce engine emissions, as do the boat owners that have been repowering and upgrading their engines for years. The Administration should consider amending the draft regulations to incentivize passenger sportfishing and whale watching boat owners to continue to upgrade their vessels to lower emission engines, using available technology that is feasible and does not create safety concerns. This is the reasonable approach CARB applied to commercial fishing vessels, vessels with engines that are technically identical to the sportfishing boats.

The Governor has repeatedly underscored the importance of recreational fishing. It is a great form of outdoor recreation that is experiencing newfound growth among nontraditional participants that are younger, more urban, and more diverse with significant gains among women, African Americans, and Hispanics.

Now more than ever, rebuilding the State's post-pandemic economy is dependent on continuing this growth and not undermining it by denying millions of Californians access to offshore fishing and marine life by putting sportfishing companies out of business or making excursions unaffordable for disadvantaged communities and the vast majority of Californians. We understand and respect the spirit of these proposed new regulations, but the letter of them is deeply troubling.

Thank you for your consideration.

Sincerely,
Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce

Attachment: www.arb.ca.gov/lists/com-attach/2968-chc2021-VWdRZwMwAmAGLgMy.pdf

Original File Name: 2021.11.10 Sport Fishing Letter.pdf

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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402 West Broadway, Suite 1000
San Diego, CA 92101-3585
p: 619.544.1300

www.sdchamber.org

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I (eye) Street
Sacramento, CA 95814

RE: Proposed CARB Engine Emission Regulations; Sportfishing/Whale Watching Vessels

Dear Madam Chair,

On behalf of the San Diego Regional Chamber of Commerce (Chamber), whose mission is to make San Diego the best place to do business in California, I write to you to express our grave concern regarding the engine emission regulations proposed by the Administration that will decimate recreational fishing's \$5.6 billion annual contribution to our State's economy and undermine the Administration's efforts to restore half of the 1.2 million hospitality and tourism related jobs lost during the COVID-19 pandemic.

2607.1

The Chamber represents almost 2,500 businesses in the region, translating to approximately 300,000 jobs. As you well know, sportfishing and whale watching boats provide coastal communities a valued source of outdoor recreation and tourism dollars. Their boat owners are in the business of introducing millions of Americans a year to the splendor of the open sea and its wildlife.

However, before these boat owners can recover from financial losses associated with the pandemic, the California Air Resources Board (CARB) has proposed costly engine emission regulations that require technology that has not been developed or tested safe on passenger harbor crafts. Similar technology used on trucks and farm equipment has been known to stall engines for hours at a time to clean emission control systems, and in worst case scenarios, catch fire. On land, a stalled engine or fire is a serious economic disruption; at sea, it is life threatening to both passengers and crew.

2607.2

CARB readily admits the proposed regulations are not compatible with some vessels, specifically stating that "vessel replacement will be likely, especially the categories with wood or fiberglass vessels." When more than 80 percent of vessels are constructed with these

2607.3

materials, industry leaders have reasonably concluded that many, if not most, boat owners will go out of business within 6 years from the adoption of the proposed regulations due to the cost of vessel replacement.

Moreover, CARB's expectation that these small business owners can easily finance new steel vessels is simply unrealistic. Even during the best of economic times, no business can lose its most valuable asset long before the end of its useful life and have to completely replace that asset within six years, especially if their existing vessels, many of which are still being financed via loans, are deemed illegal and have no resale value in California.

2607.4

We share your desire to reduce engine emissions, as do the boat owners that have been repowering and upgrading their engines for years. The Administration should consider amending the draft regulations to incentivize passenger sportfishing and whale watching boat owners to continue to upgrade their vessels to lower emission engines, using available technology that is feasible and does not create safety concerns. This is the reasonable approach CARB applied to commercial fishing vessels, vessels with engines that are technically identical to the sportfishing boats.

2607.5

The Governor has repeatedly underscored the importance of recreational fishing. It is a great form of outdoor recreation that is experiencing newfound growth among nontraditional participants that are younger, more urban, and more diverse with significant gains among women, African Americans, and Hispanics.

2607.6

Now more than ever, rebuilding the State's post-pandemic economy is dependent on continuing this growth and not undermining it by denying millions of Californians access to offshore fishing and marine life by putting sportfishing companies out of business or making excursions unaffordable for disadvantaged communities and the vast majority of Californians. We understand and respect the spirit of these proposed new regulations, but the letter of them is deeply troubling.

Thank you for your consideration.

Sincerely,



Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce



Comment Log Display

Below is the comment you selected to display. Comment 2608 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sportfishing Assoc
Last Name: of California
Email Address: info@savefishing.com
Affiliation: Sportfishing Assoc of California

Subject: CHC2021 - 21,571 Petitions to "Save Our Boats"

Comment:

Attached are 912 additional petitions being submitted to a list of 20,659 petitions that were submitted several weeks ago. The combined total is 21,571 Californians concerned about engine emission regulations that are economically and structurally infeasible, and unsafe.

Attachment: www.arb.ca.gov/lists/com-attach/2969-chc2021-BzVcNARhUnJSNQJ0.pdf

Original File Name: 2NDSaveOurBoatsPETITIONList.pdf

Date and Time Comment Was Submitted: 2021-11-12 11:17:34

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Over 20,000 California anglers support keeping commercial passenger fishing vessels with commercial fishing vessels for achieving feasible emissions reductions and protecting equitable ocean access for all Californians.

(The following are 912 petitions. 20,659 were submitted previously)

ACTON – RYAN YBARRA
AGOURA HILLS – NILE RUTH
AGUANGA – RYAN AMARIAS
ALAMEDA – BRENNEN FACCHINI
ALBANY – JULIE OGG
ALBANY – RONNIE OGG
ALSIP – DAVID DEVRIES
ANAHEIM – ERIC JOHNSON
ANAHEIM – BOB JOHNSON
ANAHEIM – RONALD POTTS
ANAHEIM – MATTHEW LEWIS
ANAHEIM HILLS – RONALD YARBROUGH
ANGWIN – MATTHEW BENNETT
ANTELOPE – DANIEL HUMBLE
ANTIOCH – TONY F
ANTIOCH – KATHY BUNTON
APPLE VALLEY – ROBERT SANCHEZ
APPLE VALLEY – CONNIE PARADISE
APPLE VALLEY – ERIC ANDREWS
APPLEGATE – JOHN STEHNO
APTOS – MICHA BERRY
ARCADIA – AMBER JORDAN
ARLETA – FELIX CEBALLOS
AUBURN – CHRISSY DEWOLF
BAKERSFIELD – JUDD WELTE
BAKERSFIELD – SARAH RIESS
BAKERSFIELD – ADAM MEZA
BAKERSFIELD – HAROLD ELLISON
BAYPOINT – MUBSHIR S
BEAUMONT – CHRISTINA SAXON
BELMONT SHORE – GEORGE MCCORMACK
BENICIA – PAUL CHEAK
BERKELEY – BETHANY RAMOS
BIG BEAR LAKE – DAVE BUCK
BLITH – DAVID BIGHAM
BODEGA BAY – AARON ORSINI
BOISE – SAVANNAH MILLAR
BOLINAS – CHRIS KNOWLES
BONSALL – DAVID MONTAGUE
BRAWLEY – MICHAEL GINNIS

BRENTWOOD – ROBERT CHUCK
BUENA PARK – EDISON TANGALAN
BUENA PARK – ERNEST HERNANDEZ
BUENA PARK – LUCY ELLIOTT
CAMARILLO – BRUCE DENNERLINE
CAMARILLO – DYLAN DICKEY
CAMERON PARK – JOSEPH THOMPSON
CAMPBELL – CURTIS BARBA
CAMPBELL – GUNTHER LATT
CAMPO – CHAD SEEMAN
CANOGA PARK – CHRIS BERGIN
CANYON LAKE – JOHN SUJISHI
CANYON LAKE – CAROL SUJISHI
CANYON LAKE – DAVID LIBERINO
CAPISTRANO BEACH – MARK WILLIAMS
CAPISTRANO BEACH – GENNIE NEIDERMEYER
CAPITOLA – RUSSELL CECALA
CARDIFF – KENNETH LUEKE
CARLSBAD - NANCY CALSBEEK
CARLSBAD - MARY FERRIS
CARLSBAD - JEFF CURTIS
CARLSBAD - DILLION FLORA
CARMEL VALLEY – JESSIE HOUSTON
CARMICHAEL – AL RICH
CASTAIC – MIKE SCOTT
CASTAIC – JOHN MORAGA
CATHEDRAL CITY – GARY GILBERT
CATHEDRAL CITY – TYLER PEULICKE
CATHEDRAL CITY – ANTHONY MARTIN
CEDAR GLEN – RONALD HOOPER
CERRITOS – MICHELLE UESUGI FONOIMOANA
CERRITOS – RACHEL NAIR
CHINO HILLS – MICHAEL SHERMAN
CHINO HILLS – CRAIG WONG
CHINO HILLS – JIM WEDELL
CHINO HILLS – ROSEMARY FIGUEROA
CHULA VISTA – BRIAN SUTTON
CHULA VISTA – SEBASTIAN LANSWICK
CHULA VISTA – JACK ROACH
CHULA VISTA – TODD BLAKE
CLEARFIELD – TYLER BYINGTON
CLOVERDALE – LYNN HOYER
CLOVIS – SARA HAUSTEIN

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CLOVIS – RACHEL HUNTER
COEUR D'ALENE – LISA URSICH
CORONA – CHRIS MONTANO
CORONA – BILLY E CORIA
CORONA – LA FARRELL
CORVALLIS – KENNETH MAGEE
CORVALLIS – CLAIRE MAGEE
COSTA MESA – KEN LEITERMAN
COSTA MESA – GRANT HELLINGER
COSTA MESA – RYAN WEHNER
COSTA MESA – DAN SWETT
COTO DE CAZA – DON MILLER
COVINA – BLAIR KOYANAGI
COVINA – LUC TANG
COVINA – JOE SARMIENTO
COVINA – MATEO ILAGAN
COVINA – ADAM TOLEDO
COVINA – MARK MEISSENBURG
CRESTLINE – HEATHER PINEDO
CRESTLINE – NOE HELGUERA
CUDAHY – ALONZO BEIJER
CYPRESS – JONATHAN DOMA
CYPRESS – MASON EISENBART
CYPRESS – TAKESHI SAITO
DANA POINT – SHERRI HAYDEN
DANA POINT – DAVID BERGSTROM
DANA POINT – LINDA GARCIA
DANA POINT – PAMELA SULLIVAN
DANA POINT – FRANK SERES
DANA POINT – MARGARET ANDERSON
DANA POINT – MIKE MARTINEZ
DANA POINT – RODGER BORGE
DANA POINT – WES KRUSE
DANA POINT – STEPHEN FOWKS
DANA POINT – LUKE VOEGLER
DANA WHARF – NICHOLE MANUO
DANVILLE – THOMAS FRANKEL
DE PERE – RYAN HERLACHE
DELANO – JOSEPH GUERRERO
DENVER – ERIK MARTINSON
DENVER – DAVID COPLEY
DIAMOND BAR – BRANDON KUHN
DURANGO – PAUL LEVENDOSKI
EL CAJON – ZAC BROCK
EL CAJON – TERRY SHIMAMOTO
EL CAJON – PAUL PURCELL
EL CAJON – SHERRIE SHELBY
EL CAJON – JAMES SHELBY
EL CAJON – VINCE GARCIA
EL CAJON – RICK STEDMAN
EL CAJON – DAVID CHENELLE
EL CAJON – RICHARD RAMSEY
EL CAJON – SCOTT KISTLER
EASTSOUND – ARTHUR LANGE
EL CENTRO – KARL BURNWORTH
EL CENTRO – FRANK DUARTE
EL MONTE – ANDY KHWA
EL SEGUNDO – CHRIS JOHNSON
ELK GROVE – RANDY LYONS
ENCINITAS – JOSH RYYZ
ENCINITAS – CRAIG GILMORE
ENCINITAS – ADAM CALM
ESCONDIDO – JEFF NESBITT
ESCONDIDO – TRAVIS KROGH
ESCONDIDO – CORREY SMITH
ESCONDIDO – DEBBIE WARREN
ESCONDIDO – CORY KING
ESCONDIDO – RUSS SNOW
ESCONDIDO – BRIAN BAIN
ESCONDIDO – CHRISTOPHER CAICEDO
ESCONDIDO – HARRY FUNK
ESCONDIDO – ANNE PHILEN
EUCLID – BARRY KOSKIE
EUREKA – GARY BLASI
EVERGREEN – NICK HARLINE
FAIRFIELD – DILLION BALLOU
FALLBROOK – JOSE GUEVARA
FALLBROOK – PETE CAMPBELL
FALLBROOK – SEAN O'CALLAGHAN
FATE – MARK ROLAND
FILLMORE – JIM LANKFORD
FONTANA – ALLAN MARTINEZ
FORESTHILL – TIMOTHY NISHIMURA
FORTBRAGG – SEAN THORNTON
FOUNTAIN VALLEY – SUSAN PINKSTAFF
FOUNTAIN VALLEY – MICHAEL KURIHARA

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FREEMONT – CRAIG HAWKES
FREEMONT – CHUNG-WEI CHAN
FRIDAY HARBOR – MICHAEL HOGAN
FULLERTON – NICOLE RATIB
FULLERTON – RENE VARGAS
FULLERTON – RAMSEY AYLOUSH
FULLERTON – MITCHELL HERGET
GARDEN GROVE – DAWN LAWLER
GARDEN GROVE – JAMES BABCOCK
GARDEN GROVE – RUDY DEL TORO
GARDEN VALLEY – GARY CALTAGIRONE
GARDENA – ALEXANDER MASUMOTO
GARDENA – PHIL MCDANIEL
GARDENA – JONATHAN TAM
GLENDALE – MICHAEL G REYES
GLENDALE – LYNN NAKAMURA
GLENDALE – VAHE SIMONYAN
GLENDALE – NASSIF SHAMMAA
GLENDDORA – ALEC RENTERIA
GLENDDORA – STEVEN POWELL
GLENDDORA – MARCOS HERNANDEZ
GODFREY – LAURA FESTER
GRAND RAPIDS – RUBEN SIFUENTES
GREENBRAE – JEFF LESLIE
GREENBRAE – GEORGE LANG
GROVELAND – STEFAN ZIEGLER
HANFORD – DON HULBERD
HAPPY JACK – JOHN RITTER
HARBOR CITY – DAMOND HOWLETT
HAWTHORNE – BILL BEEBE
HAYWARD – BRANDON HOSAKA
HAYWARD – IAN CLARK
HEALDSBURG – RICHARD TANKERSLEY
HEMET – MICHAEL FOX
HEMET – ADELE COX
HESPERIA – JOHN HOLLOWAY
HESPERIA – PATRICK SCOTT
HIDDEN VALLEY LAKE – GREGORY EIXENBERGER
HIGHLAND – RICK SIKES
HIGHLAND – RACHEL SIKES
HIGHLAND – REBECCA SIKES
HIGHLAND – HIKARU PEARSON
HOLLADAY – CHRIS LEE

HOMELAND – SHAWN FREDERICKSON
HOMELAND – DON WALLER
HUNTINGTON BEACH – JASON ORAWIEC
HUNTINGTON BEACH – RACHEL FERRARI
HUNTINGTON BEACH – MICHAEL MCINNIS
HUNTINGTON BEACH – KATE SMITH
HUNTINGTON BEACH – LAUREN CHEH
HUNTINGTON BEACH – NICK B
HUNTINGTON BEACH – BRIAN VANDERGROOT
HUNTINGTON BEACH – RANDALL MILLER
HUNTINGTON BEACH – DANIEL TYLER
HUNTINGTON BEACH – ERIC ZELIEN
HUNTINGTON BEACH – KEITH STAHL
HUNTINGTON BEACH – THOMAS BURNS
HUNTINGTON BEACH – KEVIN LARSON
HUNTINGTON BEACH – CHRISTIAN RUIZ
HUNTINGTON BEACH – AUDREY SOGOIAN
HUNTINGTON BEACH – JERRAD BRECHT
IDYLLWILD – PHILLIP STRONG
INGLEWOOD – MIKE FRANKLIN
IRVINE – ERIC KIBBE
IRVINE – JOHN PETERS
IRVINE – CONRAD LAKOMY
IRVINE – JESSE BRUMMETT
IRVINE – KOICHI TAMAGUCHI
IRVINE – CYNTHIA TYLER
JOSHUA TREE – ROWLAND GRIESE
JURUPA VALLEY – MARK SUTPHIN
KING CITY – KEVIN BROTHERS
LA HABRA – MICHAEL VALOV
LA HABRA – PEDRO GARCIA-GONZALEZ
LA JOLLA – JOHN MCCARTIN
LA MESA – EDWARD OREMEN
LA MESA – GEORGE KVAAS
LA MIRADA – GINO PETRELLI
LA PALMA – JODEE TOCHI
LADERA RANCH – JOHN GERKEN
LADERA RANCH – ABE COOK
LAGUNA HILLS – RALPH PISANO
LAGUNA NIGUEL – AIDEN LACAMBRA
LAGUNA NIGUEL – JIM MAGUIRE
LAGUNA NIGUEL – LUKE CHANG
LAGUNA NIGUEL – EILEEN GINGERICH

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LAGUNA NIGUEL – BRETТА DALIE
LAGUNA NIGUEL – ANDREW WEISKE
LAGUNA NIGUEL – HAYDEN HILL
LAGUNA NIGUEL – ALEXANDER DYER
LAGUNA WOODS – CRAIG COSBEY
LAGUNA WOODS – JOHN WILLARD
LAKE ARROWHEAD – JAMES BON
LAKE ELSINORE – PATRICIA JOHNSON
LAKE FOREST – RACHEL KYLE
LAKE FOREST – DAVID JAMRISKA
LAKE FOREST – NICOLE LEUZZI
LAKE FOREST – STEVE O'TOOLE
LAKE FOREST – DEVIN FELDMAN
LAKE HAVASU – JASON LARSON
LAKE HAVASU – SANDRA LARSON
LAKE SHERWOOD – MITCHELL FAULKNER
LAKESIDE – GRANT KULBERG
LAKESIDE – DOUGLAS WRAY
LAKESIDE – AMY HALMAGHI
LANCASTER – DAVID OLMEDA
LANCASTER – STEPHEN JONES
LANCASTER – FRANS STOOVE
LAS VEGAS – KACEY KARAS
LAS VEGAS – MALCOLM BEARE
LAS VEGAS – HJALMAR MEYER
LAS VEGAS – BRYAN SLOAN
LAS VEGAS – JOHN HORTON
LEGGETT – WAYLON HENZE
LEMON GROVE – REBECCA CORDERO
LEMON GROVE – ANDY PENA
LINCOLN – SHAWN SPIESS
LITTLETON – PETER FARB
LITTLETON – LOGAN LEWIS
LODI – MIKE GOSS
LODI – HUNTER GOSS
LOMPOC – DEAN GRAVES
LONG BEACH – CHRIS HARPE-AMOS
LONG BEACH – WINTER WILSON
LONG BEACH – JOE BAILEY
LONG BEACH – JUSTIN RAMIREZ
LONG BEACH – JULIO INTERIANO
LOS ANGELES – JASON VOEGELI
LOS ANGELES – RANDALL STANGER

LOS ANGELES – TANNER BUCK
LOS ANGELES – JOSHUA URRUTIA
LOS ANGELES – MATTHEW WATT
LOS ANGELES – BOB HARA
LOS ANGELES – MARINO ALONZO
LOS ANGELES – RYAN CARTER
LOS ANGELES – JAMES BARATTA
LOS ANGELES – JEROME RAY
LOS ANGELES – SHAHID NAMBIAR
LOS ANGELES – SCOTT GRANT
LOS ANGELES – STEPHEN HETU
LOS ANGELES – ASHLEY MARTINEZ
LOS ANGELES – DAVID SUGAMURA
LOS OSOS – BEN TILBURY
LOS OSOS – JOHANNA SANDERS
LOS OSOS – DUSTY MCADON
MADERA – NOEL MENDES
MANSFIELD – DAVID ANDERSON
MARINA DEL REY – BRIAN ANGIOLILLO
MARINA DEL REY – TREVOR BEACH
MARINA DEL REY – NICOLE LANGER
MARTINEZ – STEVEN LAND
MCKINLEYVILLE – ANDREW SMYTH
MILLBRAE – CARY WONG
MILLBRAE – DONALD DENNEHY
MILPITAS – MIKE TODD
MISSION VIEJO – CLAUDIA BROERE
MISSION VIEJO – CHARLES REGAN
MISSION VIEJO – WILLIAM DRUM
MISSION VIEJO – RICHARD MAYER
MISSION VIEJO – MIKE HOOPER
MISSION VIEJO – DEVIN PERREIRA
MODESTO – ANTHONY RAMIREZ
MODESTO – KARL QUINN
MONROVIA – ROB WOOD
MONROVIA – PHYLLIS BRADY
MONROVIA – JOHN BARRIER
MONTEREY – ROBERT JENSEN
MONTEREY – SHIRLEY JENSEN
MONTEREY – RICK TUSCANY
MOORPARK – JOHN LAXTON
MORENO VALLEY – M BUEKER
MORENO VALLEY – CHAD DOWNEY

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MORGAN HILL – STEPHON CRONON

MORRO BAY – KEVIN WINFIELD

MURRIETA – BRANDON REEVER

MURRIETA – ROBERT GRANT

MURRIETA – GREG GRAHAM

MURRIETA – ART SPADINI

MURRIETA – SHARON LANE

NAPA – SEAN HOLLAN

NAPA – JOSEPH ALDRIDGE

NATIONAL CITY – DON WADDELL

NEVADA – BENNIE NICHOLSON

NEWBURY PARK – SHAIN SMITH

NEWHALL – CURT O'BRYAN

NEWPORT BEACH – ERIC NARESHM

NEWPORT BEACH – SEAN MACNEIL

NEWPORT BEACH – ROBERT BRACK

NEWPORT BEACH – HOWARD DOWER

NEWPORT COAST – ARTHUR HAUSMANN

NIPOMO – SARA DALTON

NIPOMO – DALE HUSTRULID

NORCO – RICH FELEGY

NORTHRIDGE – YANN SCHRODI

NOVATO – CHARLES MEYER

NOVATO – SUSAN ZIDEK

OAK HARBOR – PAUL KRONENBERG

OAK PARK – WILLIAM OSBORN

OAKDALE – KENDRA SILVAS

OAKLAND – ELLEN DELAURA

OAKLAND – ROBERT GRAY

OAKLEY – TROY FOGLEMAN

OCEANO – IAN MARQUARDT

OCEANSIDE – JANE KENT

OCEANSIDE – NANCY MAGLIO

OCEANSIDE – ROB MILSTEAD

OCEANSIDE – RICK MAGNER

OCEANSIDE – THOMAS CRUZ

OCEANSIDE – KENNY WOODS

OCEANSIDE – JEFF WRIGHT

OCEANSIDE – VERN CAPISTRAN

OCEANSIDE – CHRISTOPHER JANES

OCEANSIDE – DON RODGERS

OCEANSIDE – MICHAEL TOMA

OCEANSIDE – TAMMY TAUNT

OCEAY – JANET BARTON

OJAI – ROBERT CASS

OJAI – CHARLES KILLINGSWORTH

ORANGE – JOE SCHNABLEGGER

ORANGE – MICHAEL WHITCRAFT

ORANGE – BRIANNA SALAZAR

ORANGE – MICHAEL WHITCRAFT

ORANGEVALE – TRACY LEHNER

OXNARD – WILMERM BARRAZN

OXNARD – DENNIS JUNKER

OXNARD – STEVEN EDWARDS

OXNARD – BENJAMIN SARABIA

OXNARD – ROBERT SEMERAU

PACIFICA – WALTER ALLEN

PALM DESERT – NICHOLAS CLIFFORD

PALMDALE – JACOB YOUNG

PALMDALE – BRENT M

PALMDALE – JUSTIN PHILLIPS

PALMDALE – TIMOTHY BUCKLEY

PALMDALE – ERIC THOMAS

PARAMOUNT – JOHN BLAS

PARAMOUNT – BRIAN GONZALEZ

PASADENA – GILBERT SAUSEDO

PASO ROBLES – TIMOTHY BARRON

PAULSBORO – SCOTT KISTLER

PERRIS – SHERRI REEVER

PHOENIX – STEVI WEAVER

PHOENIX – TED BOCCELLI

PINEVILLE – JOE DANIELS

PINON HILLS – RUSSELL MCFANN

PITTSBURGH – DAVID KAHLEY

PITTSBURGH – HARRY FUJITA

PLAYA DEL REY – CHARLES ROSS

PLEASANT HILL – CHAD STEWART

PLEASANTON – DON MARSHALL

PLEASANTON – HAROLD CARRISON

POINT REYES – JOHN LOPEZ

POMONA – CARLOS MALDONADO

POMONA – ANTHONY CASTRO

POWAY – RON WALKER

POWAY – GAYLE BINDER

POWAY – JASON GUTZMER

POWAY – JAMES MACISAAC

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QUARTZ HILL – DENNIS PREASMYER
RAMONA – KENNETH BRAGIEL
RAMONA – DAVID BOUBLIS
RAMONA – RYAN LANCIONE
RANCHO SANTA MARGARITA – DANIEL LEVIN
RANCHITA – CHRIS ANDREW
RANCHO CUCAMONGA – ERIC BURNEY
RANCHO CUCAMONGA – RANDY CREIGHTON
RANCHO CUCAMONGA – RUSSELL GARCIA
RANCHO DE SANTA FE – LEONARDO PENA
RANCHO MISSION VIEJO – BENJAMIN STEPHAN
RANCHO SANTA MARGARITA – EDUARDO
CHUTNEY
RANCHO SANTA MARGARITA – REX
MCNAMARA
RANCHO SANTA MARGARITA – BRUCE
HADERLIE
REDDING – CHET SEARLE
REDONDO BEACH – KEITH TURNER
REDONDO BEACH – CHRIS OUJO
REDONDO BEACH – KATHY MCLEOD
REDWOOD CITY – WILLIAM ELLIOTT
REEDLEY – KARL ZUCCA
RESEDA – ALEX RODRIGUEZ
RESEDA – KYLE SARGERT
RIALTO – RAUL TORRES
RIPON – MICHAEL QUINTANA
RIVERSIDE – RICK GAY
RIVERSIDE – KAREN COLLIER
RIVERSIDE – KEVIN MARTIS
RIVERSIDE – JOSEPH HOSCHEID
RIVERSIDE – MATTHEW ELLIS
RIVERSIDE – CRAIG DART
RIVERSIDE – JOHN FIELD
RIVERSIDE – LUCAS CANILLAS
RIVERSIDE – JIM SKEEN
RIVERSIDE – JONATHAN BOYD
ROSAMOND – GEORGE ADAMO
ROSEVILLE – DANIEL BELL
ROSEVILLE – ROBERT MARSHALL
ROSEVILLE – CONNIE LOVSLETTEN
SACRAMENTO – HERMAN GEE
SACRAMENTO – NICK PINELLI

SACRAMENTO – ROY KIMURA
SACRAMENTO – TOM PADERNA
SACRAMENTO – DAVID CLINGMAN
SACRAMENTO – ANDREY KRAVCHUK
SALINAS – MARY HELEN CHRISMAN
SALINAS – ROBERT ALBANESE
SALT LAKE CITY – TANYA STERNS
SAN BERNARDINO – JOEL MAGANTIN
SAN CLEMENTE – GALEN WOLLENBERG
SAN CLEMENTE – MONA FERNER
SAN CLEMENTE – JUSTIN DRIGGERS
SAN CLEMENTE – KIMBERLY ANDERSON
SAN CLEMENTE – MAREE RAYMOND
SAN CLEMENTE – BRUCE YOUNG
SAN CLEMENTE – TINA MONJI
SAN CLEMENTE – MICHAEL DE LA GARZA
SAN CLEMENTE – CHRIS SHEA
SAN CLEMENTE – SUSAN SHEEHAN
SAN CLEMENTE – STEPHEN HOUSE
SAN CLEY – CHARLES EVENSON
SAN DIEGO – JUSTIN GAMBY
SAN DIEGO – CHRIS R
SAN DIEGO – ANTHONY SCHMIDT
SAN DIEGO – CARL SCHMIDT
SAN DIEGO – HONUS BONAIR
SAN DIEGO – JAMES WALSH
SAN DIEGO – KATIE SCHAFFER
SAN DIEGO – JEFF WAKER
SAN DIEGO – JASE SOUSA
SAN DIEGO – JON ANTHONY MEDINA
SAN DIEGO – PETE KORAB
SAN DIEGO – STACEY ANFUSO
SAN DIEGO – RANDY PODALSKY
SAN DIEGO – ROBERT TAKESHITC
SAN DIEGO – LARRY MOTOYAMA
SAN DIEGO – ROB CREEK
SAN DIEGO – MICHAEL NESBITT
SAN DIEGO – BRANDON WALLACE
SAN DIEGO – DAN THUNBORG
SAN DIEGO – JASON BELLATI
SAN DIEGO – TODD ALEXANDER
SAN DIEGO – CHERYL LAMELL
SAN DIEGO – SCOTT VEACH

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SAN DIEGO – WARREN LUKENS
SAN DIEGO – RICHARD BALELO
SAN DIEGO – MARCY CUNNINGHAM
SAN DIEGO – JASON BARNETT
SAN DIEGO – PETER BILBREY
SAN DIEGO – CLAY BOOHER
SAN DIEGO – JAMES FINGERMAN
SAN DIEGO – BILL MCKINNEY
SAN DIEGO – ROB FLETCHER
SAN DIEGO – LORI WITHEE
SAN DIEGO – RYAN BARDELLI
SAN DIEGO – ROBERT FLETCHER
SAN DIEGO – REZA FARAHMAND
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SAN DIEGO – SCOTT LAMPE
SAN DIEGO – MATT COX
SAN DIEGO – BEDFORD BERKLEY
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SAN DIEGO – SUZANNE SLATER
SAN DIEGO – LARRY COURTNEY
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SAN DIEGO – DRAKE COLE
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SAN DIEGO – JEFF SPRIGGS
SAN DIEGO – BRIAN SHERRY
SAN DIEGO – ANDREW GAUDIOSO
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SAN DIEGO – NICK DAVIES
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SAN DIEGO – SHAYNE MCCOOL
SAN DIEGO – DUSTIN ZAMBA
SAN DIEGO – TRISTIAN GONZALEZ
SAN DIEGO – DENNIS GAMBILL
SAN DIEGO – CHARLES SKORONSKI

SAN DIEGO – KEVIN NAM
SAN DIEGO – STEVEN LEE SR.
SAN DIEGO – RICHARD REID
SAN DIEGO – BENJAMIN KHAMIS
SAN DIEGO – BRIAN DAVIES
SAN DIEGO – MITCHELL KARLIN
SAN DIEGO – JENNIFER GAMBILL
SAN DIEGO – BRENNEN GAVIDIA
SAN DIEGO – TIFFANY MAYES
SAN DIEGO – JAY MAYES
SAN DIMAS – RICKY CHUI
SAN DIMAS – BRIAN MARTZ
SAN FRANCISCO – DAVID L
SAN FRANCISCO – GARY HORNE
SAN FRANCISCO – VINCENT MARSELLA
SAN FRANCISCO – ED HATTER
SAN FRANCISCO – GREGG TANJI
SAN FRANCISCO – DAVY BORJA
SAN FRANCISCO – PHILIP DELANO
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SAN GABRIEL – YOSH SAKAI
SAN GABRIEL – DANIEL SAKAI
SAN JOSE – DENNIS YEE
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SAN JOSE – JEREMY HAGGBERG
SAN JOSE – ALEX MERRIFIELD
SAN JUAN CAPISTRANO – TANIA ALWARD
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SAN JUAN CAPISTRANO – MICHAEL MORGAN
SAN JUAN CAPISTRANO – JEFFREY MOSHIER
SAN JUAN CAPISTRANO – WILLIAM CRUZ
SAN JUAN CAPISTRANO – AUSTIN ALLEN
SAN JUAN CAPISTRANO – ALBERTO ARAIZA
SAN JUAN CAPISTRANO – JOEY ENGEL
SAN MARCOS – DALLAS SNOW
SAN MARCOS – RON RHODES
SAN MARCOS – VINCE HARDING
SAN MARCOS – AARON VIA
SAN MARCOS – VICTOR DESIO
SAN MARCOS – MATTHEW CATO
SAN MARCOS – GARY CATO

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SAN PEDRO – MARK FREEDBERG
SAN PEDRO – MATT BACA
SAN PEDRO – GREGORY BIJELIC
SAN PEDRO – JORDAN NUTTMAN
SAN RAFAEL – NADINE URCIUOLI
SAN RAFAEL – THOMAS LOUCKS
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SAN RAMON – TIMOTHY TOY
SAN RAMON – ROMAN DRUKER
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SANTA ANA – JOHN HACKER
SANTA ANA – ROMY GODDING
SANTA ANA – CRAIG DASKALAKIS
SANTA ANA – STEVEN DO
SANTA ANA – GIOVANNI CASAS
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SANTA CLARITA – JEREMY EAST
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SANTA CRUZ – ANDY GERE
SANTA CRUZ – JENNY O'LEARY
SANTA CRUZ – RANDELL MOYER
SANTA MARIA – RYAN MYERS
SANTA MONICA – KATHLEEN COLLINS
SANTA MONICA – BRUCE HELLER
SANTA ROSA – DALESMITHSON
SANTA ROSA – EDWARD TRICK
SANTEE – JOHN BASNIGHT
SANTEE – JAMES HARDIE
SANTEE – GLENN FROMANG
SANTEE – CURTIS WILSON
SANTEE – JOSH EATO
SARATOGA – FRANK GRENGO
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SEA BRIGHT – BRIAN KELLY

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SEBASTOPOL – STEVE AMERAL
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SIMI VALLEY – SCOTT HUMPHREYS
SIMI VALLEY – JOSHUA HOOPER
SOLANA BEACH – THOMAS BARONNER
SOUTH LAKE TAHOE – SEAN SULLIVAN
SOUTH SAN FRANCISCO – PHILIP ANDERSON
SPRING VALLEY – MICHAEL RUBALCABA
SPRING VALLEY – JAMES HATFIELD
STOCKTON – HENRY HARVEY
STOCKTON – ERIK TAYLOR
STOCKTON – WILLIAM SIMMONS
STOCKTON – TRACY MORINVILLE
SUN CITY – MAX ENDLICH
SUN VALLEY – LUIS ESPINDOLA
SUNLAND – MATT EWERT
SYLMAR – EVAN BARNARD
TEHACHAPI – DIANA MARTINEZ
TEMECULA – VAUGHN HENSLEY
TEMECULA – BRIAN SCHULTE
TEMECULA – JESSICA VULOVIC
THOUSAND OAKS – ROGER STEVENS
THOUSAND OAKS – BRUCE SCHULTZ
THOUSAND OAKS – CALI DELGADO
THOUSAND OAKS – MICHAEL GODFREY
THOUSAND OAKS – EVAN BRODSKY
TORRANCE – B NAKASATO
TORRANCE – ANDREI TOTOESCU
TORRANCE – BRIAN FUJIMOTO
TRABUCO CANYON – TIM TIMMERMAN
TRACY – COLE PETLANSKY
TUCSON – MAGNUM SCURO
TUCSON – MARK FLAKENSTINE
TURLOCK – ROBERT ORTIZ
TUSTIN – GREG SCOTT
TUSTIN – KENNETH LOVSLETTEN
TUSTIN – SHERRY AZMI
TUSTIN – KENTON DEAN
VACAVILLE – BRANDON O'BRIEN
VACAVILLE – ROBERT MATIAS
VALENCIA – SHAWN TESTER

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VALENCIA – PHILLIO THOMAS

VALENCIA – ALBERT YEE

VALLEJO – DAVID MACE

VALLEJO – LORNA LEITAO

VAN NUYS – ROBERT COHN

VENICE – DJ LATONA

VENTURA – JOSEPH HAYS

VENTURA – LARRY MURPHY

VENTURA – DOUG MEEK

VENTURA – ANNE SCHOOLER

VENTURA – FRANCISCO ANGUIANO

VENTURA – SHAWN HARVEY

VISALIA – JOSEPH LEAVITT

VISALIA – MICHAEL SANCHEZ

VISALIA – EILEEN NETZLEY

VISALIA – TYLER ASMAN

VISTA – STEPHEN TROBAUGH

VISTA – ABRAHAM GATERS

VISTA – BILL TARLING

VISTA – JOHN HOWE

VISTA – JOHN TSCHUMI

VISTA – ARTURO MIRELES

WALNUT CREEK – EDISON ONG

WALNUT CREEK – JOHN VOGEL

WALNUT CREEK – DMITRY SHUSTERMAN

WEST COVINA – BSAIL WATSON

WEST HILLS – DENNIS WALLACE

WEST LAKE VILLAGE – TIM TRAINER

WEST SACRAMENTO – DMITRY VARAKUTA

WEST YELLOWSTONE – LISA GRIFFITH

WESTMINSTER – CHINH NGUYEN

WESTMINSTER – KEVIN SARNO

WESTMINSTER – SEAN SIZEMORE

WESTMINSTER – GERARD EDGAR

WESTMINSTER – ED LELAND

WHITE BEAR – ROBERT SMITH

WHITTIER – PETE HAWKINS

WHITTIER – ARIYA SAENZ

WILDOMAR – GREG CURTIS

WILDOMAR – PETER WANG

WILMINGTON – MONICA SEDILLO

WINCHESTER – RANDON NAVARRO

WINNETKA – MATT AITKEN

WINNIPEG – KEN CUDMORE

WOODLAND – SAWYER FISCHER

YORBA LINDA – JIMMY LUKER

YORBA LINDA – CHRISTOPHER LOBOS



Comment Log Display

Below is the comment you selected to display. Comment 2609 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: palmer
Email Address: palmstory@comcast.net
Affiliation:

Subject: emissions

Comment:

the cargo, container, tanker ships are the worst and major reason for air quality on the West coast. When the get off shore they use the dirty fuel and look like coal trains from the old days. And thats going on up and down the west coast 24-7. Go after the real pollution sources instead of the hard working small businesses that have a .01% of the problem.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 11:30:36

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Comment Log Display

Below is the comment you selected to display. Comment 2610 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Barrett
Email Address: william.barrett@lung.org
Affiliation: American Lung Association in California

Subject: Public Health Support for Strong CHC Rule

Comment:

Please see the attached letter on behalf of California health and medical organizations in strong support of a comprehensive rule to reduce cancer risk and other health impacts caused by CHC vessel emissions.

Attachment: www.arb.ca.gov/lists/com-attach/2971-chc2021-WzNWNQFhAD8Bcwlh.pdf

Original File Name: Health Group_CHC Support_11.12.21.pdf

Date and Time Comment Was Submitted: 2021-11-12 11:38:01

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November 12, 2021

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Public Health Support for Commercial Harbor Craft Rule Amendments

Dear Chair Randolph and Members of the Board:

On behalf of the undersigned health and medical organizations and individuals, we are writing to express our support for the strongest possible pollution controls on new and in-use Commercial Harbor Craft (CHC). Pollution from these vessels represent a major source of local and regional health risks and must be addressed as quickly and thoroughly as possible. We write in strong support of the proposed regulation amendments and offer recommendations to increase the health benefits of the final rule, which we view as a critical measure of relief for communities currently bearing the immense heart, lung, cancer, and other health impacts of CHC pollution.

Californians face the most difficult air pollution challenges in the United States. The American Lung Association's *State of the Air 2021* found that California is home to seven of the ten most ozone-polluted cities in the United States, and six of the ten most particle-polluted cities.¹ Despite decades of progress, Californians face increased risks of unhealthy air, including asthma attacks, strokes, heart attacks, lung cancer and premature death. Low-income communities and communities of color face disproportionate burdens and disparities in health impacts, including portside communities directly impacted by tugboats, ferries, fishing boats and other CHC addressed through CARB's proposed amendments.

Significance of Commercial Harbor Craft Pollution

Despite their relatively small overall population of approximately 3,100 vessels, the CHC category represents an important source of community health impacts and regional air quality impacts. CHC emissions are a significant source of smog-forming NOx emissions and fine particle pollution that threaten lung and heart health. CHC represent one of the top three cancer

¹ American Lung Association. State of the Air 2021. April 2021. www.lung.org/sota.

risks in seaport communities, and contribute to California communities failing to achieve health-protective air quality standards.² To put the scope of the emissions in context, CARB staff note that [just one sportfishing boat produces the equivalent exhaust as 162 diesel school buses](#). These vessels, along with ferries, tugs, commercial fishing boats and others generate a heavy dose of carcinogenic diesel exhaust in some of the most disadvantaged communities in California. All CHC must be brought up to the most health-protective engine technology standards possible – as soon as possible – so that the lungs of children in disadvantaged communities no longer pay the price of CHC pollution.

Support for Proposed Amendment Framework

CARB's proposal would generate significant health benefits through major reductions in harmful air and climate pollutants. The proposal would amend existing policy to acknowledge technological advancement and require more stringent emission control strategies,³ and broaden the rule to capture emissions from additional vessel types.⁴ We strongly support the expanded scope of existing rules to ensure emission controls apply to a wider range of CHC including certain barges, pilot vessels, commercial passenger "charter" fishing vessels, commercial fishing vessels and other CHC not included in the existing rule. We appreciate that CARB has included reporting responsibilities for CHC facility operators to support data tracking and compliance, as well as preparation of facilities for more zero-emission technologies. The proposal would require more stringent in-use emission controls for vessels, including accelerating the deployment of zero-emission technologies. Specifically, new excursion vessels (e.g., dinner cruise, sight-seeing), which must be zero-emission capable/hybrid by 2025 and new and in-use short-run ferries are required to be zero-emission by 2026. New and in-use diesel-powered vessels would need to meet standards equivalent to the cleanest available certified engine operating with a diesel particle filter.

Benefits of the Proposed Rule

By shifting to zero emission and cleaner engine technologies, and expanding the scope of the rule, the amendments will save lives and billions in public health impacts. The proposed amendments will cut carcinogenic diesel particle pollution from CHC by 89 percent and will cut smog- and particle-forming NOx by more than half by the end of 2038. This will support efforts to attain health-protective air quality standards and significantly improve health. Notably, the proposal would result in an estimated \$5.25 billion in public health benefits between 2023 and 2038, and would avoid:

- 531 premature deaths
- 161 hospital admissions
- 236 emergency room visits

It is important to note that the monetized health costs of the proposed amendments do not factor in the significant reductions in cancer risk, and other health impacts that will result from implementing the amendments to the CHC rule. The cost of compliance with this regulation is approximately one-third of the *monetized* health benefits to be gained.⁵ These *non-monetized* health benefits are substantial and cannot be overlooked. For example, cancer risk due to CHC emissions could be greatly reduced or eliminated for millions of Californians:⁶

² California Air Resources Board. Initial Statement of Reasons Proposed Amendments to the Commercial Harbor Craft Regulation. Figure II-1. Seaport Contribution to Near Source Cancer Risk at p. III-3. September 2021. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/chc2021/isor.pdf>

³ CARB at p. III-7.

⁴ CARB at p. III-1.

⁵ CARB at Table IX-8: Annual Direct Costs of the Proposed Amendments are estimated at approximately \$1.8 billion between 2023 and 2038 at page IX-12.

⁶ CARB at V.4.

- The South Coast Air Basin’s population exposed to a potential cancer risk of 1 chance per million would drop by 10 million residents due to implementing the proposed rule.
 - 5 million residents would maintain this risk due to ongoing emissions from CHC.
- The Bay Area population exposed to a 1 chance per million cancer risk from CHC would drop by five million.
 - 2 million Bay Area residents would still face this level of cancer risk, speaking to the need for ongoing rule strengthening and updates as technologies progress.

Strengthening the Proposal to Improve Health

We believe that the proposal is a critical step toward healthier air, reduced cancer risk and a range of health improvements in communities most disproportionately burdened by toxic CHC emissions. The proposal could be improved to accelerate the health benefits of greater deployment of zero-emission technologies, reduce policy delays following technology advancement and limit compliance flexibilities that extend the life of high-emitting technologies:

- CARB should expand requirements for zero-emission technologies beyond the limited range of vessels included in the proposed amendments to accelerate more zero emission technologies as rapidly across the CHC fleet and in line with Governor Newsom’s Executive Order N-79-20 which set a state goal to “transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.” 2610.1
- CARB should ensure a responsive technology review is in place to further amend the program to accelerate deployment as new zero-emission and other advanced engine technologies come online. This commitment to generating additional emissions reductions should be included as a unique measure in the 2022 State Implementation Plan. 2610.2
- CARB should significantly limit compliance extensions to ensure relief from pollution impacts occur in the near term. As proposed, most CHC may be granted compliance extensions as far out as 2034, with certain vessels (e.g., ferries, charter fishing boats, and excursion vessels) eligible to wait even longer to clean up. 2610.3

We support the proposed amendments because failure to address this major source of carcinogenic pollution in heavily impacted communities is unacceptable. We believe that the policy should be strengthened to accelerate the health benefits and support healthier air for our most impacted residents. Please contact Will Barrett at the American Lung Association with any questions at William.Barrett@lung.org.

Sincerely,

Will Barrett, National Senior Director, Advocacy, Clean Air
American Lung Association

Autumn J. Ogden-Smith, Director, California State Legislation
American Cancer Society, Cancer Action Network

Yvonne Choong, Vice President, Center for Health Policy
California Medical Association

Wayne A. Walls, MBA, RRT-ACCS, RRT-NPS, RCP, President
California Society for Respiratory Care

Vipul V. Jain, MD, MS, President
California Thoracic Society

Linda Rudolph, MD, MPH, Director
**Center for Climate Change and Health
Public Health Institute**

Juliet Sims, MPH, Associate Program Director
Vince Leus, Program Coordinator
Prevention Institute

Joel Ervice, Associate Director
Regional Asthma Management and Prevention (RAMP)

Jim Mangia, MPH, President & CEO
St. John's Well Child and Family Center (Los Angeles)

Robert M. Gould, MD, President
San Francisco Bay Physicians for Social Responsibility

Comment Log Display

Below is the comment you selected to display. Comment 2611 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Palmer
Email Address: palmstory@comcast.net
Affiliation:

Subject: emissions

Comment:

Why don't you people go after the container, cargo, and tanker ships that switch to the dirty fuel when they get off shore in the shipping lanes? All that black exhaust blows to shore 24-7 and you want to regulate small businesses that put .001% of the problem into the environment. You should be sued for stopping control burns 20 years ago and made these fires burn 1000 degrees hotter than the natural fires that have been here for 1000 years.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 11:44:17

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Below is the comment you selected to display. Comment 2612 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brock
Last Name: Metz
Email Address: brockmetz511@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

Fishing on a boat has been my favorite thing ever since I was a young boy, it's a great experience for all we're u can enjoy a day on the water with family. I have some of my best memories on the water with family and friends enjoying a laugh and catching some fish. This is not something you can take away from the public, it has been a great an fun experience for over 40 years. This is why I think sport fishing shall not b taken away.

Thank you for your considerations

BM

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 11:54:53

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Comment Log Display

Below is the comment you selected to display. Comment 2613 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lisa
Last Name: Bartlett
Email Address: lisa.bartlett@ocgov.com
Affiliation:

Subject: Proposed Amendments to Airborne Toxic Control Measure for Commercial Harbor Craft
Comment:
PDF Comment Letter Attached.

Attachment: www.arb.ca.gov/lists/com-attach/2975-chc2021-USIFdlAhUFxVMQlo.pdf

Original File Name: Sup Bartlett CARB CHC Letter 11.12.21.pdf

Date and Time Comment Was Submitted: 2021-11-12 12:24:25

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LISA A. BARTLETT

ORANGE COUNTY BOARD OF SUPERVISORS
SUPERVISOR, FIFTH DISTRICT

ORANGE COUNTY HALL OF ADMINISTRATION
333 W. SANTA ANA BLVD.
10 CIVIC CENTER, SANTA ANA, CALIFORNIA 92701
PHONE (714) 834-3550 FAX (714) 834-2670
<http://bos.ocgov.com/fifth/>

November 12, 2021

Ms. Liane Randolph
Chair, California Air Resources Board
1001 I St
P.O. Box 2815
Sacramento, CA 95812

RE: Proposed Amendments to Airborne Toxic Control Measure for Commercial Harbor Craft

Dear Chairwoman Randolph,

I write to voice concerns over the proposed amendments to the Airborne Toxic Control Measure for Commercial Harbor Craft (CHC Regulations) and its impact on the commercial passenger fishing industry.

As an elected official representing several coastal cities in South Orange County, I serve on many regional boards and commissions, including those that manage and oversee regional transportation and regional air quality. I am no stranger to the challenges we, as Californians, face as we endeavor to reach and exceed state and federal air quality standards and enhance our quality of life. While I support the overarching goals of the proposed regulation, I have serious concerns about the potential implementation and negative impacts of the proposed regulation on a subset of the industry.

The commercial passenger fishing industry, often referred to as sportfishing, plays a critical role in the economic engines of our coastal communities. Prior to the COVID-19 pandemic, the Sportfishing Association of California reported that recreational fishing contributed approximately \$5.6 billion in economic activity and supports nearly 40,000 jobs. More than 500,000 individuals take to the waters for recreational fishing; their activity sparks, spurs, and supports our marinas, coastal communities, and other small businesses.

2613.1

A common concern from those in the sportfishing industry, is that the CHC Regulations, as proposed, are impractical or impossible to meet with their current vessels. The retrofit of current sportfishing vessels to Tier 3 or Tier 4 engines and the necessary diesel particulate filters will take up additional space in the vessel, weigh more than the engines they are replacing, likely require framework modifications, and create potential vessel instability. Most concerning of all, is the comments received regarding the potential adverse impact this rule may have on the safety

2613.2

and stability of vessels. Ultimately, even with potential compliance deadline extensions, owners would be required to replace their vessels to meet compliance which, is a significant economic burden and can have devastating impacts on this industry.

2613.3

I share in CARB's desire to reduce diesel particulate matter and NOx emissions, however, the adverse effect on the sport fishing community is of great concern. I appreciate the opportunity to comment on the amendments to the CHC Regulations and voice my strong concerns. Should you have any questions, please do not hesitate to reach out to me at (714) 834-3550.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa A. Bartlett".

Lisa A. Bartlett
Supervisor, Fifth District



Comment Log Display

Below is the comment you selected to display. Comment 2614 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gregg
Last Name: Maedo
Email Address: gregg@gmaarch.com
Affiliation: Gregg Maedo + Associates, Inc

Subject: No to regulations that may remove sportfishing boats from service.

Comment:

No to ending passenger sportfishing boats due to California Air Resources Board for regulations that stand to remove boats up and down California's coast from service!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 13:33:49

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Below is the comment you selected to display. Comment 2615 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Regina
Last Name: Hsu
Email Address: rhu@earthjustice.org
Affiliation: Earthjustice

Subject: Support for a Strong Commercial Harbor Craft Regulation

Comment:

Please see the attached letter from environmental, community, and health organizations urging the Board to adopt a strong commercial harbor craft regulation.

Attachment: www.arb.ca.gov/lists/com-attach/2977-chc2021-BjcHMFZ6A2FSZggl.pdf

Original File Name: 11-12-21 FINAL Harbor Craft Letter.pdf

Date and Time Comment Was Submitted: 2021-11-12 13:52:07

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November 12, 2021

Chair Randolph and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the Proposed Amendments to Commercial Harbor Craft Regulation

Dear Chair Randolph and Members of the Board,

Thank you for the opportunity to provide comments on the California Air Resources Board's proposed amendments to the Commercial Harbor Craft regulation (Harbor Craft Regulation). The undersigned organizations strongly support the strengthening of the proposed Harbor Craft Regulation, as this will be an important step towards cleaning up a major source of diesel pollution in California. We appreciate CARB staff's hard work on these proposed amendments.

Over three years ago, CARB staff identified to this Board the urgent need to further reduce emissions from harbor craft because of the growing health impacts from this industry.¹ At this Board meeting, which took place in the South Coast Air Basin, the Board provided assurances to the public that it would target this high source of health risk and pollution. In fact, absent CARB's adoption of the proposed amendments, pollution from these vessels is on track to be the largest contributor of near-source

¹ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Initial Statement of Reasons, II-2 [hereinafter ISOR].

cancer risk around the Ports of Los Angeles and Long Beach in 2023.² This life-saving regulation will provide significant emission reductions statewide, offer much-needed relief to portside communities, and fulfill the promises the Board made to those in attendance at the March 2018 Board meeting.

I. The Proposed Amendments will offer significant health benefits to impacted communities.

Most harbor craft in California continue to operate on old diesel engines and emit high levels of dangerous air pollutants, such as diesel particulate matter (DPM) and nitrogen oxides (NOx). There are serious public health risks associated with short- and long-term exposure to NOx, including increased risks of developing respiratory and cardiovascular diseases, cancer, and premature death.³ Long-term exposure to DPM is also associated with increased rates of chronic respiratory and cardiovascular diseases, decreased lung function in children, lung cancer, and premature death.⁴

This rule is critical because it will reduce the disproportionate pollution burdens of portside communities in California. Communities living near ports bear disproportionate health burdens from port operations, including harbor craft. Several AB 617 communities, including portside communities in Stockton, West Oakland, Wilmington/West Long Beach/Carson, and San Diego, have specifically identified harbor craft emissions as a primary area of concern.⁵

While the existing Harbor Craft Regulation has resulted in emission reductions, harbor craft are set to become one of the largest sources of diesel pollution in many areas of the state, including the South Coast Air Basin. By requiring more harbor craft to switch to cleaner engines, the proposed rule will significantly reduce harmful pollution. From 2023 to 2038, the Proposed Amendments will reduce NOx emissions by 34,340 tons and DPM emissions by 1,680 tons.⁶ This constitutes a 52 percent reduction in NOx emissions and 89 percent reduction in DPM emissions.⁷

These emissions reductions will result in important health benefits, which are most pronounced in areas with high harbor craft activity, such as the South Coast and San Francisco Bay Area. Over the life of the rule, the proposed rule will result in 126 fewer premature deaths in the South Coast. Statewide, the rule will prevent 531 premature deaths, 236 asthma emergency room visits, and 161 hospitalizations for respiratory and cardiovascular illnesses.⁸ These health benefits are valued at \$5.25 billion, which far outweigh the estimated net cost to individual consumers.⁹

² California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Standardized Regulatory Impact Assessment, 15 [hereinafter SRIA].

³ SRIA, 16.

⁴ ISOR, II-4; SRIA, 15.

⁵ SRIA, 24.

⁶ ISOR, VI-4.

⁷ *Id.*

⁸ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Appendix G: Health Analyses, G-61 [hereinafter App. G].

⁹ *Id.* at G-66. The estimated cost to individuals are as follows: \$1.81 per passenger for high-speed ferry one-way trips, \$0.97 per passenger for short-run ferry one-way trips, \$1.04 per passenger for excursion vessels, \$0.38 per TEU for tug vessels, \$0.04 per pound of fish for commercial fishing vessels, \$28.02 per passenger/day for commercial passenger fishing vessels one-day trip, \$26.09 per passenger/day for commercial passenger fishing vessels multi-day trip, and \$93.51 per passenger per day for 6-pack commercial passenger fishing vessels. SRIA, 113.

II. A strengthened Harbor Craft Regulation is feasible and necessary.

Many harbor craft in California, including workboats, tank barges, and fishing vessels, still operate on dirty diesel engines that only meet decades-old emission standards.¹⁰ Under the current regulation, Tier 0 to Tier 2 engines will contribute over 50 percent of total NOx and PM emissions from harbor craft by 2050.¹¹ Commercial passenger fishing vessels, in particular, are a huge source of NOx and PM and constitute the second largest emitting categories of commercial harbor craft.¹² This category alone emits 22.83 tons of DPM per year.¹³ The proposed amendments would require commercial passenger fishing vessels with the dirtiest diesel engines – Tier 0 and Tier 1 – to meet cleaner emission standards beginning in 2023. Importantly, people are getting sick and dying from the pollution from these vessels, and the Board should reject efforts from this industry to weaken the rule and provide far fewer health benefits to some of the most air polluted places in the country.

As harbor craft are a growing contributor of pollution, reductions from harbor craft are also necessary for California to meet state and federal air quality standards in some of the most polluted regions in the nation. Without significant emission reductions from all sources of NOx pollution, including all categories of harbor craft, the South Coast will be unable to meet federal ambient air quality standards.¹⁴ The emission reductions from this rule will also benefit other nonattainment areas in California, including the San Joaquin Valley, San Francisco Bay Area, Ventura County, and San Diego.¹⁵

2615.1

While the proposed amendments will bring significant emissions reductions, we recommend that CARB include zero-emission targets for additional categories of harbor craft. Zero-emission harbor craft are already being deployed in California,¹⁶ and CARB has an opportunity to further reduce emissions from harbor craft by setting more zero-emission targets in this rule. At a minimum, we request that CARB conduct an interim evaluation of the Harbor Craft Regulation before 2024 to evaluate progress and the state of technology to determine whether additional amendments are feasible.

2615.2

We urge CARB to prioritize public health by moving forward with a strong Harbor Craft Regulation. Thank you for your consideration.

Sincerely,

Regina Hsu
Adrian Martinez
Earthjustice

¹⁰ California Air Resources Board, Proposed Amendments to the Commercial Harbor Craft Regulation, Appendix H: 2021 Update to the Emission Inventory for Commercial Harbor Craft: Methodology and Results, H-23 [hereinafter App. H].

¹¹ *Id.* at H-25.

¹² *Id.*

¹³ App. G, G-5.

¹⁴ SRIA, 20, 23; App. H. at H-26.

¹⁵ SRIA, 22.

¹⁶ Chris Jennewein, Port of San Diego to Test First Electric Tugboat at Tenth Avenue Terminal, Times of San Diego, Jul. 12, 2021, <https://timesofsandiego.com/tech/2021/07/12/port-of-san-diego-to-test-first-electric-tugboat-at-tenth-avenue-terminal/>; Taylor Kate Brown, Is a zero-emissions ferry commute in your future, San Francisco Chronicle, June 10, 2021, <https://www.sfchronicle.com/climate/article/MicroClimates-Is-an-electric-ferry-commute-in-16238933.php>.

Marc Carrel
Breathe Southern California

Ana Gonzalez
Center for Community Action & Environmental Justice

Taylor Thomas
East Yard Communities for Environmental Justice

Sylvia Betancourt
Long Beach Alliance for Children with Asthma

David Pettit
Natural Resources Defense Council

Andrea Vidaurre
People's Collective for Environmental Justice

Peter M. Warren
San Pedro & Peninsula Homeowners Coalition

Yassi Kavezade
Sierra Club

Comment Log Display

Below is the comment you selected to display. Comment 2616 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Brown
Email Address: wnbrown21@gmail.com
Affiliation:

Subject: Commercial harbor craft regulations

Comment:

As an avid angler from California I strongly disagree with closing fishing off the California coast. I and my mother both go on a regular basis. That is our right to go fishing. It is a very enjoyable activity which I have done for 50 + years. It would destroy the lively hood to thousands of fishing charters and put and end to commercial fishing. Do not close our waters just because you can!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 13:54:19

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Below is the comment you selected to display. Comment 2617 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jacqueline
Last Name: Moore
Email Address: jmmoore@pmsaship.com
Affiliation:

Subject: PMSA Comments on Proposed Amendments to the Commercial Harbor Craft Regulation
Comment:

Attached are PMSA Comments on Proposed Amendments to the Commercial Harbor Craft Regulation.

Attachment: www.arb.ca.gov/lists/com-attach/2979-chc2021-B3cFblclAzFXDgdk.pdf

Original File Name: PMSA Comment Letter on Proposed CHC Amendments.pdf

Date and Time Comment Was Submitted: 2021-11-12 14:36:19

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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November 12, 2021

David Quiros
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: PMSA Comments on Proposed Amendments to the Commercial Harbor Craft Regulation

Submitted electronically to <https://www.arb.ca.gov/lispub/comm/bclist.php>

Dear Mr. Quiros

PMSA has appreciated the opportunity to work with California Air Resources Board (CARB) staff on the development of the harbor craft regulatory concepts and offer these comments on the final Proposed Amendments to the Commercial Harbor Craft Regulation (Amendments) ahead of the Public Hearing.

PMSA Supports AWO Comment Letter

PMSA supports the many significant issues raised by The American Waterways Operators (AWO) comment letters. AWO serves as the expert voice for the harbor craft industry, thus, PMSA's comments will focus on specific concerns and otherwise defer to the AWO remarks. One will note that many of the comments that have been raised were also shared publicly in a 15 signatory California State Legislature comment letter dated August 30, 2021, as well as other Assembly Member and stakeholder comment letters.

Facility Based and Infrastructure Responsibilities Must be Distinct

The responsibilities of infrastructure deployment, recordkeeping and overall facility-based compliance must be clearly obligated to the party which has the legitimate control. Proposing that facility owners and operators be *jointly responsible* for the installation and maintenance of shore power infrastructure of up to 99 kW will certainly cause confusion, and potentially conflict, regarding who will be responsible for purchasing, constructing, and maintaining the infrastructure. It poses a real question of who will then own the expensive infrastructure, as real estate agreements and operators could change, and who would face potential enforcement action from CARB if noncompliant? Furthermore, how would CARB enforce such a vague term under joint liability? Further confounding the issue is the responsibility of shore power infrastructure deployment greater than 99 kW is directed as the responsibility of Vessel Owner/Operator. For an industry that will be negatively impacted by these Amendments and

2617.1

required to pay millions of hard-earned dollars for new or retrofitted vessels, having assurance of responsibility and ownership for the supporting infrastructure is critical.

The Zero-Emission and Advanced Technologies (ZEAT) Infrastructure Requirements, Section i(2)B, further complicates matters as facility owners and facility operators are *jointly responsible* for cooperating with vessel owners/operators for permitting, construction, installation, and maintenance of the infrastructure. Again, cooperating is an incredibly vague term and raises ambiguity of which party will complete these activities and which would face potential enforcement action from CARB if noncompliant. The proposed language and Table III-9 of the ISOR do not align, further confusing these many vague responsibilities. The marine ports of California have established procedures and contractual obligations for tenant improvements, to which these responsibilities do not align.

2617.2

Extension E1 Must be Eligible so Long as Conditions Exist

The compliance extension of up to two years for shore power and ZEAT infrastructure delays under Extension E1 is certainly appreciated but may not provide adequate time. As Extension E1 is for unforeseen circumstances *outside of the owner's or operator's control*, the extension should not expire so long as adequate documentation confirming the circumstances still exist and mitigation efforts are attempted in good faith.

2617.3

The Feasibility Extension Must be Inclusive

The feasibility of meeting performance standards does not change based on location of the home base, thus, the operational thresholds to secure an extension based on true feasibility cannot be based on proximity to a Disadvantage Community (DAC) as no justification exists. Halving the operational hours to 1,300 per year is nonsensical under Extension E4.

2617.4

Pilot Boats Require Implementation Flexibility

Pilot boats are a unique vessel category and are necessary for pilots to safely navigate large ships to and from port terminals in both ocean and harbor marine conditions. With only 10 pilot boats operating in the state that are tasked with this essential duty, the Amendments would place an undue burden on these vessels that make up a miniscule fraction of commercial harbor craft operating in the state and de minimus contribution to CARB's emission inventory. Marine safety is paramount and pilot boats are compulsory, as such, CARB must provide implementation flexibility in emission performance standards schedules for these unique vessels. The small pilot boat fleet can't all be replaced simultaneously; based on model year of the fleet's engines and proposed implementation deadlines, the fleet would largely need to be replaced or retrofitted within an approximate two to three-year timespan. Retrofits, likely not even possible based on current technology, physical space and weight constraints, take time to complete and would require multiple pilot vessels being out of service during the same period. It is more likely that total replacement of California's pilot boat fleet would be required, at considerable cost and

2617.5

uncertainty if the new builds could all be manufactured and commissioned in time to be compliant, and ready for their essential pilot service. Pilot vessels are needed at the ready; flexibility must be built into implementation timelines for pilot boats such that no more than one vessel would be taken out of service at any time in each homeport.

Proposed Amendments Require U.S. EPA Waiver

The Clean Air Act requires that California obtain a waiver from the U.S. Environmental Protection Agency (EPA) prior to enforcing any new or non-new off-road emission standard. As previously relayed by PMSA, the characterization of the proposed harbor craft rule as an “in-use standard” is incorrect. Failure by CARB to plan for and obtain an EPA waiver will result in regulatory confusion and uncertainty. CARB’s attempt to bootstrap an emission standard requirement into an in-use standard by providing alternative compliance pathways will not shield the proposal from the requirements of the Clean Air Act. In fact, this issue has already been litigated: “Supplying a presumed mode of compliance does not alter the nature of the general requirement limiting emissions. Indeed, the Marine Vessels Rules do not impose an in-use fuel requirement because no particular fuel is required to be used at all.” *PMSA v. Goldstene*, 517 F.3d 1108 (Ninth Cir. 2008).

2617.6

Similarly, the proposed opacity limit for harbor craft is also a clear emissions standard. The proposed opacity limit would place a numerical limit on emissions that go beyond emissions standard limitations for harbor craft that have already been promulgated by CARB and are enforceable through an EPA waiver. Again, if CARB seeks to enforce an opacity standard, CARB must also seek an EPA waiver. This issue has also been litigated in the same *PMSA v. Goldstene* case, “In the end, Clean Air Act §209(e)(2) preempts the Marine Vessel Rules and requires California to obtain EPA authorization prior to enforcement because the Rules are ‘emissions standard’ that require that engines ‘not emit more than a certain amount of a given pollutant.’” PMSA urges CARB to declare their intention to obtain an EPA waiver prior to adoption and implementation of the Amendments.

2617.7

Conclusion

PMSA sincerely appreciates the opportunity to work with CARB staff throughout the rulemaking process, to ensure a feasible, cost-effective and realistic regulation. Should CARB have any questions, PMSA staff are always available to discuss these or other concerns.

Respectfully,



Jacqueline M. Moore
Vice President



Comment Log Display

Below is the comment you selected to display. Comment 2618 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alice
Last Name: Nicholson
Email Address: alicen31@att.net
Affiliation:

Subject: Commercial Harbor Craft Regulation.

Comment:

I urge action on reducing emissions from boats. There have been adverse public health effects from them and something should be done to reduce the risk those living near the areas where the boats are docked. Thank you for your consideration on this most important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 15:24:04

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Below is the comment you selected to display. Comment 2619 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Samantha
Last Name: Omana
Email Address: Samantha.Omana@sen.ca.gov
Affiliation: on behalf of Senator Monique Limon

Subject: Proposed Commercial Harbor Craft Regulations
Comment:
Letter Attached.

Attachment: www.arb.ca.gov/lists/com-attach/2983-chc2021-WzgAaVY6UmwFZgh6.pdf

Original File Name: Commercial Passenger Vehicle Letter.pdf

Date and Time Comment Was Submitted: 2021-11-12 15:31:36

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CHAIR

Ms. Liane Randolph
Chairwoman, California Air Resources Board
PO Box 2815
Sacramento, CA 95812

RE: CARB's commercial harbor craft regulations

Dear Chairwoman Randolph,

I am writing to express some feedback over the Air Board's pending airborne toxic control measures for commercial harbor craft ("CHC") ("the proposed rule"). As currently proposed, these pending regulations could have significant impacts to the commercial charter fishing and whale watching vessel owners, ports, and coastal communities.

I strongly believe in protective air quality standards, and reducing air pollution to the greatest extent possible. I do have concerns about the timing of the new proposed rule and how it might impact small businesses on the Central Coast. Tourism is one of the biggest industries in Santa Barbara and Ventura Counties, accounting for \$56 million in annual tax revenues, and \$1.9 billion in total visitor-related spending in South Santa Barbara County alone. The COVID-19 pandemic brought the tourism industry to a complete halt, and it is still in the process of building back. It is more important than ever to consider how new regulations can be feasible and affordable to small businesses.

2619.1

2619.2

We have also heard concerns that these proposed regulations could impact the only public passenger service to the Chanel Islands National Park, making it nearly impossible for the public to access the park.

2619.3

I would like to urge CARB to conduct further engagement and work with both the maritime industry and other interested parties on viable solutions that will ensure that our local CPFV Companies are allowed to continue to operate while also on a schedule to reduce air emissions.

2619.4

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Monique Limón".

MONIQUE LIMÓN
Senator, 19th District

Comment Log Display

Below is the comment you selected to display. Comment 2620 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Heather
Last Name: Pennington
Email Address: elvishspate@gmail.com
Affiliation: UCSB

Subject: Commercial Harbor Craft rules

Comment:

Dear Chair Randolph and Members of the Board,

I am writing to ask that you take action to transition commercial harbor craft to 100% clean fleets. The climate emergency demands nothing less. In accordance with requests from the Coalition for Clean Air on Commercial Harbor Craft rules, please:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule 2620.1
2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 2620.2
3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation 2620.3

Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 16:01:47

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Below is the comment you selected to display. Comment 2621 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rex
Last Name: Richardson
Email Address: matthew.hamlett@longbeach.gov
Affiliation:

Subject: Letter re Commercial Harbor Craft Regulation

Comment:

On behalf of Long Beach Vice Mayor and AQMD Board Representative
Rex Richardson

Attachment: www.arb.ca.gov/lists/com-attach/2994-chc2021-AGMGYVwVWRSC1A8.pdf

Original File Name: CARB Letter[1].pdf

Date and Time Comment Was Submitted: 2021-11-12 16:22:01

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November 9, 2021

California Air Resources Board
9528 Telstar Ave
El Monte, CA 91731

Dear California Air Resources Board:

I write this letter to voice my support for a strong Commercial Harbor Craft Regulation (“CHC”) that protects public health and moves our communities forward in the fight for clean air. Harbor crafts, especially those that have been in service for long periods of time, are major emitters of diesel particulate matter. This form of pollution harms your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. We can move forward on the path to a zero-emission future by making investments in zero emission boats and ships.

I speak in solidarity with a host of public officials and advocacy organizations to articulate the need to prioritize addressing diesel particulate matter emissions from harbor craft across the state of California. I am in support of the proposed rule amendment brought forward by CARB staff and urge its adoption. The impact of this rule is immense, as CARB staff have cited, it can avoid over 500 premature deaths statewide by decreasing diesel particulate matter by approximately 90%.

I’m asking you to adopt a strong rule for Commercial Harbor Craft that:

1. Moves forward with a rule to advance zero-emission technology and cleans up the dirtiest engines in other commercial harbor craft categories. 2621.1
2. Sets all ferries, tugboats, dredges, and barges on an electrification pathway right now and require full electrification by 2035. 2621.2
3. Directs staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 2621.3
4. Increases funding for zero-emissions boat pilots, retrofits, and new vessels to spur innovation 2621.4
5. Provides the appropriate funding for the implementation of best available technology to the regulated entities

Let’s keep California on a path towards innovation and clean air.

Sincerely,

Rex Richardson
Vice Mayor, City of Long Beach

Comment Log Display

Below is the comment you selected to display. Comment 2622 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Barsley
Email Address: gbarsley1@yahoo.com
Affiliation:

Subject: We need cleaner boats offshore and in our harbors!
Comment:

Dear Chair Randolph and Members of the Board,
I am a native Southern Californian, and my family and I appreciate the cleaner air that we have today compared to when I was a kid. But the increase in marine traffic has started to make the air worse again, even though we have technology that can improve it! as you know, the marine and harbor area pollutants blow inland to impact everyone.

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

Given the climate emergency that we are facing, we need bold climate leadership. I'm asking you to strengthen the Commercial Harbor Craft rule:

- 1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule 2622.1
- 2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation 2622.2

achieves maximum emission reductions

3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation

2622.3

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 16:30:44

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Below is the comment you selected to display. Comment 2623 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Julie
Last Name: Gengo
Email Address: Juliegengo@gmail.com
Affiliation:

Subject: We need cleaner boats and other water vessels.

Comment:

I'm voicing my opinion about the need for cleaner vessels. The technology exists and it just takes the will to regulate. People are for this to protect our local communities and influence others to do the same.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 16:42:51

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Comment Log Display

Below is the comment you selected to display. Comment 2624 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Irene
Last Name: Rowe
Email Address: ialmeidafnp@yahoo.com
Affiliation:

Subject: Ship waiting to enter the LALB Ports

Comment:

As a Nurse Practitioner who has patients who suffer from respiratory illnesses and one who has family members who suffer from asthma, I want to urge that these diesel fueled ships be switched to cleaner fuels or electric. I live adjacent to Long Beach and have witnessed the diminished air quality and pollution generated from these large ships and harbor boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 16:42:18

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Comment Log Display

Below is the comment you selected to display. Comment 2625 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Caryn
Last Name: Graves
Email Address: caryn@lmi.net
Affiliation:

Subject: Act to reduce port pollution

Comment:

Dear Chair Randolph and Members of the Board,

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 17:10:49

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Comment Log Display

Below is the comment you selected to display. Comment 2626 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Victoria
Last Name: Dubeau
Email Address: victoria.dubeau@gmail.com
Affiliation:

Subject: Zero Emission Harbor Boats

Comment:

Dear Chair Randolph and Members of the Board,

Watercraft, including ferries, tugboats, barges, etc. are one of the worst polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, San Diego, Long Beach, and Oakland. In order to protect our citizens, California must divest from diesel operated harbor boats and invest in clean technologies and jobs instead.

The technology to transition commercial harbor craft to 100% clean fleets exists today. Today, there are already over 300 operating zero-emission ships powered by batteries worldwide.

With the climate crisis we are facing, we need bold and immediate climate leadership. Which is why I am asking you to strengthen the Commercial Harbor Craft rule:

- | | |
|--|--------|
| 1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule | 2626.1 |
| 2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions | 2626.2 |
| 3. Increase funding for zero-emission boat pilots and retrofits to spur innovation. | 2626.3 |

This could not be a more critical time to protect the health of our port-side communities, Californian families, and our environment. As someone who lives in a port-side community, I thank you for your attention to this incredibly important issue.

Attachment:

Original File Name:

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Comment Log Display

Below is the comment you selected to display. Comment 2627 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Huang
Email Address: ciedmeco@gmail.com
Affiliation:

Subject: We need to clean up dirty ships & land-side shipping fleets

Comment:

We need to clean up dirty ships & vehicles --
Ports along California coast, especially the Los Angeles & Long
Beach Ports, play a major role in goods delivery & distribution for
the entire nation, and our coastal communities have suffered air &
carbon pollution for years. With green ports being the objective of
port operation & improvement, it is the time to amendment to the
Commercial Harbor Craft Regulation for have cleaner air quality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 17:37:28

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Comment Log Display

Below is the comment you selected to display. Comment 2628 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ernest
Last Name: Prieto
Email Address: ernie@chubasco2.com
Affiliation: Chubasco Sportfishing

Subject: Commercial Harbor Craft Regulation

Comment:

My name is Ernie Prieto, and I am owner of Chubasco Sportfishing in Oceanside. I have spent my entire adult life building my dream of fishing for a living. I have managed to support a family and build a successful small business for myself. I feel that requiring commercial passenger fishing vessels to move to Tier 4 engines are not economically, technologically, or financially feasible. With this new Bill you are trying to put into place, the regulations as drafted require technology that has not been developed or proven safe at sea, and consequently are economically and structurally impossible to comply with - requiring boats constructed of wood/fiberglass to be removed from service as soon as 2031.

2628.1

Our industry strongly supports clean air initiatives but this proposal will force most CPFV owners to go out of business. The economic impact alone would be devastating. We support local tourism, create jobs, and provide to charities for the local Veterans, underserved youth, first responders and gold star families.

2628.2

As a result, many low to middle income California families will lose their access to the Pacific ocean's resources-food, healthy outdoor recreation and student marine environmental education opportunities.

2628.3

Historically, CARB has regulated commercial fishing/whale watching boats and commercial passenger boats the same way - their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that you can continue to transition to lower emission engines as it is economically feasible, and technology becomes available.

2628.4

Sincerely,

Ernest Prieto

Chubasco Sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 18:23:36

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Comment Log Display

Below is the comment you selected to display. Comment 2629 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Victoria
Last Name: McMurchie
Email Address: vickie@danapointchamber.com
Affiliation:

Subject: Proposed CARB Commercial Sportfishing Boat Engine Regulations

Comment:

Good evening,

The Dana Point Chamber of Commerce strongly opposes the engine emission regulations proposed by the California Air Resources Board. Attached you will find a letter containing our concerns.

Please don't hesitate to reach out should you have any questions, or would like to discuss this further.

Best,
Vickie McMurchie
Executive Director, Dana Point Chamber of Commerce

Attachment: www.arb.ca.gov/lists/com-attach/3010-chc2021-UTVUIllwVGRQCQBn.pdf

Original File Name: DPCC_GovAffairs_CARBLetter_Opposition_NovHearing.pdf

Date and Time Comment Was Submitted: 2021-11-12 19:47:09

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November 11, 2021

The Honorable Gavin Newsom
State Capitol
Office of the Governor
Sacramento, CA 95814

RE: Proposed CARB Commercial Sportfishing Boat Engine Regulations

Dear Governor Newsom,

The community of Dana Point is world renowned for its fine beaches and access to offshore fishing and whale watching. Our community's natural amenities and access to the sea draws tens of thousands of visitors and tourists to our city each year, and is a major driver of economic activity, jobs and tax revenue for critical public services. As the Dolphin & Whale Watching Capital of the World® and the first Whale Heritage Site in the Americas, Dana Point has the best year-round whale watching, including the greatest concentration of blue whales and dolphins on earth.

2629.1

Given our community's dependency on visitor spending, we are seriously concerned about engine emission regulations proposed by the California Air Resources Board (CARB). There appears to be broad based consensus among chambers of commerce along the California coast that the regulations as drafted are extraordinarily cost prohibitive due to the lack of existing technology. And perhaps more alarming, there are a host of safety concerns associated with exhaust modifications and equipment that have not been determined safe for marine passenger vessels.

2629.2

Consequently, the regulations require boat owners to make significant and costly modifications to their engines and hulls, starting as soon as January 2023, and not when the lifespan of their boats or engines expire. When this can't be achieved safely, they will be forced to either purchase new vessels or worse, go out of business. We believe that CARB is imposing an unreasonable timetable by requiring that compliance begin some 17-months from now and during a pandemic that continues to restrict economic activity. Moreover, the proposed regulations completely disregard the lack of existing technology and economic feasibility. We've heard direct feedback from various owners who are concerned that once these boats are regulated, they'll will no longer be able to apply for grants which help to ensure that their boats are up to date on the latest pro-environment modifications.

2629.3

2629.4



This real, and arguably, eminent threat to our sportfishing and whale watching industries, has not been totally lost on CARB staff which write, "...staff cannot rule out the possibility of some business elimination if costs cannot be passed onto the customer or if passing through costs would result in significant decrease in demand." (Standardized Regulatory Impact Assessment, July 7, 2021). According to those intimately familiar with boat operations and sportfishing clientele, CARB's economic analysis grossly overestimates profit margins, even those that can occur during the best of economic times. Moreover, CARB is misguided if they believe the regulatory costs can be passed onto customers, especially if the price of passenger tickets double, to recover the cost of purchasing a new vessel. The result of these regulations is sad and foreseeable; many, if not most, small boat operators will go out of business as passenger trips and sales decline.

2629.5

As a community, we share your desire to reduce engine emissions and to protect the environment, as does the boating industry. We applaud your desire to restore half of the 1.2 million tourism and hospitality jobs lost during the COVID-19 pandemic. However, we simply don't believe this can be achieved if protecting those who own sportfishing and whale watching vessels is not part of your economic plan. There must be a sensible solution that protects our environment without harming our local economy and displacing businesses and workers dependent on outdoor tourism for jobs.

Thank you for considering the point of view of a community whose economy is dependent on providing visitors and tourists an abundant source of outdoor activities when they visit our Harbor and beautiful coastal community.

Sincerely,

Victoria McMurchie
Executive Director

CC: Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street, Sacramento, CA 95814

Comment Log Display

Below is the comment you selected to display. Comment 2630 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Stump
Email Address: stumpyd123@gmail.com
Affiliation:

Subject: Clean up the Port

Comment:

All parts of the economy need to shift away from fossil fuels, including shipping. I am resident of LA, and I want clean air all year around, not only when the winds blow just right.

The easiest place to take action on shipping is with local port boats like tug boats. Please take immediate action on the following items by strengthening the Commercial Craft rule:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule 2630.1
2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 2630.2
3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation 2630.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 19:55:03

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Comment Log Display

**Below is the comment you selected to display.
Comment 2631 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: rudy
Last Name: ceballos
Email Address: rdyceballos_14@yahoo.com
Affiliation:

Subject: sport fishing
Comment:
DONT stop sport fishing..

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-12 20:45:56

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Comment Log Display

Below is the comment you selected to display. Comment 2632 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Chang
Email Address: Captainchang@yahoo.com
Affiliation:

Subject: Engine requirements for charter boats

Comment:

I am against this possible new requirement of passenger vessels being requirements for new modifications. This new requirement is very extreme and it's going to put many boats out of business in the name of clean air.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 01:13:51

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Comment Log Display

Below is the comment you selected to display. Comment 2633 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Chang
Email Address: Captainchang@yahoo.com
Affiliation:

Subject: Engine requirements for charter boats

Comment:

I am against this possible new requirement of passenger vessels being requirements for new modifications. This new requirement is very extreme and it's going to put many boats out of business in the name of clean air.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 01:13:51

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**Below is the comment you selected to display.
Comment 2634 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Joseph
Last Name: Gallia
Email Address: Galliajoseph@yahoo.com
Affiliation:

Subject: Commercial passenger vessels

Comment:

Don't take our sport fishing from us . This is ridiculous

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:11:22

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Comment Log Display

Below is the comment you selected to display. Comment 2635 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: kelli
Last Name: Gallia
Email Address: kellidickinson@sbcglobal.net
Affiliation:

Subject: proposed amendments to commercial craft regulation

Comment:

I am opposed to this new regulation. It is unreasonable to ask. Especially when this technology is not even available.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:13:44

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Comment Log Display

Below is the comment you selected to display. Comment 2636 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Balfour
Last Name: Gerber
Email Address: bal4bal@sbcglobal.net
Affiliation:

Subject: Environmental clean up

Comment:

- | | |
|---|--------|
| Require a 100% zero-emission transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule | 2636.1 |
| Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves more emission reductions | 2636.2 |
| Increase funding for zero-emissions boat pilots and retrofits to spur innovation | 2636.3 |

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:52:38

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Comment Log Display

Below is the comment you selected to display. Comment 2637 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: tom
Last Name: schiff
Email Address: tschiffsd@aol.com
Affiliation: Concerned Recreational Fisherman

Subject: NO to Mandatory new engines for Boaters.

Comment:

Please do not force Boat owners to get a new engine. Many simply cannot afford it.

Tom in SD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:00:22

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**Below is the comment you selected to display.
Comment 2638 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dennis
Last Name: Palmer
Email Address: dmpalmer48@sbcglobal.net
Affiliation:

Subject: New regs for whale watching, sportfishing boats

Comment:

Please don't implement this new regulations! It will put those industries out of business and really hurt the little operations

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:57:19

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Comment Log Display

Below is the comment you selected to display. Comment 2639 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clint
Last Name: Bales
Email Address: clint.bales@yahoo.com
Affiliation:

Subject: Please give the fishing industry more time to solve this problem

Comment:

Please give the fishing industry more time to solve this problem.
Thank you you will ruin the lives of thousands of people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:03:20

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Comment Log Display

Below is the comment you selected to display. Comment 2640 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen

Last Name: Bicknell

Email Address: steveb@silveradocontractors.com

Affiliation:

Subject: Ca. Air Resources proposal for commercial harbor craft regulations

Comment:

Dear Sir,

I am writing this letter to you in support of the many Family owned sportfishing vessels in California that may face strict new air quality standards and make it cost prohibitive to many. I am a sport fisherman who regularly fishes on a family owned commercial sport fishing vessel located in Sausalito CA. I Oppose the new CARB rules that may put these small Family owned operations out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 08:54:26

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Comment Log Display

Below is the comment you selected to display. Comment 2641 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Sanderson
Email Address: jsanderson311@gmail.com
Affiliation:

Subject: Please save our fishing boat families

Comment:

Please do not sacrifice over 200 families with legislation that has no place in our society. Families lives are at steak, this will be remembered at election time!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:03:28

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Comment Log Display

Below is the comment you selected to display. Comment 2642 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Douglas
Last Name: Lee
Email Address: azolotone@aol.com
Affiliation:

Subject: Sportfishing Carb proposed rules

Comment:

As a fisherman, boat owner , tax payer, California resident, I am strongly opposed to proposed CARB requirement for new emmision rules.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:02:10

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Comment Log Display

**Below is the comment you selected to display.
Comment 2643 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Stephen
Last Name: Shipley
Email Address: sjshipley2000@yahoo.com
Affiliation:

Subject: Carb

Comment:

Please let sportboating continue on the west coast as is.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:04:41

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Comment Log Display

Below is the comment you selected to display. Comment 2644 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Fast
Email Address: mrthomasrfast@gmail.com
Affiliation:

Subject: Sport Fishing

Comment:

Please cease and desist your attack on owner operator businesses, especially in the sport fishing industry. How many people will you put out of work? How many people will lose a wonderful experience, and in the end, how many owners do you expect to comply with such a draconian edict? Stop and think about how the public views your position. A day will come when voters will overturn your foolishness.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:00:19

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Comment Log Display

**Below is the comment you selected to display.
Comment 2645 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: James
Last Name: Dobrott
Email Address: jedobrott@gmail.com
Affiliation:

Subject: sportfishing and whale watching boats

Comment:

protect the families that operate 174 passenger sportfishing and whale watching boats in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:05:07

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Comment Log Display

Below is the comment you selected to display. Comment 2646 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Henry
Last Name: Mencias
Email Address: Henryrmencias@gmail.com
Affiliation:

Subject: California sport fishing

Comment:

Keep California sport fishing open Been fishing out here in the ocean since I was five years old thank you Henry Mencias

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:01:42

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Comment Log Display

Below is the comment you selected to display. Comment 2647 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Christensen
Email Address: jchristensen226@sbcglobal.net
Affiliation:

Subject: Engine mandate on fishing boats
Comment:
Get real with your bureaucratic Nonsense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:05:14

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Comment Log Display

Below is the comment you selected to display. Comment 2648 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Buddy
Last Name: Layport
Email Address: bky3k@yahoo.com
Affiliation:

Subject: CARB Sport Fishing Mandate

Comment:

Please do not ruin San Diego's, or California's sport fishing. Mandating new boats would inflate charter costs in a state already flooded with taxes and some the highest living costs in the nation. I simply could not afford to pay for these new boats and the sport I grew up loving would be a thing of the past. Please please, do not mandate new boats for sport fishing!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:03:48

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Comment Log Display

Below is the comment you selected to display. Comment 2649 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Armstrong
Email Address: armstrongs@gmail.com
Affiliation:

Subject: Proposed Commercial harbor craft regs

Comment:

Hello

Please do not propose legislation that will put the fishing and whale watching industry out of business, and instead propose something that is more reasonable.

Regards,
Chris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2650 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Daniel
Last Name: Newman
Email Address: newman84@sbcglobal.net
Affiliation:

Subject: please save sportfishing
Comment:
Save our boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:10:41

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Comment Log Display

Below is the comment you selected to display. Comment 2651 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jen
Last Name: Hamaker
Email Address: jenhamaker1@gmail.com
Affiliation:

Subject: STOP TAKING OUR \$ AND LIVELIHOODS

Comment:

STOP TAKING OUR MONEY AND LIVELIHOODS! If you were truly concerned with saving the environment, massively reducing CO2 emissions and saving lives, YOU WOULD FOCUS ON MANAGING OUR FORESTS! Our forests burn every year and at an alarming rate. Why are you focusing on an industry that is already high regulated but doesn't emit near as much GHG as just one wildfire? Not part of your agenda? What is your agenda? What do we have to look forward to? No fishing? No natural resource jobs, no natural resource industry? I hope you realize that the old days of over fishing, over harvesting, over taking the earth are gone, at least here in the USA. We self regulate and are highly regulated by bureaucracies, laws etc. If you truly want to reduce GHG emissions, I suggest you focus on managing our forests and somehow get China and other countries to stop polluting. STOP TAKING OUR \$\$ AND LIVELIHOODS!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:02:00

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Comment Log Display

Below is the comment you selected to display. Comment 2652 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Shaw
Email Address: sandtrap98@gmail.com
Affiliation:

Subject: Clerk of the Board

Comment:

Please stop this regulation I am a avid fishermen this would destroy the whole fishing industry and take away the joy of every fishermen hobby and life in general

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:10:20

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Comment Log Display

Below is the comment you selected to display. Comment 2653 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeffery
Last Name: Vladic
Email Address: jefferyvladic1@gmail.com
Affiliation:

Subject: The Attack on Fisherman

Comment:

The demands of this Bill would take the Ticket Prices out of the Range of Disabled Veterans like myself. Going out on these Boats is a way of life for me and the Captains and Crew members. It's unreasonable to expect the average fisherman to bare the brunt of the costs that this would cost!!!

Jeffery Vladic

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:05:37

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Comment Log Display

Below is the comment you selected to display. Comment 2654 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Randy
Last Name: Sprout
Email Address: r.sprout@att.net
Affiliation: Marina Del Rey Anglers

Subject: Commercial Harbor Craft Regulation

Comment:

Please lets help these people all we can!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:12:44

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Comment Log Display

Below is the comment you selected to display. Comment 2655 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Sapiro
Email Address: mark@msapiro.net
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

The Amendments to the Commercial Harbor Craft Regulation as proposed will have a serious negative impact on the many individual and small family operators of commercial passenger sport fishing and whale watching boats in California. Under the proposed regulations, the majority of these will not be able to continue operation. This will have a major economic impact on the sport fishing industry and will remove the ability of people to continue to enjoy these activities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:04:31

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Comment Log Display

Below is the comment you selected to display. Comment 2656 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tyler
Last Name: VanDenburgh
Email Address: tylervandenburg@gmail.com
Affiliation:

Subject: Buy everyone new boats!

Comment:

I totally agree we need to do more to protect this earth. They being said, to make almost 200 companies buy new boats to be Compliant with a law you are trying to pass is crazy. Small business have already taken a huge toll and now you want to crush them. It's simple, do what you guys do best, "borrow" more money from the federal government, and buy these companies these new eco friendly boats. What's another 5 million dollars to you guys? It means the world to the people who own these boats, and to the people like me who already don't like the outrageous price it is to go fishing or whale watching on a charter boat.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:08:12

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Comment Log Display

Below is the comment you selected to display. Comment 2657 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Johnson
Email Address: Rickyracer2@verizon.net
Affiliation:

Subject: Stop the political games

Comment:

You can't save the world by putting hard-working people out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:36

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Comment Log Display

**Below is the comment you selected to display.
Comment 2658 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jerry
Last Name: Claxton
Email Address: jd.claxton@yahoo.com
Affiliation:

Subject: Save our sport fishing STOP damaging regulations
Comment:
Save our sport fishing STOP damaging regulations

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:13:42

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Comment Log Display

Below is the comment you selected to display. Comment 2659 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jim
Last Name: Carver
Email Address: jrc92024@gmail.com
Affiliation:

Subject: CHC2021 - Save Our Boats

Comment:

The proposed regulations will be a disaster for our sport fishing industry. Already fuel prices have drives costs out of the reach of many people. These proposed regulations will force many if not all boat owners out of business. These are small businesses without the deep pockets needed to build new boats capable of meeting these onerous requirements. I urge CARB to find a reasonable middle ground!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:11:08

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Comment Log Display

**Below is the comment you selected to display.
Comment 2660 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Irwin
Last Name: Schwartz
Email Address: DennisSchwartzQC@gmail.com
Affiliation:

Subject: CARB

Comment:

I am against the proposal to restrict commercial sportfishing boats to operate with Diesel engines thereby causing them to have purchase new boats or change their existing boats in order to reduce carbon emissions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:07:11

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Comment Log Display

Below is the comment you selected to display. Comment 2661 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kristopher
Last Name: Blomdahl
Email Address: krisblomdahl1985@gmail.com
Affiliation:

Subject: Save Sportfishing

Comment:

Please reconsider the mandatory upgrade on the Southern California sportfishing fleet! I have frequented the H&M Landing site numerous times with my budding family and hope to have that opportunity again soon. But if they are required to update the vessels than I will likely not be able to take part in the God giving right of access to public water and marine life. Please determine a better path forward that does not involve raising costs for all. Lastly, the anglers that have dedicated their lives to this noble profession would be met with insurmountable losses.

For the sake of decency please generate a plan that keeps all parties effected paramount, and can help ensure fishing and the ocean are available for generations to come.

Regards,
Kris Blomdahl

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:07:21

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Comment Log Display

Below is the comment you selected to display. Comment 2662 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Braud
Email Address: rbraud@gusd.org
Affiliation:

Subject: Engine rewuirements

Comment:

To whom it may concern,

We cannot do this to the sportfishing industry! People deserve an affordable sportfishing experience and the hardworking captains deserve a chance to earn a good wage. Please reconsider your position!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:10:01

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Comment Log Display

**Below is the comment you selected to display.
Comment 2663 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.**

First Name: Keith
Last Name: Louis
Email Address: Kalouis@gmail.com
Affiliation:

Subject: CARB mandate

Comment:

I feel with this new CARB mandate that generations and generations of Sports Fishermen will have end their legacy. This action could be done a little at a time so they can afford it.	2663.1
If the state pushes this they should offer Zero% loans to comply. I think this mandate could potentially add to the bigger problem of Homelessness.	2663.2

Keith Louis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:03:04

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Comment Log Display

Below is the comment you selected to display. Comment 2664 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dave
Last Name: Walker
Email Address: davethreewits@sbcglobal.net
Affiliation:

Subject: New Diesel Engine Requirements for Sportfishing Boats

Comment:

Requiring new standards for California's sport-fishing fleet will kill the industry and we will lose a valuable resource that will never come back. Stop the insanity and work with standards for clean air that are attainable and realistic.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:12:13

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Comment Log Display

**Below is the comment you selected to display.
Comment 2665 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Timothy
Last Name: Woolston
Email Address: woolston506@cox.net
Affiliation: fisherman

Subject: CHC2021

Comment:

please reconsider these outlandish requests. I enjoy fishing off the coast in our sport boat fleet, and I can't afford to go if you make them retrofit to these new engines. I live close to the southern border and watch all these polluting trucks cross into San Diego every day. do something about them first. The fishing fleet doesn't do as much damage as they do !

2665.1

2665.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:39

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Comment Log Display

**Below is the comment you selected to display.
Comment 2666 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Tom
Last Name: Leary
Email Address: Tleary1026@gmail.com
Affiliation:

Subject: Charter boats

Comment:

Charter boats need to be exempt from proposed air quality standards. Go after the real issue, container ships and tankers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:14:34

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Comment Log Display

Below is the comment you selected to display. Comment 2667 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Wayne
Last Name: Kanakaris
Email Address: waynekanakaris1@gmail.com
Affiliation:

Subject: sportfishing diesel engines

Comment:

Please consider the livlyhood of the families and employees that risk loosing their careers and employment with this illfated mandate. Many of these boats simply cannot be retrofited with larger and expensive engines.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:11:14

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Comment Log Display

Below is the comment you selected to display. Comment 2668 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Allan
Last Name: Chan
Email Address: a.chan@comcast.net
Affiliation: Csba

Subject: Not right to chang3 the rules

Comment:

I urge you to please not change anything in regards to party boats and guided trips. No everyone can afford their own boat and if the owners have to upgrade their boats who would it hurt. Clients would pay more to catch fish and go touring, not all boat owners are wealthy. On the contrary bait, launching, dockage, fuel, bait, permits, registrations and licenses keep going up.

It's like you are forcing many of us out of business and out of California. I see more and more people leaving. I don't like change but you are forcing me look out of state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:03:49

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Comment Log Display

**Below is the comment you selected to display.
Comment 2669 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Alan
Last Name: Spilkin
Email Address: ajspilkin1@gmail.com
Affiliation:

Subject: Sports Fishing regulations

Comment:

Please refrain from imposing more restrictions on 174 passenger sportfishing and whale watching boats in California. The economic impact on business and consumers does not justify requiring engine modifications or replacement.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:16:24

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Comment Log Display

**Below is the comment you selected to display.
Comment 2670 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: leroy
Last Name: hensley
Email Address: leroyh11@charter.net
Affiliation:

Subject: keeping the sport fishing industry open

Comment:

leave the sportfishing industry ALONE MANY PEOPLE MAKE THERE LIVING
IN THE SPORT FISHING INDUSTRY

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:16:10

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Comment Log Display

Below is the comment you selected to display. Comment 2671 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Perea
Email Address: pperea@me.com
Affiliation:

Subject: Save sport fishing, boating and whale watching!

Comment:

For many many years and generations after generations we have been enjoying our waters off the coast of many coastlines and water ways. Our memories and stories that we share among family and friends are extraordinary and priceless generations after generations that are told for futures to come. My fear is that these will stop. Our lives on the water should be at our leisure as Americans who grew up here as a normal way of life and lifestyle. If the opportunity is taken away because of restrictions, it may taint the future of our love for life on the water. Please re consider the actions of our future. Much love!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:41

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Comment Log Display

Below is the comment you selected to display. Comment 2672 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bill
Last Name: Philpott
Email Address: diefishing@sbcglobal.net
Affiliation:

Subject: CHC2021 - Save Our Boats

Comment:

My wife and I enjoy taking our very young daughter on whale watching trips out of Monterey. We do not have a lot of money but always work hard to save for an annual trip. These new regulations would make it very cost prohibitive for us to do so. Please reconsider this. We would like to be able to keep taking our daughter to see the whales.
Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:11:56

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Comment Log Display

Below is the comment you selected to display. Comment 2673 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alex
Last Name: Williams
Email Address: williams.alex.w@gmail.com
Affiliation:

Subject: Chc2021 comments

Comment:

Hello,

I want to voice my opposition to the proposed restrictions on sport and harbor craft. It's much easier to make legislation than to be the one to implement it. I would strongly encourage the CARB to not implement the proposed changes and study alternate ways to help the commercial fishing and tour industries in particular reduce their carbon footprint.

Regards,

Alex Williams

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:16:45

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Comment Log Display

Below is the comment you selected to display. Comment 2674 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Eliot
Last Name: Brown
Email Address: ecalcano1@gmail.com
Affiliation:

Subject: Save Our Boats

Comment:

Do any of you on the CARB actually fish or have gone fishing? Have you gone on whale-watching boats? If you have, then please give more thought to how you're trying to resolve this problem. Please stop acting like minimally informed politicians and more like fishermen, whale-watchers, and boat owners and back off of your unfair & unreasonable demands.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:12:39

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Comment Log Display

**Below is the comment you selected to display.
Comment 2675 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: chad
Last Name: Neel
Email Address: Speedymcfastpants@gmail.com
Affiliation:

Subject: DEAR C.A.R.B □□□□

Comment:

STOP TRYING to implement TAXING ON STUFF YOU HAVE NO IDEA about!
□□□□□□□□□□

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:18:10

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Comment Log Display

Below is the comment you selected to display. Comment 2676 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Byron
Last Name: Tobey
Email Address: btobey20@gmail.com
Affiliation:

Subject: Carb requirement for sport and whale watching boats

Comment:

Please protect the families that operate 174 passenger sportfishing and whale watching boats in California. The Pending CARB requirement will put many of these operator out of business and restrict the access to our wonderful ocean and waterways. The access allows people to better understand the valuable resources in our ocean and creates respect for maintaining it. Please do not implement these new requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:15:47

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Comment Log Display

Below is the comment you selected to display. Comment 2677 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Susan
Last Name: Bailey
Email Address: suzi_bailey@sbcglobal.net
Affiliation:

Subject: chc2021 Save Our Boats

Comment:

I strongly disagree with the proposed, onerous rules for boats in California. The new rules would cause irreparable harm to the charter fishing/whale watching industry. Please reconsider rules that would put these important members of our society out of work, and stop thousands of citizens from enjoying trips on the oceans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:16:35

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Comment Log Display

Below is the comment you selected to display. Comment 2678 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gerry
Last Name: Mueller
Email Address: gerry.mueller@cox.net
Affiliation: Fisherman senior citizen

Subject: Stop these mandates

Comment:

How can you make such rash decisions that stop a business & deprive us seniors from using our ocean. If you pass this the sport fishing industry will cease to exist & we the people can't afford to pay 3 3 times the price.

We the people will vote all of you out of your positions & make sure you never get elected or appointed again. Maybe you will then see how the shoe fits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:18:15

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Comment Log Display

Below is the comment you selected to display. Comment 2679 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Johnson
Email Address: Rickyracer2@verizon.net
Affiliation:

Subject: Stop the political games

Comment:

You can't save the world by putting hard-working people out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:36

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Comment Log Display

**Below is the comment you selected to display.
Comment 2680 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mariano
Last Name: Bacolores
Email Address: Zeta15@aol.com
Affiliation:

Subject: save our boats
Comment:
Pls save our boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:24:48

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Comment Log Display

Below is the comment you selected to display. Comment 2681 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Johnson
Email Address: Rickyracer2@verizon.net
Affiliation:

Subject: Stop the political games

Comment:

You can't save the world by putting hard-working people out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:06:36

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Comment Log Display

Below is the comment you selected to display. Comment 2682 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Rowland
Email Address: Fly_n_sb@yahoo.com
Affiliation:

Subject: Please do not destroy this industry

Comment:

Do not destroy this industry.

Sportfishing & whale watching matters to Everyday People

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:25:39

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Comment Log Display

Below is the comment you selected to display. Comment 2683 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Justin
Last Name: Bandel
Email Address: jbt9778@yahoo.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

Stop messing with people's lives if you want the boats upgraded pay for it yourself. The state has a huge surplus and instead of giving it to illegal immigrants give it to the hard working Americans who deserve it. Have been on a few cattle boats with my son over the years and have had a great time but if the price triples you can forget about it. It's already expensive because of the ridiculous gas prices in this state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:23:19

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Comment Log Display

Below is the comment you selected to display. Comment 2684 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leo
Last Name: Komonchak
Email Address: leo.komonchak@cox.net
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

I am opposed to this proposed amendment since it would end the sportfishing industry in southern California that not only provides jobs and income for Californians it provides a recreational sportfishing for many Californians. This would limit access and take away the right to fish our local waters. Why would you not seek compromise? Just change it with no regard to the above mentioned are tough consequences. It simply makes no sense. I am sure with technology there are ways to set levels to reduce this form of pollution over time as technology improves so does the air quality so setting efficient goal over time puts everyone pulling in the same direction for the same cause instead of this adversarial approach you are taking. Give us a break for once. I would be happy to volunteer in helping to achieve the goal as a mutual endeavor with Marine Sportfishing. I fished So Cal waters for the past 25 years. Thank you.

2684.1

2684.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:16:10

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Comment Log Display

Below is the comment you selected to display. Comment 2685 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: Syapin
Email Address: psyapin@yahoo.com
Affiliation:

Subject: Save sportfishing in California

Comment:

As a native Angeles I grew up fishing the Pacific Ocean, and boat trips were the ultimate! For you to take that from me, my children, and grandchildren is criminal. How you expect captains that lost a year of income from the pandemic to install a new engine that won't fit in their boat is the height of folly and shows how out of touch CARB is with Californians. Your hidden agenda is showing. Keep sportfishing alive in the golden state- don't tarnish it. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:19:21

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Comment Log Display

Below is the comment you selected to display. Comment 2686 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: doyle
Email Address: cdoyle78@gmail.com
Affiliation:

Subject: Please same Sportfishing

Comment:

I grew up fishing and whale watching in Southern California. I have some wonderful memories growing up fishing on local and overnight fishing boats. I have young kids now and we still enjoy going out on a sport boat or whale watching boat once a year. My kids look forward every year to the fishing trips. These trips spark there interest I the ocean and outdoors. There are other option out there to fish but nothing like going out on a sport boat. Please do not end this important and wonderful industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:25:26

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Comment Log Display

Below is the comment you selected to display. Comment 2687 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: PATRICIA
Last Name: Schmicking
Email Address: pschmicking@gmail.com
Affiliation:

Subject: Protect Fishing

Comment:

Hello, I love the Ocean and agree with protecting it. I believe there is a way to find a balance between fishing and protecting fish. Banning fishing is a 'knee jerk' reaction without a lot of thought of the ramification. Please investigate other options to help come to a reasonable solution. Protect the responsible fishing businesses and fisherman. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:24:59

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Comment Log Display

Below is the comment you selected to display. Comment 2688 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Mitchell
Email Address: Cmittchell1510@gmail.com
Affiliation:

Subject: Sport fishing and whale watching.

Comment:

To whom it may concern,

I am writing to you in regards to the purposed new regulations on our fishing boats. I am an angler and have recently got my 9 year old son into fishing. If the cost of tickets go up to go on a trip I will not be able to afford to take my son out anymore.

I have to save for 3 months for my son and I to be able to go on one trip. I do not want my son to lose interest in this sport and become interested in other things that are not productive. Please rethink this purposed bill so that people like myself can continue to enjoy this sport with our kids. Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:22:37

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Comment Log Display

Below is the comment you selected to display. Comment 2689 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Debbie
Last Name: Dyer
Email Address: debbiedyer100@aol.com
Affiliation:

Subject: My Opinion

Comment:

You should not have everyone who owns a boat change out their engines. They should be grandfathered in. From a date forward you have to buy new boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:19:05

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Comment Log Display

Below is the comment you selected to display. Comment 2690 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: MEL
Last Name: BEARD
Email Address: rubicon1352@gmail.com
Affiliation:

Subject: CHC2021

Comment:

Please do not put the sportfishing industry out of business. The new proposed regulation will destroy the livelihood of these families. This business has been a part of the fishing history of many people in the coastal area and others for generations. Please don't change it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:13:23

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Comment Log Display

**Below is the comment you selected to display.
Comment 2691 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Robert
Last Name: Crossette
Email Address: bcrossb@gmail.com
Affiliation:

Subject: Retrofit

Comment:

Please reconsider the proposed retrofit of commercial fishing and whale watching boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:30:38

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Comment Log Display

**Below is the comment you selected to display.
Comment 2692 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mario
Last Name: Magana
Email Address: horse69@gmail.com
Affiliation:

Subject: Sportfishing

Comment:

Its a family tradition save sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:30:15

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Comment Log Display

Below is the comment you selected to display. Comment 2693 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Robinson
Email Address: robinsonmotorsports1@gmail.com
Affiliation: Robinson Motorsports

Subject: SPORT FISHING BOAT ENGINE MANDATE

Comment:

I am writing to request the CARB back off on shutting down the sport fishing and whale watching industry with the over the top new engine requirements. I am a San Diego Native, I remember going on whale watching trips as a school child and now I am a sport fishing enthusiast. These boats are generally small family owned operations that provide great opportunities for people of all ages, races, and financial situations to see the great outdoors and enjoy sportfishing on an equal basis. Not everyone can afford to buy, maintain, and store a fishing boat and the new rules proposed would put most of the sport fishing fleet out of business. Those that do survive would be required to raise fares substantially, pricing many people out of the opportunity for this unique activity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:15:04

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Comment Log Display

Below is the comment you selected to display. Comment 2694 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lee
Last Name: Gurtner
Email Address: leeg22@sbcglobal.net
Affiliation: Ocean Fishing Fans

Subject: Stop the destruction of the commercial boat industry

Comment:

This regulation will certainly destroy the commercial boating industry; both fishing and whale watching, etc. Ignoring the plight of the boat owners and causing them to lose their boats, and go out of business seems to be another power grab by the State of CA and its bureaucracies. Destroy, don't work with these people. Unbelievable. Who the heck are your monsters, anyway? unreasonable regs and rules. Sadly, Lee Gurtner Nevada City CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:27:29

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Comment Log Display

Below is the comment you selected to display. Comment 2695 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Donald
Last Name: Hayes
Email Address: dhayes1@ca.rr.com
Affiliation:

Subject: Sport fishing legislation

Comment:

I am wholeheartedly against the legislation that will have the drastic effect of shutting down the sport fishing and whale watching business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:31:42

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Comment Log Display

Below is the comment you selected to display. Comment 2696 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ahna
Last Name: McClung
Email Address: Watermanresponse@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Reg

Comment:

My husband and our three teenager operate a marine towing company in Orange County. The proposed regulation would not provide the power (hp) we need to do our job. The modifications to our specific boats would be more costly than purchasing new boats. The lack of power is the main concern. If my boats can't tug broken down vessels then we have a huge concern for the safety of over 700,000 boats that require assistance each year from towing companies. Please save our jobs and come down to our boats and see what we do before making crucial decisions that effect millions of people negatively.

Thank you.

Ahna McClung

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:26:33

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Comment Log Display

**Below is the comment you selected to display.
Comment 2697 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: christy
Email Address: john.christy@daltile.com
Affiliation:

Subject: Save the sports fishing industry
Comment:
Stop the madness save our sports fishing industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:35:04

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Comment Log Display

Below is the comment you selected to display. Comment 2698 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: JARED
Last Name: MOORE
Email Address: jaredmmoore85@gmail.com
Affiliation:

Subject: Please stop this madness

Comment:

To whom it may concern,

I am a single father and a simple man with only one hobby. If you go through with this mandate I will no longer be able to afford this hobby. Please think of us that need this peace to survive. This is a huge mental health escape and I fear that if I loose this I will loose a peace of myself.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:31:51

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Comment Log Display

Below is the comment you selected to display. Comment 2699 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Billie
Last Name: Criss
Email Address: billiejcriss@yahoo.com
Affiliation: Customer

Subject: Save the boats

Comment:

Deep Sea Fishing and whale watching is provided by family owned boating companies and if it were not for those companies my family would have never seen Whales out in the ocean and would have never had the opportunity to go deep sea fishing if you take the boats away people can't afford to buy new ones and all that will be lost so please save the boats
Billie Criss

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:35:47

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Comment Log Display

Below is the comment you selected to display. Comment 2700 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kadon
Last Name: Barns
Email Address: Kadon.Barns@gmail.com
Affiliation:

Subject: California Sportfishing and Whale Watching

Comment:

We can not shut down these family owned businesses that have been running for 50+ years. It will eliminate so many opportunities to make great experiences and bond with loved ones. It also opens people's eyes up to the ocean and what we can do to help preserve it. We can not shut down sportfishing and whale watching or enforce laws that require them to spend so much money that they either go out of business or have to charge passengers an outrageous amount just to get out on the water.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:34:34

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Comment Log Display

Below is the comment you selected to display. Comment 2701 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Juan
Last Name: Ramirez
Email Address: Juandr.1994@yahoo.com
Affiliation:

Subject: Save our sport fishing.

Comment:

Please oppose the new regulation that will be a major hit to the sport fishing industry and put tons of hardworking American families out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:39:18

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Comment Log Display

Below is the comment you selected to display. Comment 2702 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joel
Last Name: Kaplan
Email Address: 1kaplan1@verizon.net
Affiliation:

Subject: Fishing Fleet Survivability

Comment:

Please, please, please do not implement the proposed rules. There are far bigger "fish to fry" in reducing air and water pollution. These boats are the lifeline to general population recreational fishing. Forcing them to comply with the proposed mandates will likely put them out of business. In turn, the CDFW will lose cash flow due to people no longer needing an ocean fishing license. That is just one of the negative cash flow repercussions that would cascade from this proposed amendment, should it be implemented.

2702.1

2702.2

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:37:35

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Below is the comment you selected to display. Comment 2703 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Genaro
Last Name: Taylan
Email Address: Gtaylorjr@aol.com
Affiliation:

Subject: Carb

Comment:

I don't support the carb emissions proposed requiring new engines for Sportfishing boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:37:00

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Comment Log Display

**Below is the comment you selected to display.
Comment 2704 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Doug
Last Name: Scrimmes
Email Address: D.scrimes@yahoo.com
Affiliation:

Subject: Sports fishing in California
Comment:
Stop amendments to sports fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:35:10

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Comment Log Display

Below is the comment you selected to display. Comment 2705 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Douglas
Last Name: Dulgeroff
Email Address: ddulgeroff@verizon.net
Affiliation:

Subject: Sport fishing boats

Comment:

Please allow the sports fishing fleet to continue to operate as is. The changes you are suggesting will put the majority of boat owners out of business. I have been going out on these boats since I was a young child I have taken my children out as well. Today I continue to go out on the boats. I look forward to taking my grandchildren out. I feel that the environmental impact These boats have is insignificant to the benefits they give to our citizens and state. I appreciate your consideration. Doug Dulgeroff

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:38:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 2706 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Chet
Last Name: Searle
Email Address: chetsearle@gmail.com
Affiliation:

Subject: CHC-2021 Save our boats

Comment:

I appose any new regulations on sportfishing and whale watching boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:33:35

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Comment Log Display

Below is the comment you selected to display. Comment 2707 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Earl
Last Name: Denos
Email Address: esdenos@cox.net
Affiliation:

Subject: SAVE OUR FISHING

Comment:

I have been an ocean fisherman for over 70 years. I have never thought that such a restriction could be considered. Please carefully consider your decision. It will really change the lives of our older citizens here in California. Thanks for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:42:26

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Comment Log Display

Below is the comment you selected to display. Comment 2708 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Keith
Last Name: Mossman
Email Address: kalanimossman@yahoo.com
Affiliation:

Subject: Save the Fishing Boat industry!

Comment:

By making these demands for boat owners will be devastating! For one do you know how many jobs will be lost through out california! Too many, how is this supposed to make America great again by closing jobs for thousands of people. Not only the boat operators get affected but the whole fishing industry restaurants, fishing stores, etc.... that's gonna cause millions of jobs to be affected by this demand. Look at the whole picture!

thanks

Keith K Mossman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:31:43

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Comment Log Display

Below is the comment you selected to display. Comment 2709 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jon
Last Name: Whitcomb
Email Address: jonwhitcomb@verizon.net
Affiliation: Fisherman & whale watcher

Subject: CHC2021- Save our boats

Comment:

This is terrible legislation, please do not pass it. You will put a lot of people out of business if you do. Just what we don't need especially during this time with Covid forcing businesses to close and putting people out of work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:39:45

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Comment Log Display

Below is the comment you selected to display. Comment 2710 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Aziz
Last Name: Rahman
Email Address: aziz2001nsh@yahoo.com
Affiliation:

Subject: Protect families of sportfishing

Comment:

I request Newsom Administration to protect the families of sport fishing. Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:40:37

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Comment Log Display

Below is the comment you selected to display. Comment 2711 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harold
Last Name: Reeser
Email Address: hreeser34@gmail.com
Affiliation: Oceanside Senior Anglers

Subject: Save California Saltwater Sportfishing

Comment:

I am not opposed to the proposed requirements to upgrade sportfishing boat engines. However, we must allow adequate time for the boat owners to make the expensive upgrade. I suggest a 10 year period to complete the upgrade. A shorter time period will force many boat owners to go out of business. Sportfishing costs will be too expensive to permit most anglers to continue their hobby. Please use a reasonable time period (10 years or more) to implement this upgrade for the new boat engines.

Thanks,
Hal Reeser

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:31:19

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Comment Log Display

**Below is the comment you selected to display.
Comment 2712 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mike
Last Name: Gugerty
Email Address: Mike@mkireps.com
Affiliation:

Subject: SAVE SPORTFISHING AND WHALE WATCHING BOATS

Comment:

Dear CARB,

The retrofitting of a Sportfishing boat would be to costly,
please reconsider this action.

I have grown up going out on these boats and have also brought my
kids and grandkids up going out. From these experiences they have
grown to have a great appreciation of marine life.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:39:19

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Comment Log Display

Below is the comment you selected to display. Comment 2713 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ronnie
Last Name: Morgan
Email Address: Fastlane351@yahoo.com
Affiliation:

Subject: Stop messing with the fishing boats

Comment:

Me and my family like to go fishing on party boat's. If you make them triple their rates to pay for high price mufflers. It will put them out of business. Me and my family can not afford to pay that price to go fishing. Stop messing with the fishing boat's!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:40:11

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Comment Log Display

Below is the comment you selected to display. Comment 2714 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: DARRELL
Last Name: Mougeottr
Email Address: Photographybydarrell@msn.com
Affiliation: None

Subject: Stopping whale watching and charter fishing boat

Comment:

Stopping whale watching and charter fishing boat is the worst thing I have heard in years. I am 66 years old and have fish from Baja California Holloway to San Francisco. I have faced with my dad since I was a little kid my uncles my mom my son-in-law and now my grandson. I have been out on whale watching trip taking pictures and posting them on my webpage online. This is the most horrendous idea I have ever heard of. I would thank you but if you decide not to do this then I will thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:08:35

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Comment Log Display

Below is the comment you selected to display. Comment 2715 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tim
Last Name: Lunceford
Email Address: tlmoving@aol.com
Affiliation:

Subject: Fishing fleet

Comment:

I am an owner operator for a trucking co and they did this to us and it almost put me out of business
I ask that you don't do the same thing to our Fishing fleets

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:49:46

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Comment Log Display

Below is the comment you selected to display. Comment 2716 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Keith
Last Name: Deagon
Email Address: kjdeagon@gmail.com
Affiliation:

Subject: CHC2021- save our boats

Comment:

Please do not require recreational fishing vessels to replace their existing engine,
. the industry is difficult as it is but if they are required to replace their engines, avid fishermen such as myself will be priced out of our favorite past time. Please don't do it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:43:05

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Comment Log Display

Below is the comment you selected to display. Comment 2717 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Wise
Email Address: jawise1977@gmail.com
Affiliation:

Subject: Keep sport fishing alive.

Comment:

Please do not pose sanctions that harm the sport fishing and whale watching. Not only is sport fishing our family past time, it is many families source of income. I don't think the impact of these actions on the fishing community have truly been accessed. To harm families just for approval of certain voters is atrocious. Please do not pose sanctions that will shut down these boats!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:44:19

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Comment Log Display

Below is the comment you selected to display. Comment 2718 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: larry
Last Name: builta
Email Address: lbuilt@gmail.com
Affiliation: none

Subject: chc2021

Comment:

When there is bad legislation why is it so hard for a political body just to abandoned it and move on....This proposed amendment does nothing for the people of CA so I can only deduce that special interest is driving this issue. CARB needs to not only weigh the impact of this on the human issue but also how this effects the business.

If CARB really wants to make an impact go after the large ships....cruise ships, container ships or other +500 ton vessels....why pick on the small businesses. We would be better of with maintenance and inspection programs that ensure the boats are operating at their best instead of trying to tell people buy a new 5 million dollar boat for your business.....how about we find new board members instead!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:31:19

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Comment Log Display

Below is the comment you selected to display. Comment 2719 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Manuel
Last Name: Vicente
Email Address: mlvcnt@gmail.com
Affiliation:

Subject: Against this regulation

Comment:

This mandate would be too expensive for private businesses and put many our of business. It will reduce public access to the ocean. I do not support this regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:47:57

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Comment Log Display

Below is the comment you selected to display. Comment 2720 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Suzie
Last Name: Traylor
Email Address: suzietraylor@gmail.com
Affiliation:

Subject: STOP engine upgrade mandate for CA Sportfishing Boats

Comment:

Please STOP the plan is to mandate engines that are too big and too heavy to fit in existing engine rooms for California Fishing boats.

The cost to the fishing boats to replace their engines will greatly impact pricing which is already expensive, to the point where people will not be able to afford to fish.

2720.1

Fishing is a great love for many adults and children and contributes to creating fantastic memories for families.

Please do not implement this mandate so quickly. To replace a boat engine will cost millions and put many boats out of business. There aren't that many boats that currently operate and if this mandate goes through, you will crush the entire Sportfishing market.

2720.2

Thank you,
Suzie Traylor

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:47:07

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Comment Log Display

Below is the comment you selected to display. Comment 2721 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Garcia
Email Address: Mgarci71189@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

Dear governor Newsom and carb,
My name is Michael Garcia, I'm 32 years old and I grew up in southern California. Along with all the beauty, entertainment and amazing restaurants this beautiful state has to offer, 1 thing has always been tied into it all, sport fishing. I grew up on countless stories about so many different boats, their crews and the people that love being out on the big blue sea. Sport fishing is more than just catching some fish, it's a lifestyle and for alot of people it's how they put food on their table, clothes on their families backs and a roof over their families heads. Majority of people that go fishing can hardly afford to pay for their trips, but they love being out there.

Alot of these boat owners are just everyday people who work to keep their business going. This new bill would devastate the sport fishing community, the prices for the boat owners would go way up and for some owners that operate their own boat nearly 7 days a week would not be able to afford the prices this new bill would bring on them. California's sport fishing isn't luxury entertainment, it's a major part of California's community that is at risk because of this new bill.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:28:09

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Comment Log Display

**Below is the comment you selected to display.
Comment 2722 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Octavio
Last Name: Villalobos
Email Address: villalobos.octavio.vo@gmail.com
Affiliation: Angler

Subject: Save sport fishing
Comment:
Save sport fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:53:14

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Comment Log Display

Below is the comment you selected to display. Comment 2723 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kathy
Last Name: Chilson
Email Address: bandmom0508@cox.net
Affiliation:

Subject: Sportfishing proposal

Comment:

I don't agree with this and do not want it passed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:44:47

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Comment Log Display

Below is the comment you selected to display. Comment 2724 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jan
Last Name: Packard
Email Address: janranpk@gmail.com
Affiliation:

Subject: Stop CARB

Comment:

Don't pass this bill which will kill the sportfishing Industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:53:34

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Comment Log Display

Below is the comment you selected to display. Comment 2725 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jose
Last Name: Hernandez
Email Address: progunjoe@yahoo.com
Affiliation:

Subject: Sportfishing Boats

Comment:

The State's plan is to mandate engines that are too big and too heavy to fit in existing engine rooms. This is a BIG PROBLEM. But, 2725.1

rather than retreating from this plan, the California Air Resources Board (CARB) insists that boat owners can simply buy new ones, that would range in cost from \$4.6 million to \$5.7 million. 2725.2

CARB insists that you can pay for these expensive new boats through increased passenger ticket prices. To buy new boats, one-day fishing and or whale watching trips would have to Triple in Price. There is no way our customers can afford to take themselves or their families out on the ocean at those prices and this will mark the beginning of the end for our businesses, our livelihoods - and your access to the sea. 2725.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:54:55

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Comment Log Display

Below is the comment you selected to display. Comment 2726 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nicholas
Last Name: Morenc
Email Address: nickmorenc@gmail.com
Affiliation:

Subject: chc2021 Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

I want to express my concern over some of the content of your proposed ammendments. While completely in favor of the need to improve air quality, I believe that the ammendment should not put hard-working people out of work. Requiring all boats to be retrofiited will likey be cost prohibitive to whalewatching and fishing boats currently operating. I believe the approach should be to require all new boats to comply but to grandfather existing boats that are currently operating in our harbors. By new boats I mean not only newly built boats, but any boat applying for a new license that is currently not in operation. I believe that all currently licensed boats should be allowed to continue operations. This will protect CA citizens currently employed in the industry. It will also allow hundreds of CA residents to continue to enjoy the ocean via whale watching and affordable sportfishing. I can afford and enjoy the multi-passenger fishing boats operating in the \$50 - \$100 price range. I cannot afford the small 4-6 passenger boats that cost \$500 - \$1500 for a 1 day trip. Please consider an exemption to existing boats that are currently licensed and operating.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:37:20

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Comment Log Display

**Below is the comment you selected to display.
Comment 2727 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Chilson
Email Address: dchilson@cox.net
Affiliation:

Subject: Sportfishing proposal
Comment:
I disagree to this proposal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:56:54

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Below is the comment you selected to display. Comment 2728 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Floyd
Last Name: Woolard
Email Address: woolardfr@yahoo.com
Affiliation:

Subject: Sportfishing Restrictions

Comment:

Please don't impose the proposed sanctions, this would have a devastating result to to an industry that provides far more benefits and recreation to our citizens than it polutes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:52:58

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Below is the comment you selected to display. Comment 2729 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gerard
Last Name: Edgar
Email Address: gedgx92@gmail.com
Affiliation: Me

Subject: Freedom

Comment:

These people who operate ships to take people out fishing they've been doing it all their lives for a 100 years they know what size motor they need. don't need somebody trying to tell them they've been doing for a 120 years. YOU know there's some money involved someplace that's why they're doing it. IM SO tired of this crap saying it's a free country well then act like it. SOMETIMES I think we are not a free County. Government I don't know what they're doing especially California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:52:32

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**Below is the comment you selected to display.
Comment 2730 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: RJ
Last Name: Bickel
Email Address: rjbickel@cox.net
Affiliation: Local Angler

Subject: Craft Regulation

Comment:

These expectations are absurd. NO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:00:46

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Below is the comment you selected to display. Comment 2731 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Baird
Email Address: mbaird8@gmail.com
Affiliation:

Subject: CHC2021 - Save our boats

Comment:

The number of boats on the water today is small - much smaller than all the land based initiatives they have already been put in place. We already have too many children glued to their phones and video devices. Please do more to encourage them to spend time outdoors - don't target these smaller industries that are an important way to spend quality recreational time for everyone.

Mike Baird

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:57:52

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Comment Log Display

Below is the comment you selected to display. Comment 2732 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tiffany
Last Name: Mayes
Email Address: tifmsk8@aol.com
Affiliation:

Subject: Save the Sportfishing Industry

Comment:

Please listen to what the sportfishing industry is saying about California's proposed mandates that would require the sportfishing industry to install engines that are too big and too heavy to fit in existing engine rooms. This is a BIG PROBLEM! ■ They can't simply buy new boats and triple their prices either! Part of the appeal of California is its vast access to the the incredible Pacific Ocean. Not only do Californians want access to the Pacific Ocean so do tourists. ■ The beach and the Pacific Ocean is often the reason that people visit California.

2732.1

2732.2

On a personal note, our 16 year old son has grown up fishing on sportfishing boats. ■ The owners and crew members of these boats have been incredible mentors to him. ■ He's a teenager who spends his weekends out on the ocean instead of in his bedroom playing video games. ■ Please don't take these healthy opportunities away from our youth!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:47:13

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Comment Log Display

Below is the comment you selected to display. Comment 2733 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lisa
Last Name: Souza
Email Address: souza.lisa1@yahoo.com
Affiliation:

Subject: Sport Fishing

Comment:

Please consider the livelihood of these men and women who support families by sport fishing and whale watching . You'll greatly impact our family also ..

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:02:39

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**Below is the comment you selected to display.
Comment 2734 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dennis
Last Name: Ortiz
Email Address: Ortizdennis520@gmail.com
Affiliation:

Subject: New marine regulation
Comment:
Stop your insane mandates.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:02:05

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Comment Log Display

Below is the comment you selected to display. Comment 2735 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Brown
Email Address: lineman@post.com
Affiliation:

Subject: Proposed Commercial Harbor Craft Regulation

Comment:

The proposed Commercial Harbor Craft Regulation are nothing short of virtue signaling to extreme environmentalists. If passed, this regulation will destroy commercial harbor craft businesses and prohibit Californians from enjoying our beautiful ocean waters. I would urge CARB to reconsider any changes that would further burden this already over-regulated industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:52:20

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**Below is the comment you selected to display.
Comment 2736 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Roderick
Last Name: Bickerstaff
Email Address: rodbickerstaff@gmail.com
Affiliation: Unknown

Subject: Sport Fishing Boats

Comment:

It is important to preserve access to the waters by Sports Fishing Boats and other commercial enterprises. The sustainability of families depends on it. Our State's government has a duty to keep the access in tact for those who make a living by this access.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:02:20

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Below is the comment you selected to display. Comment 2737 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Ramirez
Email Address: josephramirez11484@gmail.com
Affiliation:

Subject: SAVE SPORTFISHING AND WHALE WATCHING BOATS

Comment:

As a retired CA resident, the ocean is an incredible sanctuary that I and my fellow sportfishing enthusiasts enjoy and more importantly respect. For me and those with whom I converse on the boat I fish on in Santa Barbara, the ocean's peacefulness and serenity is highly therapeutic for all of us.

Many whom I fish with are also retired. This is one of the few physical and sports activities that many of us can enjoy.

We don't ask for much, we have served our fellow Americans, paid our taxes and have contributed to society in many ways.

I enjoy the time I spend with my 84 year old uncle who told me "All I want to do is fish as much as I can because I love it so much and I know one day I wont be able to."

Please allow us to continue enjoying something that is very special to us.

Respectfully,
Joseph Ramirez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:40:41

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**Below is the comment you selected to display.
Comment 2738 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Tim
Last Name: Harlan
Email Address: Tim1898@aol.com
Affiliation:

Subject: Fishing

Comment:

This isn't right you know they can't afford it and time period you are allowing isn't pheasable

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:07:46

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Below is the comment you selected to display. Comment 2739 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Javier
Last Name: Cazarez
Email Address: javiercazare@sbcbglobal.net
Affiliation:

Subject: Public Comment

Comment:

To whom it may concern.

I do not work for the sportfishing industry. I am just a regular blue collar Commercial Truck Driver that enjoys fishing out at sea a few days out of the year.

I started fishing as a teenager after becoming a member of a fishing club in High school. Since then that introduction to fishing has evolved to more than just pulling a fish out of the water. The time that I have spent on the water with friends and family. Creating many memorable moments are priceless. Sportfishing has brought my son and I closer. Being able to enjoy something we both like. Now being a Grandfather, I would only hope I can introduce my granddaughters to the very same thing their dad enjoyed.

Now with the implementation of these proposed rules on the Sportfishing industry will certainly cause irreversible harm to them. Many will go bankrupt and the ones that do survive will have to raise their prices sharply. Keeping fishing out on sea out of reach to the lower and middle class of this state.

I appreciate what the Air Resources Board has done to improve our air quality in this great state of ours. I do think that we all want cleaner air. It can be accomplished but we have to do it responsibly.

With respect.

Javier Cazarez

Attachment:

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Date and Time Comment Was Submitted: 2021-11-13 09:17:01

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Comment Log Display

Below is the comment you selected to display. Comment 2740 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Ryan
Email Address: raceryan@sbcglobal.net
Affiliation:

Subject: Amendments to the Commercial Harbor Craft Regulations

Comment:

Hi,
I wanted to share my view of the over reach on local Commercial Harbor Craft Regulations.
My family and friends love to go fishing with Sport Fishing Companies.
These new regulations will hinder and kill most Sport Fishing Operators.
We need less restrictive laws regarding boat emissions.
Most operators keep their boats well tuned and maintained.
Their business is very competitive with low margins.
The new regulations you are proposing will stifle and kill most Sport Fishing Operators.
Please reconsider how hard it is to run these businesses. They create many jobs and help support other local businesses.
Please rescind these proposed regulations.
We love to go fishing and whale watching. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:50:12

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Comment Log Display

Below is the comment you selected to display. Comment 2741 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Leahy
Email Address: ovrwch@gmail.com
Affiliation:

Subject: Fishing boats

Comment:

The proposed requirements for sport fishing boats to repower is misguided and potentially ruinous to California's sport fishing industry. Family owned businesses will be adversely affected and lost. Thousands of us will lose our access to our coastal waters for recreation. The tackle industry will be adversely affected as well. Thousands of jobs may be lost. Misguided laws requiring new trucks at the ports have created serious problems with freight stacking up offshore. Please oppose the proposed legislation regarding the sport fishing fleet in our great state! Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:55:30

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Comment Log Display

Below is the comment you selected to display. Comment 2742 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: KIM
Last Name: TUEY
Email Address: ktuey@aol.com
Affiliation:

Subject: CARB Boats

Comment:

I whole heartedly object to the retrofitting new engines to power these larger vessels. There must be other alternatives for these vessels to produce less pollutants than an entire new engine.

A gradual introduction of these new engines should be implemented, such as after so many hours after the current existing engines, instead of rebuilding them, new engines are then required.

A 25 year plan to phase out the old engines and be replaced with CARB engines.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:04:57

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Comment Log Display

**Below is the comment you selected to display.
Comment 2743 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: George
Last Name: Anderson
Email Address: 91b30f93@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

Please don't force this industry out of business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:15:24

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Comment Log Display

Below is the comment you selected to display. Comment 2744 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Fromberg
Email Address: Donfromberg@gmail.com
Affiliation: Fisherman

Subject: New engine requirements

Comment:

I have been Sportfishing in so Cal. For the last 60 years, as fuel prices, labor costs, dock costs all rise fishing has already become very expensive. With the new regulations proposed most small businesses in the industry will have to close or charge so much the the recreational Sportfishing industry will be gone. Please for the sake of us fishermen don't pass this measure. Thank you,
Din Fromberg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:13:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2745 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: John
Last Name: Regus
Email Address: jackregus@hotmail.com
Affiliation:

Subject: Boat regulo

Comment:

Please do away with the new proposed restrictions on local fishing boats. For some of us seniors it is one of the few inexpensive entertainments that we have. Thank you. John U 'Jack' Regus

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:14:24

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Comment Log Display

Below is the comment you selected to display. Comment 2746 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kristy
Last Name: Chupryna
Email Address: FROG4EVER77@YAHOO.COM
Affiliation:

Subject: Save sportfishing and whale watching

Comment:

Please do not change the engine regulations on California whale watching and sport fishing boats. I have enjoyed several trips for whale watching and started ocean fishing a few years ago. I have not gone since the pandemic and boats have limited numbers of passengers increasing the cost of the trips. I miss these trips. There is a charity that rents out a sport fishing boat and takes people with disabilities out fishing. I doubt they would be able to afford this if prices increase. If the new regulations go into effect I and many others would not be able to afford the ticket prices. Why target this small portion of boats and ships? The ocean will not be accessible to many Californians and our tourists.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:11:53

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Comment Log Display

Below is the comment you selected to display. Comment 2747 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Edward
Last Name: Trick
Email Address: edtrick@gmail.com
Affiliation:

Subject: save the fishing fleets

Comment:

My friend owns a fishing boat, don't put him out of business and make him buy a new boat!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:20:59

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Below is the comment you selected to display. Comment 2748 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: JOHN
Last Name: ASHWORTH
Email Address: J.ASHWORTH@VERIZON.NET
Affiliation: NONE

Subject: CHC2021 Save Our Boats

Comment:

Please exclude sports fishing and harbor excursion boats from any new emission control legislation or regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:17:44

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Below is the comment you selected to display. Comment 2749 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Art
Last Name: Acosta
Email Address: red27october@yahoo.com
Affiliation: Customer

Subject: Save fishing

Comment:

To Whom it may concern,

I've been fishing on these boats since I was 17yr old. Now at the age of 44 I've still attended these boats. I've invited from 10-15 people kids included on these fishing trips. The pricing was always affordable given they even do Groupon passes. Since the pandemic when the boats were allowed to go out the price us doubled. It's hindered my family and I to go on the boats. I just simply can't afford it. If this new law takes affect it will permanently stop us from going. All the stories shared, all the joy I hear from the kids will just be a memory. Some kids may never get to experience this. Why? Is not a child's memory a great feeling inside knowing you made that happen. In a world growing colder and are freedom being diminished slowly one thing after another. This world is becoming terrible because of the wrong leadership. Please save our boats and refrain from this. My voice is being typed to help save our kids, family, and future cherished memories.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:19:34

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Comment Log Display

**Below is the comment you selected to display.
Comment 2750 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Doug
Last Name: Scrimmes
Email Address: D.scrimes@yahoo.com
Affiliation:

Subject: Sports fishing in California
Comment:
Stop amendments to sports fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 09:35:10

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Comment Log Display

Below is the comment you selected to display. Comment 2751 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Copeland
Email Address: cjcwind@gmail.com
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft
Re

Comment:

To Whom it may concern

This proposed regulation will destroy the sports fishing industry.
The science is dubious at best. The fact is every industry has had
CARB changes implemented over years.

Please take into consideration that this will hurt small business
owners while having no effect on the highest polluters.

Chris Copeland

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:22:36

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Comment Log Display

Below is the comment you selected to display. Comment 2752 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: DERON
Last Name: STOKES
Email Address: SIS.DERONB@GMAIL.COM
Affiliation: Stokes Insurance Services Inc

Subject: Save Our Boats

Comment:

You are insane. Stop this nonsense. You are not solving anything, just creating financial hardship and more government intrusion. Go fix the drought!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:29:57

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Comment Log Display

**Below is the comment you selected to display.
Comment 2753 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Michael
Last Name: Ridgeway
Email Address: rzinfandel@sbcglobal.net
Affiliation:

Subject: Sportfishing boats
Comment:
Repeal your engine law please!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:32:12

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Comment Log Display

Below is the comment you selected to display. Comment 2754 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brad
Last Name: Van zyl
Email Address: Bradv@wonews.com
Affiliation:

Subject: Please save the Sportfishing and whale watching industry

Comment:

The proposal of the CARB policies would be an outrageous injustice to the industry that brings Americans out to enjoy the outdoors. While the fishing and outdoors industry is supportive of conservation, these restrictions and policies are too much, too soon.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:31:57

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Comment Log Display

Below is the comment you selected to display. Comment 2755 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Catherine
Last Name: Bird
Email Address: Imcath@gmail.com
Affiliation:

Subject: Sportfishing and Whale Watching in So. Cal

Comment:

Please don't change the laws in California requiring complete changeout of nautical propulsion systems. It will cost sportfishing companies way too much money that would have to be passed on to the consumer. We wouldn't be able to pay yhise prices and that would essentially kill the industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:29:55

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Comment Log Display

Below is the comment you selected to display. Comment 2756 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: RAYMOND
Last Name: TURRIAGA
Email Address: raymondturriaga@aol.com
Affiliation:

Subject: Commercial Fishing

Comment:

Leave the fishing boats and whale watching boats alone. We need to stop killing the businesses in California with these stupid rules.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:33:52

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Comment Log Display

Below is the comment you selected to display. Comment 2757 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Craig
Last Name: Russell
Email Address: cutter719@icloud.com
Affiliation:

Subject: Please reconsider

Comment:

The State's plan to mandate engines that are too big and too heavy to fit in existing engine rooms is a BIG PROBLEM. California Air Resources Board (CARB) insisting that boat owners can simply buy new ones, that would range in cost from \$4.6 million to \$5.7 million; is inappropriate.

Insisting that you can pay for these expensive new boats through increased passenger ticket prices is unfair. To buy new boats, one-day fishing and or whale watching trips would have to Triple in Price. There is no way I can afford to take myself or my family out on the ocean at those prices and this will mark the beginning of the end of sports fishing businesses, - and access to the sea.

Sincerely,
Craig Russell

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:30:20

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Comment Log Display

Below is the comment you selected to display. Comment 2758 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clifford
Last Name: Reph
Email Address: behavin8@gmail.com
Affiliation:

Subject: "CHC2021 Save Our Boats"

Comment:

I can feel the pain that the boating industry in California. Please don't put these people out of business by making them due such expensive repairs just to survive. I love my fishing and whale watching. So I am asking you to reconsider putting such a huge burden on these outfitters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:38:00

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Comment Log Display

Below is the comment you selected to display. Comment 2759 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ron
Last Name: Matthews
Email Address: rmatthews@performance-now.com
Affiliation:

Subject: CARBSport fishing vessel mandate

Comment:

The Sports fishing industry is crucial part of the California economy and culture. I am an angler I have experienced countless memories with my father and kids fishing on the water. The industry employs thousands Californians. I understand reducing air pollution is critical. This mandate is an unreasonable burden on boat operators. The technology is not st the point where it is reasonably affordable. Ti burden fleet operators with an engine that costs up to five million dollars a vessel is unreasonable and will crush the industry. Please reconsider this mandate.

Kind regards

Ron Matthews

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:24:52

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Comment Log Display

Below is the comment you selected to display. Comment 2760 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leslie
Last Name: Kress
Email Address: eaglebear58@gmail.com
Affiliation:

Subject: Fishing charters

Comment:

I was born around boats and fishing all my life. This is something that people enjoy and what this state is doing is wrong. There has been generations of people in these businesses and this seems like another blow to the people of this state. Politicians obviously do not give a damn about the people of this state at all and for that shame on you! ☐

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:36:12

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Comment Log Display

Below is the comment you selected to display. Comment 2761 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Greg
Last Name: Locke
Email Address: Glocke226 @yahoo.com
Affiliation: Fisherman

Subject: Stop This Burden ARB

Comment:

Stop this nonsense Air Resource Board, do not add a huge burden to California fishermen and fishing boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:40:08

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Below is the comment you selected to display. Comment 2762 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeffrey
Last Name: Hessick
Email Address: Jeffreyhessick@yahoo.com
Affiliation:

Subject: CHC2021-SAVE OUR BOATS

Comment:

The state of California needs to stop inhibiting basic freedoms, such as the Opportunity for Sportfishing and access to the ocean, and concentrate instead on major polluters if they want more regulations. The proposed regulations for sport boats are not only destructive of family businesses and the public's enjoyment of the ocean, but the regulations are targeting the wrong Business aspect. Target big industry and big polluters instead if you desire to have a fair and meaningful change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:19:35

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Comment Log Display

Below is the comment you selected to display. Comment 2763 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mateo
Last Name: Ilagan
Email Address: Mateoilagan32@gmail.com
Affiliation:

Subject: SPORTSFISHING

Comment:

To whom my concern,
Sports fishing should not be removed, there are many reasons why, one reason is sports fishing is peoples jobs and that's how they support their family and provide food, and when they get sick they can take loved ones too the doctor to seek the medical treatment they need! When People Go sport's fishing it releases stress as they are having a good time and catching some fish! There is no need to get rid of our sports fishing these boats taking people out to have some fun is not causing any harm. There are far worse things and this does not need to be taken out of the water

Thank you
Mateo Ilagan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:41:28

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Comment Log Display

Below is the comment you selected to display. Comment 2764 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Ross
Email Address: Charles.ross11@gmail.com
Affiliation:

Subject: Do not pass this mandate on sport fishing boat engines, please.

Comment:

I urge you not to pass this mandate. As a military veteran and recovering alcoholic, sport fishing is an incredibly important, healthy and positive part of my life. The price for these trips had gone up considerably due to the pandemic. This mandate will considerably increase the cost of sport fishing, almost certainly pushing it out of the affordable price range for many of us fishing enthusiasts.

Thank you
Charles Ross
USMC
714 423-6696

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:40:35

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Comment Log Display

Below is the comment you selected to display. Comment 2765 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leo
Last Name: Jack
Email Address: leojack0912@gmail.com
Affiliation:

Subject: Save our sports fishing

Comment:

I live in Butte Montana and travel to Southern California quite often to go on the fishing boats out of San Diego it would be a shame to see them go if you could please just give him some time when you have to replace the motors I can do it over time instead of just killing the whole industry give this some consideration the technology is not there yet thank you Leo Jack

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:46:13

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Comment Log Display

**Below is the comment you selected to display.
Comment 2766 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Nicole
Last Name: Hanlin
Email Address: nicole.hanlin@gmail.com
Affiliation:

Subject: Chc

Comment:

This mandate will hurt businesses and further block access to our waterways for the general public.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:43:13

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Comment Log Display

Below is the comment you selected to display. Comment 2767 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: McCain
Email Address: scottamccain@gmail.com
Affiliation:

Subject: CARB is bad for normal citezens

Comment:

To whom it may concern:

It is an egregious oversight to mandate new, larger engines for ocean boats. This would destroy the fishing/whale watching industry by forcing captains to pass along the expenses to anglers. As one who fishes often, I would simply not be able to afford to engage in my only hobby and pastime. Please reconsider mandating this, as it will have the exact opposite effect you desire.

Scott McCain

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:44:29

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Comment Log Display

**Below is the comment you selected to display.
Comment 2768 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Keith
Last Name: Rieken
Email Address: mkrieken2002@yahoo.com
Affiliation: K&M Handyman

Subject: Sport fishing
Comment:
Stop this insanity

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:52:31

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Comment Log Display

Below is the comment you selected to display. Comment 2769 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nicolas
Last Name: Vuocolo
Email Address: 1982njv@gmail.com
Affiliation:

Subject: Save our sportboats

Comment:

Being on a sportboat as a young kid is a life changing experience .filled with lessons and responsibilities that are lacking in youth today .and the unforgettable thill of your life when you first get bit or to see a fellow angler get bit.we cant loose this amazingly life changing experiance for people.this is the next step in loosing the future of fishing and outdoor conservation.these are family's that own these boats not mega corporations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:38:16

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Comment Log Display

Below is the comment you selected to display. Comment 2770 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leo
Last Name: Ruiz
Email Address: Leoruiz61@gmail.com
Affiliation: Dedicated angler

Subject: Stop the nonsense

Comment:

In the times we are living in this will be devastating to the industry.
Boat owners don't make enough to afford such a change and if they that cost hits the customer (me). Most anglers go out for the joy of fishing and the relationships built with the csptains and crew. Most of us can barely afford the trips as it is.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:51:18

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Comment Log Display

**Below is the comment you selected to display.
Comment 2771 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Howard
Last Name: Rogers
Email Address: Juddmonn@gmail.com
Affiliation: Southside Anglers fishing club

Subject: Save our Sportfishing Fleet

Comment:

Dear Sirs

Please do not put these regulations in place. You will bankrupt a lot of the sport charter boats not to mention a lot of small operators of fishing related industries. Please at least delay these changes because of attrition most of these boats will be upgraded to more modern, efficient power just because of fuel costs. This change over is too quick too extreme.

2771.1

2771.2

Howard J. Rogers

Past President Southside Anglers of San Jose, ca.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:54:07

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Comment Log Display

Below is the comment you selected to display. Comment 2772 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: McDevitt
Email Address: scottmcdvtt@yahoo.com
Affiliation:

Subject: Sportfishing and Whale Watching

Comment:

By making these boat owners/ business owners buy new boats and or engines for their boats you are putting the majority out of business. The increase in fares they would have to charge would force most of their customers to stay home. 2772.1

The foreign commercial fishing boats and the cargo ships coming and going out of port follow none of our rules yet dump pollution into the same air you claim to be protecting. Please think about the people that this rule will affect. Thank you. 2772.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:55:58

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Comment Log Display

Below is the comment you selected to display. Comment 2773 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Drew
Last Name: Sung
Email Address: drew.sung@gmail.com
Affiliation:

Subject: Please do not pass this

Comment:

This proposal is unreasonable and will ruin Sportfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:01:04

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Comment Log Display

Below is the comment you selected to display. Comment 2774 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rafael
Last Name: Ramirez
Email Address: Rrqualitypainting1@yahoo.com
Affiliation:

Subject: Fishing industry engine replacement two boats

Comment:

You need to choose wisely what you're about to do, By your actions implementing this law into affect, you will destroy the Sport of fishing industry. You will put people out of work prices will raise on fishing trips which already very high.you would take away what is beneficial to youth and adults, I understand about you trying to implement this Law. Personally it decades to damage the ecosystem not by the fashion industry, this was caused by industries polluting the water system,air, ozone layer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:55:50

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Comment Log Display

**Below is the comment you selected to display.
Comment 2775 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ryan
Last Name: McAnlis
Email Address: mcanlisryan@gmail.com
Affiliation:

Subject: please protect Ca sportfishing
Comment:
Please protect our Ca sportfishing, thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:06:15

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Comment Log Display

**Below is the comment you selected to display.
Comment 2776 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Joe
Last Name: Myers
Email Address: bjjjm@aol.com
Affiliation:

Subject: Reconsider position on CARBS

Comment:

Please reconsider your position on CARBS. The boat fleet in San Diego can not compete with the costs involved with trying to purchase new boats. They can't compete with Northern California monies available to them and this will ruin fishing for the average citizen in Southern California. Thank you for your time, Joe Myers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:01:38

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Below is the comment you selected to display. Comment 2777 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mechellet
Last Name: Armelin
Email Address: mechiea@aol.com
Affiliation:

Subject: SAVE SPORTFISHING BOATS!

Comment:

I think this is an important activity and source of employment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:06:24

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Comment Log Display

Below is the comment you selected to display. Comment 2778 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ernesto
Last Name: Villasenor
Email Address: erninevillasenor1904@gmail.com
Affiliation:

Subject: Dont sink the sport fishing

Comment:

This is the only way my daughter and I can spend time on a boat it costing a fortune.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:07:57

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Comment Log Display

Below is the comment you selected to display. Comment 2779 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Aaron
Last Name: M Yohey
Email Address: satinhands55@yahoo.com
Affiliation:

Subject: CARB on fishing boats

Comment:

Members of the Carb Board: Offshore fishing and the party boat industry pretty much runs on a shoe string trying to keep prices low and struggling to purchase Fuel, Insurance, benefits to employees, harbor dock fees advertising, Bait contracts, and at the same time promote fishing to the new anglers and try to keep the cost competitive with the industry so that their boats are safe and full of returning anglers, Carb restrictions on this industry is ridiculous as it will cripple the industry with trying to repower with some thing that is unable to be retrofitted and most likely the purchase of a newer boat would have to be the solution> This would force most if not all Sport Fisher charters into bankruptcy or just abandoning the California coast line and moving to another harbor, or shutting down their business. Please evaluate this decision as to the gain that will be appreciate from approx 175 boats, and the destruction of families and recreation of Fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:53:54

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Comment Log Display

Below is the comment you selected to display. Comment 2780 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tony
Last Name: Ransick
Email Address: aransick@gmail.com
Affiliation: Catholic

Subject: Don't Sink Sportfishing

Comment:

I am a fishing enthusiast, and like most hard working blue color people in America, I only am able to enjoy sportfishing once or twice a year. However, I truly look forward to the experience and my wife loves to while watch. It does not make sense to ruin the livelihood of our hard working Sportfishing industry and decimate years of family tradition to line the pockets of bureaucrats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:03:47

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Comment Log Display

Below is the comment you selected to display. Comment 2781 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Manny
Last Name: Lema
Email Address: LZORRO1@SBCGLOBAL.NET
Affiliation:

Subject: SPORTS FISHING

Comment:

How come you always go after the small guy's and try to put them out of their living. Plus it will also hurt those of us that do not own a boat and use these small boats to get away and relax...

SHAME ON YOU!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:09:44

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Comment Log Display

Below is the comment you selected to display. Comment 2782 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joe
Last Name: McCallister
Email Address: my1911a12003@yahoo.com
Affiliation:

Subject: chc2021

Comment:

This requirement will seriously impact the owners of these vessels financially. The cost of replacing their existing boats to meet the proposed regulations is prohibitive and could cause the owners of the affected vessels to loose their buisness and means of income. The suggestion that owners of these vessels raise their ticket prices to off set the cost of replacement will be prohibitive to their customers and seriously reduce the number of customers that will pay the increased fees. I ask you to not allow this proposed regulation to pass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 10:54:35

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Comment Log Display

Below is the comment you selected to display. Comment 2783 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Julian
Last Name: Zajkowski
Email Address: zajkowskimd@aol.com
Affiliation:

Subject: CARB: sport/tourist boating

Comment:

California's economy is already under duress with rising inflation and poor political management. Gas, food, housing etc prices are skyrocketing. Businesses are leaving this state. Now CARB wants to mandate new bigger engines in boats that cannot accommodate them. Why? Buying new boats is not a feasible option for most boat operators. Advising them to triple ticket prices for most citizens in not feasible. This is nothing more than another form of taxation. Attention should be focused on trying to alleviate the economic burden on the busyness and citizens of California, not grind them down. I believe CARB's proposal should be passed. Regards a concerned citizen.

2783.1

2783.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:01:46

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Comment Log Display

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First Name: FRANK
Last Name: PITETTI
Email Address: IRONCLADSPORTFISHING@GMAIL.COM
Affiliation: Fishing Charter Owner/Operator

Subject: Protect Sportfishing

Comment:

This decision will more than likely cause operations to completely shut down for many sportfishing vessels and have a negative effect on the economy and jobs. The sportfishing industry is viable to the economy, employment as well as tourism.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:16:06

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Comment Log Display

Below is the comment you selected to display. Comment 2785 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: jose
Last Name: o Govea
Email Address: jose.govea@icloud.com
Affiliation:

Subject: Please stop.

Comment:

Please stop this ridiculous request.you are destroying an industry and recreational pastime by madeing these changes. Can these changes even be implemented today give the current technology? This is not industrial cargo ships these are recreational. I want to have clean air too, but you are placing an undo burden on not only small business, but on individuals themselves selfs.

What are you giving up? Your plane traval or diving your personal car? Come down too see how you will impact us sport fishermen and women with these mandates.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:19:31

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Comment Log Display

Below is the comment you selected to display. Comment 2786 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Henry
Last Name: Orzynski
Email Address: hankorz@verizon.net
Affiliation:

Subject: Sportfishing and Whale Watching Boats

Comment:

There is a vital need to battle climate change, within reason. Destroying small businesses like Sportfishing and Whale Watching boats is not the answer.

The state should be endorsing and supporting those in the sportfishing and whale watching businesses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:21:09

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Comment Log Display

Below is the comment you selected to display. Comment 2787 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: DiCesare
Email Address: pedicesare@aol.com
Affiliation: concerned sports fisherman

Subject: SAVE SPORTFISHING AND WHALE WATCHING BOATS

Comment:

SAVE SPORTFISHING AND WHALE WATCHING BOATS. Don't introduce these crazy regulation on boat emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:32:29

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Comment Log Display

Below is the comment you selected to display. Comment 2788 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cindy
Last Name: Johnston
Email Address: cjcjplus4@yahoo.com
Affiliation:

Subject: Stop the Commercial Harbor craft regulation

Comment:

Please stop this Bill our children need to be able to go out and see the creatures in the ocean in order to be motivated to save and protect them

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:33:26

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Comment Log Display

**Below is the comment you selected to display.
Comment 2789 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: HOWARD
Last Name: REED
Email Address: howardjreed@yahoo.com
Affiliation:

Subject: CHC2021
Comment:
Please save California ocean fishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:32:13

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Comment Log Display

**Below is the comment you selected to display.
Comment 2790 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Fabian
Last Name: Larez
Email Address: Fabian.larez@sysco.com
Affiliation:

Subject: Help

Comment:

Please think about all of the families and kids that will be affected by this please

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:36:03

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Comment Log Display

Below is the comment you selected to display. Comment 2791 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Hays
Email Address: joehayspmr@gmail.com
Affiliation:

Subject: Sportfishing

Comment:

We need to protect our Sportfishing industry and the people who depend on it to make a living. Being in the marine industry, I too depend on affordable boating. Please do not pass a bill that would put all the local fisherman out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:32:06

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Comment Log Display

Below is the comment you selected to display. Comment 2792 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Erika
Last Name: Clark
Email Address: clar0725@gmail.com
Affiliation:

Subject: Please protect a tradition!!

Comment:

Good afternoon,
My family and I have enjoyed the wonderful unique fishing resource that california offers. We have four children that we have fortunately had the opportunity to take fishing with us on many opportunities. If you force the family owned business to change over night they will not be able to offer this wonderful gift to many families! It is very expensive and in this current climate many people can not afford luxuries. This is atime where we should protect small business and irreplaceable family memories. I believe in protecting the environment, but give them a opportunity to gradually make changes. Tha k you for listening.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:36:01

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Comment Log Display

Below is the comment you selected to display. Comment 2793 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Jorden
Email Address: rjorden2001@gmail.com
Affiliation:

Subject: Carb requirements for sport fishing vessels

Comment:

I'm a retired individual who makes several trips a year to go deep sea fishing in San Diego. These trips which I have been doing each year since 2010 and I greatly enjoy. During these trips I routinely contribute several thousand dollars to not only the boat and crew but also to local processors, hotels, restaurants, stores and the state of California for licenses these dollars will disappear should the new regulations be in acted for these small businesses. 2793.1

These new regulations are very onerous for these boat owners and in many cases basically impossible to comply with thus forcing them out of business and creating a virtual monopoly for the largest operators. These changes leave only one option for compliance the purchase of a new boat for millions of dollars and thus puts compliance out of reach. At a time when government is saying that small businesses are the back bone of the economy government should not be putting these very businesses out of business how hypocritical. 2793.2

You should also take into consideration that the required modifications are not physically possible in many situations and create possible hazards to both crew and passengers due to extreme heat and possible fire issues in other cases. 2793.3

All of these issues will exclude thousands from being able to enjoy their time on the ocean along the California coast and result in their either seek other states or countries to enjoy and spend their money or giving up these pleasures. 2793.4

Please reconsider your decision on this regulation so this vital industry does not disappear or become so expensive that most will be forced to either seek other areas to per-sue their enjoyment of the ocean or give it up entirely. Sure there are options that could be explored and adopted to accomplish the goal of protecting the environment.

Thank you for your consideration
Robert Jorden

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:06:51

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Comment Log Display

Below is the comment you selected to display. Comment 2794 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Adams
Email Address: ryan.adams.p@gmail.com
Affiliation:

Subject: New CARB laws on sport fishing & whale watching boats

Comment:

It's easy for a government to mandate the change that they want to see. However, a dedicated and truly capable government will care about ALL of the effects of their decisions and manage and plan in order to have minimal negative effects in the process. This new CARB law is an example of a government taking the easy way out by turning a blind eye on the negative effects of their decision in favor of a "one eye closed" method of only seeing the benefit. Actions have consequences and you cannot ignore that you are deepening the divide of the classes of people within the state when you continue to put laws like this in effect that stamp out the ability of the less privileged to enjoy some of the most unique opportunities of California's nature. By making these blind changes and remaining ignorant of the costs and effects, you are significantly increasing the cost of operation, and the ticket cost of these offshore sport fishing boats and whale watching tours. Don't be blind to your own actions, and don't be so offended by spirited emails such as this that you close off to hearing the voice of the opposing opinion. Be part of the solution!

I don't know what the answer is, but I'm sure with some thought and hard work that a plan could be put in place to reduce the boat emissions and make them environmentally friendly without having to take measures so drastic that they take this sport away from an entire generation of people. There are trade offs that can be made, reasonable minds can find solutions when working together for a common goal. Reach out to the owners and operators of these charters and work with them to find a solution that works for both parties rather than acting like a dictator that ignores the pleading of the poor.

Attachment:

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Comment Log Display

**Below is the comment you selected to display.
Comment 2795 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Johnny
Last Name: Rice
Email Address: misplacedokie@yahoo.com
Affiliation:

Subject: Sport fishing boats

Comment:

Don't spoil what little fun we have by making it unaffordable leave
the boats alone

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:39:14

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Comment Log Display

**Below is the comment you selected to display.
Comment 2796 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jerry
Last Name: Couchman
Email Address: jjcouch762@gmail.com
Affiliation: Couchman Associates

Subject: Boating

Comment:

Please leave our vessels alone. We do not need any infringement.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:23:50

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Below is the comment you selected to display. Comment 2797 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ajay
Last Name: More
Email Address: System_4_sale@yahoo.com
Affiliation:

Subject: Stop the boat carb

Comment:

It's unfair to the fishing industry and they are not the major polluters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:45:22

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Comment Log Display

Below is the comment you selected to display. Comment 2798 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Knight
Email Address: scott.knight66@gmail.com
Affiliation:

Subject: Whale watching and sportsfishing

Comment:

To whom it may concern,

Please, keep the costs of sportsfishing and whale watching for us that enjoy this experience with our family and friends.

Thank you,

Scott

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:49:40

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Comment Log Display

Below is the comment you selected to display. Comment 2799 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Nieto
Email Address: Went2fish@cox.net
Affiliation:

Subject: Fishing boats

Comment:

Please do not restrict fishing boats or other boats from operating.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:50:20

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Comment Log Display

Below is the comment you selected to display. Comment 2800 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bill
Last Name: Henwood
Email Address: cmmsign@gmail.com
Affiliation:

Subject: Save the fishing boats and whale watching boats

Comment:

We need to save the recreational fishing industry and the whale / dolphin watching boats for future generations. This industry helps with kids and their parents learn more about the ocean and the wildlife that surrounds them everyday. The recreational fishing industry also teaches people about the ocean and is a form of therapy that is calming and good for mental health. Also this industry employs a lot of people that love and protect our oceans. 2800.1

If you really want to save our environment, stop all the new housing developments, new commercial developments and build new fresh water reservoirs and hydro plants for clean power for California. 2800.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:46:22

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Comment Log Display

Below is the comment you selected to display. Comment 2801 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jsy
Last Name: Bigger
Email Address: jbigg1959@gmail.com
Affiliation:

Subject: Save sports fishing

Comment:

I love going to California for fishing it is my get away from Vegas so please do not take away this sports fishing by making them buy new boats that Wii really suck.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 11:55:52

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Comment Log Display

Below is the comment you selected to display. Comment 2802 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: gerald
Last Name: sung
Email Address: Gerald_sung@hotmail.com
Affiliation:

Subject: re: sport fishing emissions

Comment:

Dear CARB,

I am thankful that you are taking meaningful steps to address emissions from all combustion engines. I would just like to express that any transition should be equitable and reasonable. So I would like to advocate for subsidies for on the market and scalable solutions. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:04:07

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Comment Log Display

Below is the comment you selected to display. Comment 2803 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Glen
Last Name: Robinson
Email Address: gsr2008@mac.com
Affiliation:

Subject: CHC2021

Comment:

Please apply common sense here. Hands off these limited number of important resources over which you really have no jurisdiction in a common sense world.

You don't need their bodies on your mantle. They don't need to hate your dumb asses forever.

Just a little of common sense please.

Thank you.

Respectfully,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:01:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 2804 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: terry
Last Name: angel
Email Address: terryangel1946@hotmail.com
Affiliation:

Subject: save our fishing boats
Comment:
freedom to fish with our boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:15:47

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Comment Log Display

Below is the comment you selected to display. Comment 2805 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Reynolds
Email Address: daver@hitekpc.com
Affiliation:

Subject: SAVE OUR BOATS AND OUR FREEDOMS!

Comment:

Please STOP CARB's over-reach by protecting the families that operate passenger sportfishing and whale watching boats in California!

MANDATES are an awful way to govern but California Politician's seem to enjoy pushing their collective weight around where not really necessary!

How about working on bills that encourage entrepreneurship not punish hard working business owners and their customers!

Please stop this ill-conceived plan now!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:12:32

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Comment Log Display

Below is the comment you selected to display. Comment 2806 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dustin
Last Name: Zamba
Email Address: dzamba7@aol.com
Affiliation:

Subject: Hopeful

Comment:

Mr Newsom I am here with my Dad my name is Gracelyn. I am almost 10 years old and we go fishing on the sport boats and we bring my friends and it is so fun and we love it and hope we can continue do that as well as a whale watching trip a few times a year with the family. Please do not allow this regulation to go through I want to continue doing this I love being out there and my friends do to.

Mr Newsom I am the father and my father would take our friends and family out on the sport boats as well it is a positive family thing to do to get away from the crazy ness of everyday life and it helps these kids be positive and have something very real in there life. Please consider our thoughts and hopes. Respectfully Dusty Zamba

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:12:52

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Comment Log Display

Below is the comment you selected to display. Comment 2807 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bryan
Last Name: Dodge
Email Address: bdodge67@gmail.com
Affiliation:

Subject: keep fishing affordable

Comment:

don't enforce this regulation without providing grants or funding for the fishing fleets to be compliant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:32:25

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Comment Log Display

Below is the comment you selected to display. Comment 2808 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Muehleman
Email Address: Tmuehleman@sandi.net
Affiliation:

Subject: Save our sport fishing boats

Comment:

Please rethink making the sport fishing boats comply with this new engine idea at least until the technology that is needed for boats this size is more affordable and available. You will be putting many people out of work not only directly on the boats but also ancillary businesses that depend on fishing.

2808.1

2808.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:29:21

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Comment Log Display

**Below is the comment you selected to display.
Comment 2809 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Julian
Last Name: Zajkowski
Email Address: zajkowskimd@aol.com
Affiliation:

Subject: CARB: sort/tour fishing

Comment:

ADDENDUM: to prior email. I DO NOT RECOMMEND CARB PASSING THIS LEGISLATION!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:33:39

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Comment Log Display

Below is the comment you selected to display. Comment 2810 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bryan
Last Name: Dodge
Email Address: bdodge67@gmail.com
Affiliation:

Subject: keep fishing affordable

Comment:

don't enforce this regulation without providing grants or funding for the fishing fleets to be compliant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:32:25

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Comment Log Display

Below is the comment you selected to display. Comment 2811 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: De La Hoya
Email Address: Pauldelahoya@gmail.com
Affiliation:

Subject: Save Whae Watching and Sportfishing

Comment:

Dear CARB,

It is to my understanding that CARB is proposing new requirements on whale watching and Sportfishing vessels which will require businesses to either replace their current Diesel engines and/or purchase new vessels. Despite the negligence of a minority of recreational fishing enthusiasts most anglers and nature observers do care about the environment and can respect your position on this issue; however, there needs to be a sense of realism in addressing air and water pollution when addressing commercial vessels. As a life long resident of California and a passionate angler I too want clean air for myself and family but I must way the alternative. Passing these changes will likely lead to the forced closing of many businesses in California. Fishing and whale/wildlife observing in the ocean brings families and friends together. It's a safe place for people with like interest to spend time together, harvest their own healthy meals and/or observed natures beauty in person. If this board is going to move forward despite our pleas not to then I ask that you at least delay this requirement to look at alternative cheaper methods to help reduce air pollution or to find an appropriate amount of funding to provide to these affected businesses to help them purchase new equipment or boats. Not a loan and not some minuscule amount of money which helps no one, but legitimate financial funding to purchase the required equipment to meet your unrealistic requirements.

2811.1

2811.2

2811.3

Sincerely,
Paul De La Hoya
Riverside Country resident

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:15:23

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Comment Log Display

**Below is the comment you selected to display.
Comment 2812 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: James
Last Name: Burke
Email Address: jkburke25@yahoo.com
Affiliation:

Subject: Sport fishing industry

Comment:

New requirements proposed would cripple the sport fishing industry.
I ask you to let the industry survive without these burdensome
requirements.

James Burke
Recreational Fisherman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:34:37

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Comment Log Display

Below is the comment you selected to display. Comment 2813 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Art
Last Name: Hill
Email Address: arthillfishing@verizon.net
Affiliation: Art Hill's Guide Service

Subject: SAVE OUR BOATS

Comment:

Please do not shut down our fishing boats. Thousands of people's lives depend on their services, not to mention the service they provide as a recreational source.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:37:11

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Comment Log Display

Below is the comment you selected to display. Comment 2814 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jose
Last Name: Duran
Email Address: dannyboijoe189@gmail.com
Affiliation:

Subject: New sportfishing vessel engine mandate

Comment:

Hi , my name is Jose Daniel Duran ; I am reaching out to let CARB board members know how disgusted and disappointed I am regarding their standing on these new regulations regarding engines on sportfishing/ whale watching vessels they are trying to implicate on these family owned businesses. You guys are stating that they should upgrade to engines that simply do not fit in these small vessels and range in the 4-6 MILLION dollar range , implying that they can just raise prices of fares to pay for it . I find that very disgusting you think that is passenger/ anglers have money to pay fares 3x or more what they are now . I am an angler that's been fishing for years and always plan trips ahead as to not hit any financial road blocks ahead , what you are doing is taking that away from me , my family and kids and many other fellow anglers . I find it disappointing you guys find it easy to impose these new regulations on family owned businesses and employees that will be gravely impacted by these but yet all these cargo containers that have been in and around our harbors get free passes causing oil spills and more pollution in a shorter time span than our sportfishing fleet will in years . I hope your board listens to the people and throw these regulations out of the window and instead work with these family owned businesses to try and find better ways to a mutual goal that will not impact this industry . We anglers and sportfishing community care about our oceans and the eco systems it has , always have and always will , so I find it hard you guys don't include them to find new solutions instead of these absurd ideas your board has come up with . Thank you for the time . -JDD

2814.1

2814.2

2814.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:27:38

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Comment Log Display

Below is the comment you selected to display. Comment 2815 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeff
Last Name: Bond
Email Address: jeff@inspect.net
Affiliation:

Subject: Keep sportfishing affordable

Comment:

please make an exemption for private sportfishing vessels that allow people to recreational sport fish in the ocean for salmon, crab, halibut, cod, bass and other california approved sports fish.

this is a regular and important part of my life, i use the fish for food to replace red meats.

thank you, jeff bond

Attachment: www.arb.ca.gov/lists/com-attach/3206-chc2021-Bm9WPVYwUFxSYAg8.jpg

Original File Name: IMG_4443 (2).JPG

Date and Time Comment Was Submitted: 2021-11-13 12:29:10

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ALCATRAZ
WARDEN

Hone

SAVING LIVES ON THE WATER

SF



Comment Log Display

**Below is the comment you selected to display.
Comment 2816 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Patrick E.
Last Name: Ayers
Email Address: Peayers11@gmail.com
Affiliation:

Subject: Sport fishing boats
Comment:
Don't take away our sport fishing boats!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:43:48

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Comment Log Display

Below is the comment you selected to display. Comment 2817 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ben
Last Name: Albert
Email Address: benalbert12@yahoo.com
Affiliation:

Subject: New Engine Mandates

Comment:

Hello,

I am writing out of concern for the hard working people in the fishing and whale watching communities. Many workers and their families will be affected negatively by the proposed engine mandate. As such, I request that the state not move forward with this proposition.

Sincerely,

Ben Albert

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:39:37

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Comment Log Display

Below is the comment you selected to display. Comment 2818 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David C.
Last Name: Tofte
Email Address: dctofte1965@gmail.com
Affiliation: Friends and past work experience

Subject: Save Our Boats

Comment:

I grew up in San Diego. My first trip on a whale watching trip was back in the 70's. ■ I had several neighbors who's father's worked in the boats, be they Tuna boats or the family 1/2 day 3/4 day boats... They were always able to support their family and even grow their families. ■ Alot of these families passed down or grew their business' extremely well. During my teens I learned what it took to run a business as these. I had a large part on several of the boats starting with the half & three quarter day boats and growing into the longer 3-10 day boats.

2818.1

When my best friend mentioned that their family business is going to come to an end of the policy of yours passes, I had to get involved. ■ There are much better solutions than telling these families that they are no longer are going to be able to keep their lively hoods going because they have some older boats.

Back a few years you went after the trucking industry. ■ A company by the name of Airgas came up with an additive for the diesel petrol that they were using. ■ I know for a fact that they still have several 100,000 or more trucks that are still driving around the country. ■ Why can't you apply that type of technology instead of ending so many small businesses and family business in the boating and fishing industry???

2818.2

It's it all just a power grab???

Or has your board become Woke and are bowing at the climate change gods and goddesses???

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:19:02

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Comment Log Display

Below is the comment you selected to display. Comment 2819 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dallas
Last Name: Labor
Email Address: dlabor32@gmail.com
Affiliation:

Subject: Carb

Comment:

Please do not allow this very expensive retrofit to all of our commercial fishing boats. Make it so that new boats will need to comply but not the older boats. It will be too expensive for them and they will go out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:53:59

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Comment Log Display

Below is the comment you selected to display. Comment 2820 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kelly
Last Name: Kissinger
Email Address: Kissingerkelly@gmail.com
Affiliation: Oceanside Senior Anglers

Subject: Safe sport fishing

Comment:

Please do not pass this new regulation . I believe it is being rushed into legislation way ahead of the proper time . Many boat owners a just finishing paying for the last update and this demand hasn't the technology to support it .

Thank you.

Kelly Kissinger

V.P. Oceanside Senior Anglers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:57:51

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Below is the comment you selected to display. Comment 2821 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jackie
Last Name: Shull
Email Address: javase23@gmail.com
Affiliation:

Subject: Regulations

Comment:

Please don't put these expensive regulations on people whose livelihoods depend on Whale watching or fishery.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:04:29

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Comment Log Display

Below is the comment you selected to display. Comment 2822 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: George
Last Name: Griffith
Email Address: Griffith_G@msn.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Please let the harbor craft continue providing services to those that enjoy whale watching and fishing trips. Enacting regulations that would create significant costs may well result in the loss of this valuable resource. The younger and older citizens would be the hardest hit since they have few, if any, ways to compensate from its loss. Please maintain the status quo for those enjoying a day on the water provided by the harbor craft.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:55:41

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Comment Log Display

Below is the comment you selected to display. Comment 2823 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Wilcox
Email Address: cln-nsty@att.net
Affiliation: Sportfishing Association of CA

Subject: CHC2021

Comment:

Please re-think of what this new regulation will do to the 174 small business owners and employees your putting out of work. People come from all across the country to experience a whale in nature, dolphins so close you could touch them and don't forget the fishing opportunities they provide. We already pay the highest sport fishing license fees in the US and now the cost to comply will remove the boats that keep tourists coming to CA. Covid has done enough damage, you don't have to make it worse for the people in this state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 12:31:21

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Below is the comment you selected to display. Comment 2824 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeannie
Last Name: O'Brien
Email Address: obrien.jeannie@gmail.com
Affiliation:

Subject: Save Our Boats

Comment:

Dear CARB board,

Please reconsider your limitations to the small business and families that will be affected by these new restrictions. One of these families is a friend of mine and they are a hard working, willing to sacrifice time to provide an income for their families and provide a good/ethical and safe way for those who want to fish off the coast of California. The new regulations would put them out of business.

Please change your limitations to help these hard working wonderful people!

Jeannie

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:07:27

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Comment Log Display

**Below is the comment you selected to display.
Comment 2825 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jose
Last Name: Valencia
Email Address: josejoev@aol.com
Affiliation:

Subject: Political
Comment:
Stop politics

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:19:12

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Comment Log Display

Below is the comment you selected to display. Comment 2826 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Darcey
Email Address: jhdarcey@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

Please don't pass this new law. It will put lots of folks out of work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:20:33

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Comment Log Display

Below is the comment you selected to display. Comment 2827 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tory
Last Name: Brotherton
Email Address: Torybrotherton@gmail.com
Affiliation:

Subject: Save Sport Fishing

Comment:

Please do not apply rules to the sport fishing industry which will make the current engines unusable. The requirements you want to put in place are not safe for marine applications yet.

Let's not put more people out of work for the sake of politics.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:23:01

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Comment Log Display

Below is the comment you selected to display. Comment 2828 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Smith
Email Address: 9arresteve@gmail.com
Affiliation:

Subject: Fishing boats

Comment:

Please do not force fishing boat owners to change size of motors. They are very expensive and families need outdoors. Stephen H Smith

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:19:21

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Comment Log Display

Below is the comment you selected to display. Comment 2829 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sally
Last Name: Denlinger
Email Address: Sallydenlinger@gmail.com
Affiliation:

Subject: Sport fishing and whale watching boats

Comment:

Bad idea!! What a way to ruin there lively hood!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:24:50

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Comment Log Display

Below is the comment you selected to display. Comment 2830 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Areg
Last Name: Ohanian
Email Address: aregohanian@gmail.com
Affiliation:

Subject: Please Stop the Proposed Commercial Harbor Craft Regulations!!!

Comment:

To Whom it May Concern,

Please stop! Stop the proposed regulations on the 174 passenger boats that go out to the Ocean to fish or whale watch. This is not only a national pastime but also more importantly the livelihood of so many people and families!

Don't kill it for them!

Thank you!
-Areg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:30:08

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Comment Log Display

Below is the comment you selected to display. Comment 2831 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dan
Last Name: McAuliffe
Email Address: mcauliffeconst@aol.com
Affiliation:

Subject: Charter boat mandated upgrades

Comment:

Please carefully consider the ramifications that the mandates that are being proposed for energy upgrades on the charter boat industry. If approved these mandates will greatly affect this vital industry and make it impossible for many small operators to stay in business.

Thank you for your careful consideration of all the facts and issues with this proposed mandate.

Thank you,
Dan McAuliffe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:26:12

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Comment Log Display

Below is the comment you selected to display. Comment 2832 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Fleischer
Email Address: sfandsf@msn.com
Affiliation: taxpayer

Subject: Commercial Harbor Craft Regulation, Sportfishing

Comment:

Attn. Clerk of the board

I am 77 years old widower. I was a hunter and fisher all my life. I can not walk well enough now to hunt. Sportfishing on our coastal boats is all I have left Restrictions to the Commercial Harbor Craft Regulations could condemn me, and others like me, to retirement in a rocking chair.

Sportfishing is more than a leisure past time. It provides, employment, taxes, valuable tourism, healthy recreation for our youth and much more.

The technology to make many of these boats emission free does not exist and what does exist is punitively expensive. This could mean the death of Sportfishing as we know it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:00:40

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Comment Log Display

Below is the comment you selected to display. Comment 2833 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Canal
Email Address: david.canal91@yahoo.com
Affiliation:

Subject: Save our boats

Comment:

If this bill to increase emissions standard's for vessels is to pass. Not only will it put alot of said vessels out of comission but will also grately hurt and devastate a 4 billion dollar industry. The price of fishing will increase dramatically and a lot of people will stop said act, sport, hobby, or career indefinitely. Further increasing the cost of fish in our local grocery stores hurting alot more people in the process. Supply and demand. The demand will always be their. It is the supply that will be hurt. Comerical fisherman will not be able to keep up and will charge more for what little they can provide. It has show once before with dpf systems in the trucking industry. As far as the emissions stand point on said vessels. The amount of pollution to the amount of time they spend out in use don't out weigh the cost and funding it will take to accomplish this feat. It is simply not worth taking it from a tier 3 emission system/engine to a tier 4. Keep our boats on the waters. No more emission standards.

2833.1

2833.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:25:49

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Comment Log Display

Below is the comment you selected to display. Comment 2834 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: Hough
Email Address: p.hough@cox.net
Affiliation:

Subject: Leave it alone

Comment:

Leave our fishing fleet alone. So many anglers for decades have not only enjoyed but relied on our local fishing fleets for their knowledge of fishing, fishing grounds, and most importantly a fishing vessel to get us to these fish. We all enjoy fishing with a passion but most do not have the means to purchase a boat and all the electronics needed to be safe and successful. This pointless attack on our fishing fleets will put them out of business, destroy recreational fishing for the common man, and leave it only available to the wealthy and commercial fleets from China and other nations. Your aim is to destroy the livelihoods of many men and women who have called the ocean their home for generations. And the joy fisherman have loved for decades will be gone and only reserved for the elite. These proposals are without merit or consideration of the people. They will make no difference in any global climate change. The ends simply don't justify the means. Make no mistake we should all be good neighbors to the planet but destroying what so many people love and depend on is not the answer. If this is so important to the state then the state and the state will not reverse course. Then the state needs to absorb 100% of the cost because we all know these cost will put this industry out of business. If the state won't pay for everything they should give these fleets tax breaks until the cost is recuperated. Don't just simply say pay for this or your out of business. That's not a reasonable demand.

2834.1

2834.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:21:00

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Comment Log Display

Below is the comment you selected to display. Comment 2835 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gilbert
Last Name: Aguilar
Email Address: badazzg@gmail.com
Affiliation: None just a private citizen who enjoys f

Subject: Unfair

Comment:

Well there goes California showing how ridiculously ridiculous it is can't take care of people Shifting on sidewalks or homelessness but wants to Fing mess with a tax generation industry that does.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:33:13

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Comment Log Display

Below is the comment you selected to display. Comment 2836 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: john
Last Name: Ritter
Email Address: kjritteraz@yahoo.com
Affiliation: ment Di

Subject: Keep the fleet running

Comment:

Please do not shut down a vital industry in California. There are much more severe polluters than the fishing fleet. Go after the municipal fleet and convert them to natural gas or biodiesel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:40:26

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Comment Log Display

Below is the comment you selected to display. Comment 2837 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Harrington
Email Address: Robert332@live.com
Affiliation:

Subject: Please don't take away CA Ocean sports fishing!

Comment:

You'll be doing everybody in California disservice to be able to go fishing with our families and kids it is disgusting that you are trying to stop sports fishing and not finding another way.

It's American pastime and togetherness are one of the best things that we can do for us families! Our kids benefit when we take them fishing in the ocean on these boats and learn valuable life lessons! Please protect our crew our boats and our fishing on the great CA coast thank you.

I hope to be able to take my boy fishing on the Ocean soon!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:34:49

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Comment Log Display

Below is the comment you selected to display. Comment 2838 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Harrington
Email Address: Robert332@live.com
Affiliation:

Subject: Please don't take away CA Ocean sports fishing!

Comment:

You'll be doing everybody in California disservice to be able to go fishing with our families and kids it is disgusting that you are trying to stop sports fishing and not finding another way.

It's American pastime and togetherness are one of the best things that we can do for us families! Our kids benefit when we take them fishing in the ocean on these boats and learn valuable life lessons! Please protect our crew our boats and our fishing on the great CA coast thank you.

I hope to be able to take my boy fishing on the Ocean soon!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:34:49

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Below is the comment you selected to display. Comment 2839 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ronald
Last Name: Horak
Email Address: ronaldh0063@sbcglobal.net
Affiliation:

Subject: CARD mandate to replace sportfishing boat engines

Comment:

As a retired CA resident, I am asking the Newsom Administration to protect the families that operate sport fishing and whale watching boats from the CARD mandate to replace these boats engines. The mandate is unreasonable and will only destroy these essential businesses. Yours truly, Ron Horak

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:35:27

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Below is the comment you selected to display. Comment 2840 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Philip
Last Name: Greenberg
Email Address: dsertphil@yahoo.com
Affiliation:

Subject: Proposed regulations

Comment:

You people haven't got a clue as to what you are doing. How do you sleep at night when all you are doing is proving to everyone what fools you are. You should all resign and let real conservationists take your place....you know like the hunters and fishermen that actually go outdoors.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:44:52

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Below is the comment you selected to display. Comment 2841 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Slater
Email Address: Patriot_elect_engr@outlook.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

To Whom It May Concern:

The state's plan to regulate commercial fishing and whale watching vessels by mandating diesel engine emission mitigation technologies is short sighted and unnecessary. Sport fishing and whale watching industries have been hit particularly hard by covid 19 regulations imposed in 2020. Although these regulations have since been lifted, the industry continues to struggle to get back to where it was pre covid. 2841.1

The requirement to retrofit existing engines or to purchase new engines will undoubtedly drive many, if not all, privately-owned sportfishing and whale watching companies out of business for good. 2841.2

Everyone likes clean air and clean water, and the state has made tremendous strides toward this end over the last few decades. However, this plan goes too far. Perhaps a rule for new vessels makes sense, but not for existing vessels. 2841.3

Diesel engine regulations in California are already some of the strictest in the nation. Most vessels are re-powered with new engines every 2-3 years anyways, so it is not like there are heavy polluting engines still running out of the water.. Common rail technology has made diesel engines cleaner and more efficient.

We need to consider the economic and financial impacts of environmental regulations and we should ease ourselves into rules like this to avoid driving families out of business. And this won't be limited to sportfishing and whale watching. Other industries could suffer. Even the state could suffer.. the Dept. of Fish and Game will lose revenue. Please think twice before issuing across-the-board mandates such as this. 2841.4

James Slater

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:22:25

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Below is the comment you selected to display. Comment 2842 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Eric
Last Name: Galchutt
Email Address: thorvikings@yahoo.com
Affiliation:

Subject: Save sport. fishing

Comment:

Please don't sign the new sport fishing law that will kill the recreational salt water business in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:47:38

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Below is the comment you selected to display. Comment 2843 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Timothy
Last Name: Brown
Email Address: actionman.fish@gmail.com
Affiliation:

Subject: Carb

Comment:

Please do not move forward with the expensive consideration.

This is a California tradition and another example of what makes us such a special state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 13:57:11

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Below is the comment you selected to display. Comment 2844 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tommy
Last Name: LeVasseur
Email Address: lazer@blackwellconstruction.com
Affiliation: CWA

Subject: Reject CARBS new demands

Comment:

I am against the new exhaust demands being proposed by CARB.

TL

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:00:30

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Comment Log Display

Below is the comment you selected to display. Comment 2845 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Ver
Email Address: Johnv1985@yahoo.com
Affiliation:

Subject: Save the sport fishing industry

Comment:

I send this email in support of the California sport fishing and whale watching fleet . Please do not let the unreasonable burden being put in the fleet cause it to collapse. In these times that we are already experiencing a lot of businesses close, workforce shortage and high inflation, don't let another well established operation disappear. Thousand upon thousands of residents and tourists alike rely on the services that these fleet provide to enjoy the outdoors and educate themselves on our diverse resources.

The overreaching regulations that don't take into account practical and common sense approach to improve the fleet will force this invaluable services to disappear. Please come up with achievable solutions to this issue instead of completely killing the businesses and removing this affordable service from your constituents and visitors alike.

John V

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:05:16

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Comment Log Display

Below is the comment you selected to display. Comment 2846 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Larson
Email Address: Nwsurf@gmail.com
Affiliation:

Subject: Save Our Boats

Comment:

Please reconsider CARB requirements for whale watching and sportfishing fleet in CA. As a longtime sportfisherman from out of state I'm concerned about negative impacts to the fleet, their families and the cost of fishing trips. Please do not mandate new engine requirements without a full impact report. Doing so would place an undue burden on a relatively small segment of community stakeholders.

Thanks for your time,

Paul Larson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:16:26

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Comment Log Display

Below is the comment you selected to display. Comment 2847 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Lewis
Email Address: scvtony@gmail.com
Affiliation: Summit Real Estate Services

Subject: Sportsfishing Engine Requirements

Comment:

Dear California Air Resources Board (CARB),

My family was raised in Michigan and moved to California in 1975. Living close enough to the ocean to be able to appreciate our seas and ocean life has made our life much more fulfilling. Climate change has been a major concern as fresh air and clean water are both a necessity of life. We appreciate your efforts to clean up our nation and the world. Climate change has come slowly and steadily and the reversal should mirror this transition. We do believe that eventually oil and diesel engines need to be eliminated. This change should happen in a manner that has a limited impact on our citizens and the enjoyment of the sea. It would be a wise decision to allow current vehicles on the sea to operate with their current equipment and to make changes and restrictions that are affordable. New purchase should be made to have any new mandated standard. People need to be able to enjoy nature at an affordable price. We urge you to phase in your plans in a manner that is beneficial to the environment, society, our children and future children as well as those that allow us to enjoy the seas and sea animals. Love of the sea is something worth preserving.

2847.1

2847.2

2847.1
cont.

Respectfully,

Tony & Dani Lewis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:30:25

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Comment Log Display

**Below is the comment you selected to display.
Comment 2848 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: ECHAVARRIA
Email Address: MEWOODDESIGNS@YAHOO.COM
Affiliation:

Subject: Our rights

Comment:

Hey get your head out of the clouds,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:41:18

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Comment Log Display

Below is the comment you selected to display. Comment 2849 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hoover
Last Name: Ng
Email Address: hooverng@hotmail.com
Affiliation:

Subject: Proposed Amendments to Commercial Harbor Craft Regulations

Comment:

I am opposed to any proposed amendments that impact the ongoing operation of deep sea fishing boats. ■ They are hard working people trying to make a living and do not make huge profits. The pandemic has already caused some boats to go out of business. ■ The ones who are still in business would not be able to continue if these regulations were passed. ■ Please let them continue to earn their living by preserving the ongoing deep sea fishing industry. 2849.1

As a fisherman, I have benefited tremendously from being out on the water. ■ Several generations in my family have enjoyed the pleasures of fishing on the ocean. ■ Please do not restrict access to fishing on the ocean with these amendments. 2849.2

If the CARB can be selective and apply the amendments only to larger and heavier polluting type boats and ships, and exempt the smaller deep sea fishing boats, that would really help. 2849.3

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:24:24

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Comment Log Display

Below is the comment you selected to display. Comment 2850 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jane
Last Name: Broadus
Email Address: Jane61583@gmail.com
Affiliation:

Subject: Boat regulations

Comment:

Prices are already too expensive, if passed it'll be a deal killer for me and my family. We have enjoyed California waters for years but fear it's coming to an end.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:39:33

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Comment Log Display

Below is the comment you selected to display. Comment 2851 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: thomas
Last Name: burnette
Email Address: bsandeigo@aol.com
Affiliation:

Subject: Sportfishing

Comment:

We need to keep the sport fishing fleet fishing. That is a very big part of my life and the life of a lot of people that I know. We enjoyed going fishing and laws that are in the process of trying to get will kill the fishing fleet. That is a big industry for this state there will be a great loss for the state and the people who enjoy fishing and who works in it

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:38:42

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Comment Log Display

Below is the comment you selected to display. Comment 2852 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Campbell
Email Address: cbaseballboys@att.net
Affiliation:

Subject: Commerical Craft Harbor Regulations

Comment:

There is way to many commercial fleets that polloute the waters .
You need charters to keep families doing family stuff. They help
the local economy and provide fun things to do for locals and
tourism. Very much needed and be careful with evaluating what is
right and wrong .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:42:35

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Comment Log Display

**Below is the comment you selected to display.
Comment 2853 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Matthew
Last Name: Maldonado
Email Address: M1bmf@hotmail.com
Affiliation: Deckhand

Subject: Wtf
Comment:
Leave us alone

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:48:44

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Comment Log Display

Below is the comment you selected to display. Comment 2854 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lawrence

Last Name: Nye

Email Address: larrynye@msn.com

Affiliation:

Subject: New CARB sportfisher regulations

Comment:

The new rules/regulations you are proposing will end sportfishing, whale watching and dive boat operations in California.

The new rules require untested equipment in the marine environment which could lead to tragic results of human life and property.

This technology is not approved by the United States Coast Guard which has jurisdiction in this matter.

Please do not adopt this ridiculous measure.

L.Nye

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:39:23

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Comment Log Display

Below is the comment you selected to display. Comment 2855 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Schaffer
Email Address: lvtuna@aol.com
Affiliation:

Subject: Save Sportfishing

Comment:

Saltwater fishing is my passion and therefore protecting our environment is also important. However, your plans to change the way we power our Sportfishing boats will price my passion out of reach for the average saltwater angler and the boat operators. Please find a better way to protect the environment!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:44:18

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Comment Log Display

Below is the comment you selected to display. Comment 2856 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: DAN
Last Name: BURKE
Email Address: ZEBULON696@COX.NET
Affiliation:

Subject: CARB

Comment:

TIME TO LIVE WITH SOME COMMON SENSE AND NOT TRY TO KILL THOSE WHO HAVE WORKED THEIR BUTTS OFF TO AFFORD BUREAUCRATS A GOOD LIVING. THIS IS ONE OF THE MOST ASININE REGULATIONS ANYONE WITH A MODICUM OF COMMON SENSE HAS HEARD OF. TIME TO GET BACK TO A WAY OF COMMON SENSE. PERIOD.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:47:55

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Comment Log Display

Below is the comment you selected to display. Comment 2857 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gerald
Last Name: White
Email Address: smsjwhite@gmail.com
Affiliation: Nye County

Subject: Save Sportfishing & Whale Watching Boats

Comment:

Once again CARB and "radical Environmentalists are overreaching and attempting to take away another aspect of life unique to California. Sportfishing is enjoyed by many families. While already somewhat expensive, the proposed amendments of chc2021 will all but eliminate the average person's ability to afford a day or two on a charter boat.

2857.1

No doubt, if this is adopted, the vast majority of charter boat companies and family-owned charters will be forced out of business and only the wealthiest will be able to afford a day of fishing. I personally go fishing with my sons aboard one of several charter boats two to three times a year.

2851.2

I too am concerned about the environment, but not at the expense of limiting fishing opportunities for the average family and putting charter operators out of business. Please rethink this and look into other options to retro-fit current boat engines.

In closing, I certainly hope that lobbyists for the companies selling these proposed new engines are not involved. Your thoughtful consideration is appreciated.

Sincerely,

Gerald White, SMSgt, USAF Retired

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:19:21

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Comment Log Display

Below is the comment you selected to display. Comment 2858 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Amy
Last Name: Volk
Email Address: barryamyvolk@yahoo.com
Affiliation:

Subject: Amendments to the Commercial Harbor Craft Regulation

Comment:

Dear Govt Officials and CARB,

I am writing to ask that you PLEASE reexamine your proposed new engine mandate. Our fishermen have already suffered endless natural and economic disasters and requiring them to BUY NEW FISHING VESSELS because the engines you are mandating do not fit in their boats is frankly insane. Why not wait to enact this type of mandate until the technology exists? As you know, these engines are simply too big and too heavy to fit in most existing engine rooms. To

2858.1

suggest that captains should just "increase fares to make up the cost" of buying a new boat to replace the perfectly operational vessels is ludicrous. We all want clean air and a reduction in greenhouse gases but we urge you to provide an alternative before shutting down an entire industry. Fishermen care deeply about the health of our oceans for obvious reasons. They can be stewards and partners if this transition is executed properly.

2858.2

Please stop and look closely at the lives that would be destroyed by this knee jerk reaction to (albeit considerable) political pressure. We want changes to emission standards that yield tangible results vs destroying the small fisheries who sustainably feed Californians because they are easy pickings.

Thank you very much,

Amy Cavanaugh-Volk
Lifelong Citizen of Northern California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:34:11

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Comment Log Display

Below is the comment you selected to display. Comment 2859 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jacob
Last Name: Brand
Email Address: jakebrand@verizon.net
Affiliation:

Subject: chc2021

Comment:

How can you end sportfishing for all in southern california. they don't make much money and you are adding expenses which will put them out of business. You should be ashamed of yourself.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:11:20

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Comment Log Display

**Below is the comment you selected to display.
Comment 2860 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Gregory
Last Name: osterholt
Email Address: greg.osterholt888@gmail.com
Affiliation: Go electrical

Subject: Reject state rules
Comment:
Stop socialism

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:13:47

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Below is the comment you selected to display. Comment 2861 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Burkett
Email Address: ksburkett777@gmail.com
Affiliation:

Subject: New air quality regulations for existing fishing and whale watching boats

Comment:

Please don't approve this new mandate. It will severely restrict access for lower income clients. My grandparents had a fishing barge about a mile offshore from Huntington Beach pier when I was a child (1958-1965) and I spent a lot of time there. It fostered a love for the ocean, boats and fishing in particular. It already costs \$200 per person to go fishing in the bay area near me. The way I understand it, new boats will be necessary to accommodate the larger, heavier engines that comply with the proposed regulations. New boats are very expensive and of course the costs will have to be passed on to the customers. I can still afford to go fishing 8-10 times a year but a lot of my friends can't. If this law passes, most of Californians will be priced out. Please don't let this happen. Thank you for your consideration, Scott Burkett

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 14:27:15

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Comment Log Display

Below is the comment you selected to display. Comment 2862 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brad
Last Name: Foster
Email Address: Boobof@aol.com
Affiliation:

Subject: Carb discussions on sport fishing vessels

Comment:

I have been fishing these waters most of my life, 72, I've taken my grdkids on these boats, along with a million others here in Calif, and you pass these refs, the boat owners would go bankrupt, depriving thousands from livilyhoods , business would collapse, leaving untold people unemployed. Not to mention depriving thousands of people of recreational activities. This would also impact the rod and reel manufacturers, boat mechanics, etc. The list goes on and on, so I implore you to not pass these regulations, Thank You!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:10:30

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Below is the comment you selected to display. Comment 2863 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Porter
Email Address: mikeporter63@gmail.com
Affiliation:

Subject: No on Commercial Harbor Craft Regulation
Comment:
No on Commercial Harbor Craft Regulation.

Thank you, Mike Porter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:24:06

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Below is the comment you selected to display. Comment 2864 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Cregan
Email Address: Mc.cregan@gmail.com
Affiliation:

Subject: Charter and whale watching boats

Comment:

Do not burden our charter boat owners and whalewatching charter boat owners with the personel expenses of retrofitting theories engines...if you want to make that imorovement,improvement, for all tlof the engine replacement costs and the expenses and damages of the down time....it was youridea,your idea, you should pay for it....if not,we will loose our sport and you will destroy hundreds and hundreds of father ,son and family pastimrs,pastimes, many many private businesses will be deatyoad....stop thus nonsense...and while you are at it,please resign.....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:31:44

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Below is the comment you selected to display. Comment 2865 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Nordstrom
Email Address: mnord170@hotmail.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

Please don't destroy the opportunity for people to enjoy the ocean, to catch and release fish, (or keep and eat fish) to see a whale from a boat. Please do not crush the hearts of those who love the beauty and majesty of the ocean. You are not saving the earth by killing this opportunity for the common person, you are just making is accessible only to the very rich. How far will you allow your pride to push you toward the destruction of those who are not as financially or politically well connected as you? You will be held accountable for your actions, you will reap what you sow. Search your heart if you can find it, learn what your true motives are. Please sow the seeds of love, not arrogant hate disguised as environmentalism. You can be a friend of the environment without hurting other people, this is a fact. Why must you hurt others with your greedy lust for power and fame? Shame on you. You will be held accountable by God at the final judgement, you will reap what you sow. Let the people fish and watch whales from the boats they are using now, these boats and these activities are not even a drop of water in all of the oceans compared to what China is doing to the planet. Why don't you go to China and work on fixing the environment damage their doing?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:18:31

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Below is the comment you selected to display. Comment 2866 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Franklin
Email Address: capt.soleman@comcast.net
Affiliation: Soleman fishing

Subject: Engine Rules

Comment:

To the Airboard:

My name is Don Franklin and I own the charterboat SoleMan in San Francisco. The proposed rules changes if implemented will end my business plain and simple. The tier 4 engine will not fit in my boat and would seriously affect the stability of it. Also as a sole owner of my boat, the financial impact is tremendous. Currently it is almost 96 thousand dollars to repower to a tier 3 motor. I am a small time operation with 2 employees and this is stretching my dollars.

2866.1

Also I use my boat as a floating class room to take out disadvantaged youth from the San Francisco Recreation and Park dept. I have taught fishing camps, eco camps and done fundraising with it. It is important to me that today's inner city youth be exposed to the water like I was. It is from this exposure that I helped create a fishing camp thru the dept the Bite Me 101. I have taught kids fishing the last 12 years exposing them to San Francisco Bay and the Pacific Ocean. Without the use of my boat this camp would cease to exist and these kids wouldn't have the experience.

2866.2

Sincerely,

Don Franklin
Capt F/V Soleman

Attachment: www.arb.ca.gov/lists/com-attach/3262-chc2021-VjVcbgBIAmAKOgg4.jpeg

Original File Name: C4D160A8-7B5F-43DD-A78E-3E4698D5B8A5.jpeg

Date and Time Comment Was Submitted: 2021-11-13 15:40:04

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Sole-Man

Willy's Welding

GOLF

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Below is the comment you selected to display. Comment 2867 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Osuna
Email Address: Richard.osuna@oxnard.org
Affiliation:

Subject: California fishing boats

Comment:

Talk about hurting Californians. We are overly required to pay the highest price for hunting and fishing licenses compared to other states. Everything is going up for hunters and fishermen. I would love to keep on taking my dons and nephews on ocean fishing trips but I'm seeing that your proposed price hike for captains having to purchase new boats or retrofit new engines means that ticket prices will triple. I and many other friends will not be able to afford taking our kids out fishing nor ourselves because of the high prices. You will kill all recreation fishing I wish I could keep taking family to enjoy our oceans and fisheries. I hope you put a stop to this new law that you are trying to pass. I understand that something needs to be done but there has to be a better way to keep recreation fishing. If this passes I know a lot of family and friends will not purchase fishing licenses anymore. Since the whole family can't enjoy them nobody will. Please reconsider

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:34:50

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Below is the comment you selected to display. Comment 2868 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chuy
Last Name: Peraza
Email Address: Peraza469@gmail.com
Affiliation:

Subject: Save sport fishing

Comment:

We need sport fishing to stay alive a lot ppl depend on it that's how they bring food to the table to there family's

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:03:42

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Below is the comment you selected to display. Comment 2869 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kris
Last Name: Shimamoto
Email Address: kshimamoto@sbcglobal.net
Affiliation:

Subject: Commercial craft harbor regulations

Comment:

Please consider modifying the amendment which will force owners of the whale watching and fishing fleet to purchase new vessels. Although I am for protecting our oceans and natural resources, there must be a better way than to drastically enforce these new regulations! Not only are people's livelihoods being taken away but thousands of people will no longer have the opportunity to enjoy the ocean via whale watching and fishing. These activities educate the general public in the ecosystem. If it inspires a single youth put his or hers effort to preserving our oceans that it worth the cause to keep the existing fleets in business. A long term solution must be created that will be amicable to all parties involved.

Sincerely,
Kris Shimamoto

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 15:47:37

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Below is the comment you selected to display. Comment 2870 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robt
Last Name: Goefrey
Email Address: bobunreel@aol.com
Affiliation:

Subject: chc2021

Comment:

This is a really bad idea to force new engine requirements on offshore vessels. The economics of this idea make no sense. Very little return on investment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:09:09

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Comment Log Display

Below is the comment you selected to display. Comment 2871 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dennis
Last Name: Junker
Email Address: dennisjunker@yahoo.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

Please give up any rules which will destroy sport fishing in my watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:23:27

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Below is the comment you selected to display. Comment 2872 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Ortiz
Email Address: usmcmp73-77@hotmail.com
Affiliation: Recreational fisherman, boat owner

Subject: Ruining our state

Comment:

Please stop ruining our state even more with with this proposed law, how do you expect to get tax revenue from these small businesses when you're forcing them to shut down, this is unbelievable !! Please Stop hurting California private Business..

Attachment:

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Date and Time Comment Was Submitted: 2021-11-13 16:16:44

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Below is the comment you selected to display. Comment 2873 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Nelson
Email Address: nlsnjpn@yahoo.com
Affiliation: Visiting angler

Subject: Leave sportfishing alone !

Comment:

Please don't apply these proposed rules to the sportfishing industry. It will also lead to a decline for revenues in the hotel and restaurant businesses. Out of state fishermen contribute a ton of money to your local economies. Without affordable sportfishing, I will have absolutely NO reason to visit your state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:23:30

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**Below is the comment you selected to display.
Comment 2874 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ken
Last Name: Wood
Email Address: kenwood4646@gmail.com
Affiliation:

Subject: Protect Boat Owners

Comment:

Please respect boat owners and their families and customers.
Please listen to their concerns about expensive regulations that
could wipe out their businesses and the ability of people to enjoy
and appreciate, and be concerned for our environment by
experiencing it up front and personal in our waters.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:37:23

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Comment Log Display

Below is the comment you selected to display. Comment 2875 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sarah Hayes
Last Name: McGill
Email Address: sarahsnotes@me.com
Affiliation:

Subject: Protect sport fishing & whale watching

Comment:

Dear Governor Newsom,
I am writing to ask you to please protect the families that operate 174 passenger sportfishing and whale watching boats in California. Our family loves having the opportunity to explore on the ocean via fishing, whale watching, etc. We hope and pray we can continue to enjoy the ocean! Thank you for your time!

Sincerely,
Sarah Hayes McGill

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:37:32

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Comment Log Display

**Below is the comment you selected to display.
Comment 2876 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Baum
Email Address: dogdavedi@mac.com
Affiliation:

Subject: CHCR

Comment:

As an avid fisherman and longtime CA resident I am once again disappointed to see the politics and lobbying interests that continue to try and reduce access to a resource called the Pacific ocean! There seems to be no boundaries to the graft that continues in CA management of its natural resources. We allow unregulated use of water resources towards businesses that contribute less than 3% of our GDP but continue to attack my right to a God-given resource called the Pacific ocean. At some point you need to be accountable and reasonable which seems to be out of politicians' way of thinking and your greed with special interests. I will vote against any of the candidates I can who continue to support the special interests groups behind this. And yes, I do vote and don't forget.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:46:58

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Comment Log Display

Below is the comment you selected to display. Comment 2877 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Fukuto
Email Address: steve@longbeachsportfishing.com
Affiliation: Long Beach Sportfishing

Subject: Consider Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

To all this concerns:

My name is Steven Fukuto. I own the Commercial Passenger Fishing Vessel (CPFV) ELDORADO. I also own Long Beach Sportfishing and represent 13 similar CPFV in Long Beach Harbor.

This operation employs over 150 persons whose livelihood depends on working on CPFV's.

2877.1

Your proposed regulations regarding implementation of Tier 4 engines, as currently written, will place all of these persons and myself out of business.

I ask that you reconsider Proposed Amendments to the Commercial Harbor Craft Regulation for the following reasons.

1) There are no Tier 4 engine under manufacture that will fit into the current compartment of the vessel.

2) There is no safe place to locate a Diesel Particulate Filter (DPF) on board the vessel.

2877.2

3) Heat produced by the regeneration process of the DPF is too intense for the wood/fiberglass construction of the vessel.

4) The weight displacement created by a larger Engine/DPF configuration will negatively affect the stability of the vessel. They may not be able to be retrofitted to existing vessels.

5) CPFVs are commercial fishing vessels. The method of harvest is different than the seiners and trawlers. CPFV's should be classed as commercial fishing vessels.

2877.3

6) Estimated replacement cost to update a vessel is laughably underestimated in CARB's proposed regulation. It is more than double the amount.

2877.4

7) Unless CARB has some magic financing scheme to help replace a vessel, there are hardly any financial sources available for a

2877.5

"fisherman" who could qualify to purchase.

8) This proposed regulation will decimate a fragile industry that is barely surviving under the COVID Pandemic. This will be a death knell to many operations, who are mainly small family business and leave them with a worthless asset and business.

2877.1
cont.

We are all conservationist, taking care of all resources. Let the industry develop the lower emission equipment before mandating drop dead dates for items that is not reasonably available.

Steven Fukuto
Owner, M/V Eldorado
Owner, Long Beach Sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:16:23

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Comment Log Display

Below is the comment you selected to display. Comment 2878 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sam
Last Name: Hernandez
Email Address: l2masam@yahoo.com
Affiliation: Retired

Subject: CARB

Comment:

Excessive emission restrictions have caused a backlog at the port of LA. Out of state drivers can't bring their rigs in and pick up freight to take to other US destinations..independent owner operators who couldn't afford new trucks / engines were also shut out. We are experiencing product shortages and very high runaway inflation because of this....the effects may last for years.

Applying the same restriction on the sports fishing And water craft industry will cause many similar problems. Higher prices for recreation. Covid lock downs with limited social interaction and reduced outdoor activities are resulting in more crime. Fishing & hunting recreation has been the savior for many wayward kids...A slower Chang and time frame is critical to keeping our nation healthy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 16:57:30

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Comment Log Display

Below is the comment you selected to display. Comment 2879 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Camron
Last Name: shear
Email Address: readitnot@gmail.com
Affiliation:

Subject: Sport fishing and whale watching vessels

Comment:

I would like to state that I am against any new regulation requiring vessels to be retrofitted with any type of unreasonable equipment. Such equipment that may impose an extreme cost burden on the owners of the vessel, or require them to purchase a completely new one. As a citezen of CA, I enjoy the fishing opportunities the ocean provides. However fishing would be too expensive if the industry is forced to comply with the new proposed regulations.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:02:17

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Comment Log Display

Below is the comment you selected to display. Comment 2880 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Gonzales
Email Address: gonzok34@sbcglobal.net
Affiliation: Retired DOD Navy/Disabled Vietnam Vetera

Subject: Commercial Boating Amendment

Comment:

Proposed Amendment will destroy whale watching, sports fishing and similar commercial activities that support local, state and out of town visitors ability to enjoy the boating opportunities available here in California. The cost to retro fit existing craft to meet the proposed amendment isn't accurately identified or even considered when those costs aren't even known. Every commercial boat owner will be forced to close businesses in the worse case. Those able to comply will have to increase fees along to customers.

At a point and time when unreasonable restrictions, regulations and amendments are being imposed in the name of global warming. California is driving business, commerce and residents out of this State. Elected Officials seem to disregard the common tax payer without consideration of the impact unreasonable restrictions create. I strongly request a No Vote on this issue! Respectfully Robert W. Gonzales. Combat Veteran

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:11:26

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Comment Log Display

Below is the comment you selected to display. Comment 2881 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jennifer
Last Name: Fluhrer
Email Address: doll_facebeuty@yahoo.com
Affiliation:

Subject: Carb regulation

Comment:

If this law passes I will not be able to afford to go fishing every year like I do. Since I visit from out of town I also spend a considerable amount in the local community for hotels and dining out. If this takes affect I will no longer have a reason to travel to San Diego every year

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:30:40

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Comment Log Display

**Below is the comment you selected to display.
Comment 2882 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ubaldo
Last Name: Franco
Email Address: franco1@ymail.com
Affiliation: Angler

Subject: Save our Sportfishing

Comment:

You have to compromise and find a better solution that is realistic to boat owners. Please.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:40:01

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Comment Log Display

Below is the comment you selected to display. Comment 2883 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Lynch
Email Address: d_lynch@cox.net
Affiliation:

Subject: Protect families that operate sportfishing boats in CA!

Comment:

Protect the families that operate hundreds of passenger sportfishing and whale watching boats in California. 2883.1

The State's plan is to mandate engines too big to fit in existing engine rooms. This is a BIG PROBLEM. The California Air Resources Board (CARB) insists that boat owners can simply buy new boats that would range in cost from \$4.6 million to \$5.7 million. 2883.2

CARB insists that boat owners can pay for these expensive new boats through increased passenger ticket prices. To buy new boats, one-day fishing and or whale watching trips would have to Triple in Price. There is no way sports fisherman can afford to take themselves or their families out on the ocean at those prices. This will mark the beginning of the end for sportfishing businesses, their livelihoods - and sports fishermen's access to the sea. 2883.3

There are thousands of jobs that will be lost as a result if this.

STOP THE MISGUIDED BUREAUCRATIC TINKERING WITH THIS INDUSTRY'S AND THESE FAMILIES LIVELIHOODS!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:39:03

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Comment Log Display

Below is the comment you selected to display. Comment 2884 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rudy
Last Name: Castillo
Email Address: rcastillo007@att.net
Affiliation:

Subject: Save our boats

Comment:

Please allow the current sports fishing and whale watching boats to continue to operate without any new equipment improvement mandates. With fuel costs and the cost of living rapidly increasing on a daily basis, it will force the charter boat owners to raise their prices causing a potential drop in business which may negatively impact the boat owners to the point of closing their business. This will be a great loss for the people who use this type of hobby for relaxation and the experience to feel better about themselves, at the same time, bringing home some good healthy fresh food and knowing that you have caught it yourself. The charters can also be used to teach children something that will be healthy for them instead of just being locked into cell phones and computers. Please help keep the small businesses to continue to provide service to the community.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:27:56

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Comment Log Display

Below is the comment you selected to display. Comment 2885 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Jones
Email Address: joseph.joker.jones@gmail.com
Affiliation:

Subject: Save Sportfishing in California

Comment:

Sportfishing is one of the most honest way to earn a living please don't destroy it.

The Sportfishing industry is a multi billion dollar industry it's puzzling to anglers why Air Resource Board would consider destroying this industry. We the anglers and the Sportfishing industry has been through enough in this state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:06:06

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Below is the comment you selected to display. Comment 2886 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Merrill
Last Name: Roberts
Email Address: mrob2099@gmail.com
Affiliation: None

Subject: Save our boats

Comment:

Please do not put hard stipulation on our boats. It would drive the coast up and make it so expensive to go fishing or even whale watching

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:50:35

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Comment Log Display

Below is the comment you selected to display. Comment 2887 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ted
Last Name: Davidge
Email Address: Fishheadted@aol.com
Affiliation: Avid fisherman - Boater

Subject: Chc2021

Comment:

You need to come up with a better idea for clean burning fuel! Come up with something practical for the boat owner and environment! That works & practical!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:54:14

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Comment Log Display

Below is the comment you selected to display. Comment 2888 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Skoronski
Email Address: cgskoronski@yahoo.com
Affiliation:

Subject: Closing Fishing and abuse of Environmental Laws

Comment:

Please understand that outside of your secure financial bubble people rely on the ocean to get away from the craziness of everyday land life, support their families and create experiences for those who otherwise would never experience the Ocean. Please give a logical explanation on how you can use Environmental Laws to literally do whatever you want to like a Gestapo state police. Please provide a way to actually help the environment without crushing entire industries....I'm expecting diesel trucks are gone too correct?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:54:37

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Comment Log Display

Below is the comment you selected to display. Comment 2889 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: mark
Last Name: collup
Email Address: collup4@gmail.com
Affiliation: none

Subject: off shore fishing extortion by CARB

Comment:

CARB a non elected unaccountable bureaucratic gang of headhunters have found a small group of tax paying hard working folks to strong arm and cram there unfounded wrath upon. Most of these fishing boats only operate in costal waters a fraction of the time most of their time is spent on waters outside CARB jurisdiction. The rules proposed would only cause hardship and not help the air quality. Such a small fleet spending very little time in coastal waters is a non factor, but CARB has set its sights small operators and will fine most boats out of business. STOP the extortion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:29:59

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Comment Log Display

**Below is the comment you selected to display.
Comment 2890 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: roland
Last Name: lewis
Email Address: buddylewis@hotmail.com
Affiliation:

Subject: Sport Fishing
Comment:
Save the boats!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 17:57:01

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Comment Log Display

Below is the comment you selected to display. Comment 2891 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: david
Last Name: stevens
Email Address: dasother@roadrunner.com
Affiliation: interested fisherman

Subject: environmental regulations on fishing and whale watching boats

Comment:

The proposed changes appear unworkable. I understand that right now the technology required to meet the proosed mandates DO NOT CURRENTLY EXIST. The retrofits for busses and trucks cannot safely be applied ocean going boats. Thus these propsed changes would pose far too many life threatening situtations at sea and strain our rescue fleet.

2891.1

Finanicially it would ruin the sportfishing and whale watching industry in the name of victroy for a select few that care less about those that work hard to support their families in jobs that won't make them rich, but, they love their jobs. The cost of new boats at \$4.5 million plus would make it econimically impossible to attract customers to pay about triple the going rate.

2892.2

I urge CARB to vote NO on the Harbor Craft Regulation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 18:18:33

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Comment Log Display

Below is the comment you selected to display. Comment 2892 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Morgan
Email Address: dripdroplandscapes@gmail.com
Affiliation:

Subject: Save our boats

Comment:

I am a retired Viet Nam era Army veteran. I enjoy sport fishing from well informed offshore captains here in Southern California. My opportunity to enjoy the great outdoors here in southern California will be quenched if the prices are forced higher per trip by forcing the the legislation that will require the boat owners to go out of business or spend large sums of money to accommodate the California Air Resources Board (CARB) mandates for engines that are too big and too heavy to fit in existing engine rooms.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 18:27:08

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Comment Log Display

Below is the comment you selected to display. Comment 2893 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stavanna
Last Name: Easley
Email Address: Stavanna.scta@gmail.com
Affiliation: Angler

Subject: Save our sport fishing boats

Comment:

I am writing in hopes of protecting all of the sport fishing boats in California. These boats count on their customers/passengers to make a living. If these CARB Regulations go into effect passengers will not be able to afford ticket prices to go fishing or whale watching. In result our boat owners will loose their careers and all anglers or passengers will loose the opportunity to go into the ocean. This is heartbreaking and I am opposed to the legislation that is trying to be passed. I deeply enjoy going fishing on the Black Pearl out of Morro Bay with my family. Its is a great activity to do with family and friends. If this legislation is passed Many boat owners will loose their livelihoods and I will never have the opportunity to take my future children fishing.

Attachment: www.arb.ca.gov/lists/com-attach/3292-chc2021-BWNRbwdkUDcBNwA0.jpeg

Original File Name: F8B404A5-63D5-49D3-8821-B3F72926CDF9.jpeg

Date and Time Comment Was Submitted: 2021-11-13 18:51:50

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Comment Log Display

Below is the comment you selected to display. Comment 2894 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dionisio
Last Name: Brache
Email Address: Drbrache@hotmail.com
Affiliation: Angler

Subject: Engine mandate

Comment:

As a low income family we enjoying family fishing on local boats. The engine mandate would make it too expensive for our family to continue. Please reconsider the mandate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:03:38

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Comment Log Display

Below is the comment you selected to display. Comment 2895 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Kelley
Email Address: mkelley450@aol.com
Affiliation:

Subject: CARB change of regulations for commercial sport fishing and tour boats

Comment:

I am writing to object to the mandatory change of emission controls to the sport fishing and tour boat industry. I feel these changes are being pushed onto these small businesses without regard to the consequences to them or their customers. Please reconsider this legislation and provide sponsorship and teamwork instead.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 18:49:29

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Below is the comment you selected to display. Comment 2896 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Arthur
Last Name: Stephens
Email Address: artstephens00@gmail.com
Affiliation:

Subject: Fishing boats

Comment:

Please reconsider legislation requiring new restrictions on diesel fishing boat engines. This new requirement will ruin the sportfishing industry in California. Currently it is very expensive for the average middle class fish we even to go out on a trip. Any increase will be devastating to me. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:13:45

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Comment Log Display

Below is the comment you selected to display. Comment 2897 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Aric
Last Name: Curtis
Email Address: aric.curtis2@gmail.com
Affiliation:

Subject: Mandatory Replacement of fishing vessel engines

Comment:

Dear CARB,

I am writing you about the proposal to require commercial harbor craft, including sportfishing and whale watching boats, to purchase new engines. The engines for these boats are very costly and would put a tremendous burden upon the owners of these vessels. I believe these owners should be allowed to use their current engines until they are in need of replacement and then they could comply with the proposed new engine requirements. If the new engine requirement is forced on boat owners as proposed, many will be forced out of business. Please reconsider this proposal. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:02:33

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Comment Log Display

Below is the comment you selected to display. Comment 2898 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Malthaner
Email Address: j.malthaner@gmail.com
Affiliation:

Subject: Proposed Amendments to Commercial Harbor Craft Regulations

Comment:

ENOUGH IS ENOUGH. It is time for CARB to get off their high horse and stop this nonsense. With employment tanking in California and countless thousands getting out of this State, we can NOT afford to impose further crippling restrictions on certain sectors of our economy.

Countless thousands, many multi-generational, depend on the Pacific Ocean their their passenger carrying vessels to make a living and support thier and their crew's families.

If you support these whimsical amendments, BACK OFF. We know who you are and don't think for a minute we aren't coming after you and the beauracrats that keep you in power in the future. Keep enjoying your employment until your FIRED!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:18:22

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Comment Log Display

Below is the comment you selected to display. Comment 2899 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ellen
Last Name: DeLaura
Email Address: ellen.delaura@yahoo.com
Affiliation:

Subject: "CHC2021 Save Our Boats"

Comment:

This new mandate will kill the sport fishing industry. Many of these boats are family owned businesses which will be destroyed. 2899.1

The amount of damage which the current boats may create is nothing compared to sanctioned industries such as agribusiness and meat production. Agriculture contributes 29% of green house gases! 2899.2

Please either subsidize the sport fishing boat upgrades, create an exemption, or drop the new requirements. At risk is a wholesome sport, and a method many people like myself get a chemical free wholesome source of protein. I grow organic veggies in the city, live on a small budget, and with two fishing trips a year, I can get my fish. Not like the farm raised fish who are raised in crowded environments and are flown all over the country. For senior citizens like myself, who live on social security, fishing trips provide an important part of our diet. 2899.3

I fish on a family owned boat which is less that two years old. With the new requirements, this boat will become a bad investment. I don't think the family can survive this requirement - they will have to fold the business the current captain grew up in. He has had no other job! Its wrong and cruel to pick on these fisherman while container ships pollute more in one day than a fishing boat in years.

Please stop this and find another solution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:15:47

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Comment Log Display

Below is the comment you selected to display. Comment 2900 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ron
Last Name: Ramirez
Email Address: ronramirez100@live.com
Affiliation:

Subject: Save our boats!

Comment:

Please don't let this come into law. The cost to upgrade the state's commercial fleet is too costly. It's not fair to the population that pays to see our marine life.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:25:23

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Comment Log Display

Below is the comment you selected to display. Comment 2901 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephen
Last Name: Simon
Email Address: bigfish1944@yahoo.com
Affiliation:

Subject: Save our boats

Comment:

Save our boats. As a fisherman for the last 65 years I feel this bill is inappropriate as the cost for new boat is extremely out of the question please do not pass this bill thank you very much Steve Simon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:32:44

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Below is the comment you selected to display. Comment 2902 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Samuel
Last Name: McNutt
Email Address: smcnutt58@yahoo.com
Affiliation:

Subject: Harbor Craft Proposed Amendment

Comment:

My family and I utilize commercial fishing at least 10 times annually. This proposal will cost many families the ability to enjoy commercial fishing as we've always had. I can only pray that Governor Newsom and the team of representatives responsible for this proposal would think it through. To increase the cost of commercial fishing by three times we are pretty much end the years of fishing our family enjoys.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:38:34

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Below is the comment you selected to display. Comment 2903 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dan
Last Name: Gorman
Email Address: DeterminedCharters@gmail.com
Affiliation:

Subject: Save CA Charter boats

Comment:

Dear CARB,

While reducing emissions with the advent of Catalytic Converters for passenger vehicles in the 1980's was a great benefit to the all citizens, unfortunately there currently is NOT a cost effective solution for the marine charter boat industry. Unless CARB foots the bill to replace all commercial marine engine packages in California, the expense for owner/operators and charter companies to comply is cost prohibitive. Even if operators were able to charge 3x for ticket prices to offset the cost of new engines, the public would balk at such an increase to take their loved ones for a day on the beautiful Pacific Ocean.

I respectfully request you to stand down on this ill conceived idea that owner / operators can absorb this type of unnecessary expense. This would effectively kill the charter boat industry in California. The public deserves the basic right to access our public natural resources such as the Pacific Ocean.

Thank you,

Dan Gorman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:24:17

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Comment Log Display

Below is the comment you selected to display. Comment 2904 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: VICTOR
Last Name: ARAI
Email Address: varai@yahoo.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

I am against these new regulations. These boats are not like motor vehicles. I go sportfishing from San Pedro once a week in the summer. I feel that the government is overreaching by subjecting these requirements. This law will kill many small business in the beach towns. The real problems are the large shipping craft that come into San Pedro. Are they going to have the same emissions regulations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:41:09

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**Below is the comment you selected to display.
Comment 2905 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Charles
Last Name: Clemons
Email Address: charlesleeclemonsjr@gmail.com
Affiliation:

Subject: SUPPORT WHALE WATCHING AND SPORT FISHING FAMILIES - SHIPS

Comment:

To The Newsom Administration

We are asking them to protect the families that operate 174 passenger sportfishing and whale watching boats in California. This sudden expense to purchase new engines will stretch them beyond sustainability. The costs will triple and create a strain on families that fulfill a vital leisure role for Californians and Tourists. There has to be another way to meet this expense without it on the backs of these hard-working families. Do not tax them for this expense.

Sincerely,

Charles Clemons

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:53:50

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Comment Log Display

Below is the comment you selected to display. Comment 2906 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dionisio
Last Name: Brache
Email Address: Drbrache@hotmail.com
Affiliation: Angler

Subject: Engine mandate

Comment:

As a low income family we enjoying family fishing on local boats. The engine mandate would make it too expensive for our family to continue. Please reconsider the mandate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:03:38

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Comment Log Display

Below is the comment you selected to display. Comment 2907 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: peter
Last Name: schilhavy
Email Address: peter-and-priscilla1@hotmail.com
Affiliation:

Subject: Ineffectiveness and punitive nature of proposed CARB regulations

Comment:

Dear CARB,

Quote:

The State's plan is to mandate engines that are too big and too heavy to fit in existing engine rooms. This is a BIG PROBLEM. But, rather than retreating from this plan, the California Air Resources Board (CARB) insists that boat owners can simply buy new ones that would range in cost from \$4.6 million to \$5.7 million.

2907.1

CARB insists that you can pay for these expensive new boats through increased passenger ticket prices. To buy new boats, one-day fishing and or whale watching trips would have to Triple in Price. There is no way our customers can afford to take themselves or their families out on the ocean at those prices and this will mark the beginning of the end for our businesses, our livelihoods - and your access to the sea.

2907.2

Given this situation your legislature will bankrupt all the sport fishing and whale watching boats. There is no way the sport fishing boats will be able to afford or fund this. I personally know one captain and boat owner and he lives paycheck to paycheck. He works construction on the side just to get by. I have a good job but when an overnight trip goes from \$120 to \$360 I will not be able to afford saltwater fishing and I will quit.

There are 174 sporting and whale watching boats. Any emissions from these boats are released over the ocean as opposed to the enclosed valleys of CA so they are quickly diluted by the hundreds of miles of free ocean surrounding them. There are 14 million + cars in CA. The amount of pollution of these boats is miniscule compared to cars. This does not include industry.

2907.3

14,894,912

U.S. automobile registrations in 2019, by state
Characteristic Number of registered automobiles
California 14,894,912

Feel free to bankrupt and put out of business 174 boat owners and their crews for a stupid mandate that will have no measurable effect on reducing pollution. I am a well-respected Principal mechanical engineer who has been working for 33 + years in the aerospace industry designing space engines and missile defense products. So from a technical perspective it is obvious your proposed legislation is foolish, harmful and ineffective.

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Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:24:17

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Comment 2908 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jeff
Last Name: Nikolas
Email Address: jnikolas55@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

Carb needs to compromise with boat operators to keep these services available.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 20:02:38

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Below is the comment you selected to display. Comment 2909 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Glen
Last Name: Aikin
Email Address: gaikin@yahoo.com
Affiliation:

Subject: Don't Sink Sportfishing and Whale Watching

Comment:

Please DO NOT pass legislation requiring boat owners to buy new engines. The bigger engines you're proposing have a larger foot print and will not fit in many existing engine compartments. This will cause many boat owners to go out of business because they can not afford to purchase new boats with the required engines. These are tax paying citizens and passage of this regulation will force them into unemployment. Many of these business people are barely making a living as it is. And to suggest that I, as a sports fisherman, will pay higher prices to go sportfishing is an erroneous assumption. I can barely afford to go now as it is. Increasing the price that will be required to fund a new boat will price me out of the sportfishing market. So I urge you to reconsider your stance and LEAVE THINGS ALONE!

2909.1

2909.2

2909.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 19:53:54

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**Below is the comment you selected to display.
Comment 2910 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dale
Last Name: Dominguez
Email Address: daledominguez91@gmail.com
Affiliation:

Subject: Sportfishing
Comment:
Save sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 20:16:50

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Below is the comment you selected to display. Comment 2911 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alfredo
Last Name: Delamerced
Email Address: adelamerced18@gmail.com
Affiliation:

Subject: New Eng

Comment:

I want to reach out about the requirements you are thinking of implementing that would require new engines or boats be purchased by whale watching and sport boat owners. This is too unrealistic. It would cause already high ticket costs to triple. Your middle class citizens like myself would not be able to afford taking our families out on these trips. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 20:18:58

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Below is the comment you selected to display. Comment 2912 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charity
Last Name: Hagen
Email Address: czy4brds@yahoo.com
Affiliation:

Subject: CHC2021 Save Our Boats

Comment:

Hello,

I am writing to protest the new regulations proposed for tourist and sightseeing boats on the oceans of CA. I am a regular passenger on whale and bird watching boats, traveling out to sea several times each year. These trips on the ocean are essential for my psychological health and well being. Being on the ocean calms my soul like nothing else on this planet. By proposing these new regulations on boat owners, by making them have to buy expensive new engines and perhaps even new boats, you will put this industry out of business. This means that people like me with emotional needs will be unable to go out on the ocean and will be unable to achieve emotional balance in our lives. You are putting government and onerous and burdensome regulations first and people second. If you go through with this you will prove to the people in this state that you care nothing about them, their livelihoods, or their health. It will show all you care about is controlling the population with your draconian rules. You care nothing about the planet by proposing these rules. People are essential to this planet. People should come first. Start showing you care about the people in your state by canceling these regulations and letting boat owners continue with their livelihood and people like me continue to get the emotional help we need by going on the ocean.

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Date and Time Comment Was Submitted: 2021-11-13 20:09:16

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**Below is the comment you selected to display.
Comment 2913 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dan
Last Name: Emmett
Email Address: demmett@douglasemmett.com
Affiliation:

Subject: Harbor boats rule

Comment:

Please pass the Harbor boats rule. Timely and important.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 20:57:10

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Below is the comment you selected to display. Comment 2914 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Carlson
Email Address: bosshog2121@yahoo.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

As an avid fisherman, an Army Veteran, and disabled I totally disagree with this proposed regulation. How do you expect the people who do not earn salaries like you to continue to enjoy sportfishing in the State of California. No wonder so many people are moving out of California at an alarming rate. If the poor to middleclass are taxed so much, how do you expect them to live?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:02:03

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Comment Log Display

Below is the comment you selected to display. Comment 2915 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dan
Last Name: Nay
Email Address: danlemanbackup@gmail.com
Affiliation:

Subject: Fishing Boat Exemption

Comment:

Hello,

I believe the new regulation concerning boat engines should exempt fishing, sports, and whale watching related boats. The reason for this is due to the increased costs that these companies will be facing. Passing the price increase onto consumers may not be very viable, as the nature of its demand seems to be very inelastic, suggesting an increased price will draw away a large amount of consumers, thereby resulting with a diminished revenue overall.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:07:42

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Comment Log Display

Below is the comment you selected to display. Comment 2916 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joseph
Last Name: Babcock
Email Address: joebabcock@hotmail.com
Affiliation:

Subject: Sportfishing

Comment:

Please do not implement policies in sportfishing that will affect tourism in the state of California. It is my understanding that you are considering mandating engines and exhaust in sportfishing boats and whale watching boats. This is bad policy and I disagree with the idea of implementing mandates on engines in sportfishing boats. It will increase ticket costs and drive tourism away from California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:08:52

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Comment Log Display

Below is the comment you selected to display. Comment 2917 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Dobos
Email Address: daviddobos@rocketmail.com
Affiliation:

Subject: Harbor craft regulations

Comment:

Kalifornia has enough laws and
We as fisherman don't need any more of this crap! We pay through
the nose for all the licensing as it is and now this?
When will you people stop?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:13:37

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Comment Log Display

Below is the comment you selected to display. Comment 2918 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Heidi
Last Name: Sanborn
Email Address: heidi@heidisanborn.com
Affiliation:

Subject: Clean up the boats

Comment:

I lived in Long Beach for 7 years and had to leave due to the pollution from the ships. From the day I moved there, living on the ocean, I was having constant sinus infections and had never had them before. Looking back, I am positive it was the emissions from the ships. I eventually got better living in Sacramento but never got over the damage caused from so many sinus infections and had sinus surgery. Thankfully, I have not had a sinus infection since but I spent too much of my time in my 20's sick due to the bad air I had to breathe living in lLong Beach. Please, for the health of the planet and public health, take action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:40:54

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Comment Log Display

Below is the comment you selected to display. Comment 2919 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Novielli
Email Address: bobnovielli@ca.rr.com
Affiliation:

Subject: Save our boats

Comment:

Each year I have been blessed to be able to go on a 10 day fishing trip. This is an expensive proposition. All told it costs in excess of \$5000.00 I'm afraid you can kill this already expensive sport by imposing the regulations being proposed. There has not been a new boat made in the San Diego fishing fleet in the last 15 years. Modern day boat building costs are just too expensive. Please don't kill this industry and recreational activity by imposing rigid regulations that are too expensive for this industry to pass on to the paying fisherman.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 21:43:21

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Comment Log Display

Below is the comment you selected to display. Comment 2920 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marcos
Last Name: Borja
Email Address: Maddogsracing@yahoo.com
Affiliation:

Subject: Appose regulations against the sport boat industry

Comment:

For this administration to impose restrictions against the sport boating industry is an over reach. These businesses have been operating for years and families depend on this business to thrive. Thousands come from all over the US to get on these boats for a fair price. Now they have been hit with two years of covid restrictions and now face this. I think that if your goal is to be kind to the environment, you also have to have a plan to work with these companies. If we can throw billions to a bullet train that goes nowhere we can help out the boating industry to repurpose their hulls and engines.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 22:28:14

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Comment Log Display

Below is the comment you selected to display. Comment 2921 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: CHARLES
Last Name: TELLES
Email Address: chucktelles@hotmail.com
Affiliation:

Subject: SAVE OUR BOATS

Comment:

Please do not put the small fleets in jeopardy with this restrictive legislation. The new rules could put fisherman, sightseeing and dive boats out of business. Most of these operators are scraping by and the added cost to retrofit with upgrades could destroy their businesses. Maybe the current boats could be grandfathered in and new boats would have to meet new standards. Thank you.

2921.1

2921.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 22:29:44

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Comment Log Display

Below is the comment you selected to display. Comment 2922 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Greg
Last Name: Sasaki
Email Address: gregsdds@cox.net
Affiliation:

Subject: Please reconsider

Comment:

I AM an environmentally concerned citizen, and have been for well over 50 years. I appreciate your efforts to reduce air pollution and improve our environment. However, I must ask you to create a more feasible pathway for small businesses reliant on diesel powered boats to decrease their negative impact on the environment than the proposed regulations. Step by step improvements have been made and are noticeable already to citizens like me. I agree that regulations are necessary to drive industry to invest in technology to reduce their negative environmental effects if those improvements negatively affect their bottom line. Please create goals achievable without driving small businesses into financial ruin. I want you to force improvement while allowing people to keep their businesses alive. If only large companies with legions of attorneys are able to stay in business, we will be a weaker country indeed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 22:30:21

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Comment Log Display

Below is the comment you selected to display. Comment 2923 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ali
Last Name: Appelgate
Email Address: appelgatea@gmail.com
Affiliation:

Subject: CARB to support clean ships

Comment:

Dear Chair Randolph and Members of the Board,

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must stop investing in diesel operated harbor boats and instead invest in clean technologies and jobs.

2923.1

The technology exists to transition commercial harbor craft to 100% clean fleets today. Battery-electric boats are already in production, and hydrogen fuel cell electric vessels are being designed that support longer ranges and durations than battery-electric systems.

I am specifically submitting this letter in support of funding for UC San Diego's Scripps Institution of Oceanography (Scripps) hydrogen-hybrid coastal research vessel project. This vessel will reduce criteria pollutants and greenhouse gas emissions, while demonstrating the viability of clean, nonpolluting zero-emission shipboard power systems to the maritime industry. The vessel will feature an innovative hybrid propulsion system that will use hydrogen fuel cells to enable true zero-emission operations for 75 percent of the ship's expeditions, supplemented by a conventional diesel-electric power plant when additional range is required offshore.

2923.2

Given the climate emergency that we are facing, we need bold climate leadership -- and bold transformation of maritime power systems that Scripps is working to demonstrate.

I am also advocating for adoption of green hydrogen (hydrogen derived from low-carbon sources) for maritime hydrogen fuel systems. Institutions like Scripps need to defray the cost of

green hydrogen used on ships to effectively compete with lower-cost diesel fuel. Access to affordable green hydrogen will incentivize and accelerate the expanded use of hydrogen fuel technology within the maritime industry, supporting federal and state carbon reduction goals and enabling a zero-carbon well-to-wake energy pathway.

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 22:58:22

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Below is the comment you selected to display. Comment 2924 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: REX
Last Name: DOUGLAS
Email Address: BIGFATREDS123@GMAIL.COM
Affiliation:

Subject: CHC2021

Comment:

please dont affect the livelihoods of these vessel operators.there is enough going on right now and people are struggling.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-13 23:50:00

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Below is the comment you selected to display. Comment 2925 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Barnes
Email Address: mike_barnes03@yahoo.com
Affiliation: Fisherman

Subject: Carb

Comment:

Please don't do it. California has more regulations and it's killing businesses all around the state. Evidenced by companies leaving.
Please use common sense.

MB

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 02:43:31

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Below is the comment you selected to display. Comment 2926 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrea
Last Name: Dunn
Email Address: andreabythesea2018@gmail.com
Affiliation:

Subject: Save sports fishing California

Comment:

Many people enjoy sports fishing. It gives many people jobs too.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 03:40:56

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Comment Log Display

Below is the comment you selected to display. Comment 2927 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gunnar
Last Name: Woodyard
Email Address: gunnarzephyr@gmail.com
Affiliation:

Subject: CARB Is Out Of Touch With Reality!!

Comment:

Are you seriously going to take an action that will absolutely sink most of the Sportfishing Fleet? Are you actually going to try and say you have no idea what damage you'll do to Charter Boat owners and their families? Where in the world did you get the notion that what you're doing is worth the damage you'll cause?!

Do us a favor: BUTT OUT!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 04:02:58

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Comment Log Display

Below is the comment you selected to display. Comment 2928 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alan
Last Name: Pearson
Email Address: alan-pearson@comcast.net
Affiliation:

Subject: California sportfishing

Comment:

Mr. Newsom

I am a 59 year old.

I grew up in San Diego.

As a troubled teenager I learned a work ethic that has served me well through the years.

Things are even harder for young people now without some kind of outdoor motivation. WHY!!! Would you think it's a good idea to take away something that has inspired thousands of young people like me over the years.

I still go back and fondly enjoy a day's fishing on the ocean.

I'm a truck driver now, and I don't even have to mention how badly that has gone because of regulations. Just look at your ships out there polluting the air.

You are not fixing any problems you are only creating more problems. You are in disguise ☐

It's MONEY and your concern is PHONEY.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 03:54:53

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Comment Log Display

Below is the comment you selected to display. Comment 2929 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Matthew S
Last Name: Plut
Email Address: sw44magnum@gmail.com
Affiliation:

Subject: CARB Boat Engine Mandate

Comment:

Please do not move forward with this draconian proposal. It would essentially mandate the closure of fishing and whale watching opportunities for Californians while at the same time putting charter boats out of business affecting not only their families, but the substantial boating and Sportfishing industries as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 04:37:13

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**Below is the comment you selected to display.
Comment 2930 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Nancy
Last Name: Vidor
Email Address: nancy.vidor@hotmail.com
Affiliation:

Subject: Regulations
Comment:
Stop the restrictions

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 04:51:51

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Below is the comment you selected to display. Comment 2931 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mike
Last Name: Day
Email Address: Huitesbassclub@gmail.com
Affiliation:

Subject: Re powering Sportfishing boats

Comment:

Please reconsider the idea that captains of Sportfishing boats can buy new boats and pass the cost onto the public. If cost goes up significantly we will not be able to afford this. Inflation and fuel cost increase is all we can bear.

Any cost increase due to having to purchase all new sport boats will kill the sport and all the tourism commerce associated with it

Please re think this plan.

Thank you

M Day

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 04:56:53

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Below is the comment you selected to display. Comment 2932 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Madden
Email Address: danmadden08@gmail.com
Affiliation:

Subject: Carb proposal

Comment:

Please save sportfishing and whale watching!!
The technology you insist on doesn't even exist!! Let's take a moment and let common sense settle in.
Save our industry and way of life

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 05:18:27

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Comment Log Display

Below is the comment you selected to display. Comment 2933 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dave
Last Name: Roti
Email Address: daveroti@cox.net
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

After researching and coming to an understanding of this Proposal, I urge a NO vote on it's implementation. To do so would cause irreparable harm to the sport fishing industry, it's families and clients. All without providing benefits to air quality.

Furthermore, integration of these regulations is completely impractical, not simply modifying existing engines but requiring complete replacement, and the current technology doesn't exist to make that possible as new engines would be much larger and would not fit.

Again, I urge a NO on implementation of this Proposal.

Regards,
Dave Roti

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 05:15:55

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Below is the comment you selected to display. Comment 2934 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bedford
Last Name: Berkley
Email Address: Beachbed@aol.com
Affiliation: West Marine

Subject: Commercial Harbor Craft Regulation

Comment:

I HOPE that common sense will prevail in your decision. And it will be a change that will not dramatically change the price or the experience of Sport Boat Fishing in San Diego.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 05:54:55

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Comment Log Display

Below is the comment you selected to display. Comment 2935 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Steele
Email Address: Stevensteele727@gmail.com
Affiliation:

Subject: Don't Destroy Small Business and Sportfishing

Comment:

The only people able to comply running a commercial fishing business will be large corporations and the uber wealthy if this legislation is adopted. The outrageous costs of compliance will be passing the costs through ticket prices and the destruction of affordable fishing. This will especially hurt the financially marginalized and people of color. Please let the small business person have a chance and let all people have a chance to fish affordably.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:00:49

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Comment Log Display

Below is the comment you selected to display. Comment 2936 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Blakeslee
Email Address: wblakeslee@twc.com
Affiliation:

Subject: Save our sportfishing

Comment:

Please do not destroy our sprortfishing and whale watching by imposing unreasonable fees on the fleet. With prices spiking on everything, please spare the fleet these unneeded engine ungrades.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:19:53

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Comment Log Display

Below is the comment you selected to display. Comment 2937 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: S
Last Name: Gruenewald
Email Address: sgrueny@cox.net
Affiliation:

Subject: Sportfishing

Comment:

Sirs, I am writing regarding the proposed mandates concerning the offshore sport fishing industry. I've been fishing these waters for over 50 years. It is my opinion that CARB is focusing on a very insignificant problem that will affect many people adversely, not to mention potential economic impact. I am asking that you please consider not passing the proposed legislation concerning this SMALL but important industry. There is certainly a multitude of problems in this world/country...this is certainly not one of them. Thank you for your attention to this matter.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:19:40

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Comment Log Display

Below is the comment you selected to display. Comment 2938 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Grace
Last Name: Arciniegas
Email Address: grace.arciniegas@gmail.com
Affiliation:

Subject: Please continue sport fishing

Comment:

Is as lot a people working in this. Is important to keep their jobs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:32:36

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Comment Log Display

Below is the comment you selected to display. Comment 2939 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Ashford
Email Address: jlashfordconstruction@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

We need to keep the lively hood alive for the operators of the boats in question. Manny if not all will not br able to comply.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:38:01

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Comment Log Display

Below is the comment you selected to display. Comment 2940 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: ROBERT
Last Name: DORN
Email Address: RSDORN@COMCAST.NET
Affiliation:

Subject: PROHIBITIVE REGULATIONS

Comment:

PLEASE HAVE MERCY ON THE CITIZENS AND STOP THE UNREALISTIC REGULATIONS THAT WILL DESTROY RECREATIONAL FISHING, WHALE WATCHING, AND MANY LIVLIHOODS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 06:59:25

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Comment Log Display

**Below is the comment you selected to display.
Comment 2941 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: WILLIAM515686
Last Name: HARRISON
Email Address: HUNTERBILL46@YAHOO.COM
Affiliation:

Subject: more stupid legislation
Comment:
what more can i say

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:02:24

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Comment Log Display

Below is the comment you selected to display. Comment 2942 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kerrie
Last Name: Holmberg
Email Address: kdholmberg@gmail.com
Affiliation:

Subject: Protect Sportfishing

Comment:

Please do not limit access to the sea and bankrupt thousands of working families. Better, long-term solutions are necessary for everyday people who weren't born with silver spoons. So many are struggling already, don't be deaf to those who need you most.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:17:08

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Comment Log Display

Below is the comment you selected to display. Comment 2943 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chuck
Last Name: Ormson
Email Address: Chuck.Ormson@gmail.com
Affiliation: Marina Operator/Vessel Owner

Subject: Don't Sink Sportfishing!!

Comment:

This over the top, poorly thought out, proposed regulation is an industry killer. Only the very largest operators have a chance of survival. The rest will simply R.I.P.

Why would you ruin an industry that poses such a small portion of the air quality issues. Need to put on the thinking caps here. This is nothing more than picking low hanging fruit without concern for harvesting the crop.

Sincerely,

Chuck Ormson
CDR USN (Ret)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:08:45

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Comment Log Display

Below is the comment you selected to display. Comment 2944 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Critchlow
Email Address: cheer.critchlow@gmail.com
Affiliation:

Subject: California Air Resources Board - Regulations under consideration

Comment:

The State's plan under consideration to mandate engines that are too big and too heavy to fit in existing engine rooms is the reason for this email. This is a BIG PROBLEM. But, rather than tabling this plan, the California Air Resources Board (CARB) is stating that boat owners can simply buy new ones, that would range in cost from \$4.6 million to \$5.7 million.

2944.1

These CARB's solution under consideration "purchasing expensive new boats" cannot just be paid for through increased passenger ticket prices. To buy new boats, one-day fishing and or whale watching trips would have to Triple in Price. There is no way we can afford to take ourselves or their families out on the ocean at those prices and this will mark the beginning of the end of these businesses, our access to the sea.

2944.2

Given the current economic climate it is unthinkable that such a law would be instituted on this industry trying to recover from the pandemic lock downs.

2944.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:16:34

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Comment Log Display

**Below is the comment you selected to display.
Comment 2945 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Val
Last Name: Debolt
Email Address: valdebolt1@gmail.com
Affiliation:

Subject: Sportfishing
Comment:
Na

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:29:05

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Below is the comment you selected to display. Comment 2946 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Cooper
Email Address: Markcooper590@gmail.com
Affiliation:

Subject: Commercial harbor craft regulations

Comment:

Please do not mandate private sports fishing and whale watching boat owners to upgrade their engines for it will ruin the industry. Jobs will be lost and it will take the joy out of many peoples lives including my own. Please reconsider.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:15:27

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Below is the comment you selected to display. Comment 2947 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Arthur
Last Name: Florez
Email Address: arthurflorez@msn.com
Affiliation:

Subject: Sport fishing boats mandates....proposed

Comment:

As a life time resident of the state of California who for several family generation of off shore fishing. I am writing to express my concern of the private boat operations who provide a much needed recreation. More important! Part of the identity of the rich culture of the state. IM ASKING FOR MORE CONVERSATION WITH THE INDUSTRY TO HEAR ALL WHO PROVIDE THIS SERVICE TO SO MANY!!!!!! Working together THE PEOPLE AND THERE REPRESENTIVES !!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:01:13

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Comment Log Display

Below is the comment you selected to display. Comment 2948 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Smiley
Email Address: targetbids@yahoo.com
Affiliation:

Subject: Save our boats.

Comment:

These people do not make enough money to buy new engines. They are hare working people that live month to month. The rates for a fishing trip or whale watching trip is already as high as can be and still get customers. The new mandates will likely put most out of business. Businesses that too a lifetime to build. Not only that but many children from families like mine that live on less than 40K a year will never be able to afford a day on a boat in the ocean. That would be a shame.

2948.1

2948.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:27:22

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Comment Log Display

Below is the comment you selected to display. Comment 2949 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Bailey
Email Address: Thbaileyesq@sbcglobal.net
Affiliation:

Subject: Chc2021. Save Our Boats

Comment:

Thanks for the opportunity to share my thoughts. As a grandfather of six I sincerely hope you will not deprive us of the opportunity to share some days on the water with our youngsters. These draconian proposals are a poor trade off of recreational and business loss vs very limited environmental gain. At the very least please grandfather in the existing participants. Thanks for your consideration. THB

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:15:54

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Below is the comment you selected to display. Comment 2950 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Phillip
Last Name: Smith
Email Address: Pbsmith65@msn.com
Affiliation:

Subject: Save our Boats

Comment:

When you make your decision please take into consideration all the families of the sport fishing boats. As they do not have a lot of income and cannot afford to buy complete new crafts to do there business . I understand we need to protect our environment.. but we also need to protect the investments of all the small businessman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:38:51

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Comment Log Display

Below is the comment you selected to display. Comment 2951 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Hector
Email Address: jason15838@gmail.com
Affiliation:

Subject: Concerns for the Future of Sportfishing

Comment:

The approach CARB is taking with the madate will cause these existing vessels which have many years of useful life to be sold to other countries where they will continue to be used and not result in a net benefit of reducing pollution. Reason being they will continue to be in service and few owners and sportfishers will be able to afford new boat or higher fares which will reduce the fleet to just a few boats at very high prices. 2951.1

I will have to go fishing out of Mexico or somewhere else and our local economy will suffer. Many people work on those boats and rely on the tips and fares generated. Why regulate the small family boat owner out of business? Is this best for California when people can just go elsewhere to fish. 2951.2

Keep the status quo as it is working fine and if you wanna mandate something, do it on all new purchases, create incentives to buy existing retrofit technology if it exists but make it optional at this time. 2951.3

A pilot program would be in order now to study the impact before full implimentation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:48:12

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**Below is the comment you selected to display.
Comment 2952 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Guy
Last Name: MacDonald
Email Address: Guysrentals@gmail.com
Affiliation:

Subject: CARB requirements

Comment:

Please do not kill the sport fishing and whale watching industry with your CARB mandates.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:54:07

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Below is the comment you selected to display. Comment 2953 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jonathan
Last Name: Willy
Email Address: Jonathanwilly@gmail.com
Affiliation:

Subject: Chc2021-Save our boats

Comment:

Please don't sink sportfishing. Requiring new engines will make it unaffordable to take our families out on the ocean. You'll convince a lot more people to save the environment if they can experience it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:59:40

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Below is the comment you selected to display. Comment 2954 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: marc
Last Name: Mallinckrodt
Email Address: msm.mallinckrodt@gmail.com
Affiliation:

Subject: Diesel engines

Comment:

Mismanagement at its finest, sportboats are a tiny fraction of polluters. Mandate the military and foreign vessels before you go after private ones that benefit the states economy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:04:21

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Below is the comment you selected to display. Comment 2955 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Snyder
Email Address: dukesnyder71@gmail.com
Affiliation:

Subject: Regulations

Comment:

To whom it may concern,
I'm tired of watching the workers ,captains, boat owners and everyone else involved having to deal with the regulations constantly being forced upon the fishing industry that puts stress on there lives and how they make a living.
I'm sure that the air pollution contributions from the private fishing industry are virtually unmeasurable yet this is the low hanging fruit that government tends to go after for they are mostly middle class (or less) and is harder for us to fight back!
David

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 07:56:00

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Below is the comment you selected to display. Comment 2956 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Doug
Last Name: Jung
Email Address: Dougjung@gmail.com
Affiliation:

Subject: Save fishing And whale watching for the little people

Comment:

Please do not kill off the fishing industry and wildlife tours

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:12:05

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Below is the comment you selected to display. Comment 2957 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joe
Last Name: Wielinski
Email Address: Joeskijr@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

I enjoy taking my 3 kids sport fishing off of the coast of So. California. Raising the cost of trip tickets will force me to stop fishing on the sport boats and fish from shore. I would hate to tell my kids that we can't enjoy the ocean from the boats because the tickets are too expensive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:09:56

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Below is the comment you selected to display. Comment 2958 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: Winfield
Email Address: Kevin.subseatours@gmail.com
Affiliation:

Subject: Regulations on Sportfishing engines

Comment:

Please compromise with sportfishing boat owners. Please do not force many of them out of business.

Thank you
Kevin Winfield

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:12:52

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Below is the comment you selected to display. Comment 2959 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Koontz
Email Address: Mrmpk@aol.com
Affiliation: Nonexistent

Subject: Proposed fishing boat and whale watching boat regulations

Comment:

I am strongly urging you to vote no on the CARB proposal to retrofit the entire fishing and whale watching boat fleet.

I oppose this proposal because the cost of the conversion is prohibitive.

Also most of the fleet cannot retrofit as there is no space in the engine compartment to facilitate proposed changes.

This proposal would effectively put many of the fleet owners to either buy new boats or go bankrupt. CARB is POISEN to the sport fishing and whale watching Industry!

Thanks,
Michael Koontz

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:14:58

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Comment 2960 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Pete
Last Name: Ramirez
Email Address: Pete@premiumcc.com
Affiliation: 909 790-4068

Subject: Save the Boats

Comment:

Hi

Let me know how we can help

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:29:41

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Below is the comment you selected to display. Comment 2961 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Joe
Last Name: Wielinski
Email Address: Purchasing@Genericmfg.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

Please reconsider forcing our sport fishing boats to repower or get new boats.

Doubling or tripling the cost of the tickets to go sport boat fishing would force my family and friends to not go sport boat fishing anymore.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 08:41:29

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Comment Log Display

Below is the comment you selected to display. Comment 2962 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Foushanes
Email Address: bobfoush@yahoo.com
Affiliation:

Subject: Bad Idea

Comment:

To whom it may concern...
This is a dopy idea. Knock it off.
Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:03:01

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Comment Log Display

Below is the comment you selected to display. Comment 2963 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Patrick
Last Name: Rivelli
Email Address: privelli@msn.com
Affiliation:

Subject: Amendment to the Commercial Harbor Craft Regulation

Comment:

Please protect the families that operate 174 passenger sportfishing and whale watching boats in California. None of them are wealthy and this legislation would destroy their livelihood since they cannot afford the cost to install new engines in their boats. The cost to go fishing for one day is already expensive. I can only afford to go out about four times per year. If this legislation is passed, and if there are any boats still operating, the sportfishing costs will be so high that I won't be able to go out fishing at all. Please reconsider the proposed amendments to the Commercial Harbor Craft Regulation.

2963.1

2963.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:00:53

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Comment Log Display

**Below is the comment you selected to display.
Comment 2964 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Moddie
Last Name: Wilson
Email Address: mo71590@aol.com
Affiliation:

Subject: Access to sport fishing

Comment:

Please continue to fund the sport fishing program.
Thanks

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:12:39

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Comment Log Display

Below is the comment you selected to display. Comment 2965 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Elizabeth
Last Name: Blaznek
Email Address: Bblaznek@hotmail.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

It makes no sense to stop sport fishing or whale watching tours. Both give people pleasure (myself included) as well as encourage tourism to the area. What is to gain from stopping these two things. Surely, this area is not in danger of being "fished out" and surely the boats are not polluting the air or water. Who's agenda are you following? Shame on you if you take this industry away! It makes as much sense as closing the beaches during COVID.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:20:33

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Comment Log Display

Below is the comment you selected to display. Comment 2966 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lauren
Last Name: Wilson
Email Address: elisewilson187@gmail.com
Affiliation:

Subject: Save our jobs

Comment:

Another mandate? Please back off and save our fishermen who rely on this trade to support their families and have been committed to the trade for decades. They take pride in what they do and have done for generations and have dedicated their lives to.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:19:39

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Comment Log Display

Below is the comment you selected to display. Comment 2967 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Criss
Last Name: Ard
Email Address: Cashard@yahoo.com
Affiliation:

Subject: Save our Party Boats

Comment:

Please come up with a better resolution than requiring private party boats to buy larger engines/boats for your proposal. Celebrating family/friend birthdays by going Salmon fishing will no longer be affordable if prices double-triple due to this new requirement.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:34:23

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Comment Log Display

Below is the comment you selected to display. Comment 2968 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dave
Last Name: Mitchell
Email Address: davemitchell77@gmail.com
Affiliation:

Subject: Please don't sink sport fishing and whale watching.

Comment:

Please don't sink sport fishing and whale watching.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:38:27

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Comment Log Display

Below is the comment you selected to display. Comment 2969 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Virgil
Last Name: Hane
Email Address: chuckhane@att.net
Affiliation: Citizen of CA / USA

Subject: Pacific fishing

Comment:

I enjoy going offshore fishing. I can only go 2 to 3 times a year due to cost. Make it more expensive and I can't go at all. Keep this resource alive!

Attachment: www.arb.ca.gov/lists/com-attach/3375-chc2021-UDNTPVwoADAEaVMM.jpg

Original File Name: chuck fish.jpg

Date and Time Comment Was Submitted: 2021-11-14 09:48:52

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**Below is the comment you selected to display.
Comment 2970 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Thomas
Last Name: Le
Email Address: Anh2tom@yahoo.com
Affiliation:

Subject: Save our boats

Comment:

The environmental impact on pollution from these boats is insignificant. Save our boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:45:39

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Comment Log Display

Below is the comment you selected to display. Comment 2971 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jeffrey
Last Name: Creech
Email Address: jkmfirepros@gmail.com
Affiliation:

Subject: Sport fishing CARB

Comment:

I don't agree with the new CARB regulations for the sport fishing industry

This will put lots of people out of work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 09:56:12

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Comment Log Display

Below is the comment you selected to display. Comment 2972 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Angulo
Email Address: Davida1668@gmail.com
Affiliation:

Subject: Harbor Craft Regulations

Comment:

Don't run the fishing industry out of California like they ran the manufacturing industry out of California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:01:10

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Comment Log Display

Below is the comment you selected to display. Comment 2973 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Johnson
Email Address: paul.fulcrumcs@yahoo.com
Affiliation:

Subject: Don't stop whale watching and sport fishing through unrealistic environmental restrictions

Comment:

Please reconsider the potentially devastating effects of unreasonable and unrealistic restrictions on commercial fishing vessels. Other common sense and business friendly means can be sought out and implemented over a reasonable period of time and wouldn't cost jobs, livelihoods and experiences enjoyed by many California residents like myself. You have been chosen to support your community, not harm it, these knee jerk measures that sound good have consequences that can be avoided by involving the ones that actually run the operations and can be worked with to find a solution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:13:10

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Comment Log Display

Below is the comment you selected to display. Comment 2974 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Andrada
Email Address: mandrada@comcast.net
Affiliation:

Subject: Save our Boats

Comment:

Your draconian rules on the fleet are BS. These new rules will cripple an entire CA Fishing and Whale watching Fleet of commercial vessels. You know this, yet plow ahead. We the PEOPLE of California demand you do something to protect the fleet by delaying enacting these new rules until a compromise can be worked out. We the People of CA want to continue to enjoy the benefit of living in CA on the water. We already have to fight fish and game to harvest the ocean we pay to protect. We object to your plan to destroy an entire industry, We will not allow it to happen. The People have spoken.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:04:18

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Comment Log Display

Below is the comment you selected to display. Comment 2975 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gerald
Last Name: Graf
Email Address: nygerry@gmail.com
Affiliation:

Subject: Harbor Craft Regulations

Comment:

I am 100 percent behind clean air and eliminating pollution wherever possible. However, I can't see the value of burdening small boat owners by requiring them to repower their boats at an extremely high cost. The market today doesn't even show the availability of lower polluting engines that would meet your standards. Let's build engines that would meet the pollution standards at a reasonable cost without burdening these small boat owners with all the expense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:10:32

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Comment Log Display

Below is the comment you selected to display. Comment 2976 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Walter
Last Name: Korbler
Email Address: fishinggator@gmail.com
Affiliation:

Subject: Commercial harbor craft regulation

Comment:

Please consider the tremendous financial burden that the new regulations would put on the commercial boat industry. (sportfishing, whale watching, sight seeing, etc...) The cost involved to retrofit older boats, or build new ones would bankrupt or put out of business these companies, putting a high number of citizens out of work, as well as denying people with limited means who cannot afford private pleasure craft the ability to enjoy the outdoors. In my opinion the negative effects this proposal would bring forth highly outweigh the very limited positives. Sounds like a very misguided regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:16:22

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Below is the comment you selected to display. Comment 2977 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Miller
Email Address: ocroof78@gmail.com
Affiliation:

Subject: Save our sport fishing boats

Comment:

This decision only devastates and industry. Mexico's boats will end up in the same water as California boats do. Boats in Mexico do not have the same restrictions. This type of logic does not help California all it does is hurt an industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:15:36

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Comment Log Display

Below is the comment you selected to display. Comment 2978 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Warner
Email Address: swarner1024@gmail.com
Affiliation:

Subject: Protect Access to Sportfishing

Comment:

California Air Resources Board (CARB) will consider adopting such draconian engine emission regulations that would require existing boats to be scrapped and multi-million dollar new boats to be purchased, forcing ticket prices to be raised by 2-3 times existing prices. Not only could this mark the end for California sportfishing and whale watching boat owners but it would also make ocean access so costly that many current anglers won't be able to afford it.

2978.1

These regulations are not only a direct threat to family businesses and outdoor tourism, but future access to offshore fishing and marine life. As boats are removed from the water, fishing participation rates will decline and so will fishing license sales that fund critical offshore and inland conservation and fishery programs - programs that are essential to environmental sustainability and access to plentiful fish.

2978.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:30:07

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Comment Log Display

Below is the comment you selected to display. Comment 2979 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christopher
Last Name: Gillum
Email Address: cgillumsr@gmail.com
Affiliation:

Subject: Chc2021

Comment:

I just wanted to say that whale watching and bigger fishing boats should be allowed in this day and age. Its a community thing. Brings everyone together and it's some of the highlights of my youth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:29:06

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Comment Log Display

Below is the comment you selected to display. Comment 2980 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rick
Last Name: Sams
Email Address: Richard.sams.ctr@gmail.com
Affiliation:

Subject: Sport boat Engine Mandates

Comment:

The requirement to replace existing engines in sport boats needs to be further reviewed. Accordingly, what percentage to these small numbers of craft contribute vs. the loss of ocean access and collapse of the fishing and whale watching industry?

As an avid fisherman I ABSOLUTELY love and respect our environment, but we need to look at alternate measures to offset this mandate.

Can we measure the boats similar to cars and set realistic emissions based on hull design?

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:16:02

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Comment Log Display

Below is the comment you selected to display. Comment 2981 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Shawn
Last Name: Dolan
Email Address: sdolan50@msn.com
Affiliation:

Subject: Ocean vessels rule

Comment:

Focus forst steps on reducing Opacity from Ocean vessels, using technology to measure opacity on and out of port, from the port towers, with cameras. This will tage problem vessels, making the public aware of the brands aboard will assure compliance from the transport vessels. Inexpensive, simple, accurate, repeatable, and the acute impact to the population, controled, sooner rather than later.

Technically, measuing opacity from distance is not only achievable, but reliable and consistent.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:40:00

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Comment Log Display

Below is the comment you selected to display. Comment 2982 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Barbara
Last Name: Gattuso
Email Address: Bgattuso@san.rr.com
Affiliation: SWVP. SAE

Subject: Craft regulations

Comment:

Another bureaucratic regulation trying to destroy the boating /fishing industry.
In California it's do as I say not as I do.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 10:57:47

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Comment Log Display

**Below is the comment you selected to display.
Comment 2983 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Art
Last Name: Logan
Email Address: art.logan77@gmail.com
Affiliation: Home

Subject: amendments chc2021
Comment:
Please do not pass this amendment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 11:17:50

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**Below is the comment you selected to display.
Comment 2984 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Miller
Email Address: ddm1154@roadrunner.com
Affiliation: Carlsbad tackle

Subject: chc2021
Comment:
Please save sportfishing
In California

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 11:38:55

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Comment Log Display

Below is the comment you selected to display. Comment 2985 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Vern
Last Name: Ashley
Email Address: Vern.fish00@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

As a deckhand on one of the board out of channel islands with these new restrictions put into place I'll no longer be able to afford to even my monthly boat slip fees as well as the other 40+ deckhands and captains in the fleet which will lead to the very few boats left in the fleet to increase prices by at least 200% just so they can even afford these new tier 4 engines

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:03:06

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Comment Log Display

Below is the comment you selected to display. Comment 2986 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nickolas
Last Name: Moskos
Email Address: npmoskos@cox.net
Affiliation: 3rd generation Sport fisherman / Cal

Subject: Amendment to the Commercial Harbor Craft Regulation

Comment:

This amendment, in my opinion, will do nothing to further environmental issues and will only serve to further stress our recovering economy by putting the proposed, unproven, constraints on hundreds of privately owned fishing operations / livelihoods. if passed this amendment would only result in millions of lost dollars in state revenue including thousands of lost business / jobs. The resultant impact to the fishing industry would be unconscionable. I urge a no vote on this amendment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 11:51:36

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Comment Log Display

Below is the comment you selected to display. Comment 2987 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: arthur
Last Name: fox
Email Address: billfox335@gmail.com
Affiliation:

Subject: sportsfishing

Comment:

Sportfishing and whalewatching in California are a long traditional industry. They can not afford new million dollar boats and to pass it on to the consumer whom are white collar workers. How wrong can you ? Preserve the industry as it is right now. Find other solutions within reason. Middle class Americans can't buy their own deep sea vessels. We enjoy our sportfishing and need access to it. We pay our taxes and vote and we won't forget who votes for this ridiculous approach to change everything that currently works.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:07:26

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Comment Log Display

**Below is the comment you selected to display.
Comment 2988 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Joseph
Last Name: Phillips
Email Address: jpi199012@aol.com
Affiliation:

Subject: Please don't put my family and I out of business

Comment:

Fishing is the only business I have. If you pass the proposed legislation I will have to quit and then have a large boat that would be worth pennies on the dollar. Then What?????

Joseph Phillips

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:19:29

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Comment Log Display

Below is the comment you selected to display. Comment 2989 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Peter
Last Name: Gonzalez
Email Address: 1959elco@Gmail.com
Affiliation:

Subject: CHC 2021 - SAVE OUR BOATS

Comment:

Please protect the families that operate our 174 passenger sports fishing boats and whale watching boats in California. I personally use and support their services which I find therapeutic for my mental health. Mandating these new engines will not be feasible for these small businesses which will be detrimental to their existence and to these wonderful California experiences. Jobs and businesses will be lost compounding to this already hurting economy. Please reconsider and retreat from this mandate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 11:32:56

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Comment Log Display

**Below is the comment you selected to display.
Comment 2990 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Richard
Last Name: Barclay
Email Address: prbarclay@verizon.net
Affiliation:

Subject: Commercial Harborf Craft
Comment:
Save sportsfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:39:28

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Comment Log Display

Below is the comment you selected to display. Comment 2991 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gabriel
Last Name: Lemus
Email Address: gabriellemus2423@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

I am sending this email because I do agree with ending sport fishing in California. I love going fishing on the boats and it has always been a tradition.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:37:38

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Comment Log Display

Below is the comment you selected to display. Comment 2992 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Milstead
Email Address: Mcrewman@aol.com
Affiliation:

Subject: Sportboat emissions upgrade

Comment:

To whom it may concern,
Please carefully consider the compete impact of what you are proposing. The business's cost will be to high to operate and customers will not pay exorbitant fees. Look at the big picture.This is making movement to make movement and not a productive solution to the issue of pollution. Focus on bigger Issues and not things like TRYING to eliminate lead fishing weights and beach campfires (little to no impact and waste of taxpayer money). Respectfully,please do your job right way.Sincerely Rob Milstead,fisherman,taxpayer and king of comminsence.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 12:24:54

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Comment Log Display

Below is the comment you selected to display. Comment 2993 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: jim
Last Name: sutton
Email Address: jimmysutton@att.net
Affiliation: West Marine Fishing Specialist

Subject: Commercial Harbor Craft Regulation

Comment:

Good Afternoon. As a long time Angler and Sales person for our local fishing here in San Diego I would would like you to please reconsider the new Emmisions for our Fleet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:18:45

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Comment Log Display

Below is the comment you selected to display. Comment 2994 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marvin
Last Name: Sims
Email Address: msims1@socal.rr.com
Affiliation:

Subject: Pblc Hearing to Consider Proposed Amendments to the Commercial Harbor Craft Regulation
Comment:

Please help protect the families that operate 174 passenger sport fishing and whale watching boats in California. Otherwise, many people will lose their job.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:26:35

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Comment Log Display

Below is the comment you selected to display. Comment 2995 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rosa
Last Name: Joseph & Mary
Email Address: Marjoe.rosa@gmail.com
Affiliation:

Subject: Sport fishing in San Diego

Comment:

My husband has a ERD and the only pleasure he has is our annual 2 day get away to H&M landing for a fishing trip.

I am saddened by the possibility of the prospect of the CA government shutdown of these small family business / boat operations that provide them with an income and are a joy for people with limited incomes.

It's hardly a case of over fishing the majority of ocean pollution comes from big businesses. I appreciate your consideration in finding a better solution.

With gratitude.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:19:45

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Below is the comment you selected to display. Comment 2996 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dennis
Last Name: Kelly
Email Address: dkatantarctic@yahoo.com
Affiliation: Retired Professor of Marine Biology

Subject: Rule change on boat engine for sport fishing and whale watching boats

Comment:

Delay the implementation of the rule change concerning commercial sport fishing and whale watch boats. The new rules will kill the industry and hurt the public

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:29:49

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Below is the comment you selected to display. Comment 2997 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: tom
Last Name: oneil
Email Address: tofuutom@gmail.com
Affiliation:

Subject: salmon sport fishing fleet

Comment:

please protect the sport fishing fleet, it is invaluable to the men & women whose families & live's depend on it. as doe's the many lives enriched by the fishing experience that it provides.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:42:55

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Comment Log Display

Below is the comment you selected to display. Comment 2998 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Yumori
Email Address: captmidnightsportfishing@gmail.com
Affiliation: Pronto Sportfishing

Subject: Commercial Harbor craft regulation

Comment:

Requiring commercial small passenger vessels to install Tier 4 engines is not economically, technologically or financially feasible.

Our industry strongly supports clean air initiatives but this proposal will force many small passenger vessel owners to go out of

business. As a result many low to middle income California families

will lose their access to the Pacific ocean's resources-food, healthy outdoor recreation and student marine environmental education opportunities.

The small passenger vessel industry does support going to TIER 3 engines (with appropriate grant funding made available) to significantly reduce diesel particulate emissions.

We ask you to please adopt this reasonable and viable compromise which serves all parties well. Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 13:45:18

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Below is the comment you selected to display. Comment 2999 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alfred
Last Name: Verrell
Email Address: aaverrell@sbcglobal.net
Affiliation:

Subject: Fisherman & Charter Master

Comment:

Evidently the state does not have a clue how this will destroy the sport fishing in California. The cost of fishing has already increased to the point that some people cannot afford the cost of going fishing for a day on a boat. The Virus was the cause of this increase. I know if the state gets their way, I will not be able to afford to go fishing. I cannot imagine how many people whose job is related to sport fishing will no longer receive an Income.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 14:06:47

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Comment Log Display

Below is the comment you selected to display. Comment 3000 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Rebstein
Email Address: ajrebstein@gmail.com
Affiliation:

Subject: Sports fishing

Comment:

If there are no sports fishing boats on the California coast. There's no reason for people like me and my money to come to California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 14:37:50

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Comment Log Display

Below is the comment you selected to display. Comment 3001 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Mizeur
Email Address: mizkatpa@frontiernet.net
Affiliation:

Subject: New boat engine rules

Comment:

Please do not implement any rule changes for sportfishing boats in ca. Why would you want to do this?these vessels are nothing compared to the damage done by the shipping industry! Dont take away the only affordable offshore fishing for people that can not afford boats who came up with this stupid idea anyway?let the people vote on this issue

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 14:39:07

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Comment Log Display

Below is the comment you selected to display. Comment 3002 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mary Ann -
Last Name: Fernandes
Email Address: maryann@fernandesmedia.com
Affiliation: Family member of fisherman

Subject: Don't hurt the defenseless!

Comment:

Are you trying to bankrupt all hard working middle class workers in California? My husbands family comes from multi-generational fishing in the San Diego area and we have a nephew full time in the fishing industry.

I know California is not serious about climate change. If they were they would be investing in nuclear and hydrogen energy. Instead you are giving kickbacks to solar (money laundering?)- encouraging the mining of rare earth minerals at a CO2 detriment, fusing these minerals and chemicals together at a high temperature to make toxic gas and more CO2 waste to produce a solar panel that at best will work for 30 years and then be discarded and hazardous to the environment forever. How is that safe for the environment? It isn't, it's just best for you politically.

How about this, instead of robbing us of our money for your gigantic money laundering scheme (you wouldn't get any kickbacks from these engines the boats need to get would ya!?), allow for new ideas in energy. The one that will win will be the one that people want to pay for on their own free will...and it will be cost effective. That is how the free market works in your favor!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 14:44:11

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Comment Log Display

Below is the comment you selected to display. Comment 3003 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ronald
Last Name: Casapulla
Email Address: rpcasa@cox.net
Affiliation: Oceanside Senior Anglers Inc

Subject: chc-2021-save our boat

Comment:

Please vote down all attempts to raise the costs for passengers on sport boats and other commercial use vessels as this action will tend to force price increases which will most likely put them all out of business.

R P Casapulla

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 15:08:34

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Below is the comment you selected to display. Comment 3004 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Louise
Last Name: Johnson
Email Address: lcjsew@aol.com
Affiliation:

Subject: Dirty Ships Hurt Everyone

Comment:

Dear Chair Randolph and Members of the Board,

Dirty fleets cause cancer, asthma, and so many more illnesses to those who live near ports all along the California coast. Winds can bring that harmful pollution inland so easily. We must drastically improve the fleets that visit our harbors and effect our beautiful state

The technology exists to transition commercial harbor craft to 100% clean fleets today. Already, there are over 300 operating zero-emission ships powered by batteries worldwide, with another 194 on order.

3004.1

With the climate emergency that we are facing, we need bold climate leadership. Please strengthen the Commercial Harbor Craft rule:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035, including tugboats and barges, which are excluded from the current rule

2. Add language to allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions

3004.2

3. Increase funding for zero-emissions boat pilots and retrofits to spur innovation

3004.3

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue which affects so many California residents.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 15:41:49

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Below is the comment you selected to display. Comment 3005 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Easley
Email Address: Seasley67@aol.com
Affiliation:

Subject: Save our sport fishing boats

Comment:

I have been fishing off of the boats out of Morro Bay since i was 13 years old with my mother. I am now 54 years old and i love to go fishing with my daughter off of the black Pearl in Morro Bay. I dream to take my future grandchildren fishing as well. If these legislations are passed the cost of a sports fishing ticket will be way more than I and most passengers can afford. This legislation will require cost to rise so much that customers will not be able to afford it and all sports fishing boats will loose their livelihoods. I am writing this letter in hopes of saving sports fishing and stopping the legislation from being passed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 15:55:13

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Comment Log Display

Below is the comment you selected to display. Comment 3006 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Manuel
Last Name: Ortiz
Email Address: manuelortizjr13@gmail.com
Affiliation:

Subject: Helping out the fishing boat community

Comment:

I'm writing this in hopes that you would help the fishing boat community. The cost is really high I am going to be impossible for me to fish our oceans if they raise the price.. I just started deep-sea fishing it is helped me greatly my depression. Thank you for your time in reading this and hope you guys would do the right thing...

Signed,
Manuel Ortiz

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 16:03:26

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Below is the comment you selected to display. Comment 3007 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alena
Last Name: Ruiloba
Email Address: cathbadua@gmail.com
Affiliation:

Subject: Sportfishing

Comment:

As part of the sport fishing community my job will be put in jeopardy with these standards. Many people will have their livelihoods destroyed. My whole communities fishing fleet will go down. These regulations need to be more reasonable in time and scope.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 16:03:30

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Comment Log Display

Below is the comment you selected to display. Comment 3008 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Pangborn
Email Address: wcpangborn@gmail.com
Affiliation:

Subject: Harbor Craft Regulation

Comment:

I've been a sports fisherman in the SF area for 60 years. If these new engine and emission control regulations pass I will no longer be able to afford this passtime.This will put an end to sport fishing in California. There has to be a better feasible solution to protect air quality without putting Californians out of business!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 16:35:36

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Comment Log Display

Below is the comment you selected to display. Comment 3009 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lisa
Last Name: Cox
Email Address: paydencash08@gmail.com
Affiliation: black pearl

Subject: tier 4 motors

Comment:

Hello,

Let me start by stating "I am in agreeance with our air quality!" I am one of the only woman owned businesses in the Sportfishing industry. I own The Black Pearl Sportfishing vessel. It is my now my only means of support. I am an educated woman who loves California and have been a resident my whole life. I have been a nurse most of my adult life and have fished since I have been a child. My best memories have been with my dad and grandfather while they took me fishing. We take many families fishing throughout the year and create many more good memories for many families. I am most happy to comply with the emissions program. My vessel is 65' and will not hold tier 4 motors. I have tier 3 at this time and will be happy to comply to tier 4 when they can be implemented to this size vessel. My USCG ratings are impeccable. I do appreciate what your program is trying to do and agree that some vessels are big polluters. Change is necessary. Please, just come up with something that works and I will be happy to comply. I have 5 children and am not rich. I must be able to afford to upgrade the motors. I do not have 4.5 million to buy a new boat. Please work with us.

Thank you for your time,
Lisa Cox
Black Pearl Sportfishing
661-400-4292

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 16:48:49

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Comment Log Display

Below is the comment you selected to display. Comment 3010 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Belflower
Email Address: sbelflowerx8@gmail.com
Affiliation:

Subject: Help these boat owners out

Comment:

As we look at the future is taking a man's livelihood away the right thing. I would ask that you think about the families that will be affected by this. After 2020 a lot of these families are struggling to make it. Don't make that harder on them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 17:00:18

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Below is the comment you selected to display. Comment 3011 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Miller
Email Address: jmillerwheels@gmail.com
Affiliation:

Subject: commercial Harbor Craft Regulation

Comment:

I was born and raised in California, Santa Monica. I have enjoy affordable sport fishing all of my life, I am 74. Nobody has spent much more time on the water then me. I have taken kids out for the first time many times and they all loved been on the boats and the excitement of catching the first fish. Over the years the operation of the boats is much improved. I can't think of not being able to go fishing with friends of all walks of life and enjoy the beautiful sunrises and sunsets and being around happy excited kids. Nobody enjoys the ocean more. Please let it continue for me ,the other people that enjoy it and the people of all ages that want to be able to enjoy the various types of boats that California has and the people that operate them. Thank You Jim Miller

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 16:45:19

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Below is the comment you selected to display. Comment 3012 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Keith
Last Name: Birchfiel
Email Address: boomop27@gmail.com
Affiliation:

Subject: Harbour craft regs.

Comment:

This reg will hurt the future for our industry and the future of our young fisherman , and the young to understand about the sea life (whales , porpoise and others) the boats are already regulaulated by the USCG and will not run if they don't pass.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 17:01:30

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Below is the comment you selected to display. Comment 3013 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Walker
Email Address: Captainahabebp1@gmail.com
Affiliation: 40 year boat captain

Subject: marine carb program sport boats

Comment:

I am sending this as a Captain of over 40 years. I was a crew boat captain for the oil platforms and have seen much pollution when it comes to money from big industries. However, I has also Captained Sportfishing vessels and many a whale watch boat. I have taken many children fishing for many a year. There is no greater joy than watching children catch a fish or see a whale for the first time. I could not even begin to guess how many, but I can tell you it has well over 100,000 children over the years. We have a magnificent coast line with beautiful breathtaking views, exquisite marine life and extraordinary fishing, which people enjoy on a daily basis. I believe in keeping our environment safe. Please work with the fishing and whale watch boats. Provide economical motors that they can afford and give them time to comply. The people who work in these particular industries do not have millions of dollars. They need time and affordable motors. Do not take the opportunities for future generations to see the full beauty of our ocean .

3013.1

3013.2

Thank you and God Bless,
Brian Walker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 17:03:49

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Comment Log Display

Below is the comment you selected to display. Comment 3014 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alfred
Last Name: Barker
Email Address: abj5150@yahoo.com
Affiliation: CCA California

Subject: Not in support of CARB emissions regulations

Comment:

To Governor Newsome, The California Air Resources Board and everyone else involved with this proposal,

I am a member of the Sportfishing community as an employee in the Sportfishing business, as a fisherman and as a local and state representative of a major coastal conservation organization. This letter is to express my concerns about the pending emissions regulations being proposed for Sport fishing Boats in California. There are many reasons this proposed legislation is flawed:

1.) One of the biggest flaws is the fact that the proponents of this legislation have not given adequate consideration to the overall economic impact this legislation will cause to the Sportfishing industry and the overall loss of tax revenue to the state of California. The California recreational Sport Fishing industry generates over 5.6 billion dollars annually and is responsible for the livelihood of thousands of people and their families. The proposed legislation would be devastating to not only the fishing industry but to the lives of many.

3014.1

2.) The proposed technology for the Diesel Particulate Filter (DPF) does not exist and due to non existence, has not been approved by the U.S. Coast Guard.

3014.2

3.) The proposed technology has not been tested and has not been proven to be safe for use at sea. This could lead to putting human lives in danger.

4.) The California State University Maritime Academy has concluded that the suggested standards for existing engines does not exist. In the alternative, treatment equipment (modifications) alone will significantly impact a vessel's stability.

5.) Over 80% of the existing Sport Fishing fleet is constructed of wood, fiberglass and combinations of said materials. Boats built of these materials would not be safe to operate if they could be retrofitted with proposed emissions devices. The result of the newly proposed emissions devices would require boats currently being used, to be replaced with boats made of steel hulls. This requirement would force most sport fleet operators out of business as the cost of this would be untenable.

Please apply common sense and logic to this proposal and end this madness before the wellbeing of those within the the Sportfishing industry and so many businesses associated with the Sport Fishing industry are bankrupted and forced out of business. Please realize the loss to the entire state if this incompetent proposal is to go forward.

Sincerely

Alfred W. Barker Jr.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 17:38:12

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Comment 3015 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Owen
Last Name: Owens
Email Address: owowens@yahoo.com
Affiliation:

Subject: Carb
Comment:
Don't put people out of work

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 18:31:12

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Below is the comment you selected to display. Comment 3016 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Chris
Last Name: Sanchez
Email Address: mcx1511@gmail.com
Affiliation:

Subject: Smog of boats

Comment:

This technology has it flaws and forcing it on older boats doesn't make sense,. As a farmer we had the option to get new tractors and decommission the old ones, why aren't these boat owners given the same option?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 18:47:12

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Comment Log Display

Below is the comment you selected to display. Comment 3017 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Trigueiro
Email Address: reddness80@aol.com
Affiliation:

Subject: The new carb requirement for fishing charters

Comment:

The new carb requirement for fishing charters should not be instated until there is an affordable version or technology has advanced to the point where it would not put many of our current fishing vessels out of service as to the requirements would be impossible to achieve. Until you find away to control smog emitted from a vehicle in a feasible fashion that would not impact and overtaxed already citizen no more laws shall be imposed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 18:55:43

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Below is the comment you selected to display. Comment 3018 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gene
Last Name: Kramer
Email Address: genekramer52@gmail.com
Affiliation:

Subject: chc2021, harbor craft

Comment:

Sirs: Your proposed engine and boat upgrades for sport fishing boats are merely a means to kill the industry. These small time, family owned commercial boats cannot be upgraded with bigger tier 4 engines, which do not currently exist. The wooden and fiberglass boats will catch on fire due to the heat generated by tier 4 engines. Your proposed solution, buying new and bigger boats, is not economically feasible. Two of your other proposals are pure pie in the sky nonsense, battery power or hydrogen. They don't exist and are unsuitable for boating. Current mid sized boats don't even use propane. It is too risky and hydrogen will be worse. Lithium ion batteries have the same problem. If they leak, they burn in air and in water. You can't put out a lithium ion battery fire. Don't you remember the fire on the Conception dive boat? What is wrong with you people?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 18:54:41

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Comment Log Display

**Below is the comment you selected to display.
Comment 3019 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Paul
Last Name: Molder
Email Address: pmolder@cot.net
Affiliation:

Subject: sport fishing engine mandate

Comment:

Please reverse course on your new diesel engine mandate. There are not enough sportfishing boats make a difference in the climate change especially when you look at all the pollution countries like China, India and many of the third world countries. As it is now a family can barely afford to go fishing once or twice a year and what you are asking the sport fishing fleet to do would eliminate the opportunity for most people to be able to afford a days fishing on the ocean.

3019.1

3019.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:01:37

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Comment Log Display

Below is the comment you selected to display. Comment 3020 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leon
Last Name: Benham
Email Address: Leonbenham@cox.net
Affiliation: Citizens for Coastal Conservancy

Subject: Save our Fishing Boats

Comment:

I am opposed to making more restrictive requirements on Southern California Fishing boats and requiring the upgrade of there vessels to meet new air quality requirements.

There has not been a smog alert day in California for over 30 years, except for fires. We have solved the air quality problem in California.

This is overkill and will not help the environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:28:03

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Comment Log Display

Below is the comment you selected to display. Comment 3021 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Susan
Last Name: Morse
Email Address: pfaff@cox.net
Affiliation:

Subject: chc2021

Comment:

I respectfully ask you to delay and rethink the requirement of the commercial sportfishing fleet and whale watching (small business) boat owners to upgrade engines until the technology and manufacturing, catch up to a REASONABLE and COST EFFECTIVE solution. These small businesses have had positive financial activity of \$5.6 Billion for the State of California and supported 40,000 jobs here. Local residents and tourists both enjoy the activity on the ocean.

3021.1

In the past three years, as a volunteer from a Non-profit fishing club, I have personally witnessed the joy, camaraderie and awe that the children experienced from a half/day fishing trip, on a commercial boat, that was sponsored by our club.

3021.2

I have also observed the same with wounded warriors from the nearby US Marine Corps base, spending a day fishing in the ocean, as guests of the angler club.

To think that these heart touching experiences would dry up for these young people, because the commercial fishing boats could not afford to comply with new regulations that are afoot.

Thank you for the opportunity to voice my concern.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:46:20

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Comment Log Display

Below is the comment you selected to display. Comment 3022 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tommy
Last Name: Voss
Email Address: tomvoss74@gmail.com
Affiliation: Citizen of California

Subject: CHC vote

Comment:

As a citizen of this state who enjoys and pays to go fishing out of Morro Bay and Avila I strongly urge you to continue to allow your residents the ability to continue fishing of the central coast.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:40:53

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**Below is the comment you selected to display.
Comment 3023 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Wade
Last Name: Gavin
Email Address: wadegavin@att.net
Affiliation:

Subject: Proposed Harbor Craft Engine Regulations/Commercial passenger Vessels
Comment:
Please see attached

Attachment: www.arb.ca.gov/lists/com-attach/3434-chc2021-BmUCZQNwAzJRCAAdr.pdf

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2021-11-14 19:48:24

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November 14, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Harbor Craft Engine Emission Regulations/Commercial Passenger Vessels

Dear Madam Chair,

I have owned Patriot Sportfishing in Avila Beach since 2012. In 2015 I expanded with the purchase Morro Bay Landing. I utilized all my savings and retirement to fulfill my dream of owning a marine excursion business on beautiful California's Central Coast. I currently provide the same business in two separate locations with twelve employees.

My passengers experience the following quality educational fun filled aquatic experiences such as: sportfishing, whale watching, bird watching, burials at sea, tagging trips from several universities, transportation for local, state, and federal governmental agencies...etc.

I am very much in favor of reducing emissions. However, the drafted regulations would have devastating repercussions. The temporary retrofits to my vessels are not financially reasonable much less the cost of new vessels.

3023.1

However, the drafted regulations would deem my vessels worthless, thus not giving me enough equity after the sale if sold for even a deposit on a new supposedly compliant vessel with an uncertain future of its existence.

If I am not able to remain in business this will adversely financially affect: my twelve employees, vendors, web designers, credit card processing, banking, marine mechanics, the lack of tax revenues to the local, county, state, and federal taxing authorities, bookkeeping and all other resourced services.

3023.2

Historically, CARB has regulated commercial fishing/whale watching boats and commercial passenger boats the same way – their engines are technically identical. CARB's proposed regulations apply a double standard with commercial fishing boats subject to substantially less stringent and less costly requirements. CARB should return passenger boats to the same vessel category as commercial fishing boats so that you can continue to transition to lower emission engines as it is economically feasible, and technology becomes available.

3023.3

There are only 174 commercial passenger boats in California, or less than 10% of all harbor craft. CARB wants to punish the commercial passenger vessels while a large number of container ships sit idling off the Coast of California with no mention of emissions being emitted.

California Air Resources Board (CARB) has proposed cost prohibitive engine emission regulations that require technology that has not been developed or tested safe at sea.

CARB readily admits the proposed regulations are not compatible with some vessels, specifically stating that “vessel replacement will be likely, especially the categories with wood or fiberglass vessels.” When more than 80% of vessels are constructed with these materials, many boat owners have concluded that they will go out of business in 3-6 years from the adoption of the proposed regulations.

CARB contends that this is economically feasible even though existing boats that cannot comply with the proposed regulations will have no resale value in California. Their solution; pass on the regulatory costs in the form of higher passenger tickets. Many of my customers are from California’s Central Valley.

These are hard-working middle-class people who cannot afford a price increase. Sportfishing is an occasional luxury and will become unaffordable if this bill passes.

3023.4

CARB has refused to conduct an appropriate vessel replacement analysis.

The only credible comment by CARB is the fact that they concede that business elimination is possible but continues to withhold any analysis that led to this determination or how widespread the business elimination will be.

CARB staff cannot rule out the possibility of some business elimination if costs cannot be passed onto the customer or if passing through costs would result in significant decrease in demand.

The broad-based consensus among the boating industry is that CARB has grossly underestimated the cost of vessel replacement, especially since no assessment can be made on engine technology that has not been developed yet. If this proves to be so and if some replacement vessels cost double to triple CARB’s estimate, business elimination will be significant.

When CARB developed its economic analysis, the Standardized Regulatory Impact Assessment, it failed to evaluate the financial impact the regulations would have on CDFW license sales and revenue.

3023.5

California has one of the largest coastlines in the country and for most residents, commercial passenger boats provide their only access to offshore fishing and marine life.

CARB also failed to evaluate the overall economic impact on coastal communities, and specifically their hospitality and tourism industry. For many coastal communities, passenger boats are the primary draw for tens of thousands of visitors each year. It is important to note that California is also one of the largest retail markets in the country for outdoor products, generating millions of dollars in sales tax revenue.

The elimination of Morro Bay/Port San Luis’ sportfishing and whale watching fleet, in whole or part, would have a devastating impact on the regional economy and jobs. The same could be said for most every harbor and marina community from Southern California to the Oregon border.

Governor Gavin Newsom recognizes that California draws millions of visitors from all over the United States and the world and has made it a priority to restore the half of the 1.2 million hospitality and tourism jobs lost during the pandemic. This laudable goal cannot be achieved without protecting commercial passenger boats that provide access to sportfishing, whale watching, marine life and scuba diving.

3023.6

Passenger boat owners provide another public benefit that occurs, often unseen, but appreciated by community partners. Many boat owners provide schools and non-profit organizations access to the marine environment, often at little to no cost. Many of the beneficiaries of these fishing and marine life programs are school children, disadvantaged youth, and veterans. For many children, this is their first introduction to marine life and for wounded warriors, it is a source of mental rehabilitation. Greater regulatory costs would jeopardize these programs.

3023.7

During the public comment period, CARB did not consult with the California Department of Fish and Wildlife, the California Fish and Game Commission, the Department of Boating and Waterways, the Coastal Commission, tourism authorities, chambers of commerce, harbor and marina organizations, port authorities, the United States Coast Guard or local government agencies up and down the California coast.

3023.8

Boat owners share the desire to reduce engine emissions and they have been repowering their engines for years. However, rather than deny boat owners their livelihood, CARB should consider amending the draft regulations to incentivize boat owners to continue to upgrade their vessels to lower emission engines, using available and tested and feasible technology that does not require vessel replacement. This is the reasonable approach CARB has applied to commercial fishing vessels that bring fish to market, vessels with engines that are technically identical. What's more, commercial passenger vessels will no longer have access to Carl Moyer funds, a reliable source of state funding for repowering engines – while commercial fishing vessels will. CARB has failed to provide an acceptable answer as to why they have applied a double standard and with it, introduced catastrophic economic consequences for the families that operate passenger boats.

Our coalition implores the CARB board to protect the families and crew that depend on the boats that provide millions of Californians affordable access to offshore fishing and all the splendor of the sea.

Respectfully submitted,



Wade Gavin
Patriot Sportfishing, Inc.
dba Patriot Sportfishing - Avila
dba Morro Bay Landing - Morro Bay
P. O. Box 850
Avila Beach, CA 93424



Comment Log Display

Below is the comment you selected to display. Comment 3024 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Maestro
Email Address: solid1972@att.net
Affiliation:

Subject: CARB for fishing boats

Comment:

This will ruin many lives both on the water as workers and as families and people buying fishing equipment and fishing in order to stay out of trouble. Do you not realize the state will lose billions of dollars if the state unwisely passes this. You have no evidence yet and no one knows what kind of engines exist right now for this. You will ruin it and make it difficult for many. You really need to do some research and not just jump on the so called clean air bandwagon. Fishing boats are few and far between that do not cause any pollution like you claim. Please hold off and thoroughly do your investigation. This would be total devastation as I bond with my children with multiple fishing trips out to sea.

Thank you
David

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:45:44

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Below is the comment you selected to display. Comment 3025 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ruben
Last Name: Maestro
Email Address: Maestronister5@gmail.com
Affiliation:

Subject: Carb emissions for boats

Comment:

To Governor Newsome, The California Air Resources Board and everyone else involved with this proposal,

I am a member of the Sportfishing community as an employee in the Sportfishing business, as a fisherman and as a local and state representative of a major coastal conservation organization. This letter is to express my concerns about the pending emissions regulations being proposed for Sport fishing Boats in California. There are many reasons this proposed legislation is flawed:

1.) One of the biggest flaws is the fact that the proponents of this legislation have not given adequate consideration to the overall economic impact this legislation will cause to the Sportfishing industry and the overall loss of tax revenue to the state of California. The California recreational Sport Fishing industry generates over 5.6 billion dollars annually and is responsible for the livelihood of thousands of people and their families. The proposed legislation would be devastating to not only the fishing industry but to the lives of many.

2.) The proposed technology for the Diesel Particulate Filter (DPF) does not exist and due to non existence, has not been approved by the U.S. Coast Guard.

3.) The proposed technology has not been tested and has not been proven to be safe for use at sea. This could lead to putting human lives in danger.

4.) The California State University Maritime Academy has concluded that the suggested standards for existing engines does not exist. In the alternative, treatment equipment (modifications) alone will significantly impact a vessel's stability.

5.) Over 80% of the existing Sport Fishing fleet is constructed of wood, fiberglass and combinations of said materials. Boats built of these materials would not be safe to operate if they could be retrofitted with proposed emissions devices. The result of the newly proposed emissions devices would require boats currently being used, to be replaced with boats made of steel hulls. This requirement would force most sport fleet operators out of business as the cost of this would be untenable.

Please apply common sense and logic to this proposal and end this madness before the wellbeing of those within the the Sportfishing industry and so many businesses associated with the Sport Fishing industry are bankrupted and forced out of business. Please realize the loss to the entire state if this incompetent proposal is to go forward.

Sincerely

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:55:46

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Below is the comment you selected to display. Comment 3026 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Merit
Last Name: McCrea
Email Address: meritmccrea@hotmail.com
Affiliation:

Subject: Haborcraft regulations

Comment:

Commercial Passenger Fishing Vessels are commercial fishing and should be recognized as such in your regulations. They provide the public access to our rich fisheries offshore. This is both recreational and importantly, a source of food, the same as commercially caught fish by other commercial fishers.

3026.1

In a broader sense the proposed regulations are not "practicable" at this time. Implementing them would simply reduce both safety at sea and further curtail our ability to sustain peoples' quality of life through a cascade of unintended consequences.

An example of this is what we are currently seeing in the backlog of freight traffic offshore today, ships both pumping out pollutants while standing by and raising the cost of goods. This is the result of Prop 5 and the reduced number of truck drivers and CARB regulations which reduced the number of California Compliant tractor vehicles.

3026.2

Reducing the number of qualified tugs, pilot boats, crew boats and ferries is likely to further exacerbate problems. The governor's mandate and timeline is naive. CARB needs to speak truth to power in this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 19:45:37

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Below is the comment you selected to display. Comment 3027 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Richard
Last Name: Licata
Email Address: 1rlicata.ph.t@gmail.com
Affiliation: Oceanside senior anglers club

Subject: The new mandate

Comment:

The economy is working against itself people weathering out covid. Enough being told what to do and the costs. Now is not the time

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:03:18

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Below is the comment you selected to display. Comment 3028 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Grundvig
Email Address: mgrundvig143@gmail.com
Affiliation: pubic; fisherman

Subject: new CARB rules Commercial Harbor Craft conver to tier 4

Comment:

I am in full support to changes to engine emissions to improve our air quality. I live in Bakersfield and the rules regarding engines in the south valley has had a positive impact on our air. But to implement such a change to this market will have a nearly immeasurable impact and put some very small businesses, out of business. I admit I do not know the numbers but willing to bet that the emmissions from trucks on S. California highway in just one day will exceed the expected gains from such a change to fishing vessels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:09:36

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Below is the comment you selected to display. Comment 3029 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Marquez
Email Address: marquezconst68@gmail.com
Affiliation:

Subject: Whale watching

Comment:

My family looks forward to our whale watching trips, we would not be able to afford it if the prices go up. Please help.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:18:33

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Below is the comment you selected to display. Comment 3030 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Rudden
Email Address: jrudden@hotmail.com
Affiliation:

Subject: Cleaner Air Using Available Technology

Comment:

As a native Californian and someone who cares about clean air and a clean environment, I support cleaner power plants for commercial Sportfishing boats. However, I want to get behind a clean air policy that does not wipe out a thriving industry that supports California residents and tourists from landlocked states from connecting with the ocean.

3030.1

Please consider policies that allow Sportfishing owner/operators to upgrade power plants using mature technologies. Mandating emissions requirements that are not currently commercially available could put an entire industry out of business.

3030.2

Thank you,
James

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:17:58

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Below is the comment you selected to display. Comment 3031 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mike
Last Name: Turner
Email Address: mturner149@verizon.net
Affiliation:

Subject: CHC2021

Comment:

Please see it fit to review this major problem for the fishing and whale watching fleets of Southern California. Being in this Emissions business myself in the Trucking side/Refuse/Sweepers/Buses; there is a size and problem with Diesel Engine available to work in the Boating Industry. Consider leaving them on the back burner until you have finish with Trains, plains and Automobiles First! Thank for for your endeavors going ahead pro or Con... and try and understand this is a real problem at this time. Thanks MET

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:35:48

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Below is the comment you selected to display. Comment 3032 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jerry
Last Name: Ellis
Email Address: 0331jerryrad@gmail.com
Affiliation:

Subject: Boat emissions

Comment:

With all that's going on in our economy. The last thing we need. Is to put such a heavy burden on our fishing industry. California would only lose more jobs. And put a hardship on our already struggling economy. Loss of the lively hood and thousands of jobs in this state. Please keep our fishing fleet afloat.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:49:42

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Below is the comment you selected to display. Comment 3033 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Hurtt
Email Address: slhurtt@gmail.com
Affiliation:

Subject: Commercial boat owners motor swap

Comment:

To who it may concern:

Please reconsider requiring commercial boat operators to change out their diesel engines to conform to carb air quality requirements. This places an unfair financial burden in too short a time frame to make adjustments.

The boat owners provide for substantial quality of life for many Americans and economic viability.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:43:34

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Below is the comment you selected to display. Comment 3034 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jennifer
Last Name: Clayton
Email Address: Jennic2b@charter.net
Affiliation:

Subject: Proposed Harbor craft regulations

Comment:

Stop destroying peoples jobs and livelihoods.
Is there any California politician that actually has a conscience?
You will be judged!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 20:49:43

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**Below is the comment you selected to display.
Comment 3035 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ito
Last Name: Douglas
Email Address: Douglas.Ito@cpuc.ca.gov
Affiliation: CPUC

Subject: Proposed Amendments to Commercial Harbor Craft (CHC) Regulations

Comment:

Attached

Attachment: www.arb.ca.gov/lists/com-attach/3446-chc2021-UmsGLQEyAGcELwU3.docx

Original File Name: 9-24-21_CARB CHC Reg Letter.docx

Date and Time Comment Was Submitted: 2021-11-14 21:27:22

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PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 24, 2021

Ms. Heather Arias
Chief, Transportation and Toxics Division
California Air Resources Board
1001 I Street
Sacramento, California 95814

SUBJECT: Proposed Amendments to Commercial Harbor Craft (CHC) Regulations

Dear Ms. Arias:

This letter is in response to your staff's request for clarification regarding the process for a vessel common carrier (VCC), subject to the California Air Resources Board's (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulations, to request a modification of its fares from the California Public Utilities Commission (Commission or CPUC).

The Commission governs VCC fares through Public Utilities Code §§ 451 et seq., Rule 3.2 of the Commission's Rules of Practice and Procedure, and Commission General Order 117A (<https://www.cpuc.ca.gov/regulatory-services/licensing/transportation-licensing-and-analysis-branch/passenger-stage-corporation-and-vessel-common-carrier>).

If a VCC applies to the Commission to obtain authorization to modify its fares in response to CARB's CHC Regulations, the application would go through the Commission's formal application process. In this process, applications are assigned to a CPUC Commissioner and an Administrative Law Judge to facilitate the development of the public record and bring a Proposed Decision to the Commission for a vote. The Commission has the discretion to approve, deny or modify any application. It is also important to note that Commission proceedings may take up to twelve months or longer before a Commission Decision is issued.

I appreciate your staff's active engagement with us, and we look forward to continuing to work with you throughout the development of the proposed amendments.

Thank you,

/s/

Douglas Ito
Director, Consumer Protection and Enforcement Division

cc: Jeff Kasmar, Program Manager, Transportation Licensing and Analysis



Comment Log Display

Below is the comment you selected to display. Comment 3036 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kevin
Last Name: Brown
Email Address: kbrown@meca.org
Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on the CHC Regulation

Comment:

please see attached comments

Attachment: www.arb.ca.gov/lists/com-attach/3447-chc2021-VDIQMwRmADJSCwhr.pdf

Original File Name: MECA Comments on CARB Harbor Craft Regulation 121121.pdf

Date and Time Comment Was Submitted: 2021-11-14 21:29:26

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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**STATEMENT
OF THE
MANUFACTURERS OF EMISSION CONTROLS ASSOCIATION
ON THE CALIFORNIA AIR RESOURCES BOARD'S
PROPOSED AMENDMENTS TO THE COMMERCIAL HARBOR CRAFT
REGULATION**

November 12, 2021

The Manufacturers of Emission Controls Association (MECA) is pleased to provide comments in support of CARB's proposed Amendments to the Commercial Harbor Craft Regulation. We believe an important opportunity exists to significantly reduce emissions from these marine vessels. Staff has correctly emphasized the use of engine replacements, rebuilds and repowers as the primary compliance route for achieving the PM and NOx reductions proposed by this regulation. MECA agrees with CARB staff that the passage of this regulation serves as the best incentive to encourage marine engine manufacturers to certify new engines with diesel particulate filters (DPFs) as well as further the availability of retrofit DPF strategies for marine applications.

MECA is a non-profit industry trade association of the world's leading manufacturers of clean mobility technologies. Our members have nearly 50 years of experience and a proven track record in developing and commercializing emission controls, including advanced selective catalytic reduction (SCR) and DPF technologies for new engines and retrofit applications. MECA companies supply the full complement of electrified vehicle powertrain technologies and electric vehicle components. In addition, MECA companies supply technologies such as; catalytic and evaporative emissions controls, advanced fuel injection, turbochargers, cooled-EGR systems, cylinder deactivation, OBD systems, sensors and controls among others to make combustion engines as clean and efficient as possible.

Technologies such as SCRs, DPFs, diesel oxidation catalysts (DOCs), and ammonia slip catalysts (ASCs) are commercially available today and can be found on millions of highway and off-road engines since 2007. Retrofit DPFs have been installed on many thousands of in-use heavy-duty vehicles and off-road equipment in California and more broadly worldwide to provide significant reductions in diesel particulate matter (PM), as well as reductions in toxic hydrocarbon and carbon monoxide (CO) emissions from the in-use fleet.

3036.1

Emission Control Technologies for Marine Diesel Engines

MECA agrees with the staff report's assessment that marine applications pose unique operating environments and challenging packaging envelopes for emission control technologies. However, proper application engineering over the past twenty years has resulted in the successful application of DOCs, DPFs, and SCR catalysts on a variety of marine engines today.

Since the mid-1990s, urea SCR technology has been successfully installed on a variety of marine

applications in Europe, including auto ferries, cargo vessels, military ships, and tugboats, with hundreds installed on engines ranging from approximately 450 to over 10,000 kW. In addition, the International Maritime Organization Tier 3 requirements which came into force in 2021 have required that new engines utilize marine specific SCR installations in NOx Emission Control Areas (N-ECAs) which include the coastal waters of Europe, the United States and Canada. CARB funded a demonstration of a DPF+SCR retrofit of a tug boat that achieved over a 95% reduction in PM emissions and more than a 90% reduction in NOx from two parallel Detroit Diesel 525 hp engines. The New York Port Authority retrofitted two Staten Island Ferries with SCR that remain in operation. Globally, there is growing experience with emission control technologies installed on marine diesel engines and in particular in Europe where Euro V engine standards require DPFs on inland waterway vessels to meet strict particulate regulations.

Although there are numerous examples where marine harbor vessels have been retrofitted with aftertreatment including DPFs and SCR, retrofitting existing marine vessels represents numerous challenges. Each ship has a different engine and space constraints that require customized aftertreatment solutions. The best analogy to marine retrofits is stationary retrofits. Therefore, the verification process for these vessels should mimic stationary sources rather than mobile retrofits. Because each retrofit is a unique installation, we urge CARB staff to consider what flexibilities can be allowed to marine retrofit manufacturers during verification leaving greater reliance on in-use testing to confirm that aftertreatment remains operational. This is especially true of DPFs that rely more on active regeneration and may not be catalyzed. Furthermore, the wall flow filters are very effective in removing over 95% of PM from the exhaust and can be periodically checked by a simple opacity stack test. This would be similar to stationary sources that require source testing for permitting and reporting.

3036.2

Based upon these technology examples, MECA agrees that passage of the Amendments to the Commercial Harbor Craft rule results in the best commercial incentive to encourage companies to include DPFs in their Tier IV engine certifications and for companies to pursue retrofit DPF verification, as well as establish market presence in support of California commercial harbor craft.

3036.3

In addition, as the marine market is relatively small and specialized compared to other retrofit markets, CARB should continue to consider appropriate flexibilities which will expand the coverage of engines and reduce the cost of verification. In particular, in-use methods employing PEMs equipment are considerably more cost effective than test cell-based procedures for these large engines, and better reflect real world system performance. MECA recommends that CARB consider holding a workshop specific to marine manufacturers and installers to provide further information on device verification and to raise further awareness of these opportunities in California.

3036.4

The Use of R100 Fuel

The most effective emission controls utilize the three primary elements of the system including the engine, aftertreatment and fuels. MECA also supports the staff proposal that will require harbor craft diesel engines to be fueled with R100 renewable diesel that has been shown to reduce PM and NOx emissions as well as combat climate change.

3036.5

Conclusion

In closing, we commend the Air Resources Board for its continuing efforts to provide the people of California with healthy air quality and for demonstrating true leadership in this regulatory program that will significantly reduce PM and NOx emissions from commercial harbor crafts. MECA believes that technologies to reduce diesel emissions, such as DPFs, DOCs, and SCR, are available today, for both new engines as well as retrofits, to reduce NOx and PM emissions from off-road vehicles and engines and these same technologies can have a role in reducing emissions from both new and in-use harbor craft. Retrofit technologies remain as a potential compliance option. Because of the unique challenges of retrofitting aftertreatment for existing harbor craft that we discussed above, we urge CARB staff to think creatively how these unique systems can be verified and their performance confirmed in-use. For retrofit manufacturers to take advantage of this clearly defined market opportunity for DPF filters, they would need some flexibility in the verification of these one of a kind retrofit installations. Our industry is committed to continue to invest in the development and verification of cost-effective, retrofit emission control technologies for all existing diesel engine applications, including marine harbor craft.

Contact:

Dr. Rasto Brezny
Executive Director
Manufacturers of Emission Controls Association
2101 Wilson Blvd. Suite 530
Arlington, VA 22201
Phone: (202) 296-4797 x106
Mobile: 301-717-3628
E-mail: rbrezny@meca.org



Comment Log Display

Below is the comment you selected to display. Comment 3037 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ethan
Last Name: Allen
Email Address: ethan@allenscamera.net
Affiliation:

Subject: Carb on sports fishing boats

Comment:

It is not a great idea to require all these boats to be moved out of California you have killed enough buisness and opportunity all ready

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 21:31:29

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Comment 3038 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jaime
Last Name: Diamond
Email Address: info@stardustsportfishing.com
Affiliation:

Subject: CHC Rule Change

Comment:

Please read attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/3449-chc2021-BmVRNgd0U2IKUwVm.pdf

Original File Name: CARB CHC W.pdf

Date and Time Comment Was Submitted: 2021-11-14 21:40:14

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November 14, 2021
Ms. Liane Randolph, Chair
California Air Resources Board
C/o CHC 2021
1001 I Street
Sacramento, CA 95814

Chairperson Randolph and Commissioners,

Good afternoon, my name is Jaime Diamond, my husband Capt. Jason and I are on the board of directors for the Sportfishing Association of CA. Jason and I along with our three young children own two sportfishing vessels which have been operating out of Santa Barbara since 1996. We run day fishing trips March- December. We partner with UCSB, NOAA, DFW and others for collaborative fisheries research projects and one can say, most importantly, we partner with the SB Maritime Museum facilitating Floating Marine Labs to Santa Barbara County Title 1 school 3rd & 4th grade students. Providing most of them with their first ocean interaction. The proposed CARB regulations as is, will have a drastic negative impact on our business and our communities.

My husband has been a fisherman for 40 years, we know our communities. We act as stewards of the land and water, not only for our own benefit, but for the benefit of our future generations. We make this active choice to bear much of the cost and responsibility protecting our natural resources. We value the importance of air quality, we also believe in the three pillars of sustainability - economic viability, environmental protection and social equity. As the proposed rule stands, it is not a sustainable option for our industry, it is not equitable for CPFV operators or the people they serve.

One of our vessels is currently upgrading to the best available, newest Tier Three engine. The other is currently a Tier Two, which we intend to upgrade. I am concerned with the proposed amendments to the (CARB) Commercial Harbor Craft Regulation (CHC Regulation). Under the amended CHC rule, beginning January 1, 2023, Commercial Passenger Fishing Vessels (CPFV) will be required to replace engines with cleaner tiered engines & equipment, among other requirements. At first, that sounds pretty good.

Unfortunately, the proposed rule was rushed without truly fleshing out the rippling consequences. **To start, we will be removed from our longstanding designation as Commercial fishing vessels, despite the fact we are recognized as such by CADFW. We are Commercial fishing vessels, who also carry passengers.**

3038.1

301 W Cabrillo Blvd. Santa Barbara, CA 93101

info@stardustsportfishing.com 805.259.6775

We have to buy the same license, we have same class of boats, the same engines and our businesses have similar profit margins.

We, the small passenger vessels are ocean access for mid to low income & disadvantaged communities. Those who cannot afford the luxury of owning their own private boat. We are the means by which our local communities can see and visit the Channel Islands, go fishing & whale watching, experience the beauty of our coastline and local sea life. We would have to increase our rates becoming an elitist activity. Researchers, and nonprofits would no longer be able to afford the cost, denying best available science and putting an end to life changing experiences for our local school kids.

3038.2

The lack of communication between CARB and USCG is unacceptable. We cannot change anything on our vessels without USCG approval, therefore we cannot put in engines or other equipment without their oversight for safety as we are passenger carrying vessels. I'm sure you can appreciate my concern here after the Conception disaster. Tier 3 or 4 plus DPF is just not possible for us. The added weight of components will not fit and will affect stability of the vessels. It will also change our passenger capacity due to added weight further increasing the cost to the public. CARB has stated they are aware and said we will just have to replace all 174 CPFV s in the fleet with steel vessels. Why? Because the proposed equipment runs so hot it isn't safe for use in wood or fiberglass vessels, and the expansion & contraction will break the welds on aluminum boats too. The diesel particulate filters they want us to use are notorious for clogging. For a truck, its most likely no big deal, pull over get out and wait for a tow. If that were to happen on a Passenger vessel, it would leave us dead in the water. What if that happened mid shipping channel crossing with weather picking up, or touring the painted cave at the Channel Islands, entering/exiting the harbor? Even worse, when these filters clog and the engine does not automatically shut off, they can overheat, catch fire, and explode. This has the potential to make the Conception incident seem commonplace.

3038.3

There is a clear lack of communication between CARB and local APCD's. Local APCD Carl Moyer Grant programs have very different structures for financing, contract length, and how many components can be funded at one time. The cost associated with upgrading to Tier 3 or 4 is also an extreme economic hardship for our small business, especially since once this becomes a rule, we will no longer qualify for Carl Moyer grant funding. We also are concerned about the equipment availability. Tier 3 & 4+DPF is not available in a model small enough to fit our vessels.

3038.4

I ask you to support CPFV's, let us continue to be considered a "Commercial Fishing Vessel" and receive access to grant funding, same compliance deadlines as Commercial Fishing Vessels, and be returned to our former classification as such.

We are 100% behind cleaner air and healthier communities, but it is being rushed to the detriment of those who are the backbone of these coastal communities. Most of us live where we work and want the best for our environment, however it must be done thoughtfully, truly working WITH stakeholders, using commonsense and not causing more harm than good. Frankly, to push this type of action through during a global pandemic with businesses on the brink, people's lives and livelihoods hanging in the balance, is unconscionable. Please, consider all which has been laid before you, and consider waiting until our lives and world are not in immediate peril.

I would like to mention, when Ms. Bonnie Soriano presented to the Ventura County Board of Supervisors & APCD she repeatedly mentioned the age of our vessels. She tried to say a vessel such as mine which is approaching 50 years old should just be decommissioned anyway. That is akin to saying any home approaching 50 should be torn down. Of course not! We keep our vessels in prime condition, it is not only a point of joy and pride, but we must do so as our passenger's lives depend on it! Our vessels are inspected every year by USCG, and every two years they get hauled out of the water for a more in-depth inspection. I am including pictures of our boats, so you understand what a 50 year old boat really looks like.

3038.5

One more thought; reducing my ability and opportunity to defend my business and livelihood to three minutes of public comment is demeaning, demoralizing, and everything that is wrong with politics. This rule proposal was pushed through its paces at light speed during a pandemic which we are still in. I am an Elected School board trustee; I was not appointed by someone with a specific agenda come hell or high water (both of which seem very close right now). I have a duty to serve both the students in my district and the other stakeholders such as Teachers & Staff, and community members. Sometimes, in the best interest of the kids, or teachers, I have to make a decision which the administration does not agree or want. If what is being asked has a huge negative impact on any one group, I cannot go forward. We must do better and find another way. This is your chance to find another way. Please let Commercial Passenger Fishing Vessels (CPFV) return to its classification as Commercial Fishing Vessels, allowing us more time and access to grant money so we can continue to upgrade our engines to the best & safest available without having to rebuild our vessels.

3038.6

Respectfully,

Jaime Diamond
Owner, Stardust Sportfishing



These two pictures were taken during one of our Veteran's day Veterans trips. Sixty Five Veterans and Wounded Warriors had a free day of peace and healing on the water.





My Family and our boats. From Left: My oldest son Matthew 15- he loves working on the boats, learning everything he can, his dream is to get his Captains license and run the boats. Next, my daughter Molly 11- she feels right at home on board, she is my creative one a little artist, after a day on the boat she usually can be found painting or drawing something ocean related. My husband Capt. Jason Diamond- this is literally the only job he has ever had since he was a teenager. This man gets to live his dream, helping people fall in love with sportfishing and ocean adventures. That's me in the white shirt- I may have married into this business, but I wouldn't have it any other way; this has built the most beautiful life for my family, and I count be more blessed. Finally, our youngest fisherman- MAX! He is four years old and has been able to tie on a fishing hook since he was three. The kid is absolutely nuts for fishing and hanging out on the boats and at the Landing. His TK teacher had to adjust his drawing assignments to fishing related because all he wants to draw is fish.



Comment Log Display

**Below is the comment you selected to display.
Comment 3039 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Cameron
Last Name: Fornof
Email Address: Fornofcameron@yahoo.com
Affiliation:

Subject: Carb ban
Comment:
Against carb ban.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 21:42:34

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Comment Log Display

Below is the comment you selected to display. Comment 3040 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - .

First Name: Jan
Last Name: Dietrick
Email Address: jdietrick9@gmail.com
Affiliation:

Subject: Strengthen Commercial Harbor Craft rule to transition to zero emissions

Comment:

Dear Chair Randolph and Members of the Board,

I live in Ventura. Our beaches are affected by the air pollution in the two harbors. I was shocked to read that harbor boats are one of the top three cancer risks for Californians living near CA ports. Let's stop investing in diesel operated harbor boats! The technology exists to transition to 100% clean fleets for the sake of clean air and emissions reduction.

3040.1

Please strengthen the Commercial Harbor Craft rule:

1. Require a 100% zero-emissions transition for the majority of harbor boats by 2035

2. Include tugboats and barges, which are excluded from the current rule

3040.2

3. Allow the Board to revisit the rule as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions

4. Increase funding for zero-emissions retrofits to spur innovation

3040.3

5. Fund ZE boat pilot training.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 22:07:08

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Comment Log Display

**Below is the comment you selected to display.
Comment 3041 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Donald
Last Name: Wong
Email Address: dmbjwong@comcast.net
Affiliation: C-Gull II Sportfishing Inc

Subject: Harbor Craft proposal chc 2021
Comment:
Harbor Craft proposal chc 2021

Attachment: www.arb.ca.gov/lists/com-attach/3452-chc2021-UTkAZ1EiWWhXPllg.docx

Original File Name: Harbor Craft proposal.docx

Date and Time Comment Was Submitted: 2021-11-14 22:03:18

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C-Gull II Sportfishing, Inc

15187 Shining Star Lane
San Leandro, CA 94579

November 10, 2021

Ms. Liane Randolph

Re: Proposed Amendments to Commercial Harbor Craft Regulation (chc2021)

My name is Donald Wong. I own and operate C-Gull Sportfishing, Inc, which has two Commercial Passenger Fishing Vessels (C-Gull II and New Huck Finn) for over 30 years. My career and livelihood have been solely dependent on the sea.

I understand the importance of awareness of the climate and most importantly the environment. I have made every effort to support the environment by repowering my vessels four times in the last twenty years with the assistance of the Carl Moyer Program. I am currently in the process of repowering my vessels to Tier 3 this winter.

What is being asked of sportfishermen to upgrade to Tier 4 makes it impossible to be able to continue as a business. We cannot repower our engines to meet your requirements without having to purchase new vessels. Please continue to allow us to be ambassadors of the sea, whether it be whale watching, fishing, crabbing, ecological trips etc.

Please reconsider your mandate before you put many Californians out of business.

Sincerely
Donald Wong



Comment Log Display

Below is the comment you selected to display. Comment 3042 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: JANET
Last Name: TEXAS
Email Address: janetex@yahoo.com
Affiliation:

Subject: Save Our Boats

Comment:

New regulations are unrealistic and will decimate sport-fishing.
These new regulations are unreasonable.

Janet Texas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 22:26:23

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**Below is the comment you selected to display.
Comment 3043 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mark
Last Name: Cooley
Email Address: Mark_cooley@comcast.net
Affiliation:

Subject: Carb restrictions Sportfishing

Comment:

Please do not put these restrictions on sport fishing boats you are over reaching as a government entity America was founded on the idea that smaller government control was a good thing and still is this is not right

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-14 22:46:37

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Below is the comment you selected to display. Comment 3044 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Hughes
Email Address: hughesjohnf@yahoo.com
Affiliation:

Subject: Do Not Force Charter boats to install New engines!

Comment:

Dear CARB,

They say that the road to hell is paved with good intentions. In your 'academic' solution to protecting the environment you are going to drive many of these boats out of business. I hope that is not your actual intention, but, it will be the actual result. If the ticket prices triple then there will be significantly less customers. It was a thrill for me and my kids to go fishing on these charter boats. But, no more, if the prices triple.

You can come up with a better "solution" than this, can't you?

Regards,
John

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 02:28:29

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Comment Log Display

Below is the comment you selected to display. Comment 3045 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Culwell
Email Address: highliner3@sbcglobal.net
Affiliation:

Subject: CARB

Comment:

Is your administration going to put all small business out of business with your regulations? Very sad to see California go to shit. fishing is a god given RIGHT not yours to take away from us and our family's. Please rethink this disaster regulation for the generations to come. Thank you for your time reading this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 04:22:46

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Below is the comment you selected to display. Comment 3046 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sergio
Last Name: Perez
Email Address: h20buffalo112@aol.com
Affiliation: Fisherman/ Boat owner

Subject: Commercial Harbor Craft Regulations

Comment:

To Governor Newsome, The California Air Resources Board and everyone else involved with this proposal, I am a member of the Sportfishing community as an employee in the Sportfishing business, as a fisherman and as a local and state representative of a major coastal conservation organization. This letter is to express my concerns about the pending emissions regulations being proposed for Sport fishing Boats in California. There are many reasons this proposed legislation is flawed:

- 1.) One of the biggest flaws is the fact that the proponents of this legislation have not given adequate consideration to the overall economic impact this legislation will cause to the Sportfishing industry and the overall loss of tax revenue to the state of California. The California recreational Sport Fishing industry generates over 5.6 billion dollars annually and is responsible for the livelihood of thousands of people and their families. The proposed legislation would be devastating to not only the fishing industry but to the lives of many.
- 2.) The proposed technology for the Diesel Particulate Filter (DPF) does not exist and due to non existence, has not been approved by the U.S. Coast Guard.
- 3.) The proposed technology has not been tested and has not been proven to be safe for use at sea. This could lead to putting human lives in danger.
- 4.) The California State University Maritime Academy has concluded that the suggested standards for existing engines does not exist. In the alternative, treatment equipment (modifications) alone will significantly impact a vessel's stability.
- 5.) Over 80% of the existing Sport Fishing fleet is constructed of wood, fiberglass and combinations of said materials. Boats built of these materials would not be safe to operate if they could be retrofitted with proposed emissions devices. The result of the newly proposed emissions devices would require boats currently being used, to be replaced with boats made of steel hulls. This

requirement would force most sport fleet operators out of business as the cost of this would be untenable.

Please apply common sense and logic to this proposal and end this madness before the wellbeing of those within the the Sportfishing industry and so many businesses associated with the Sport Fishing industry are bankrupted and forced out of business. Please realize the loss to the entire state if this incompetent proposal is to go forward.

Sincerely

1212

Like

Comment

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 04:40:31

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Comment 3047 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Darrell
Last Name: Datte
Email Address: ddatte55@gmail.com
Affiliation:

Subject: California Sportfishing

Comment:

Please cease the pursuit of mandating new engines for the California Fishing and Whale-Watching fleets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 05:26:43

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**Below is the comment you selected to display.
Comment 3048 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Daniel
Last Name: Tyler
Email Address: fisherman482@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

Please don't take my job from me!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 05:34:41

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**Below is the comment you selected to display.
Comment 3049 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Alan
Last Name: Fluhrer
Email Address: Fluhrda@nv.ccsd.net
Affiliation:

Subject: Carb regulation

Comment:

If you pass this regulation I will not be able to go on my annual fishing trip to San Diego. I always bring a group of friends with me since we take out a private charter. We would no longer be spending time and money in the local economy on hotels, restaurants and other attractions. We spend an average of \$3000-\$4000 on every trip

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 05:39:32

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Comment Log Display

Below is the comment you selected to display. Comment 3050 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Hause
Email Address: tomcarla@att.net
Affiliation: Veterans of Foreign Wars

Subject: Chc2021. Save Our Boats

Comment:

Please do not pass this amendment. It will surely kill the sportfishing opportunities of countless veterans like myself. Too many of us veterans will lose one of the few opportunities we have for enjoying the outdoors at an affordable cost. The measures in this amendment will increase the cost of this recreation to an unaffordable level for many of my compatriots. Please do not proceed with this amendment. Thank you for your consideration.

Sincerely,
Tom Hause
Vietnam Veteran

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 06:01:19

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**Below is the comment you selected to display.
Comment 3051 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mitchell
Last Name: Ketterling
Email Address: mitchaz1.mk@gmail.com
Affiliation:

Subject: Sportfishing boats

Comment:

Let's keep are sportfishing going these changes will only put people out of business and make it so only the rich to enjoy life

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 06:12:04

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Below is the comment you selected to display. Comment 3052 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kurt
Last Name: Frye
Email Address: kurtandrewfrye@gmail.com
Affiliation:

Subject: CHC2021 - Save our Boats

Comment:

Stop with the regulations that are going to put the family owned businesses of fishing and whale watching out of business. Enough is enough. I take my 2 sons out fishing all the time, we can't afford our own boat. If you pass these regulations and the industry goes under, so does my experience and joy taking my boys fishing.

Kurt Frye

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:01:34

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**Below is the comment you selected to display.
Comment 3053 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Brian
Last Name: Coday
Email Address: Briancoday@yahoo.com
Affiliation:

Subject: Sport boats

Comment:

Please don't pass new engine regulations on sportfishing boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:02:21

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**Below is the comment you selected to display.
Comment 3054 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Kevin
Last Name: Ragsdale
Email Address: Krag2003@yahoo.com
Affiliation:

Subject: Save the Fishing boats

Comment:

Please do not further regulate the commercial public fishing boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:06:41

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Below is the comment you selected to display. Comment 3055 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Hough
Email Address: mausurfers@msn.com
Affiliation:

Subject: Mandated marine engine/fishing vessel replacement

Comment:

This is how we put commercial fishermen and whale watching boat owners out of business by making it impossible for them to make a living. People can't afford to pay the price to go on these vessels. Let's be real people what you are asking is not economically feasible to the owners or the consumer. The industry as a whole will be destroyed by these unreasonable requirements.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:05:45

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**Below is the comment you selected to display.
Comment 3056 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Todd
Last Name: Vanderstraeten
Email Address: pipestodd@yahoo.com
Affiliation:

Subject: New boats

Comment:

You need to get the container ships idling off the coast, to move further out. Not the little guys trying to make a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:07:08

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**Below is the comment you selected to display.
Comment 3057 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ron
Last Name: Hunt
Email Address: orcaron@gmail.com
Affiliation: Scuba Diving instructor @ Sonoma State U

Subject: Ocean environment

Comment:

Save Our Ocean Environment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:09:48

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Comment Log Display

Below is the comment you selected to display. Comment 3058 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Pfeiffer
Email Address: mikep5@cox.net
Affiliation: Native Californian

Subject: Comm Harbor Craft Reg

Comment:

Please reconsider the amendments in regard to the California based commercial fleet and retrofiting. Families and tourists who enjoy our ocean waters will be subject to higher prices and will choose other destinations accordingly. The commercial harbor craft fleet does not have a full round year schedule and does not impact our waterways regardless. I am an avid angler and seabird watcher that is very watchful of our environment. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:09:24

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Comment Log Display

Below is the comment you selected to display. Comment 3059 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nilo
Last Name: Lins
Email Address: wnt2trn@att.net
Affiliation:

Subject: Sportfishing

Comment:

Please drop your mandate on passenger sportfishing boats. As you can see from the Port of LA and the Port of Long Beach, your draconian mandates cause nothing but trouble.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:14:42

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Comment Log Display

Below is the comment you selected to display. Comment 3060 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: dana
Last Name: smith
Email Address: bigd5150@verizon.net
Affiliation:

Subject: fishing/ whale watching

Comment:

Please leave sport fishing and whale watching alone

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:22:35

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Comment Log Display

**Below is the comment you selected to display.
Comment 3061 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jay
Last Name: Bullard
Email Address: bunktuna@yahoo.com
Affiliation:

Subject: Future of fishing

Comment:

This senseless draconian measure would wipe out an entire industry.
I would feel sorry for our young people that would never experience everything the ocean has to offer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:22:55

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Comment Log Display

Below is the comment you selected to display. Comment 3062 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Christiansen
Email Address: tomasitochris@gmail.com
Affiliation:

Subject: Chc2021

Comment:

Good morning, the sport fishing industry, is a "mom&pop" that will lose their boats should you impose the proposed regulations. a far better target for your organization would be removing leaded fuel from our sky's (Aviation fuel) rather than a marginal reduction in emissions on the water

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:17:24

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Comment Log Display

Below is the comment you selected to display. Comment 3063 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: ERIC
Last Name: UNDERWOOD
Email Address: underwoe@yahoo.com
Affiliation: Recreational fisherman

Subject: CHARTER BOAT MANDATE FROM CARB

Comment:

Please don't inact the coming mandate on boats to change out their engines. The cost for them to do so will raise the prices to were the average consumer like myself will not be able to afford taking my family fishing. I've been fishing for 45yrs! My dad brought on boats up and down the southern California coast. I've been bringing my kids and in the future I want them to have the opportunity to bring their kids. We are a medium income family. We have a budget. I am not in a position to buy a personal watercraft so I rely solely on our charter fishing industry. It would be devastating not to have the option to continue enjoying a passion I've had for over 40yrs!!

Thanks in advance for your consideration

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:17:14

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Comment Log Display

**Below is the comment you selected to display.
Comment 3064 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Daniel
Last Name: Butler
Email Address: Daniellynnbutler123@gmail.com
Affiliation:

Subject: Sportsfishing

Comment:

Don't shut down sportsfishing I am a deckhand and it would ruin my whole livelihood, I wouldn't be able to provide for my family. Being a deckhand on a sportsfishing boat is my only source of income

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:26:09

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Comment Log Display

Below is the comment you selected to display. Comment 3065 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Robert
Last Name: Taylor
Email Address: itwasbo@gmail.com
Affiliation:

Subject: Don't sink sportfishing

Comment:

To Governor Newsome, The California Air Resources Board and everyone else involved with this proposal,

I am a member of the Sportfishing community as an employee in the Sportfishing business, as a fisherman and as a local and state representative of a major coastal conservation organization. This letter is to express my concerns about the pending emissions regulations being proposed for Sport fishing Boats in California. There are many reasons this proposed legislation is flawed:

- 1.) One of the biggest flaws is the fact that the proponents of this legislation have not given adequate consideration to the overall economic impact this legislation will cause to the Sportfishing industry and the overall loss of tax revenue to the state of California. The California recreational Sport Fishing industry generates over 5.6 billion dollars annually and is responsible for the livelihood of thousands of people and their families. The proposed legislation would be devastating to not only the fishing industry but to the lives of many.
- 2.) The proposed technology for the Diesel Particulate Filter (DPF) does not exist and due to non existence, has not been approved by the U.S. Coast Guard.
- 3.) The proposed technology has not been tested and has not been proven to be safe for use at sea. This could lead to putting human lives in danger.
- 4.) The California State University Maritime Academy has concluded that the suggested standards for existing engines does not exist. In the alternative, treatment equipment (modifications) alone will significantly impact a vessel's stability.

5.) Over 80% of the existing Sport Fishing fleet is constructed of wood, fiberglass and combinations of said materials. Boats built of these materials would not be safe to operate if they could be retrofitted with proposed emissions devices. The result of the newly proposed emissions devices would require boats currently being used, to be replaced with boats made of steel hulls. This requirement would force most sport fleet operators out of business as the cost of this would be untenable.

Please apply common sense and logic to this proposal and end this madness before the wellbeing of those within the the Sportfishing industry and so many businesses associated with the Sport Fishing industry are bankrupted and forced out of business. Please realize the loss to the entire state if this incompetent proposal is to go forward.

Sincerely

Robert Taylor

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:30:22

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Comment 3066 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Eric
Last Name: Dupre
Email Address: Dupreeric@yahoo.com
Affiliation:

Subject: Don't Close Our Fishing Fleets

Comment:

Don't forget how important fishing is for many of us.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:31:47

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Below is the comment you selected to display. Comment 3067 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ric
Last Name: Mills
Email Address: ric925az@gmail.com
Affiliation:

Subject: Ban on fishing and site seeing boats

Comment:

This is a ridiculous idea and needs to be stopped. Their are many people that would be affected. Their carbon imprinted is very small and our environment is not affected. Stop the nonsense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:37:36

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Below is the comment you selected to display. Comment 3068 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charlie
Last Name: Sanchez
Email Address: Craftsman625@gmail.com
Affiliation:

Subject: CHC2021 - Save our boats

Comment:

It is imperative that you halt California air resources board plans for commercial boating and allow more time to explore other operational control strategies for reducing emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:20:07

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Below is the comment you selected to display. Comment 3069 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: WILLIAM
Last Name: SIEGEL
Email Address: WILLIAM.C.SIEGEL@GMAIL.COM
Affiliation:

Subject: Regulations impacting the sportfishing industry

Comment:

Please reconsider the proposed regulations mandating changes to the sportfishing fleet. It is clearly a solution looking for a problem, and in fact will decimate the industry and make it unaffordable for most.

Estimates are that it will triple the cost of participating, and I for one will tell you that it will eliminate this as an outdoor option for me.

Maybe no one on the Board fishes, so you don't care about it's impact, but it a valuable outlet for retirees who can't afford their own boats and your actions will take this away from them.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:51:13

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Comment Log Display

Below is the comment you selected to display. Comment 3070 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: victor
Last Name: lozada
Email Address: victorlozada72@gmail.com
Affiliation: HOOKNLEAD

Subject: Mangade Engines

Comment:

Dear Carb,

Pleased protect the families that operate 174 passenger sportfishing and Whale Watching boats. We have enjoyed decades of fishing in our family on these boats from Ventura to San Diego. Im concerned that the amount of boats available will decrease dramatically, price hikes and the opportunity to go fishing on these boats will be much harder to do.

Thank you

Victor Lozada

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:49:39

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Comment Log Display

Below is the comment you selected to display. Comment 3071 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Palmer
Email Address: dphuntnfish4life@gmail.com
Affiliation:

Subject: Commercial boat fishing regulations

Comment:

As a life long outdoorsman and son to a CA Game Warden please do not further regulate our current commercial fishing fleet. You are not by any means scientifically mitigating any problems associated to climate change linked directly to the fishing fleet in CA. You are only targeting small fractions of a problem that does not even exist. Work on picking up trash not ruining business. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:55:45

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**Below is the comment you selected to display.
Comment 3072 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: LINDA
Last Name: VAIO
Email Address: lindavaio@hotmail.com
Affiliation: GSSA

Subject: Save Our Boats

Comment:

Please consider the impact your decision will have on fishing boats; especially party boats and commercial fishing boats. They have been struggling for years and this engine change would be a nail in the coffin to their industry.

Thank you,
Linda

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:01:33

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Below is the comment you selected to display. Comment 3073 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Underhill
Email Address: tunderhill@coldwellbanker.com
Affiliation: Bosting industry engine size

Subject: Boating industry

Comment:

CARB, in collusion with the legislature, has done enough damage to business and industry. Your efforts have helped the teamster's union destroy much of the trucking industry, leading to the current distribution problems. It's past time for carb to stay out of the regulatory business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 07:58:55

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Comment Log Display

Below is the comment you selected to display. Comment 3074 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Glenn
Last Name: Hazen
Email Address: amazinhazen2@hotmail.com
Affiliation:

Subject: Save Sport fishing and Ocean tours

Comment:

Please do not continue with Engine replacements until a better solution can be made for those boat owners that provide a valuable resource.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:05:55

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Comment Log Display

Below is the comment you selected to display. Comment 3075 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alberto
Last Name: Araiza
Email Address: araiza1928@gmail.com
Affiliation:

Subject: Protect the families who operate sportfishing and whale watching boats

Comment:

Hello,

I am with the families that operate the 174 sportfishing and whale watching boats here in California. I have purchased tickets for sportfishing multiple times because the prices are so affordable. If the tickets prices would go up then I would not be able to participate any longer. Thank you for my consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:09:08

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Comment Log Display

Below is the comment you selected to display. Comment 3076 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Gough
Email Address: goughgary@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

This new regulation will put fishing and tour boat operators out of business. Prices for these trips are already at an all time high. I can't afford the price increase and won't be able to go fishing on the boats. I've been fishing with the various fishing landings since 1953. This would be a terrible terrible regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:06:30

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Comment Log Display

**Below is the comment you selected to display.
Comment 3077 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: GREGG
Last Name: LIPANOVICH
Email Address: gregglip@cox.net
Affiliation:

Subject: stupid law

Comment:

competition take scare of this more rules/laws arne't needed

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:15:27

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Comment Log Display

Below is the comment you selected to display. Comment 3078 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: christo
Last Name: franklin
Email Address: rohog@yahoo.com
Affiliation:

Subject: supporting zero emission standard for boats

Comment:

I am writing in support of zero emission standard for boats by 2035.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:18:18

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Below is the comment you selected to display. Comment 3079 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rian
Last Name: Ramirez
Email Address: Ryzen01@yahoo.com
Affiliation:

Subject: Do not CARB our boats

Comment:

Do not Ask our boats to be CARB. It would raise the ticket prices and then there would be a lot of us that would not be able to afford going fishing or whale watching with our families.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:13:19

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**Below is the comment you selected to display.
Comment 3080 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: GUILLERMO
Last Name: MARTINDELCAMPO
Email Address: MOTO932@GMAIL.COM
Affiliation: FORD MOTOR CO.

Subject: SAVE THE FISHING SPORT

Comment:

PLEASE DON'T SHUT DOWN WHAT WE LOVE TO DO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:22:04

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Comment Log Display

Below is the comment you selected to display. Comment 3081 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lucy
Last Name: Garcia
Email Address: lucy.rea.garcia.lg@gmail.com
Affiliation: Los Angeles Unified School District reti

Subject: Boat fuels

Comment:

Having taken my grandsons out whale watching on a breezy day, I know the emissions from boats are nauseating and unhealthy. People who live by the pirts deserve better. And aren't we pledged to lower greenhouse gas emissions? And clear up environmental justice issues? It's a win all around to stop the use of fossil fuels on boats.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:20:18

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Comment Log Display

Below is the comment you selected to display. Comment 3082 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Evans
Email Address: mleconstruction@aol.com
Affiliation:

Subject: Sport boat and whale watching boats

Comment:

I just wanted to take one moment to oppose the destruction of the fishing and whsle watching fleet. What you are proposing doing is disgusting and repugnant. This rule will destroy the livelihoods of thousands of families and ruin what millions of Californians enjoy. Its disgusting.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:26:16

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Comment Log Display

Below is the comment you selected to display. Comment 3083 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Andrew
Last Name: Smyth
Email Address: Captainkalik@gmail.com
Affiliation:

Subject: Carb proposal will sink me

Comment:

The Carb proposal will put small family owned businesses like mine out of business. I am facing financial difficulties as it is. This proposal will sink me and others like myself. Please. I have a family to support, don't support this Carb proposal.

Andrew Smyth

North coast Sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:24:29

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Comment Log Display

Below is the comment you selected to display. Comment 3084 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Vern
Last Name: Capistran
Email Address: verncap@gmail.com
Affiliation: Calif. Coastal assoc.

Subject: Sportfishing boat air emissions

Comment:

I'm a sportfisherman, I enjoy going on open party fishing boats year around. The new/proposed Calif Air pollution regs being considered and the imposed time requirements are UNREASONABLE for owners of Sportfishing boats. Boat engine modifications to meet the requirements are very expensive & new boat engine technology doesn't exist to meet these air quality regs. Please give boat owners more time to comply or cancel these proposed regs all together. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:16:59

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Comment Log Display

**Below is the comment you selected to display.
Comment 3085 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Mary
Last Name: Bailey
Email Address: baileylab63@gmail.com
Affiliation:

Subject: Chic 2021 Save Our Boats

Comment:

Please do not put this vital recreational industry out of business.
My 6 grandchildren deserve better.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:35:13

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Comment Log Display

Below is the comment you selected to display. Comment 3086 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steve
Last Name: Goldberg
Email Address: sgoldberg@contractingconcepts.com
Affiliation: CCI

Subject: Save Sportfishing and Stop the new Law

Comment:

please listen to the public, this attempt to inject laws without voting on it and allowing the voters to choose, also you will be putting hundreds out of business and taking away the right for us the people to take our families out on some fun and family time fishing, whale watching, and just plane fun watching other sea life and diving etc.

this law is wrong in all ways.

please listen to the peolple.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:43:12

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Comment Log Display

Below is the comment you selected to display. Comment 3087 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bruce
Last Name: Sichak
Email Address: bsichak@pbrand.com
Affiliation:

Subject: sport fishing

Comment:

For more than 30 my son and I have enjoyed ocean fishing while visiting relatives in San Diego. This is just another worthless and ineffective regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:42:54

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Comment Log Display

**Below is the comment you selected to display.
Comment 3088 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Robert
Last Name: Ludwig
Email Address: robert_ludwig@msn.com
Affiliation:

Subject: Fishing boats

Comment:

SAVE OUR SHIPPING INDUSTRY... Don't eliminate our shipping until you have provided a proper substitute.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:51:08

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Comment Log Display

Below is the comment you selected to display. Comment 3089 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Pfaffman
Email Address: Jpfaffman@yahoo.com
Affiliation:

Subject: carb

Comment:

I've been an avid sport fisherman for the past 50 years. I depend on the sport fishing fleet for access to the ocean. I believe having these operators and owners change out their engines all at the same time will put many out of business. More time is needed for technology to catch up with this procedure. Let's work together for a logical solution that won't put people out of business. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:37:18

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Comment Log Display

Below is the comment you selected to display. Comment 3090 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Nguyen
Email Address: tony32nguyen@yahoo.com
Affiliation:

Subject: Replacing boat engines will ruin livelihoods and destroy entire charter fishing industry.

Comment:

Hello CARB,

Your intention to clean the air will end up wiping out entire charter industry and endangering thousands of businesses that support their business. Customers won't be able to afford whale watching or charter fishing trips with their families. People out of state and around the world come to California to fish for tunas, yellowtail, sailfish, etc., but if those prices triple then they won't come to California. You will cause loss of businesses from hospitality to clothing to airlines and rental car to restaurants in addition to fishing charter business. Please don't destroy livelihoods, businesses, or the economy.

Thanks,

Anthony

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 08:46:28

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Comment Log Display

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First Name: James
Last Name: Zurlinden
Email Address: Jzurlinden494@msn.com
Affiliation:

Subject: CARB Sport Fishing Regulations

Comment:

I want to state to the board that I do not support these new regulations. This would be hurtful to the different businesses throughout the state. You are trying to force a change that does not help anyone. You need to have a support system and the resources in place to help these businesses before you try to implement new regulations. You cannot do this blindly and expect the difference businesses to "find" a way to comply. You must support them! Not find a way to run the smaller businesses out of state. If you pass these regulations the companies boats will be worthless so they couldn't even sell them to try to buy a new vessel. Try selling your transportation that's worth only salvage value and have to buy a brand new vessel at full price. Again, you need to support these businesses with a correct system in place before you implement these kind of regulations. I want to state again that I do not support these regulations that the board is putting forward.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:00:20

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First Name: Ben
Last Name: Dover
Email Address: fuckjoebiden@evildemocrats.com
Affiliation:

Subject: stop the evil deeds of the evilists

Comment:

Let the boats sail freely & leave the boat owners alone you Fck'n Evil Rat Bastards. Instead go rot in the bowels of hell for all eternity!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:05:15

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Below is the comment you selected to display. Comment 3093 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Craighton
Last Name: Kamikawa
Email Address: lastkamikaze13@gmail.com
Affiliation:

Subject: Newsome

Comment:

Don't penalize the fishing industry. Let them keep what they are doing to keep our economy up.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:29:11

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Comment 3094 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: WALT
Last Name: ORTH
Email Address: waltfte@att.net
Affiliation: CALIFORNIAN

Subject: SPORTFISHING BOATS

Comment:

YOUR TRYING TO PUT SMALL BUISNESS OWNERS OUT
OF BUISNESS BY DOING THIS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:38:14

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Below is the comment you selected to display. Comment 3095 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Hurt
Email Address: tom@ebeinc.com
Affiliation:

Subject: CARB Regulation

Comment:

This regulation will put hundreds of people out of work. The device that is required is not even developed yet. It will also drive the price of sport fishing out the roof. The boat I fish on replaced there engines 3 years a go and is the cleanest and most efficient vessel on the water. Now CARB wants to put them out of business and the rest of the fleet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:36:45

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Comment Log Display

Below is the comment you selected to display. Comment 3096 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Victoria & Patrick
Last Name: Johnson
Email Address: islewoman@yahoo.com
Affiliation:

Subject: Reject CARB amendment for Ferry Boats to Catalina Island

Comment:

November 15, 2021
Members, California Air Resources Board
1001 I Street
Sacramento, CA 95814
VIA EMAIL: harborcraft@arb.ca.gov

RE: Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Members of the Board:

I am a resident of Catalina Island that has lived here for since 1975. My husband is a third-generation islander and we have raised three children on the island. In the past, we owned a business that was sold in 2011. We both still work and all jobs on the inland (except rock quarry) are tourism related.

We are very concerned about your proposed rules requiring ferries to be powered by Tier 4 classified engines. Ferry service is critical for those of us who live here, and these rules could devastate our lives and our livelihoods. The costs associated to comply with the proposed amendment will have a devastating impact on the lives of all residents. Visitors will also be impacted and many will choose to not visit. Businesses will struggle and fail, residents will be forced to move and the island population will shrivel. Workers will not be able to live here and support the current economy. Wealthy homeowners that wish a 'deserted island' feeling may stay, but services will be extremely limited as the work force will be gone!

I travel the ferry every three weeks taking a friend to chemo. This cost will add to the burden but the treatments are not an option. Living here I have traveled to the mainland for orthodontic work, health care, surgeries, etc. and all these were not optional. Necessary travel for locals will become too expensive. We also travel for pleasure as do the visitors to our island. We need the visitors to survive!

I urge you to reject the new rules or to modify them so they do not have a negative impact on me, my fellow residents, and our island community on Catalina.

Thank you,

Victoria and Patrick Johnson

13 Canyon Terrace, PO Box 103, Avalon, CA 90704

424.264.9318

islewoman@yahoo.com

Attachment: www.arb.ca.gov/lists/com-attach/3515-chc2021-AWJVMIAjWGkEXQVz.docx

Original File Name: CARB VJ personal Letter.docx

Date and Time Comment Was Submitted: 2021-11-15 09:45:02

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November 15, 2021
Members, California Air Resources Board
1001 I Street
Sacramento, CA 95814
VIA EMAIL: harborcraft@arb.ca.gov

RE: Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Members of the Board:

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We are very concerned about your proposed rules requiring ferries to be powered by Tier 4 classified engines. Ferry service is critical for those of us who live here, and these rules could devastate our lives and our livelihoods. The costs associated to comply with the proposed amendment will have a devastating impact on the lives of all residents. Visitors will also be impacted and many will choose to not visit. Businesses will struggle and fail, residents will be forced to move and the island population will shrivel. Workers will not be able to live here and support the current economy. Wealthy homeowners that wish a 'deserted island' feeling may stay, but services will be extremely limited as the work force will be gone!

I travel the ferry every three weeks taking a friend to chemo. This cost will add to the burden but the treatments are not an option. Living here I have traveled to the mainland for orthodontic work, health care, surgeries, etc. and all these were not optional. Necessary travel for locals will become too expensive. We also travel for pleasure as do the visitors to our island. We need the visitors to survive!

I urge you to reject the new rules or to modify them so they do not have a negative impact on me, my fellow residents, and our island community on Catalina.

Thank you,

Victoria and Patrick Johnson

13 Canyon Terrace, PO Box 103, Avalon, CA 90704
424.264.9318
islewoman@yahoo.com



Comment Log Display

**Below is the comment you selected to display.
Comment 3097 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: john
Last Name: zabel
Email Address: mediafs2004@yahoo.com
Affiliation:

Subject: Private Sportfishing Family Businesses

Comment:

I am writing in support of making some sort of accommodation to the impending requirements for marine engines. we need to continue to support small businesses and the proposal as drafted would drive all out of the business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 09:55:09

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Comment Log Display

Below is the comment you selected to display. Comment 3098 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lowell
Last Name: Bennett
Email Address: lowellrb@yahoo.com
Affiliation:

Subject: Comments on Commercial Water Craft Proposal

Comment:

My history 56 year CA Resident. Many of my family, 2 sons 4 grandchildren participate in sport fishing

- 1 Major economic impact to CA and fees to participate in sportfishing. 3098.1
2. I understand the need for clean air , common sense approach would be to attack big city work traffic. Electric and commercial transit is necessary in these areas. There are not that many sport fishing boats to drive this drastic change. 3098.2
3. This may drive many of these boats to fly the Mexican Flag. Big impact to the SD and LA tourist trade. 3098.3
4. As technology becomes available develop a affordable plan to phase cleaner propulsion concepts.
5. City, state and Fed government needs to reduce citizens cost not use cost to control citizen activity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 10:00:34

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First Name: Omar
Last Name: perez
Email Address: tactiks07@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

As a fisherman for many years learning from my mentors and family sportfishing isn't just a past time and it goes beyond that, from families providing a service to explore the sea and obtain fresh food to provide for one's family is a great sense of accomplishment and part of survival.. demanding these regulations so abruptly is like stealing a meal from great multi generational Americans that are simply making a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 10:19:57

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Comment Log Display

Below is the comment you selected to display. Comment 3100 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: michael
Last Name: bonifazi
Email Address: michael92284@yahoo.com
Affiliation: Allbright Restoration Services

Subject: saving our sportfisher

Comment:

It may sound simple, but having to pay for new boats would be impossible for most small business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 10:24:32

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Below is the comment you selected to display. Comment 3101 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: greg
Last Name: smith
Email Address: cactusboy99@yahoo.com
Affiliation:

Subject: law change

Comment:

This will hurt the industry and cost jobs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 10:33:18

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Comment Log Display

Below is the comment you selected to display. Comment 3102 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Bob
Last Name: Mackie
Email Address: bob_mackie@live.com
Affiliation:

Subject: New CARB Regulations on fishing vessels

Comment:

I understand the need to enforce air quality standards but feel that the focus on the Sportfishing fleet at this time may have a detrimental impact on an industry already hammered by the pandemic.	3102.1
The Sportfishing fleet can be looked at as an efficient, safe platform where multiple enthusiasts can participate in an activity that otherwise may involve multiple private owned vessels that collectively may create worse environmental harm and be tougher to regulate. Additionally, the Sportfishing fleet provides access to disadvantaged enthusiasts that may not otherwise have the resources to participate in offshore fishing. If as stated by the industry, ticket prices are likely to increase threefold,,I would purchase a vessel or fish less. I would be concerned about seniors and others who would lack the resources to be out in the water. I consider the service provided by the Sportfishing fleet to be one of the great equalizers of society where all can participate and see humankind all collectively having a good time. I consider my party boat Sportfishing to be therapeutic, my "Church of the Pacific" and ask that the intangible benefits to society be considered.	3102.2 3102.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 10:29:03

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**Below is the comment you selected to display.
Comment 3103 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Prasanna
Last Name: Colluru
Email Address: prasanna@futureproofshipping.com
Affiliation:

Subject: Harbour Craft Regulation
Comment:
Attached letter

Attachment: www.arb.ca.gov/lists/com-attach/3522-chc2021-BmVSNVAjAzlCW110.pdf

Original File Name: CARB_FPS.pdf

Date and Time Comment Was Submitted: 2021-11-15 10:59:24

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November 15, 2021

Liane Randolph, Chair

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Need for Stronger CARB's Commercial Harbor Craft Rule

Dear Chair Randolph,

We are writing to comment on CARB's proposed Commercial Harbor Craft Rule – we would like to urge CARB to set a 100% zero-emissions deadline for all vessel segments of the Commercial Harbor Craft by 2035.

Based in the Netherlands, Future Proof Shipping (FPS) offers zero-emissions marine transportation services to enable players across the value chain make the transition to zero-emissions. We are connecting and enabling the entire maritime and green energy value chain, starting with logistics service providers and cargo owners that are ready to take the lead.

We are now in the process of developing a zero-emissions inland container vessel that will carry container cargo between Rotterdam (NL) and Belgium. We have recently secured a recommendation from the European authorities permitting the use of hydrogen as a fuel for propulsion and power supply on board the vessel. Once the retrofit of the Maas is completed later this year, the vessel will continue to ship container cargo between Rotterdam and Antwerp and is expected to reduce greenhouse gas emissions by 2000 CO₂e tonnes annually.

We are building our own fleet of zero-emissions inland and short-sea vessels, which we offer for charter. By 2025, our ambition is to have sailing or in development, a fleet of 10 zero emission vessels inland and short-sea vessels.

We are witnessing a fast-evolving global technological shift that requires more integrated approaches enabling alternative fuels, wind and solar energy, renewable hydrogen, fuel-cell technologies, zero emission dockyards, and many more, to overcome the evidence-based expected ecological catastrophe.

Rules and regulations have a key role to play in enabling technology deployment, and de-risking projects to make them bankable, which in turn, is key to scale and ultimately, commercial viability. The draft rule as written does not go far enough in ambition or technology forcing. The rule does not reduce greenhouse gas emissions at the magnitude or pace required, and risks creating a stranded asset scenario for harbor craft owners who may pay to retrofit to Tier 3 and 4 engines only to be forced to make a full zero-emission transition in just a few years afterwards.

For the marine sector, we believe that a strong but achievable standard would be that all harbor craft operating in the state must be zero emission by 2035. What we need now to drive uptake are strong market accelerating policies, including incentives and funding mechanisms.

We would be happy to discuss our zero-emissions solutions further with you.

Yours sincerely,



Prasanna Colluru

Director of Corporate Strategy

Future Proof Shipping B.V.

cc:

CARB Board members

Secretary Jared Blumenfeld, CalEPA



Comment Log Display

Below is the comment you selected to display. Comment 3104 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Habieb
Last Name: Fakhoury
Email Address: mr.sneeb@gmail.com
Affiliation:

Subject: please save sportfishing and whale watching boats

Comment:

Hello, I am sure you have received a number of these emails but this is VERY important to us. IF the boats have to go ahead and make these changes to be able conform to the rules being mandated then most of them will go out of business which in turn will kill the fishing fleet that has been in San Diego and been enjoyed by generations for decades since the 1950's. San Diego is literally one of the busiest ports in regards to sport fishing, it is the southernmost launch ramp with a direct course into Mexico. Please don't make them do what CARB is trying to make them do, this will make ticket prices untouchable by those with regular incomes. Thanks for your time and have a great day, Habieb

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:00:16

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Comment Log Display

Below is the comment you selected to display. Comment 3105 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Hoffman
Email Address: mhoffman@goldengate.org
Affiliation: Golden Gate Ferry

Subject: Golden Gate District Comments on CHC2021

Comment:

I will also submit our comments by email to the Clerk of the Board.

Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/3524-chc2021-B2QBbwNhVloLbAZr.pdf

Original File Name: CHC AMMENDMENTS DISTRICT COMMENTS.pdf

Date and Time Comment Was Submitted: 2021-11-15 11:05:27

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November 15, 2021

California Air Resources Board
1001 "T" Street
Sacramento, CA 95814

Subject: Comments on board item CHC2021, Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Members of the Board:

Thank you for considering public comments on the proposed amendments to the commercial harbor craft regulation. The Golden Gate Bridge, Highway and Transportation District (District) has, in anticipation of this regulation, contracted with four independent naval architecture firms to complete feasibility studies for the entirety of the District's seven vessel fleet. These studies identified significant barriers to the repowering of the District's catamaran passenger vessels with a propulsion package meeting or exceeding the intent of the proposed regulation.

Under the proposed new regulation, the District's fleet of seven ferry vessels will have compliance years ranging from 2022 to 2027. Repowering three vessels and replacing four vessels over this five-year timeframe risks significant interruption to the District's public ferry services. The District will be forced to balance biennial regulatory dry dockings, unplanned dry dockings, and vessels removed from service for repower while still maintaining the same level of public ferry services necessary to remove congestion on the Highway 101 corridor. 3105.1

California Air Resource Board (CARB) should recognize the size and complexity of the District's CARB Compliance Project. The District is budgeting \$154,220,000 for the CARB Compliance Project. The project will replace four catamaran passenger vessels and repower three Spaulding class monohull passenger vessels, as necessary, to meet the requirements of the amended regulation. This project represents 53% of the estimated statewide cost, \$287,827,581, for monohull and catamaran ferries as outlined in CARB's Cost Analysis Workbook ISOR. Considering the aforementioned, the District suggests that CARB revise the proposed regulation to include the following: 3105.2

1. Include language in subsection (e)(12)(E)5 to allow for a 2-year scheduling extension for public ferry agencies required to replace multiple vessels in the same or subsequent year(s).

2. Include language in section (f), Alternative Control of Emissions (ACE), clarifying that the Executive Officer (E.O.) has the authority under the proposed regulation to determine eligibility for a public agency's fleet compliance plan if the agency demonstrates a strategy that meets the intent of the regulation before the year 2033. The regulation 3105.3

should provide the E.O. with the flexibility to approve ACE plans that demonstrate a continual effort to achieve emissions reductions through construction projects that repower or replace existing vessels.

The first suggestion will allow for a staggered replacement of ferry vessels by public agencies with multiple vessels. Without such flexibility, the District's compliance with the proposed regulation will result in significant disruptions to ongoing public ferry services in the Bay Area. The proposed 2-year extension will help the District maintain its current level of public ferry services while balancing construction projects with vessel down time caused by the maintenance required by regulation.

The second suggestion allows for public transit agencies like the District to submit a plan that meets the intent of the regulation. Federal Transit Agency (FTA) funds for replacing an existing vessel are available only after a vessel has reached the end of its useful life—ordinarily defined as after 25 years. The District suggests that CARB clarify the proposed regulation to ensure that, in approving an ACE plan, the E.O. may allow public ferry agencies like the District to achieve the emissions reductions called for in the proposed regulation without sacrificing funding sources critical to providing public transit.

The District appreciates the opportunity to comment on Board item CHC2021, Proposed Amendments to the Commercial Harbor Craft Regulation, and shares CARB's commitment to further reduce pollution from commercial harbor craft. The District asks that CARB consider these suggestions prior to adopting the proposed amendments.

Sincerely,

Michael S. Hoffman
Director, Engineering and Maintenance
Ferry Division

cc: James Swindler, Deputy General Manager, Ferry Division
Denis Mulligan, General Manager



Comment Log Display

Below is the comment you selected to display. Comment 3106 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paula
Last Name: Forbis
Email Address: Paula.Forbis@sdapcd.org
Affiliation:

Subject: Commercial Harbor Craft Rule
Comment:
Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/3525-chc2021-VzQGbwBsVWsKaVIg.pdf

Original File Name: Commercial Harbor Craft Regulation. SDAPCD Comment Letter.pdf

Date and Time Comment Was Submitted: 2021-11-15 11:12:36

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San Diego County Air Pollution Control District

November 15, 2021

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Supervisors Representative*

Esther Sanchez, Vice Chair
*District 5 Representative
Mayor, City of Oceanside*

Nathan Fletcher, Military Liaison
*San Diego County Board of
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Anne Marie Birkbeck-Garcia
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Physician/Public Health*

Marcus Bush
*District 1 Representative
Councilmember, City of National City*

Georgette Gomez
*Public Member
Environmental Justice*

Consuelo Martinez
*District 3 Representative
Councilmember, City of Escondido*

Enrique Medina
*Public Member
Scientific/Technical*

Sean Elo-Rivera
*District 4 Representative
Councilmember, City of San Diego*

Jack Shu
*District 2 Representative
Councilmember, City of La Mesa*

Stephen Whitburn
*City of San Diego Representative
Councilmember, City of San Diego*

Mr. Richard Corey
Executive Officer
California Air Resources Board
P.O. Box 2815, Sacramento CA 95812
Via web portal: <https://www.arb.ca.gov/>

Re: Commercial Harbor Craft Regulation Changes - Support

Dear Mr. Corey,

This letter is to express the San Diego County Air Pollution Control District's (District) support for the adoption of the proposed changes to the Commercial Harbor Craft (CHC) regulation. California Air Resources Board (CARB) staff estimates that the proposed amendments will achieve an 89% reduction in NOx emissions and a 52% reduction in PM2.5 emissions from CHC vessels statewide at full implementation. These emission reductions would result in health benefits for individuals in San Diego County by reducing the incidence of premature death, hospital admissions, and emergency room visits. The proposed amendments will also result in reduced greenhouse gas emissions compared to the current regulation.

The CHC regulation is a key piece of the District's strategy to achieve clean air for all, especially in the Portside Environmental Justice Community. The Portside Community has an exposure risk to diesel particulate matter (DPM) greater than 95 percent of census tracts statewide, according to CalEnviroScreen 3.0, and four of the census tracts in the community are in the 99th percentile for DPM. The recently approved Portside Community Emissions Reduction Plan (CERP) identifies CHC as one of the main contributors of DPM emissions in the community, at 53% of off-road mobile source emissions. The CHC regulation would support the CERP's actions and goals to reduce DPM emissions in this environmental justice community.

Over the past twelve years, the District has provided over \$14 million in incentive funding to repower more than 190 marine engines to achieve early emission reductions ahead of existing regulatory requirements through its implementation of existing incentive programs such as Carl Moyer and the Community Air Protection Program. However, given the timelines and requirements of these proposed amendments, these incentive opportunities

3106.1

will be very limited in the future, and as such, the financial costs of compliance with this regulation will likely fall to the CHC owners. While it will be difficult for the District to provide substantial assistance to local harbor craft owners or facility owners through the existing incentive programs, the District plans to continue to work with vessel owners to provide incentives for early or extra emission reductions where feasible.

Finally, the District and CARB are currently developing a Memorandum of Understanding (MOU) to provide the District with authority to enforce the CHC regulations. This initiative aligns with the strategies established under the Portside CERP as the CHC regulation is designed to reduce DPM and nitrogen oxide emissions generated from CHC. The proposed MOU can increase compliance rates by expanding the District's presence in the field and promoting local outreach efforts.

3106.2

The District supports the adoption of the proposed changes to the CHC regulation and looks forward to working in cooperation with CARB to further reduce emissions in the San Diego region.

3106.3

Sincerely,

Paula Forbis, Interim Air Pollution Control Officer
San Diego County Air Pollution Control District



Comment Log Display

Below is the comment you selected to display. Comment 3107 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Kathleen
Last Name: A. Reyes
Email Address: reyesgarden@sbcglobal.net
Affiliation: Customer

Subject: CHC2021

Comment:

This is absolutely ridiculous! To put this kind of cost on 174 fishermen, trying to make a living. The amount of "smog" they create is minimal, compared to street traffic and manufacturing. STOP now, and allow them to phase in new equipment overall 10 -15 year time frame. These people are NOT the problem here, and we who enjoy our time on the water (fishing, whale watching, etc) cannot afford the high cost that would be passed on to us!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:09:30

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Below is the comment you selected to display. Comment 3108 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leonardo
Last Name: Antunez
Email Address: Leonardoantunez@ymail.com
Affiliation:

Subject: Sportsfishing and Whale watching

Comment:

As it some of us can barely afford to go on boats. By the CARB making the boats buy new boats it would tripple to quadruple the price of tickets. By passing this bill your are in a way violating our rights to fishing under the california constitution. We are asking that you take into consideration the future of fishing for our kin.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:28:55

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Below is the comment you selected to display. Comment 3109 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Grant
Email Address: sgrant8@ca.rr.com
Affiliation:

Subject: OPEN PARTY FISHING BOATS

Comment:

Dear Legislature:

These boats carrying anglers on "open party" trips are historic and an integral part of the history of SoCal Fishing. ■ And most would be affected by changes in emission and fuel efficiency standards now being considered in the legislature and other agencies.

3109.1

Big Game Fishing was invented off the coast of California and these boats (as fuel inefficient and/or polluting as they may be) are nonetheless iconic and should be allowed to operate until no longer safe. ■ A exception and/or exemption to these boats should be mandated as part of any new regulations. ■ Or perhaps extend their compliance to retrofit to 25 years. ■ By then, I would hazard a guess that these boats may no longer be seaworthy. ■ But from what I understand, an approval process (through application) could be created to be exempted from the new regulations. ■ And what I am suggesting affects probably less than 200 small family owned businesses.

As for the boats, Granddads have now taken their Grandkids on these boats once like their parents took them back in the 1960s. ■ These boats have character and represent a grand tradition of angling. Combat fishing as it is sometimes called.

It is the smell of the galley, the smell of the bunks, the dings and scratches of the deck rails, the layout, the architecture, that is what makes these boats unique and an integral heritage of the Southern California.

Of course, newer boats will be better for the environment but sometimes there must be consideration given to the generations of fishing these boats represent. ■ Many of these boats will be retired in due course so there really is no need to shut off their heritage

now due to environmental concerns.

Plus, the reason these boats have existed is to provide an inexpensive, fun atmosphere, learning and cultural experience and if they have to retrofit (assuming that is even possible), the patrons will be forced to pay way too much money for the experience.

3109.2

Open party boat Fishing is cheap and it should stay that way so that all members of the community can afford it. ■ That is what makes these boats so enjoyable as there is a true cross cultural and socio-economic diverse group of anglers who for one day, or one trip have to work together to land their big fish!!!

Their lines may cross that day and their paths may never cross again but if these boats disappear for environmental considerations, I suspect the opportunity for people of different ages, races, religions, etc. to interact will have one less opportunity to learn from each other while sharing the common love of the thrill of catch.

Just thoughts.
Thanks for listening.
Scott Grant

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:05:15

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Below is the comment you selected to display. Comment 3110 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Carnes
Email Address: scarnes@dc.rr.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

Hello,

This group of individuals (Commercial Boat Owners) is so small that I believe that by putting them out of business or making them re tool their boats or making them buy new boats, is really NOT going to solve the air pollution or ozone problems! It might help the problem, but is it worth ruining the lives of these people? If you decide Yes, may I suggest that the State of California in some way properly compensate the boat owners or offer them extremely low interest rate loans to either re tool their boats or to buy new ones!

Thank you for your consideration in this matter!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 11:36:28

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Below is the comment you selected to display. Comment 3111 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: George
Last Name: Faircloth
Email Address: condecuno1@aol.com
Affiliation: Angler

Subject: Ban on diesel fishy party boats

Comment:

I hope that you consider a delay in the implementation of the ban on diesel boats. This will need a longer transition time to insure that a more cost effective technology can be implement in a fashion that does no destroy this industry which contributes greatly to local economies around the state. It will surly reduce the amount of fishing licenses sold in this state which will require California to find other financial sources to pay for the protection of the ocean resources. Expecting the public to pick up the cost of a new fleet of sports fishing boats will greatly reduce the numbers of paying fisherman as the cost for just a half day trip is over \$60.00. I am 71. As a young man in the early 1970's I could go out for \$5.50.

For the general public this will be seen as government just restricting their lives even more.

If the State insists on doing this It would only be fair if it shoulders the bulk of the financial burden on this. How about using fishing license revenue (which you will be loosing any ways) to finance it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:10:14

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Below is the comment you selected to display. Comment 3112 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: MICHELE
Last Name: Cagliostro
Email Address: scumbago@aol.com
Affiliation: none

Subject: CARB and Sportfishing

Comment:

These mandates must at the very least be a future goal so boatowners can have a chance to prepare for such a giant expense. Proceeding as planned will kill the industry and thousands of families.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:26:01

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Below is the comment you selected to display. Comment 3113 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Sandy
Last Name: Naranjo
Email Address: snaranjo@portofsandiego.org
Affiliation: Port of San Diego

Subject: Harbor Craft Rule to Reduce Port Pollution

Comment:

Dear California Air Resources Board:

Harbor craft, such as tugboats, ferries, barges and dredges, contribute to a increased health and cancer risks to millions of Californians near the ports and beyond. I am signing my name to support strengthening the Commercial Harbor Craft Regulation ("CHC") for cleaner air. Harbor craft, many of them old and polluting, emit a toxic brew of diesel particulate matter. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

3113.1

I join fellow public officials to end the continued emissions from harbor craft across the state of California. This proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents nearby our harbors and beyond. This rule avoids 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from air quality experts at the California Air Resources Board. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I'm asking you to strengthen the Commercial Harbor Craft rule:

1. Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories.

2. Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035.

3. Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions

3113.2

4. Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation

3113.3

Let's keep California on a path towards innovation and clean air.

Sincerely
Port Commissioner Sandy Naranjo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:36:47

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**Below is the comment you selected to display.
Comment 3114 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jerry
Last Name: Porter
Email Address: mporter759@aol.com
Affiliation:

Subject: Save Sport Fishing

Comment:

Please don't take my local fishing away, I can't afford a boat of my own.
Thanks,
Jerry Porter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:45:52

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Below is the comment you selected to display. Comment 3115 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: charles
Last Name: robinson
Email Address: yowie1@verizon.net
Affiliation:

Subject: Commerical Harbor Craft Reg.

Comment:

This regulation you are putting forward means the end of commerical sport fishing for the people of California. There is to much regulation of outdoor sports already. People are leaving this state at alarming rates and so are jobs. DO NOT PASS THIS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 12:51:52

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Below is the comment you selected to display. Comment 3116 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Matt
Last Name: Holmes
Email Address: matt@littlemanila.org
Affiliation: Little Manila Rising

Subject: Commercial Harbor Craft

Comment:

Require a 100% zero-emission transition for more harbor craft segments by 2035. Allowing ferries, tugboats, dredges and barges, to stay on diesel under the proposal as currently written will continue to contribute huge levels of local pollution in communities like Stockton where we are already overburdened with Stationary Pollution source like those shown in the attached image.

Stop Planning to Pollute us when there's an alternative at hand.

Attachment: www.arb.ca.gov/lists/com-attach/3536-chc2021-UCNdOFwvAjQLaFU7.png

Original File Name: Screenshot 2021-11-15 130201.png

Date and Time Comment Was Submitted: 2021-11-15 13:00:42

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Comment 3117 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name	Arthur
Last Name	Mead
Email Address	art.mead@crowley.com
Affiliation	Crowley
Subject	Proposed Amendments to the Commercial Harbor Craft Regulation
Comment	<div style="border: 1px solid black; padding: 5px;">Please find attached comments to chc2021 on behalf of Crowley Maritime Corporation.</div>
Attachment	www.arb.ca.gov/lists/com-attach/3537-chc2021-AjBTZVRnUjAEMwk4.pdf
Original File Name	20211115CARBCHCLetter(FinalSigned).pdf
Date and Time Comment Was Submitted	2021-11-15 13:15:10

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Monday, November 15, 2021

By E-Mail and by Electronic Submittal

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Sacramento, CA 95814
(<https://www.arb.ca.gov/lispub/comm/bclist.php>)

**Re: Proposed Amendments to the
Commercial Harbor Craft Regulation**

California Air Resources Board,

On behalf of Crowley Maritime Corporation and its affiliates ("Crowley"), thank you for the opportunity to comment to the California Air Resources Board ("CARB") regarding the Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation, specifically the Airborne Toxic Control Measure for Commercial Harbor Craft (Section 93118.5).

Crowley applauds CARB's continuing leadership in the stewardship of California's air quality, and expresses its appreciation for CARB's recognition that the U.S. domestic maritime industry, of which Crowley is a leader, plays a substantial role supporting the economies of West Coast states, including California, and the livelihood of their citizens.

I. Summary of Crowley's Position

Crowley is grateful that CARB has chosen to engage with us to achieve a solution that recognizes the unique nature of articulated tug barges (ATBs). Crowley seeks to continue this active dialogue in the hope of achieving cost-effective solutions that will both lower emissions and enable Crowley's ATB fleet to continue to serve California.

The proposed amended CHC Regulation continues to fail to address the unique nature of ATBs. Unless Crowley is able to use an Alternative Control of Emissions ("ACE") plan, the engine retrofit and replacement requirements of the proposed CHC Regulation would render Crowley's ATBs uneconomical to operate in California.

3117.1

This would substantially disrupt interstate commerce by forcing the trade of current and future liquid energy products in, and to and from, California's ports to use oil tankers that are less flexible. It would also render such energy transportation more expensive.

Crowley welcomes the proposed amendments' embrace of alternative compliance pathways, but the guidance they give on appropriate ACE plans do not allow for meaningful alternatives for Crowley's fleet of ATBs. The regulations need to be further refined to ensure more flexibility for compliance as to ACE plans.

3117.2

Above all, Crowley urges CARB to work with Crowley to design, approve, and deploy alternative compliance pathways to include those discussed herein.

II. Standing and CARB's Recognition of the Unique Nature of ATBs

A. Crowley's Background and Standing to Provide This Comment

Crowley owns and operates a diverse fleet of ocean-going vessels and harbor tugboats and offers a wide range of environmentally safe and reliable transportation options to meet many commercial and government customer requirements. As CARB is aware, Crowley is the largest independent operator of American-owned and -operated Jones Act-compliant vessels, which include ATBs, tugboats, and self-propelled tank vessels. Indeed, Crowley is the largest employer of coastal and deep-sea mariners in the United States.

Founded in San Francisco in 1892, Crowley-affiliated companies operate harbor, coastal and oceangoing cargo vessels that are either based in, or regularly call at, California ports. Crowley's California operations have helped to drive the Golden State's economy forward for the past 130 years. As one of the oldest operators of vessels in California waters, Crowley has a unique perspective and expertise serving the needs of Californians from Crescent City to San Diego.

Crowley has demonstrated safe, reliable, and environmentally-conscious operation of tankers and ATBs. Above all, we have shown an ongoing commitment to sustainable transportation solutions.

For example, Crowley invested \$18 million to build the first zero-emissions electric tug in the United States. The e-tug will operate at the Port of San Diego's Tenth Avenue Marine Terminal and will be operational by mid-2023. Over the first 10 years of its use, the e-tug's operation will, versus a conventional tug, reduce 178 tons of nitrogen oxide, 2.5 tons of diesel particulate matter, and 3,100 metric tons of carbon dioxide. Furthermore, this

innovating vessel will eliminate the need for the fuel required of a traditional tug - 30,000 gallons (114,000 liters) of diesel every year. The e-tug project is also an example of Crowley's collaborative partnerships with a broad array of stakeholders, including the West Coast Collaborative, DERA, MARAD, the San Diego County APCD, and CARB, in the pursuit of commercially-viable solutions to the current climate and air quality crises. The e-tug, the eWolf, will act as a beacon of transformation across American ports, reducing both greenhouse gas (GHG) and other air emissions (e.g., PM_{2.5}, PM₁₀, NO_x, SO_x) that have had an adverse impact on communities and ecosystems proximate to United States port infrastructure.

The development of this future-focused technology is not just an example of what is possible: it represents the next generation of clean-tech assets that will be deployed to Californian and American ports over the coming decade. We must ensure that California's regulatory framework enhances, and does not risk impeding, these important innovations.

We submit that, because of Crowley's extensive experience with vessel operations across a broad range of vessel types, and the direct implication of the proposed regulation, Crowley is uniquely qualified to submit these comments to CARB. Crowley respectfully asks that CARB take note of its serious concerns about the proposed CHC Regulation.

B. Crowley's ATBs

Over many years, Crowley has proven itself to be an innovator and leader in high-risk bulk liquid energy cargo transportation through the development of an unrivaled ATB fleet that includes the newest and most sophisticated United States-flagged vessels. Crowley's fleet of ATBs range in size from 14,600 deadweight tons (DWT) to 45,000 DWT; our ATBs safely and reliably carry bulk liquid throughout the United States East, Gulf and West Coasts, including Alaska, as well as international ports.

Crowley's fleet of ATBs are one of the keys to unlocking the energy transition in the state of California for our future energy needs, to include bio, renewable, and synthetic energies that will be used to transition other industries away from conventional fossil fuels.

Crowley operates seven of the nine ATBs currently operating on the U.S. West Coast: three 550 Class ATBs (e.g., Sea Reliance/550-1, Sound Reliance/550-2, and Ocean Reliance/550-3), three 650 Class ATBs (e.g., Vision/650-10, Gulf Reliance/650-2 and Commitment/650-6, and a newer ATB (e.g., The Aveogan/Oliver Leavitt) that is currently operated primarily in the Alaska market.

The 550 Class ATBs were developed and designed specifically for West Coast operations and weather conditions, with advanced safety features, such as double hulls, segregated ballast, and radar gauging systems. The 550 Class ATBs have a capacity of 155,000 barrels at 96% capacity and are designed to carry liquid energy products in bulk, providing maximum cargo flexibility. In addition, the 550 Class ATBs include several innovative safety features that make operations in California more efficient, reliable, and environmentally conscious.

The three 650 Class ATBs are part of a fleet of ten 650 Class vessels. Each 650 Class ATB has a capacity of 178,000 barrels at 96% capacity. The 650 Class ATBs have a proven design for full ocean service, coupled with systems that enable multiple trading capabilities, to allow for use in the U.S. Gulf to West Coast, and West Coast trades. The 650 Class ATBs are designed to carry liquid energy products in bulk, and heated cargoes to provide maximum cargo flexibility.

Crowley's ATBs feature other safety features, including a cargo pump in each of the 14 cargo tanks to assure maximum cargo integrity and fuel segregation flexibility.

C. History of the Regulation and the Recognition of the Unique Nature of ATBs

Crowley has been actively engaged with CARB, especially over the past 2½ years, to address the unique nature of ATBs. The focus of these discussions has been what Crowley sees as CARB's misapprehension of the nature of ATB operations, which has resulted in their being covered by what Crowley respectfully submits is the wrong regulatory scheme.

3117.3

The initial phase of the CHC regulations issued in 2007, and their 2010 amendments, chose to include ATBs within the definition of "commercial harbor craft", despite the fact that, especially from an operational perspective, it made, and makes, no practical sense to do so.

ATBs do not operate like traditional harbor craft. The operational profile of larger ATBs, as employed in Crowley's fleet, is equivalent to that of self-propelled ocean-going tank vessels (Medium Range "MR" Tankers). As Crowley has demonstrated in its prior submissions to and discussions with CARB, ATBs are ocean-going tank vessels. Unlike harbor craft, ATBs do not operate predominantly in California ports and harbors. The operational profile of ATBs, when in California to load or discharge cargoes, bears no resemblance to the operations of harbor tugs.

When the revisions of the 2007 Ocean-Going Vessels At Berth Regulation (At Berth Regulation) were proposed in 2019, an opportunity arose for CARB to recognize the anomaly of regulating ATBs as if they were harbor craft, and to include ATBs in the At Berth

Regulation, so that they could be regulated in the same way as other ocean-going tank vessels. Since at least as early as the spring of 2019, Crowley has made clear, in both its public comments and its informal discussions with CARB Staff and Board Members, that the exclusion of ATBs from the At Berth Regulation would be a serious mistake, based on a misconception of the nature of ATBs and their operation, and that this regulatory error should and could be rectified through amendment of the At Berth Regulation to include ATBs, like other ocean-going tank vessels.

Unfortunately, CARB did not rectify this error and did not include ATBs in the At Berth Regulation.

Instead, CARB resolved to recognize **the unique nature of ATBs** in these proposed amendments to the CHC Regulation. On August 27, 2020, CARB adopted Resolution 20-22, which included the following:

BE IT FURTHER RESOLVED that the Board directs staff to continue to engage the articulated tug barge (ATB) industry to determine the best options for cost-effective emission reductions that recognize the unique nature of ATBs as CARB updates the commercial harbor craft regulation.

In the context of the current CHC Regulation amendments, the resolution directed CARB Staff to address the unique nature of ATBs, and to focus on achieving emissions reductions that are cost-effective for ATBs.

III Crowley's Response

Crowley is grateful for the opportunity to collaborate and work with CARB on this issue of such great importance to the environment, the industry and to the people of California. Our experts have spoken to David Quiros, Heather Arias and others at CARB over a sustained period of time, and we thank CARB for the opportunity to do so. Crowley's response incorporates and is intended to supplement the relevant comments and response of The American Waterway Operators (AWO).

A. Without Meaningful Alternative Compliance Pathways, Compliance with the Regulation is Not Commercially Feasible for Crowley's ATBs

(i) The Engine Retrofit/Replacement Proposal

The proposed CHC Regulation Amendments confirm that ATBs are covered by the regulation commencing in January 1, 2023 (§93118.5(b)(4) and that ATBs are to be included in the definition of "regulated in-use vessels" to which the engine compliance mandate applies. §93118.5(e)(6.1). The Regulation would effectively require that ATB owners or operators replace every in-use engine on an ATB with a Tier 3 or Tier 4 engine that meets CARB performance standards, which are likely to include diesel particulate filters (DPF).

(ii) Cost of Retrofit

Crowley estimates that a retrofit of the engines on its ATB fleet to comply with these requirements would be around **\$9.55M** per 550-class ATB (150,000 bbl. capacity) and about **\$8.75M** per 650-class ATB (180,000 bbl. capacity).

On a fleet-wide basis, the retrofit cost is estimated to be **\$38.2M** for the 550 fleet, and **\$87.5M** for the 650 fleet, a total of **\$125.7M**.

(iii) Cost of Replacement

The cost of replacing new engines in the vessels, to comply with the mandate of the proposed CHC Regulation Amendments, would be even higher.

Crowley estimates that the replacement cost for the 550-class ATBs would be **\$90M** per vessel or **\$360M** for the entire 550-class Crowley fleet. Crowley estimates that the replacement cost for the 650-class ATBs would be **\$105M** per vessel or **\$1,050M** for the entire 650-class Crowley fleet.

3117.4

Were Crowley to replace the vessels in its ATB fleet to comply with the requirements of the proposed CHC Regulation Amendments, the total estimated cost would be **\$1,410M**.

(iv) DPF Technology

At this point, it is highly questionable if DPF technology can be installed with Tier 3 or Tier 4 engines in a technically-feasible or safe manner. Although DPF devices have been used on trucks, albeit with some serious consequences such as fire danger, there is no indication that DPFs can be used on large marine engines, or that it would be safe to do so.

3117.5

(v) Effect of the Engine Regulation: Driving Crowley's ATBs from California

As demonstrated above, neither an engine retrofit nor the replacement of the vessels in the Crowley ATB fleet would be cost-effective or commercially feasible. Absent the ability to comply with the emissions reduction requirements through alternative compliance pathways, the effect of these proposed CHC Regulation Amendments, as they are currently proposed, will therefore likely be that Crowley can no longer operate its ATB fleet in California. Given the flexible, safe, efficient and cost-effective transportation option provided by ATBs, the CHC Regulation's effect of removing Crowley's ATB fleet from California would have a potentially far-reaching impact for Californians.

3117.6

If the interstate clean petroleum product and emerging, new liquid energy trade, with California no longer has the option to use ATBs, it would instead be forced to charter MR Tankers to carry such products to and from California ports. ATBs of more than 120,000 bbl. capacity are the functional equivalent of MR Tankers and are, therefore, relatively interchangeable with those vessels in operational markets. MR Tankers are not proposed to be regulated under this current rulemaking because they must comply with CARB's previous At Berth Regulation.

The proposed amended CHC Regulation would therefore not have its intended beneficial effect on California emissions. Should the CHC Regulation be issued as proposed, without addressing a meaningful ACE for ATBs, ATBs will be displaced on the West Coast with MR Tankers enjoying a lower regulatory threshold and having the perverse result of increasing the carbon intensity, particulate matter and GHG discharges for the equivalent of liquid energy cargo carried in and to and from California ports into the future.

This would also have a substantial adverse impact on interstate commerce and is contrary to what this rule was designed to accomplish in terms of environmental justices and health benefits to the people of California.

Regulating ATBs as harbor craft is inconsistent with the federal regulatory scheme and regulations of other jurisdictions. Crowley ATBs operate at multiple ports of call across the United States and internationally. They are regulated as ocean-going vessels under numerous applicable regulations, subjecting them to domestic and international emission and engineering control specifications. If regulated as harbor craft under the proposed CHC Regulation, ATBs and self-propelled tank vessels will face significantly different emissions control requirements in California, despite performing the same function elsewhere and regulated as oceangoing vessels, as is their MR Tanker competition. This would be neither rational nor fair commercially, because self-propelled bulk liquid tankers

- many of which fly foreign flags of convenience to escape many of the requirements of U.S. environmental and regulations - are ATBs' competition in interstate and international commerce and regulated under the CARB At Berth Regulation.

C. Alternative Compliance Pathways: In General

3117.7

Under the circumstances, the feasibility of the alternative compliance pathways under the proposed CHC regulation is crucial to the continuing operation of Crowley's ATBs in California. In our view, identifying broad ranging, flexible and workable alternative compliance pathways is the only cost-effective option for ATB's, and is consistent with Resolution 20-22's direction to CARB to **recognize the unique nature of ATBs.**

Crowley appreciates the attention that CARB staff have applied to the option of alternative compliance pathways ("ACP"), as set forth in the proposed Section 93118.5(f).

We also acknowledge that because the Alternative Control of Emissions ("ACE") plans are necessarily specific to the applicant's fleet and operations, their consideration and approval by CARB's Executive Officer (EO) will be based on a plan-by-plan basis, so that the Regulation is necessarily general when it comes to ACE plans.

However, Crowley believes that the ACP provisions of the proposed Regulation could benefit from more specificity and more clarity. This will enable owners and operators like Crowley better guidance on designing ACE plans.

Crowley has begun preliminary work on preparing its ACE plan in order to achieve equal or greater emission reductions than Crowley's Normal Compliance Baseline. In this context, Crowley, with the support of Starcrest Consulting Group LLC, has modeled the emissions associated with Crowley's fleet of ATBs. We would be pleased to share that data with CARB to illustrate the issues Crowley anticipates in designing an effective ACE plan.

One of the main questions raised by the Section 93118.5(f)(E) requirements for alternative emission control strategies (AECS) concerns fleet averaging. The definition of "fleet" in the proposed regulation is,

"the total number of harbor craft owned, rented, or leased by an owner or operator in an air district or distinct locale within Regulated California Waters; or, the statewide population of a specific vessel type. On and after January 1, 2023, "fleet" also includes chartered harbor craft and extends to harbor craft in an air basin".

As that definition applies to Crowley and its diverse fleet of ocean-going vessels, including ATBs, and harbor tugboats, operating in California, this definition is unclear.

Crowley submits that it would be more consistent with the overall intent of the CHC regulation for the definition of “fleet”, in the context of fleet averaging, to broadly include the statewide population of all vessels included within CARB’s definition of “Harbor Craft”. Moreover, given the diverse nature of Crowley’s operations, we would propose that, for the purpose of “fleet averaging”, all of Crowley’s affiliates be included within the definition of owner or operator.

D. Alternative Compliance Pathways; AECS Options

Crowley submits that there should be no requirement that an approved AECS should involve a “combination” of two or more of the examples listed in Section 93118.5(f)(1)(E). The focus of the ACE plan should be on achieving a reduction in emissions that is equal to or greater than that achieved through an engine retrofit or replacement. To require that the AECS must combine one or more strategies is unnecessary and unduly restrictive.

3117.8

Crowley also submits that Section 93118.5(f)(1)(E) would benefit from including more specific examples, so that owners and operators are better informed about how the EO will approach the approval process for an ACE plan and add to the equitable and consistent implementation of the rule.

Specifically, Crowley submits that the following could be included in Section 93118.5(f)(1)(E) as examples of alternative emission control strategies.

- Funding of accelerated conversion of cargo handling equipment used at marine terminals and ports in communities affected by the fleet’s operations. This will achieve the goal of the regulation to reduce emissions for those affected by the operations of the applicant’s harbor craft, but would be more economically-efficient than other options.
- Funding of the acceleration of the conversion of drayage trucks that operate out of California’s ports from diesel to alternative energies, to achieve demonstrated emissions benefits.
- Funding the expansion of shore-side port infrastructure for cold ironing and other EV uses; including the investing in roll-on-dock containerized clean power solutions that can accelerate the pace of shore-power deployment.

- Coordinating with SDAPCD to reduce cancer risk for each permitted stationary source, including portable equipment and vessels, in or around port communities.
- Working in partnership with infrastructure owners to accelerate the build out of ZEV HD/MD truck charging infrastructure, powered by all renewable sources and backed by a power purchase agreement.
- Expanding investment in nature-based solutions to climate change and sea level rise impacts, including increase tree canopy coverage in port communities, the revitalization of emissions-sequestering wetlands, and other land use investments that serve as buffers both between industrial and residential uses, and against the impacts of climate change in accordance with the recommendations put forth in California's Fourth Climate Change Assessment (2018) in and around port communities.
- Allocating resources and expertise towards a private 5G edge computing network to support marine innovation, fuel entrepreneurship, and technological activation to leverage efficiencies and reduce emissions.
- Implementing an incentive program for zero and near-zero vehicles for low-income residents in disadvantaged areas in or around port communities.
- Developing and implementing a residential air filtration and/or air monitoring program for residents in or around port communities.
- Piloting a short-haul on-road electric truck pilot program that seeks to displace diesel vehicle miles traveled (VMT) annually. This strategy would yield emission reduction benefits and demonstrate continued leadership and collaboration on and around California's ports. The pilot would include an evaluation component to identify lessons learned and recommend action(s) to accelerate the transition to ZEV heavy-duty on-road electric trucks.
- Investing in the development of new energy production capacity – such as renewable diesel, RNG, and biodiesel – to increase the availability of science-backed clean marine fuels for the California market.
- Co-investing with the State of California on the development of zero emissions alternative assets to the ATBs in question, ensuring our continued ability to support the California market's energy needs while showcasing the possible innovation in public-private partnerships against the impacts of climate change.

These are just a few ideas to expand the scope of ACE plans to achieve equivalent or greater emissions reductions than would result from vessel engine retrofitting or replacement. Although the current definition, particularly Section 9318.5(f)(1)(E)8. (“any other measures that sufficiently reduce emissions”) is broadly-written, Crowley submits that more examples, including some or all of the above, would help clarify what form of ACE plan would meet CARB’s requirements and ensure all available emissions reductions strategies are considered.

IV. Concluding Comment

Crowley urges CARB to continue to engage with Crowley to design, approve, and deploy alternative compliance pathways, to include those outlined above, which meet the intended outcome of the CHC Regulation. Such collaboration and innovation would benefit California’s and CARB’s long term emission goals.

In California, Crowley’s ATBs have the capacity to enable the efficient movement of next generation liquid energy sources today, leveraging a broad array of advances in drop-in fuels, efficiency technologies, and solutions that are on the horizon of commercial viability. Rather than drive Crowley’s ATB fleet out of the State, the CHC Regulation should include effective alternative compliance pathways to achieve the emissions reduction mandated.

Crowley is not advocating that CARB alter or lower its ambitions with respect to emissions reduction, response to climate change, or building a better future for all Californians. Our focus is on enabling Crowley’s ATBs, avoiding unintended consequences and offering, with our decades of operational experience in California’s liquid energy cargo transportation market, to support CARB in reaching its goals and fulfilling its mission.

Yours respectfully,

CROWLEY MARITIME CORPORATION

Art Mead
Vice President & Chief Counsel
Government and Regulatory



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First Name: Brian
Last Name: Vahey
Email Address: bvahey@americanwaterways.com
Affiliation: The American Waterways Operators

Subject: AWO Comments on Proposed Amendments to Commercial Harbor Craft Regulation (chc2021)

Comment:

See attached comment letter plus appended report.

Attachment: www.arb.ca.gov/lists/com-attach/3539-chc2021-WzoGd1Y4Aw9SN1Iz.pdf

Original File Name: AWO CARB CHC Comments plus Appendix 11.15.21.pdf

Date and Time Comment Was Submitted: 2021-11-15 13:29:22

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801 North Quincy Street
Suite 500
Arlington, VA 22203

PHONE: 703.841.9300
EMAIL: jcarpenter@americanwaterways.com

Jennifer A. Carpenter
President & CEO

November 15, 2021

Ms. Liane Randolph, Chair
c/o Harbor Craft
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Regulations for
Commercial Harbor Craft in
California

Dear Mr. Quiros:

On behalf of The American Waterways Operators (AWO), thank you for the opportunity to provide comments on the California Air Resources Board (CARB) proposed amendments to the Commercial Harbor Craft (CHC) regulation. AWO is the tugboat, towboat and barge industry's advocate, resource, and united voice for safe, sustainable, and efficient transportation on America's waterways, oceans, and coasts. AWO's more than 300 member companies own and operate towing vessels and barges on the U.S. inland and intracoastal waterways; the Atlantic, Pacific, and Gulf coasts; and the Great Lakes. The tugboat, towboat, and barge industry supports family wage jobs and long-term career opportunities for more than 300,000 Americans. Our industry moves more than 665 million tons of critical cargo each year safely, securely, efficiently, and sustainably.

CARB's CHC regulations are particularly significant given the importance of waterborne commerce to the state of California. California ranks third among states in waterborne commerce by tonnage and fourth in economic impact, with more than \$12.2 billion in annual economic activity driven by the domestic maritime transportation industry. **At a time when California ports are experiencing historic congestion and supply chain failures are impacting every American, we are deeply concerned that CARB is proposing to take regulatory action that could decimate maritime commerce by forcing tugboat companies to retire safe and efficient harbor craft and cease doing business in the state.** This is particularly egregious given the abundance of procedural flaws, faulty data, and inaccurate assumptions that have characterized this rulemaking process and CARB's refusal to address these infirmities despite repeated entreaties from the regulated community and other stakeholders.

AWO urges CARB not to proceed with this rulemaking in its current form, but instead to build on the success of the collaborative approach that has yielded significant improvements in engine technology and emissions performance over the last decade or more. Specifically, we urge CARB to replace this flawed rulemaking with a new approach that would:

- **Create more aggressive emission reduction goals but set compliance deadlines further into the future so that companies have time to accommodate new technology.** 3118.1
- **Emphasize a more holistic regulatory approach that incentivizes all port stakeholders to participate in the state's carbon reduction goals, rather than force individual harbor craft companies to act as system integrators for technology that currently has limited application for maritime operations.** 3118.2
- **Continue to support existing grant programs (e.g., the Carl Moyer program) that are working well, rather than undercutting them and shortchanging California taxpayers by forcing out of service many of the vessels that have recently undergone retrofits made possible by these very programs.** 3118.3
- **Exempt oceangoing tugs and barges, either towed on a wire or rigidly connected through an ATB system, which do not operate as harbor craft, and meet all the criteria set by CARB in its decision to exempt the commercial fishing fleet.** 3118.4

In sum, we recommend that CARB establish more ambitious emission reduction goals on a more realistic timeframe and use grant and other incentive mechanisms to assist port operators, vessel owners, engine manufacturers, and the full suite of California's maritime stakeholders in making investments in emission-reducing technology that helps California advance toward the long-term goal of zero carbon emissions.

If CARB is not willing to redesign the rulemaking in favor of this better approach, we urge the agency to suspend the rulemaking until it addresses the underlying flaws and known errors in the regulatory package. AWO has repeatedly pointed out that CARB has inflated the vessel inventory and will present unassailable evidence showing that towing vessels that have failed to report to CARB account for only a small percentage – less than 2.3% – of total hours in CARB waters. We will also demonstrate that the health risks claimed by CARB are overstated, at minimum by the overestimation of the vessel inventory, but more likely to a much greater extent due to unaddressed flaws in the modeling itself. **It is reckless for CARB to move forward with a rule that could have devastating impacts on California's maritime supply chain when it is so clear that its foundation is based on inaccurate data and an unvalidated model.** 3118.5

Process Failures, Inaccurate Data, and Bad Policy

3118.6

On numerous occasions throughout the rulemaking process, both in formal comments on previous iterations of this regulatory proposal as well as at CARB workshop meetings, AWO has pointed out multiple ways in which CARB's assumptions about the California harbor craft fleet are unsupported by accurate data. We have argued that CARB's proposed implementation timelines will force some vessel operators to decommission new equipment that already meets the best-achievable performance standard for air emissions. Disturbingly, this input has continually gone unheeded, and nowhere in CARB's supporting documents can a substantive record of any of this feedback be found. This is a glaring failure of process.

AWO four major concerns with CARB's approach to this rulemaking have been:

- CARB's refusal to acknowledge that the rule will have significant negative cost and operational implications on CHC operators, including AWO-member towing vessel operators. The technical solutions offered by the rule are infeasible, overly prescriptive, pick winners and losers in the commercial marketplace, and fail to allow vessel operators to design innovative solutions to achieve emission reduction goals.
- CARB's unwillingness to address and correct acknowledged errors in its vessel population data that drastically overstate the towing vessel population operating in covered waters.
- The unaddressed and unacknowledged uncertainty of the CARB model's calculations of the health risk created by harbor craft emissions that likely overstates their impact on the public, even beyond the improper inflation created by the overstated vessel inventory.
- The questionable legal authority under which CARB has undertaken this rulemaking.

To date, these concerns have not been adequately addressed. We elaborate on them again below.

CARB Refuses to Account for the Significant Negative Cost and Operational Impacts of the Rulemaking

CARB's Arbitrary and Capricious Exemption of Some Vessels and Not Others

CARB's decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule while not similarly exempting other vessels that meet the same criteria is arbitrary and capricious. This decision unfairly places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

3118.7

CARB's rationale for excluding these commercial fishing vessels applies equally to towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins;
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits;
- Competition with out-of-state and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Oceangoing tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four criteria that led CARB to exempt those vessels. AWO submitted information in April 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for oceangoing tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out-of-state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, U.S.-owned, U.S.-crewed, and U.S.-built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB should extend the exemption for commercial fishing vessels to oceangoing tugboats and barges to avoid arbitrary and capricious distinctions between similarly situated classes of vessels.

Compliance Costs

The regulation would impose unreasonably high compliance costs and create waste by forcing vessel operators to replace or retire relatively new, clean, and operable engines and vessels. In the towing industry's experience under the 2009 rule, transitioning a towing vessel from a Tier 0 or Tier 1 to a Tier 2 engine often required a vessel rebuild or engine repower. Because vessels often outlive the useful life of engines, rebuilds and repowers are a normal feature of a vessel's lifecycle and compliance deadlines under the previous regulation could be effectively aligned with scheduled vessel rebuilds or repowers.

Under the proposed rule, many towing vessels would have to be retired or removed from service in California before the end of the vessel's or the engine's useful life because space constraints and other limitations do not allow for the installation of the required equipment on existing vessels. This includes towing vessels in which operators have already made significant investments to reduce emissions and improve air quality. In the 2009 regulation, revised in 2011, CARB stated that once a vessel has been retrofitted with Tier 2 engines, no other retrofit

would be necessary¹. Many of the industry's recent investments were thus made with the understanding that CARB's current and forthcoming commercial harbor craft rules would allow vessels to serve out a far greater portion of their useful lives than the proposed rule would allow.

Harbor craft operators typically expect a newly built vessel to have a useful life of 20-25 years. Investment decisions are made with the expectation that they can be recouped over this period. The proposed regulations would dramatically alter this calculus, forcing vessels from service after as little as 10 years, including tugs retrofitted under the previous regulation. Additionally, towing companies that have recently built new vessels with Tier 4 engines would be faced with the possibility of taking these vessels out of service within just a few years to comply with the proposed regulations, attaining a marginal incremental improvement in emissions at the cost of millions of dollars. We are concerned that CARB does not understand how disruptive – and economically untenable – this approach is for towing vessel operators. It is extremely difficult for a company of any size to develop a viable capital plan in an environment with this degree of regulatory uncertainty. Moreover, the net environmental impact of forcing the premature retirement of serviceable vessels and their replacement with newly built vessels (even newbuilds with a lower emissions profile) must be considered as the procurement of materials and disposal of old vessels has a net negative environmental impact.

Feasibility

CARB's proposal to require Tier 4 engines with Diesel Particulate Filters (DPF) on existing vessels is not feasible. Currently, there is little to no marine application of DPF, considerable size and engine space restrictions exist, and back pressure created by DPF on an engine exhaust system is intolerable for the safe operation of existing and known future engines. There is currently no manufacturer-approved DPF available for the engines commonly used on towing vessels, so operators cannot determine the utility of DPF on their vessels. CARB is proposing to require technology that is untested, unproven, and simply unavailable.

3118.9

In previous letters to the docket, AWO has provided specific examples of more appropriate timelines for the implementation of new technology standards, such as delaying the implementation date for any DPF rules by a minimum of five years after the approval of a compliant Tier 4 with DPF engine and allowing compliance flexibility for vessels with either a Tier 3 engine with a DPF or a Tier 4 engine without a DPF. These suggestions have gone unheeded, and we are troubled that CARB has not acknowledged that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of towing vessels.

¹ CHC Regulation 17 CCR 93118, (e)(6)(C)(1)

In sum, CARB has failed to provide realistic relief for vessels that cannot comply with the proposed rules due to space or feasibility constraints. Under the current proposal, a vessel operator has no recourse other than to retire a vessel that cannot physically accommodate the installation of unproven and unavailable technology.

Shore Power for At-Berth Vessels

3118.10

CARB's proposal to require shore power for vessels at berth depends on the development of shoreside infrastructure beyond the control of vessel operators. Terminal and lay-berth facilities should equitably bear the burden of any proposals requiring specific shoreside infrastructure development. Many towing vessel companies use shore power at their home berths to limit emissions and generator use and decrease idling time for main engines, but vessel operators without long-term leases and control over infrastructure may find it impossible to comply with this proposal.

The proposal also impacts customer berths, where the terminals may have to provide increased infrastructure. AWO is concerned that facilities may decide not to offer short-term lay berths if they cannot comply with CARB's proposed infrastructure requirements. Limited berth space could force towing vessels to idle in the harbor between jobs or burn more fuel to return to an electrified home dock. In this situation, the regulation would have the perverse effect of increasing, not decreasing, air pollution. This scenario also highlights the importance of incentivizing the entire port community to shift to low-emissions technology rather than requiring vessel operators to bear the brunt of the responsibility.

Opacity Testing

The opacity testing proposal is too subjective. Certain types of towing vessels have a highly variable duty cycle and their engines must be tuned to provide the power, maneuverability, and braking necessary to operate safely. CARB's proposal suggests testing should be done during the transitional phase of a vessel's fuel map (i.e., when accelerating or decelerating the engine), and not at steady state (i.e., at constant RPM under a consistent load), where the engines operate most efficiently. Tuning the engine to minimize smoke during the transitional phase could compromise engine integrity when the operator needs maximum responsiveness to ensure safe operation.

3118.11

The power and torque requirements during the transitional phase of accelerating a marine engine are different from those forces required for highway and off-road applications. For a tugboat, maneuvering a vessel while applying forces to a moving ship or barge is a dynamic process that places a high demand on the propeller, and it has been a challenge for engine manufacturers to ensure the vessel's engines do not stall in the process. Stalling an engine in this environment can be deadly, causing the tug to capsize or be overrun by the ship it is assisting. One way to avoid this risk is to alter the fuel map to ensure there is adequate fuel

available when the need arises. This may result in a temporary overfuel event that creates haze. This is not a sign that the vessel's emission controls have failed, but rather the result of a prudent safety measure to avoid the much greater risk to human life and the environment if the tug were to capsize. Opacity testing should be done at a constant RPM, under a constant load, to ensure the engine is operating appropriately.

Legal Considerations

As AWO has expressed in previous comments, we believe that the proposed CHC regulations would, if enacted without express authorization from the U.S. Environmental Protection Agency, violate the federal Clean Air Act as they are “standards and other requirements relating to the control of emissions.”² Although the Clean Air Act expressly preempts state regulation of emissions from many types of engines, it allows California to seek authorization from EPA to adopt standards for certain nonroad engines and vehicles including harbor craft. Federal law limits the standards available to California without express authorization from EPA to “in-use standards.” CARB characterizes certain elements of its proposed regulations as “in-use” standards, which federal courts have determined apply to “use, operation, or movement” of regulated non-road vehicles. Examples of in-use standards include limitations on idling times, carpool lanes, and other use restrictions that control emissions. Despite CARB’s characterization, we believe the CHC rule contains emission performance standards (e.g., opacity testing) that necessitate authorization from EPA. The proposed regulation is not an “in-use” rule because it regulates emissions and engines. In previous meetings, CARB has indicated its intention to discuss this issue with EPA but has provided no information in the record to confirm that the agency has received EPA authorization to proceed with the proposed regulations. **It is essential that CARB clarify its legal authority to issue the new rules before proceeding.**

3118.12

The Proposed Rule is Based on Inaccurate Vessel Population Data that Overstates the Impact of Towing Vessel Emissions

These problematic proposals are based on an inaccurate accounting of the size and emissions impact of the CHC fleet, undermining the entire basis for the rulemaking. Even more troubling, AWO has repeatedly pointed out this shaky foundation to CARB, which has acknowledged erroneous assumptions in its data but, inexplicably, refused to correct them, subjecting this rulemaking to significant legal vulnerability.

Vessel Inventory

Under existing harbor craft regulations, towing vessel operators are required to report to CARB the number of vessels they operate in California waters. Rather than relying on this

² Clean Air Act §209(e)(2)

reporting to determine the size of the towing vessel population, CARB used a U.S. Coast Guard database that provides information on vessel ownership and regulatory status, but not area of operation. When CARB identified more towing vessels in the Coast Guard database with a California home port than the number of towing vessels reported to CARB as operating in California waters, the agency assumed, without evidence, that CHC companies have been significantly under-reporting their fleet sizes to CARB.

AWO has repeatedly pointed out that the Coast Guard database is designed to track the ownership and regulatory status of vessels and provides no insight or information into where vessels operate (which can, of course, change as vessels are mobile assets). Despite this, CARB has used home port information from the Coast Guard database to conclude that an additional 52 towing vessels are operating in California waters, on top of the 177 towing vessels reported to the agency, for a total of 229. This has led the agency to overestimate the number of unreported vessels, the population of towing vessels operating in California, and their cumulative impact on air quality.

In past comments, AWO has demonstrated to CARB staff the error of using the Coast Guard database to identify vessels operating in California. We have also provided evidence in both written comments and multiple meetings to show that emissions from vessels that have not reported their hours are only a fraction of the scaling factor CARB has used to inflate the emission inventory. We have explained the basis for these discrepancies and told the agency how it can obtain accurate data. Inexplicably, CARB has rebuffed all our efforts to provide an accurate vessel inventory. Indeed, at the CHC Workshop #4 held on March 16, 2021, CARB acknowledged that the agency was aware that its vessel counts did not accurately reflect the actual number of vessels in the applicable airshed, but informed attendees, without further explanation, that CARB would not be revising the vessel count numbers in the draft regulation. These reckless technical and procedural errors jeopardize the entire basis for the regulation and subject it to heightened legal scrutiny.

AWO contracted with Ramboll, a third-party engineering consulting firm, to conduct an independent assessment of the number of towing vessels operating in California and the likely impact of emissions from those vessels. Using Automatic Identification System (AIS) data for 2019, Ramboll was able to account for every towing vessel operating within California waters during that year. The AIS data affirms that CARB has significantly overcounted the size of California's towing vessel fleet. Ramboll found that only 200 towing vessels operated within 100 nautical miles of the California coast, nearly 30 vessels fewer than CARB estimated to be working in California.

The CARB model also assumes that non-reporting vessels operated the same number of hours as reporting vessels. Using the AIS data, Ramboll was able to determine the number of hours the towing vessels operating in California waters were moving, which is a reliable predictor of engine hours. Using a CARB-provided list of vessels that filed reports in 2019, AWO was then

able to isolate the reporting vessels from non-reporting vessels.³ The non-reporting vessels averaged just 18% of the operating hours of the reporting vessels. This means that the total unreported hours are just 2.3% of the total reported hours, not the 29% that the CARB scaling factors had estimated. This discrepancy makes sense considering that CARB's reporting requirements have been in place for more than a decade, and the vessels companies are most likely to overlook in their reports to CARB are either those vessels that are transiting through California waters but not calling on California ports or those that are seldom used in California.

3118.13
(cont)

Ramboll then ran emissions estimates based on this accurate assessment of towing vessel operating hours and found that NO_x and PM emissions were only 72% and 62%, respectively, of the figures that CARB's improperly inflated model produced.

Health Effects

Given this inflation of the towing vessel fleet size and operating hours, AWO expects that CARB's assessment of harbor craft emissions and their health impact is similarly skewed. Ramboll's estimates of emissions based on accurate fleet size and operating hours data lend credence to AWO's concern that CARB's estimates are overstated.

3118.14

AWO asked Ramboll to review and comment on the Health Study section of the CARB rulemaking packet. Based on this assessment, Ramboll raised serious questions about the methodology CARB used both in its assessment of cumulative harbor craft emissions as well the resulting health effects. Most concerning is Ramboll's observation that CARB has made no apparent effort to validate its air quality model with verifiable, real-world results. Ramboll conducted a preliminary analysis to validate the agency's harbor craft-related exposure estimates by comparing CARB-modeled air concentrations at receptor points near Long Beach, Anaheim, Pico Rivera, and Los Angeles with the PM_{2.5} concentrations measured at the sampling stations installed at these locations. Because the sampling stations capture emissions from all nearby sources, CARB's modeled concentrations specifically for harbor craft would be expected to be within the range of the total measured emissions or, more likely, lower. Below is the table of results from this exercise, extracted from the Ramboll report.

³ AWO chose 2019 for two reasons: first, it was the last year not affected by the impacts of COVID on vessel operations, and second, CARB provided vessel reporting status for that year, which allowed us to measure the difference between reported vessels and non-reported vessel hours.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

The second column above shows the average annual PM_{2.5} concentrations measured at the sampling stations listed on the left. Again, these figures show estimated PM concentrations collected from all sources in the area, including cars and trucks, rail and harbor craft as well as other sources. They also reflect locations near the shoreline that are most likely to be impacted by harbor craft emissions. The four columns on the right show CARB's modeled concentrations calculated at four locations nearest to each sampling station. As highlighted in the table, Ramboll found from this preliminary check of the data that CARB's modeled estimates are up to 4 times higher than actual measured concentrations from all sources captured at sampling stations in the same general area. It is not plausible that emissions from harbor craft alone would be higher than the emissions captured in these areas from all possible sources. This raises serious questions about the accuracy of CARB's model and what, if any, efforts CARB has made to validate it.

Ramboll and AWO made numerous requests for information from CARB staff that would help us understand the methodology the agency used to determine health impacts associated with harbor craft emissions. CARB staff were unable or unwilling to provide much of the necessary information, which has forced Ramboll to make more generalized observations about CARB's approach. Those observations are offered in detail in Section 2.2 of the attached report, but the essence is that: (1) there is enormous uncertainty in the health effects data that CARB has presented, calling into question the purported benefits of the proposed rulemaking; and (2) CARB has applied health effects analyses in an unconventional way and failed to report its findings in a manner that transparently acknowledges the lack of certainty inherent in those findings.

What we can say with certainty is that CARB's assessment of the health risks from CHC emissions is overstated, at minimum by the agency's overestimation of the vessel inventory and emissions, but more likely to a much greater extent due to the unaddressed weaknesses in the modeling itself. CARB's overstating the emissions from harbor craft is magnified in each step of the model, with each highly conservative assumption or input that is propagated throughout both risk assessments. Based on the comparison of the model output with actual PM levels at monitoring sites, it seems clear that errors in the model are overestimating the actual exposures to communities along the shoreline, and thus overestimating any potential benefits of the proposed rules, by a significant margin. This is an unacceptably weak foundation for such a consequential rulemaking.

A More Holistic, Supply Chain-Driven Approach is Needed

AWO members are committed to reducing their vessel emissions and lessening their impact on the environment. The most effective approach to emissions reduction begins with recognizing the integrated nature of the maritime supply chain and the roles, interdependency, and limitations of its component parts. Tugboat operators are the individual, end-level users of the kind of engine technology CARB's proposed regulations would mandate and are limited in what they can achieve independently of other actors in the supply chain. For tugboats and other types of harbor craft to successfully comply with aggressive new emissions standards, engine manufacturers must design engine technology that is appropriate for the type of work tugboats are required to perform and port facilities must provide shoreside infrastructure that supports and sustains this new technology. Every part of the maritime supply chain must move together. CARB's proposed regulations would force harbor craft operators to build more advanced equipment themselves, regardless of the availability of supporting infrastructure and in the absence of any meaningful market incentives. This approach is akin to attempting to reduce on-road engine emissions by asking every individual California driver to design an electric car in their garage.

3118.15

CARB's approach also fundamentally misunderstands the way vessel owners invest in their assets. Towing companies build new vessels at regular intervals and retrofit vessels with new and cleaner engines as they become available and as vessel size constraints allow. The ability to raise and invest capital is dependent on being able to recoup that investment over a vessel's useful life, typically 20-25 years. CARB's incremental approach to emissions requirements undercuts this planning not only by forcing out of California relatively new vessels built with the best engine technology available at the time, but also by cannibalizing the resources companies could otherwise invest in more ambitious future technology. Instead of using revenue from existing vessels to support future investments in zero carbon emissions technology, towing companies would be required under the CARB proposal to devote more resources towards compliance with incremental, interim – but still extremely costly – emissions standards. CARB's regulation would be working at cross-purposes with the state's long-term emission reduction goals.

By extending emissions compliance deadlines, CARB would enable vessel operators to plan for the adoption of technology that achieves more substantial emission reductions, including potentially zero carbon standards. It would allow towing companies that have built new vessels with state-of-the-art equipment to continue operating in California and encourage stakeholders at every point in the supply chain to work together to achieve ambitious goals. This does not mean foregoing progress in reducing emissions in the short term, since companies that build new vessels in the interim will continue to use the best available technology, as required by federal EPA standards and supported by California's existing grant programs that incentivize the adoption of new technologies.

This approach has been working in California for years. California harbor craft operators have long participated in successful, incentive-based air quality programs through CARB and various Air Quality Management Districts, taking advantage of grant and finance plans to upgrade and improve engines, and achieved meaningful results for California air quality. Earlier iterations of progressively higher voluntary standards have led to successful technology innovations, well-managed industry costs, and substantive air quality improvements.

Crowley Maritime's electric tug *eWolf* represents one of the many ways that California harbor craft operators are working with the State to achieve emission reductions through innovative technologies. The *eWolf* is a zero-emissions tug that Crowley expects will begin operations in the Port of San Diego by 2023. It has cost Crowley alone \$18 million to develop, and has received additional grant support from federal, state, and district-level partners. It is just one example of the way the California maritime industry proactively partners with government agencies to develop innovative new technologies.

AWO urges CARB both to continue to work with companies to incentivize these types of innovations and to recognize the emissions benefits that new technology provides. Like the Crowley *eWolf*, Foss Maritime's hybrid tugs, first introduced in 2008 to the Los Angeles/Long Beach market, offered the promise of using innovation and new technology to reduce vessel emissions. The vessels were built specifically for the heavy workload of LA/LB and the demand for higher horsepower in the tight confines of the harbor. The tugs were effective and provided a model for future vessel conversions. Foss sought a waiver under the 2009 CHC rulemaking to keep operating the two hybrids with their original engines and to allow the company to convert other similar tugs to hybrid, keeping the Tier 0 and Tier 1 engines, but obtaining lower overall emissions in every category through the use of a hybrid electric system. Unfortunately, CARB did not grant a waiver, and Foss chose to redeploy the vessels to other markets and discontinue plans for future hybrid conversions and newbuilds since the regulatory environment did not support such innovation by providing flexibility for alternative means to achieve the same end. **We urge CARB to design a regulatory system that supports and rewards early adoption of innovative, emission-reducing technology, rather than discouraging innovation through rigid and prescriptive regulation.**

3118.16

Ms. Liane Randolph

November 15, 2021

Page 13

The maritime industry makes trans-oceanic trade possible with up to 20 times less emissions than alternatives like air cargo; meanwhile, short sea shipping and trans-harbor movement generate less than half the emissions of other modes such as road or rail. In California, vessel engines with lower emissions have reduced community health risk and the maritime industry has grown more efficient. In the last ten years, the number of engines in service on harbor craft in California has stayed consistent while the volume of cargo moved has increased and emissions per hours worked have decreased.

We urge CARB to build on this track record of success by replacing the proposed harbor craft regulations, which are based on a flawed legal and technical foundation, with a different framework: one that expands the compliance timeline so as not to force harbor craft operators to adopt technology that is currently unavailable, infeasible, or untested; encourages all parties in the maritime supply chain to work together to achieve more ambitious emission reduction goals; and helps harbor craft operators and other port stakeholders to invest in cleaner equipment through grant funding. If California's ultimate goal is net zero carbon emissions, harbor craft operators must be seen as an essential part of a larger supply chain working to achieve that goal together. As currently proposed, CARB's harbor craft regulations would put companies out of business, deprive Californians of high-quality, family-wage jobs, and further stress an already over-burdened supply chain. We do not believe this is CARB's intent, and we stand ready to work with the agency and other stakeholders in the maritime supply chain to design and implement a better approach to improving California's air quality while keeping vital maritime commerce flowing.

Sincerely,

A handwritten signature in blue ink that reads "Jennifer A. Carpenter". The signature is written in a cursive, flowing style.

Jennifer A. Carpenter
President & CEO

MEMORANDUM

Date: November 11, 2021

To: American Waterways Operators

From: Amnon Bar-Ilan, Christian Lindhjem, Sonja Sax

Subject: Ramboll Comments on the California Air Resources Board (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation

1. REVIEW OF HARBOR CRAFT EMISSIONS IMPACTS AND COMPARISON OF CALIFORNIA HARBOR CRAFT EMISSION INVENTORY

1.1 Introduction

The California Air Resources Board (CARB) air emissions inventory and proposed rule effectiveness are presented in Appendix H of the proposed regulation supporting documentation. This 2021 document updates CARB's emission inventory methods from the 2007/2009 Commercial Harbor Craft (CHC) emission inventory methods.¹ In general, the approach is similar, but many of the default inputs were substantially revised to lower overall emissions as shown in Figure 1.

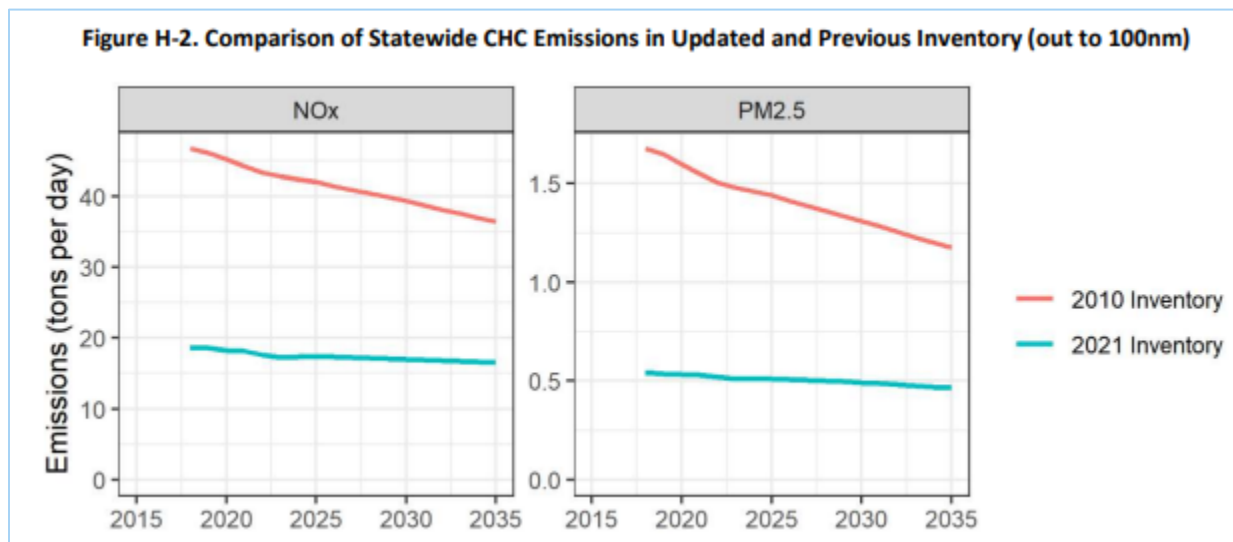


Figure 1. CARB commercial harbor craft emissions inventory comparison. (CARB 2021)

¹ <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road>

CARB segregated the vessels by type (including vocation) shown in Figure 2. In this report, we focus on the Tugboat types, which include Tugboat-Escort/Ship Assist, Tugboat-Push/Tow, and Tugboat-Articulated Tug and Barge (ATB).

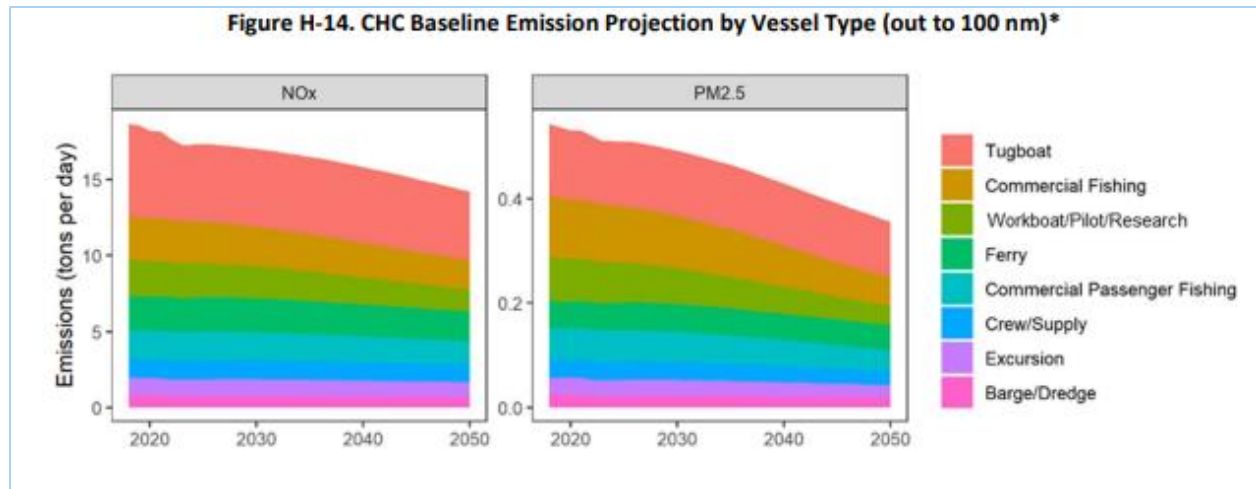


Figure 2. CARB commercial harbor craft emissions inventory by vessel type. (CARB 2021)

Alternative source of activity data includes AIS data that is publicly and freely available from a trusted source.² The AIS data identifies tug and towboats using vessel codes 31 for towboats and 52 for tugs and provide position, speed, and course. The AIS data identifies every vessel operating in US continental waters identified by MMSI for a given year.

Emissions estimates depend on input factors related to the vessel activity and engine characteristics. The AIS data provides the population and activity for all vessels operating in a defined domain. Emissions estimates also require that the new engine emission factors be identified by Tier level in Table H-5 of Appendix H of CARB (2021), age, and fuel correction.

$$\text{Emissions} = \text{Pop} \times \text{Power} \times \text{Activity (hrs)} \times \text{Load Factor} \times (\text{zhEF} + \text{DF} \times (\text{Age}/\text{Life})) \times \text{Fuel Correction}$$

Pop – Population of vessels (activity input)

Power – Engine power (activity input)

Activity – Hours of engine operation (activity input)

Load Factor – Average fraction of available power (CARB input estimate)

zhEF – Emission factor when new (zero-hour) (CARB input estimate)

DF – Deterioration factor (CARB input estimate)

Age – Engine age (activity input)

Life – Useful Life (CARB input estimate)

Fuel Correction – In-use relative to engine certification fuel (CARB input estimate for 2011+ engines is 0.948 – NO_x and 0.852 – PM³ and PM correction is more significant for older engines)

² <https://marinecadastre.gov/ais/>

³ <https://ww3.arb.ca.gov/msei/chc-appendix-b-emission-estimates-ver02-27-2012.pdf>

The vessel types average load factor estimates according to primary vocation for the range for tugs and towboats is shown in Table 1. Because of the difference in assumed load factor, it is important to appropriately characterize the activity that each vessel performs.

Table 1. CARB Load Factor input by vessel type. (Table H-9, CARB 2021)

Vessel Type	Load Factor	
	Main	Auxiliary
Tugboat-ATB	0.50	0.50
Tugboat-Push/Tow	0.33	0.37
Tugboat-Escort/Ship Assist	0.16	0.34

1.2 Vessel and Emission Inventory and Comparison with CARB Estimates

3118.17

We used the AIS records to identify tug and towboats using vessel identification numbers 31 and 52, and American Waterways Operators (AWO) provided more detailed input for their vessel fleet including primary vocation, engine power, Tier level, and, in some cases, hours of operation in California waters. Table 2 shows the comparison of the vessel population found operating within 100 nm of the California coast during 2019. CARB (2021) reported that they identified the population of 177 tugs and towboats through the harbor craft reporting in Table H-3 and upwardly adjusted that inventory to account for unreported vessels through Coast Guard lists at California home ports. The AIS records find only 200 tug and towboats (23 vessels or about 13% more than reported by CARB) during 2019 compared with CARB's estimate in Table H-3 of 229 vessels or 29 more than were reported in the AIS records.

Table 2. Vessel population found in California waters <100 nm in 2019

Vessel Type	CARB App. H			AIS Records		
	Table H-3	Adjusted Total Table H-3	Average Hours Table H-4	Population	Average Hours (>0.1 knots)	Average Hours (<0.1 knots)
Tugboat-ATB ^a	11	19	2,466	14 ^a	1,991	1,380
Tugboat-Push/Tow	108	147	1,550	118	817	1,216
Tugboat-Escort/Ship Assist	58	63	2,676	68	2,141	3,855
Combined Tug and Towboat	177	229	1,936	200	1,350	

^a – AIS does not distinguish ATBs from Towboats; AWO identified six fleet vessels and eight others found in AIS records as ATB.

We used the AIS records to determine hours of operation for each tug and towboat operating in California waters out to 100nm during 2019. The average hours for AIS compared favorably with the CARB averages except for towboats where the operating hours about half that estimated by CARB. Total and average hours at less than 0.1 knots speed were considered to use no propulsion power, but auxiliary engines running at normal loads, though many tugs at their base will use shore power for auxiliary loads such as to keep the AIS transponders emitting a signal.

AWO supplied tier and power of the main and auxiliary engines for their members' fleets as summarized in Table 3. For other tugs and towboats found in the AIS data, we used CARB default information with Tier 1 emissions rates to towboats (including ATB) and Tier 2 to tugboats to hours of operation. The AWO supplied fleets generally had higher installed power

than the CARB averages by vessel type, so using the CARB default for AIS extra (non-AWO) fleets leads to a conservative overestimate of emissions.

Table 3. Vessel population and inputs use found in California waters <100 nm in 2019

Vessel Type	CARB App. H Default Inputs			AWO Fleet		
	AIS Extra Population	Main Engines (hp)	Tier	AIS AWO Population	Main Engines (hp)	Tier
Tugboat-ATB ^a	8	4395	1	6 ^a	6400	2, 3
Tugboat-Push/Tow	94	731	1	24	2700	0 – 3
Tugboat-Escort/Ship Assist	7	2450	2	61	3898	0 – 4
Combined Tug and Towboat	109			91		

^a – AIS does not distinguish ATBs from Towboats, AWO identified six vessels in AWO fleets and eight in AIS records as ATB.

The CARB default and AIS hours of operation were combined in the emissions to estimate tug and towboat emissions for 2019 as shown in Table 4. When applied, deterioration and fuel corrections primarily increase PM emissions relative to our baseline estimate. We also investigate the impact that fleet mix of engine Tier levels could have on average emissions rates primarily increasing PM emissions rates. The Tier levels for the AWO fraction of all vessels was provided, while CARB default fleet mix was used for the other tugs and towboats found in the AIS records.

Table 4. Tug and towboat emissions in California waters <100 nm in 2019.

Vessel Type	AIS Emissions Estimates		AIS (with deterioration, fuel correction)		AIS Additional Correction for Fleet Mix	
	NOx tpd	PM tpd	NOx tpd	PM tpd	NOx tpd	PM tpd
Tugboat-ATB ^a	1.36	0.020	0.92	0.019	0.85	0.020
<i>Idle <0.1 knots</i>	4%	5%				
<i>Fraction within 24 nm</i>	87%	83%				
Tugboat-Push/Tow	0.97	0.023	1.11	0.032	1.05	0.039
<i>Idle <0.1 knots</i>	9%	15%				
<i>Fraction within 24 nm</i>	82%	85%				
Tugboat-Escort/Ship Assist	2.04	0.041	2.31	0.057	2.31	0.057
<i>Idle <0.1 knots</i>	17%	26%				
<i>Fraction within 24 nm</i>	99%	99%				
Sum Tug and Towboats	4.37	0.086	4.34	0.109	4.22	0.117
CARB App. H (Estimated from Figure H-14)	6.1	0.14				
Relative to CARB Figure H-14	72%	62%	71%	78%	69%	83%

1.3 Assumptions

- AIS data using a <0.1 knot cutoff to eliminate vessel activity when main (and often auxiliary) engines are at least low power or entirely off. The '<0.1knot' criteria best matched the propulsion engine time for tugboat (4% overestimate) and towboats and others identified in AWO fleets (4% underestimate).
 - Under <0.1 knot, the auxiliary engines were assumed to continue to be used to supply power for the AIS and other electrical demands. This is a known overestimate because many tugs plug into shore power while at base.
- Based on the CARB default model year, we used Tier 1 engines for towboats (both ATB and others) and Tier 2 for tugboat-Escort/Ship Assist.
 - CARB reported to have used a distribution of Tier levels; Andrew Daminao (CARB, email to Charles Constanzo, Friday, September 3, 2021 8:55 AM) provided a file 'Towing Vessel Inventory 2019' that provided information about the fleet mix by tier level.
 - Shown in Table 5 is a comparison of the impact on emissions that fleet mix could have compared with either Tier 1 or Tier 2. The small fraction of Tier 0 in the fleet has a significant impact (greater than 50% for DPM) on towboat emissions rates estimated and less but still significant on the tugboats.
 - AWO provide fleets' engines characteristics for 2019 that had generally higher Tier levels and averaged lower emissions levels than the fleets provided by CARB.

Table 5. Fleet mix emissions impacts from CARB towing vessels file and AWO Submittals for 2019.

Vocation	Tier	Count	AW O Co unt	Emission Factor by Tier (g/hp-hr)		CARB Tier 0, 1 Contribution	
				NOx	DPM	NOx	DPM
Tugboat-ATB	0	2	0	7.34	0.37	25%	49%
Tugboat-ATB	1	1	0	6.97	0.12	12%	8%
Tugboat-ATB	2	6	2	5.08	0.09		
Tugboat-ATB	3	2	4	3.69	0.05		
Tugboat-ATB	4	0	0	1.04	0.03		
Average ATB (CARB)		11		5.41	0.136		
Average ATB (CARB)		Ratio vs. Tier 1		0.78	1.14		
Average ATB (AWO)		6		4.15	0.063		
Tugboat-Push/Tow	0	32	1	7.34	0.37	39%	65%
Tugboat-Push/Tow	1	14	4	6.97	0.12	16%	9%
Tugboat-Push/Tow	2	42	8	5.08	0.09		
Tugboat-Push/Tow	3	17	11	3.69	0.05		
Tugboat-Push/Tow	4	0	0	1.04	0.03		
Average Towboat (CARB)		105		5.80	0.173		
Average Towboat (CARB)		Ratio vs. Tier 1		0.83	1.44		
Average Towboat (AWO)		24		4.85	0.088		
Tugboat-Escort/Ship Assist	0	4	5	7.34	0.37	15%	34%
Tugboat-Escort/Ship Assist	1	8	12	6.97	0.12	28%	22%
Tugboat-Escort/Ship Assist	2	18	22	5.08	0.09		
Tugboat-Escort/Ship Assist	3	6	21	3.69	0.05		
Tugboat-Escort/Ship Assist	4	0	1	1.04	0.03		
Average Tugboat (CARB)		36		5.52	0.121		
Average Tugboat (CARB)		Ratio vs. Tier 2		1.09	1.35		
Average Tugboat (AWO)		61		5.09	0.104		

- The deterioration of emissions due to age is a large uncertainty given that engines are regularly rebuilt and that historic regulations have encouraged engine rebuilds with emission upgrades to higher Tier levels.
 - CARB (2021) assumed that towboats would average a model year of 2003 (Table H-1), which in 2019 is 16 years old and past their useful life (Table H-8) of 14 years for main engines. This would increase NOx emission rates by 24% and PM by 77% for towboats.
 - CARB (2021) assumed that tugboats would average a model year of 2009 and be 10 years old in 2019. This would increase NOx emission rates by 15% and PM by 48% for towboats.

1.4 Conclusion

We demonstrated using publicly available AIS records that it is possible to accurately identify vessel activity spatially defined. Individual vessels are identifiable through MMSI numbers unique to the AIS transmitters along with their actual activity within California waters. Using the AIS data, CARB can more accurately identify the unreported vessels and not rely on a less reliable list of vessels by home port.

Overall, the number and emissions from tugs for both NOx and PM (including towboats) appear to have been overestimated in Appendix H. The emissions overestimate depends on several input variables, but engine emissions deterioration and fleet fraction, especially the remaining Tier 0 engines still in operation, have a significant effect on PM emissions rates.

2. COMMENTS ON THE HEALTH STUDY (APPENDIX G)

2.1 Health Risk Assessment for South Coast and Bay Area Air Basins

CalPuff Modeling

The CalPuff modeling conducted in support of the Proposed Amendments to the CHC Rulemaking involve a number of model inputs and assumptions as outlined in Appendix G. Ramboll reviewed the modelling methodology as well as supporting documentation provided by CARB.

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A missing element of the modeling was any validation of the key model inputs as well as the model results. Because of the complex nature of the modeling, including a number of assumptions regarding the emissions inventory, spatial and temporal allocation of emissions, complex terrain and meteorology, it is paramount that CARB validate to the extent possible the model inputs and results.

With regards to model inputs, at the very least CARB should verify that the meteorological estimates used in the model compare to actual measured estimates from a relevant meteorological station. In addition, CARB used a single year of meteorological data and it would also be important to consider using more than one year in order to capture any variability in meteorological parameters that tend to vary from year to year.

With regards to model results, one important way to validate results includes comparing modeled results with measured values at monitor locations at or near the modeled receptor points. While we understand that the CARB is only considering contributions from CHCs in the form of diesel particulate matter, the modeling is used to estimate exposures to diesel

particulate matter and PM_{2.5}. We also understand that ambient monitors will be measuring PM_{2.5} from all sources. Therefore, we expect that modeled concentrations would be within the range of measured estimates or lower.

Ramboll conducted a check of how modeled PM concentrations compare to measured PM_{2.5} concentrations for the South Coast Air Basin. Table 6 shows the results of the comparison between measured concentrations at monitoring sites in the South Coast Air Basin and nearby receptors.

As shown in Table 6, the results from this preliminary check of the data show that the modeled estimates are overestimating exposures as these estimates are up to 4 times higher than actual measured concentrations of PM_{2.5} particularly in the most impacted regions (i.e., near the shoreline). Inland modeled estimates (which are expected to be less impacted by CHC emission) are closer to the measured concentrations although still exceed these concentrations for some receptors. This indicates that overall the modeled estimates are overestimating exposures. CARB should similarly verify the results for the Bay Area Air Basin.

An additional source of uncertainty is associated with scaling the concentrations for future years based on changes in emissions. Because the concentrations are not only based on the changes in emissions, but other key factors including meteorology, this introduces a significant amount of uncertainty, making the validation of model estimates even more critical. Also, because we believe that emissions are overstated this will contribute to even more uncertain exposure estimates based on simply scaling.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

Cancer Health Risk Assessment

The cancer risk assessment also relies on a number data inputs and assumptions, starting with the estimates from the CalPuff modeling. Many of the inputs and assumptions are considerably conservative as they are meant to be health protective and are screening-level analyses. It is important to note that screening level analyses are often followed by more targeted analyses with refined parameters that are more site-specific and/or based on more realistic parameters in order to yield more realistic risk results. Importantly, the numerous levels of

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conservativeness in screening level analyses result in risk values that are often highly overestimated and do not necessarily reflect actual risks.

One key data input includes the exposure estimates, which are based on the CalPuff model inputs and a number of additional key assumptions. As noted above, based on Ramboll's check of the modeled DPM estimates, it is likely that these estimates are overestimating exposures, both due to overestimated emissions (see Section 1) contributing to overestimates of about least about 20-60%, in addition model assumptions that result in overestimates compared to measured estimates by as much as a factor of 4 (see comments above) at some receptor locations.

Exposure estimates are also based on updated methodology that also increases the risk estimates because of the application of high (95/80%) breathing rates and multiplicative factors for greater susceptibility in children. In addition, the risk assessment includes several conservative assumptions for estimating exposures including exposures across a residence time of 70 years⁴ and assuming a person is home 24 hours a day over those 70 years. All of these conservative assumptions compound to generate highly inflated risks.

Another key input for the risk assessment is the use of a cancer potency factor (CPF). CARB relied on the estimate developed by OEHHA of $1.1 \text{ (mg/kg-day)}^{-1}$ or 3×10^{-4} per $\mu\text{g/m}^3$. This cancer potency value, which represents a 95% upper confidence interval of the lifetime risk, is dated and overly conservative compared to more recent evaluations of the literature on which the cancer potency is based.

At the time of the development of the cancer potency EPA deemed the evidence to be too uncertain to use for cancer risk assessment (US EPA 1994⁵). An HEI study (HEI 1995⁶) found similar limitations associated with the studies that were the basis of the OEHHA value. These limitations included (1) questions about the quality and specificity of the exposure assessments for diesel exhaust, (2) a lack of quantitative estimates of exposure to allow derivation of an exposure-response function, and (3) lack of adequate data to account quantitatively for individual other factors that might also be associated with lung cancer, such as smoking. In 2002, EPA⁷ again concluded that data were too uncertain for developing a cancer potency, but using more qualitative methods determined the risk to be in the range of 10^{-5} to 10^{-3} . Therefore, the risk could potentially be about 300 times lower than the OEHHA value.

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Another important issue in extrapolating results from older epidemiology studies, as OEHHA did, is that diesel exhaust exposure in these studies is based on diesel exhaust composition that is very different compared to more contemporary diesel exhaust, and also quite different from marine vessel emissions (as these studies evaluated exposures in railroad workers and truck drivers). Specifically, because of the long latency period for lung cancer, epidemiology studies need to examine workers whose exposures started more than 20 years earlier. These particular studies are based on exposures from the 1950s and 1960s. However, the US EPA and CARB have progressively tightened standards for particulate emissions from diesel engines, including marine engines, resulting in the development of new technology diesel engines with significantly lower emissions and also likely different composition. Because these

⁴ A 30 year residence time is considered to be a more realistic residence time period.

⁵ US EPA. Health Assessment Document for Diesel Emissions (External Review Draft, 1994) - Volume 1. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/8-90/057Ba (NTIS PB95192092)

⁶ HEI. Diesel Exhaust: A Critical Analysis of Emissions, Exposure, and Health Effects. 1995. [Diesel Exhaust New Scan.pdf \(healtheffects.org\)](http://www.healtheffects.org)

⁷ U.S. EPA. Health Assessment Document for Diesel Engine Exhaust (Final 2002). U.S. Environmental Protection Agency, Office of Research and Development, National Center for Environmental Assessment, Washington Office, Washington, DC, EPA/600/8-90/057F, 2002

changes have resulted in not only quantitative reduction in mass emitted, but have also resulted in differences in the composition with respect to size and chemicals associated with the exhaust (e.g., Hesterberg et al. 2011⁸), the epidemiology studies based on old generation engines may not be applicable to current emission conditions.

Even if the epidemiology data were deemed robust enough for use in quantifying the cancer risks of DPM, the uncertainty suggests that cancer risks could be over 100 fold lower than estimates by CARB, which would bring the cancer risks into an acceptable range by US EPA and California standards (i.e., 10^{-6} to 10^{-4}) under the current regulations, without the need for application of the proposed regulations.

At a minimum, CARB should provide a more detailed discussion of the uncertainties noted in these comments and the impact on the estimated risks, which we note are likely highly inflated. The cumulative impact of application of multiple conservative assumptions needs to be acknowledged.

2.2 Regional PM_{2.5} Mortality and Illness Analysis for California Air Basins

CARB used two different methods to estimate the impacts of the Proposed Amendments to the CHC Regulation on mortality and other health effects (hospital admissions for cardiovascular and respiratory diseases and emergency department visits for asthma). The first method relies on the modeled estimates for the two air basins (San Francisco Bay and South Coast) and the second method is a reduced form analysis that is applied to other air basins as well as to impacts from reductions in NOx.

While the CARB health analysis is based on standard methodology used by EPA to calculate health impacts, we were not able to check the results based on the data provided by CARB as many of the model inputs were missing. Also, even though the methods appear to be applied correctly, given what we were provided for review, the approach taken by CARB is unconventional. First, CARB is using two different methods to calculate health impacts, one based on modeled results and a second based on a reduced-form method with large simplifying assumptions. Both methods are subject to large uncertainties, but the reduced-form method has significantly more uncertainty.

Also, the way the CARB approaches the health analysis is also significantly different from the way EPA and others have conducted similar analyses (i.e., using BenMAP). CARB essentially is computing effects based on changes in PM_{2.5} modeled estimates (or PM emission reductions) for each year starting in 2023 and up to 2038 between the current regulations and the proposed amendments. The impacts are summed across air basins for each year, and then summed across all years. To our knowledge, this type of cumulative assessment of health benefits across a long time period in the future has not been conducted previously using the methods CARB is using. We welcome other examples where this has been done.

The implications are that these impacts are cumulative over time. In addition, the impacts actually increase over the years (presumably as the difference in emissions or concentrations increase between current and proposed regulations).

⁸Hesterberg, T. W., Long, C. M., Sax, S. N., Lapin, C. A., McClellan, R. O., Bunn, W. B., & Valberg, P. A. (2011). Particulate Matter in New Technology Diesel Exhaust (NTDE) is Quantitatively and Qualitatively Very Different from that Found in Traditional Diesel Exhaust (TDE). *Journal of the Air & Waste Management Association*, 61(9), 894–913.

The amount of uncertainty associated with this analysis is very large and propagated across all the steps in the risk assessment process including 1) emissions estimation, 2) modeling and scaling of PM concentrations (which rely on emission inputs), 3) deriving PM from diesel PM, 4) assumptions regarding conversion of NOx to PM, 5) application of health functions from epidemiology studies, and 6) estimation of baseline health statistics and population statistics for future years. The magnitude of the uncertainty and the impact on the direction of bias has not been evaluated by the CARB, but our analysis, based on available data, suggest that the magnitude is quite large (and larger than expressed by the 95% confidence intervals provided by CARB) and most likely are overstating the health benefits of the proposed amendments.

In light of the significant amount of uncertainty in the health analysis, we strongly suggest that CARB present the findings so that they are more transparent and in a way that acknowledges the level of uncertainty, as well as amount of confidence that can be placed on the results. For example, we don't think it is appropriate to present the combined results for the health analysis based on modeled data and those based on the IPT methodology, because the IPT results would tend to be much more uncertain and less reliable. Also, instead of presenting a total number of deaths as the sum across air basins and years, CARB should present results as a range on potential annual impacts for each air basin, separately. This again, with the acknowledgement that year to year there is uncertainty and the numbers could be more or less than estimated depending on many different model assumptions at every step in the risk assessment process.

Some of the key limitations and sources of uncertainty of these two methodologies for estimating the potential health impacts from the Proposed Amendments are discussed below.

Analysis for the San Francisco Bay and South Coast

As is the case for the cancer health risk assessment, the PM mortality and illness analysis relies on a number of model inputs and assumptions, many that are associated with significant uncertainty that tends to overstate the risks.

In interpreting the mortality and illness results, it is important to consider that the health impacts are based on a single population-based epidemiological study that infer statistical associations between health effects and air pollution exposures, but that cannot provide definite evidence of a cause and effect. This is because these studies have important limitations that preclude definite conclusions regarding a causal link between PM and mortality or illness, including uncertainty regarding the exposure estimates, the potential role of other pollutants or factors that might explain the effects, and evidence that there is likely a threshold below which health impacts are unlikely. In addition, the components of PM that may be associated with adverse health effects are yet unknown, but the analyses assume that all PM is equally toxic, making it a very conservative analysis.

The epidemiological studies that form the basis of the health study, including the mortality study by Krewski *et al.* (2009)⁹ rely on data from central-site monitors to estimate personal exposures. This results in exposure measurement error because central-site monitors may not accurately capture population mobility, the uneven distribution of PM exposure attributable to local sources, pollution patterns that can be affected by terrain features and weather, and daily variations in PM concentrations or composition that may differ from variations experienced by

⁹ Krewski, D. et al., 2009. Extended Follow-up and Spatial Analysis of the American Cancer Society Study Linking Particulate Air Pollution and Mortality Report. Health Effects Institute, 140 <https://www.healtheffects.org/system/files/Krewski140.pdf>

individuals. These factors can bias the results of an epidemiology analysis in either direction. The direction and magnitude of the bias depends on the type of measurement error. For PM_{2.5}, however, because of the spatial variability of air pollutant concentrations the bias is likely to result in effects being overestimated (e.g., Goldman *et al.*, 2011¹⁰, Rhomberg *et al.* 2011¹¹).

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The bias associated with confounding effects is particularly difficult to address in epidemiology studies because it is challenging to account for all potential confounding factors. A confounder is a factor that is associated with both an exposure and an outcome, and may make it appear that the exposure is associated with (or caused) the outcome. In PM mortality studies there is evidence that co-pollutants can confound the PM mortality association, especially because many of the pollutants are strongly correlated, and disentangling the effects of any single pollutant (if any) is difficult. Even if potential confounders are accounted for in studies, there may still be issues of how well the confounding variables are measured and controlled for. For example, in the study by Krewski *et al.* (2009), which is used by CARB for the mortality estimates, data on potential confounders such as smoking and body mass index were determined at the beginning of the study for all participants, but were not re-evaluated over the follow up study period. Changes in these variables over time could alter confounding effects. The issue of confounding relates to both the assumption of causality, where another factor may actually be the causal agent, and to the magnitude of the association, where a co-factor may account for some of the observed risk. In either case, ignoring the effects of confounding results in overstated effects estimates.

Another source of uncertainty is the assumption of a log-linear response between exposure and health effects, without consideration for a threshold below which effects may not be measurable. The issue of a threshold for PM_{2.5} is highly debated and can have significant implications for health impacts analyses as it requires consideration of current air pollution levels and calculating effects only for areas that exceed threshold levels. Without consideration of a threshold, effects of any change in air pollution below or above the threshold are assumed to impact health. Interestingly, although EPA traditionally does not consider thresholds in its cost-benefit analyses, the NAAQS itself is a health-based threshold level that EPA has developed based on evaluating the most current evidence of health effects. Most epidemiological studies do not indicate that a threshold exists, but these studies often do not have the statistical power to detect thresholds. Some studies that have employed different statistical methods have shown evidence of a threshold for PM-mortality effects. For example, Abrahamowicz *et al.* (2003)¹² found evidence for a PM_{2.5} threshold at about 16 $\mu\text{g}/\text{m}^3$ below which mortality effects were not observed. Considering a threshold for PM effects would mean that effects would occur only when threshold levels of PM is exceeded.

Sensitivity analyses are often warranted using different health functions from different studies in order to evaluate the potential variability and/or uncertainty in health estimates. For example, some epidemiological studies have reported no mortality impacts from PM_{2.5}

¹⁰ Goldman, GT; Mulholland, JA; Russell, AG; Strickland, MJ; Klein, M; Waller, LA; Tolbert, PE. 2011. "Impact of exposure measurement error in air pollution epidemiology: Effect of error type in time-series studies." *Environ. Health* 10 (1) :61. 211-5049

¹¹ Rhomberg, LR; Chandalia, JK; Long, CM; Goodman, JE. 2011. "Measurement error in environmental epidemiology and the shape of exposure-response curves." *Crit. Rev. Toxicol.* 41 (8) :651-671. 211-7617

¹² Abrahamowicz M, Schopflocher T, Leffondré K, du Berger R, Krewski D. Flexible modeling of exposure-response relationship between long-term average levels of particulate air pollution and mortality in the American Cancer Society study. *J Toxicol Environ Health A.* 2003 Aug 22-Oct 10;66(16-19):1625-54.

exposures (Beelen et al., 2009¹³; Enstrom, 2005¹⁴, Lipfert et al., 2006¹⁵). This means that if the BenMAP analyses used different concentration-response functions, the actual impacts may be very different from those reported in this analysis and could include a zero effect.

One additional important uncertainty stems from the assumption that all PM_{2.5}, regardless of composition, is equally potent in causing health effects such as mortality. This is important because PM_{2.5} varies significantly in composition depending on the source, and this is particularly important because the composition of particulate matter from diesel has also changed over time as a function of changes in both diesel fuel composition as well as the use of emission controls. Several reviews have evaluated the scientific evidence of health effects from specific particulate components (e.g., Rohr and Wyzga 2012¹⁶; Lippmann and Chen, 2009¹⁷; Kelly and Fussell, 2007¹⁸). These reviews indicate that the evidence is strongest for combustion-derived components of PM including elemental carbon (EC), organic carbon (OC) and various metals (e.g., nickel and vanadium), however, there is still no definitive data that points to any particular component of PM as being more toxic than other components. EPA also stated that results from various studies have shown the importance of considering particle size, composition, and particle source in determining the health impacts of PM (US EPA, 2009¹⁹). Further, EPA (2009) found that studies have reported that particles from industrial sources and from coal combustion appear to be the most significant contributors to PM-related mortality, consistent with the findings by Rohr and Wyzga (2012) and others. Therefore, by not considering the relative toxicity of PM components, BenMAP analyses are likely to be conservative.

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Analysis Using the IPT methodology for Other Air Basins (and NOx)

In addition to the analysis conducted on modeled PM_{2.5}, CARB applied a reduced-form methodology (IPT) to estimate additional health impacts for other air basins and from PM_{2.5} derived from NOx emissions. These reduced-form analyses involve important simplifying assumptions that can greatly affect the reliability of the estimated health impacts.

The uncertainties described in the previous section also apply to the development of the IPT factors that are used to estimate the impacts for other air basins. Additional uncertainty is introduced when applying these IPT factors to the estimated emissions for this rulemaking. The IPT factors are based on a specific time period, and therefore important variability due to meteorological changes and or spatial differences are not accounted for. Most of these uncertainties were not discussed or considered by CARB. Importantly, a large majority of the assumptions and uncertainties likely result in overestimated benefits, particularly when considering the compounding effects of the uncertainties in the various modeling inputs, starting with the emissions estimates, on the final calculation.

¹³ Beelen, R; Hoek, G; van den Brandt, PA; Goldbohm, RA; Fischer, P; Schouten, LJ; Jerrett, M; Hughes, E; Armstrong, B; Brunekreef, B. 2008. "Long-term effects of traffic-related air pollution on mortality in a Dutch cohort (NLCS-AIR Study)." *Environ. Health Perspect.* 116 (2) :196-202

¹⁴ Enstrom, JE. 2005. "Fine particulate air pollution and total mortality among elderly Californians, 1973-2002." *Inhal. Toxicol.* 17 (14) :803-816. 209-6826

¹⁵ Lipfert, FW; Wyzga, RE; Baty, JD; Miller, JP. 2006. "Traffic density as a surrogate measure of environmental exposures in studies of air pollution health effects: Long-term mortality in a cohort of US veterans." *Atmos. Environ.* 40 (1) :154-169. 206-7558

¹⁶ Rohr A.C., R.E. Wyzga, 2012. Attributing health effects to individual particulate matter constituents. *Atmos Environ.*, 62, 130-152. doi:10.1016/j.atmosenv.07.036.

¹⁷ Lippmann, M., L.C. Chen, 2009. Health effects of concentrated ambient air particulate matter (CAPs) and its components. *Crit. Rev. Toxicol.*, 39, 865e913.

¹⁸ Kelly, F.J., J.C. Fussell, 2007. Particulate Toxicity Ranking Report. Report Number 2/07. Environmental Research Group, Kings College, London.

¹⁹ U.S. EPA. Integrated Science Assessment (ISA) for Particulate Matter (Final Report, Dec 2009). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009

As noted previously, we don't believe it is appropriate for CARB to combine the results from this analysis with the analysis for the two air basins, for which modeled estimates are available. In addition, the estimated range of annual impacts for each air basin should be reported instead of summing the cumulative results across years.

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2.3 Conclusions

The health risk assessments conducted by CARB are subject to a significant number of uncertainties that are propagated through the risk assessment steps and that we have shown to overestimate the health impacts. We first show that emissions estimates are inflated (see Section 1) and these estimates are inputs to the CalPuff modeling used to estimate exposures and risks for the Bay Area and South Coast Air Basins. We also note that CARB did not validate the model estimate against measured levels of PM_{2.5}. Our preliminary analysis indicates that the modeled estimates are overestimating the measured levels for receptors near monitoring stations, particularly in highly impacted areas. Lastly, we highlight many of the risk assessment model assumptions that will also contribute to overstated health impacts in both the cancer risk assessment and the mortality and illness assessment.

Specifically, in the cancer risk assessment the use of highly conservative exposure assumptions (e.g., high breathing rates, 70 years of exposures 24 hours a day), application of sensitivity factors, and use of a highly conservative cancer slope factor all add up to highly inflated cancer risks. Similarly, in the mortality and illness analysis, risks are also likely to be overstated because of assumptions related to the choice of epidemiological study as the basis of the analysis, as well as the assumptions regarding the year to year changes in emissions across the air basins. Importantly, because the two methods used by CARB are associated with significantly different amount of uncertainty, the mortality and illness results should be presented as annual effects, and shown separately by air basin and by methodology, noting that results using the IPT approach will be more uncertain than those based on modeled results.

Overall, CARB needs to provide a more robust validation of modeled assumptions, a more thorough discussion of the underlying uncertainties and impact on the results, and a more transparent representation of the study results.



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Last Name: Medina
Email Address: amedina@manatt.com
Affiliation:

Subject: San Francisco Bar Pilots Comments

Comment:

Attached are comments from the San Francisco Bar Pilots.

Attachment: www.arb.ca.gov/lists/com-attach/3540-chc2021-BWZTNFQnVmcEXQBs.pdf

Original File Name: CARB Letter 11 12 21 FINAL.pdf

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SAN FRANCISCO BAR PILOTS ASSOCIATION

Pier 9 East End
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November 12, 2021

Liane M. Randolph
Chair, California Air Resources Board
1001 "I" Street/PO Box 2815
Sacramento, CA 95814

Via Email: Liane.Randolph@arb.ca.gov
Electronic submittal: <https://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Proposed Commercial Harbor Craft Regulations: Pilot Vessels

Dear Chairperson Randolph:

The San Francisco Bar Pilots (SFBP) are mandated by the California Harbors and Navigation Code to safely navigate approximately 8900 commercial ships annually to and from over 200 terminals in the greater San Francisco Bay Area to ports as far as Sacramento and Stockton. Our service to these vessels begins and concludes in the open ocean at an offshore "pilot station," 11 miles west of the Golden Gate Bridge. To provide this service, SFBP intermittently operates 5 pilot vessels: 3 offshore station vessels and 2 high speed harbor vessels. Two to 3 of these vessels are in service at any one time. Pilot vessels are specially designed to come alongside commercial ships, while underway, so that pilots can safely board and disembark in both ocean and harbor conditions. They are unique from other vessels in maritime service and the ports served.

Our Association vigorously supports emissions reduction and the adoption of green and efficient technologies. In fact, one of the core premises of California's state regulated pilotage system is environmental stewardship. We currently have a new pilot vessel under construction that will be the first Tier 4 engine pilot vessel in the United States. It's important to note that this project has been undertaken with the full support of our customers and the CA Board of Pilot Commissioners, absent of a regulatory requirement to do so. <https://pacmar.com/article/new-developments-in-high-speed-marine-propulsion>

There are only 10 pilot vessels that operate in California, their contribution to the emissions inventory is de minimus and they are unique in their construction and service applications. Strong positive incentives are already in place to transition replacement vessels to green technologies and we remain perplexed by the decision to regulate this small and specialized fleet; especially when the much larger commercial fishing fleet is exempt. It is our primary position that pilot vessels should be exempt from the proposed regulations or, if subject to the proposed regulation, existing vessels should be exempt for their remaining service life with new construction being subject to the proposed regulation.

3119.1

SFBP have previously commented regarding our vessel specific concerns with the Proposed Commercial Harbor Craft Regulations. We have also been engaged in an ongoing conversation with CARB Staff to better understand the proposed regulations, compliance options and impacts on our business and the

State mandated pilotage infrastructure. We offer the following general comments for your consideration:

- The Proposed Regulations are unnecessarily complex, restrictive, and difficult for vessel owners to understand. Effective regulation should not require small business to bear the expense of hiring myriad consultants and attorneys to interpret, evaluate and monitor requirements and initial/ongoing compliance. 3119.2
- Implementation timetables are unrealistic and create unreasonable near-term financial burden. Equipment sourcing, shipyard availability and increased costs of new technology should be taken into consideration. The supply chain crisis has only served to exacerbate this issue. The proposed regulations accelerate our new build program to a schedule that, as a practical matter, is unattainable; requiring the construction of 3 vessels by year-end 2024, 1 by year-end 2025 and 1 by year end 2028. Schedule and sourcing challenges aside, compliant equipment adds additional \$10.5M in construction costs (25% higher) resulting in a \$45M build program that creates significant financial hurdles given all these constraints. 3119.3

Further to this issue, as a matter of policy, regulatory implementation schedules should be feasible as published vs a shadow system of granting extensions with the associated burden and uncertainty of multiple extension applications.
- Green harbor craft technology is nascent and much of it untested for pilot vessel application. Forced adoption of early technologies into a 20+ year asset creates safety and reliability concerns and precludes the use of technologies that may be developed in the near future. 3119.4
- There are significant engineering challenges in retrofitting new technologies into existing vessels and from a financial perspective, the investment cost of new technologies does not warrant conversion of older vessels. Simply put, service appropriate Tier 4 engines and associated equipment are too large to be installed in existing engine spaces and the weight is not compatible with the hull construction parameters. Therefore, the default outcome is vessel replacement which comes at a significantly higher cost and construction/financial planning horizon. 3119.5
- Grants and other funding sources are restrictive in their application and are a difficult “fit” to secure funding for construction of new pilot vessels. For example, “pilot vessels” were not included in the VW Mitigation Trust Grant program. SFBP would welcome access to financial support; however, the lack of inclusion in these type of programs supports our assertion that the State’s pilot vessels should not be subject to the proposed regulations. 3119.6

Thank you for the opportunity to comment and your careful consideration of the logistical and financial impacts these proposed regulations have on the San Francisco Bar Pilots and the State’s pilotage system.

Sincerely,



Capt. John Carlier
President

Cc: Clerks' Office, California Air Resources Board
1001 I Street, Sacramento, California 95814

Board Members: arbboard@arb.ca.gov

Richard Cory, Executive Officer: Richard.Corey@arb.ca.gov

David Quiros, Freight Technology Section: David.Quiros@arb.ca.gov

Comment Log Display

Below is the comment you selected to display. Comment 3120 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Darren

Last Name: Miller

Email Address: darrencharlesmiller@gmail.com

Affiliation:

Subject: Vote No on Proposed Commercial Harbor Craft Regulation

Comment:

Hi, my name is Darren Miller. I am a third generation San Diego native and an avid waterman. I have enjoyed the ocean with my grandparents, my parents and now with my children. Most of the ocean trips that I have been on with my family have been on commercial boats as they allow you to travel further offshore and have a much safer and more comfortable experience. These trips have created numerous life long memories for our family and has led to many great fish tales with the fish getting bigger in both size and number each time we retell the tale.

The proposed Amendments to the Commercial Harbor Craft Regulation will either force these commercial boats that families like mine have enjoyed for years out of business or to make unnecessarily expensive rebuilds to their boats that will likely triple the cost of the tickets for their passengers, which by the way have already increased due the recent increase in gas prices. The increase in ticket price as a result of the Proposed Amendments will make it so that families like mine will no longer have access to the ocean. Just last week, I took my oldest son on his first ocean fishing trip. We had an amazing trip and we can't wait to schedule another trip next year, and the year after, and so on.

Please help ensure that families like mine can continue to enjoy the ocean for years to come by voting against the proposed Amendments. Thank you,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 13:19:06

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

Below is the comment you selected to display. Comment 3121 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Merritt
Email Address: scott@merrittws.com
Affiliation: Merritt Waterline Solutions, LLC

Subject: AmNav Maritime Services Comments on CHC Proposed Regs

Comment:

The attached comment file is submitted on behalf of Milt Merritt, President and COO of AmNav Maritime Services, LLC.
Best regards,
Scott

Attachment: www.arb.ca.gov/lists/com-attach/3542-chc2021-W2ISZFZIAGIEMwc2.pdf

Original File Name: 202111 Amnav Maritime LLC CHC Comment Letter Final with Appendices.pdf

Date and Time Comment Was Submitted: 2021-11-15 13:40:31

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November 15th, 2021

Mr. David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Regulations for Commercial
Harbor Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the California Air Resources Board (CARB) proposed concepts for further reducing pollution from Commercial Harbor Craft (CHC). Since 1976, AMNAV Maritime (AmNav) has been the leading provider of marine and harbor services in the San Francisco Bay area. Established on the "best value" service solution, AMNAV has expanded operations to Los Angeles/Long Beach, and continues to be a leader in ship-assist, tanker and barge escorts, marine construction support, salvage, emergency response, military operations, shipyard vessel assist, logistics for oversized equipment, and vessel and barge towing services. Committed to providing the "Best Value" with the highest standards in reliability, safety and environmental stewardship, AMNAV Maritime boasts a wide range of modern vessels. Our diverse fleet with horsepower in excess of 6,800 including ASD/Z-Drive tractors and conventional, twin-screw equipment, AMNAV is always able to meet the precise needs of our clients. We are privileged to do business in California and committed to be a proactive partner in the regulatory process with CARB.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian's rely on to deliver and support the delivery of their essential goods and services. At no time in our history has the fragility of the supply chain been so evident. That is not a reason to back away from our commitment to the environment, but a reason to pursue practical, science-based solutions. AmNav has a long history of taking the lead on the environment implementing creative and technologically advanced solutions. We have spent tens of millions of dollars on clean air new builds and upgrades. Over the last 20 years we have performed dozens of engine upgrades and clean-air rebuilds in advance of the regulatory requirements of the 2009 CHC rulemaking. In the last two years we have built and delivered a state-of-the-art 90 ton Tier 4 escort tugs to the California Market. A tug, that under the proposed rules, will require significant modification just 7 years after being delivered.

We completed these projects in concert with many federal, state and port agencies. So, it is with a sense of frustration that we continue to be disappointed by CARB's failure to engage in a meaningful

dialog with industry. This will be our third series of formal written comments on this rule, we've attached the previous two for your reference, and we have yet to see CARB respond to any of our legitimate concerns as to the feasibility of the new rules, or the evidence that they are relying on false assumptions, unvalidated models and antiquated formulas to exaggerate the impact of harbor craft emissions. We believe that moving forward with the regulations as written, in light of the unaddressed and unacknowledged uncertainty of the CARB model's calculations regarding the health risk from CHC emissions is irresponsible. We urge CARB to stop pushing this clearly flawed and unsupported by science regulation and work in collaboration with the CHC industry and other impacted stakeholders to craft a regulation that makes a difference. One that:

- Develops rules that require those entering California must meet existing Best Available Technology Standard (BATS) at the time of entry or at the time construction began, whichever is first. (BATS defined as technology that is approved by both manufacturer and the regulator for use).
- Sets up a technical advisory committee of both industry and regulatory members to determine what is the BATS.
- Doesn't require adoption of unproven and unapproved technology (i.e. DPFs). Timelines should set adoption from the time of approval or production begins.
- Doesn't require those who in good faith upgraded or built new to comply with existing regulations, i.e. 2007/2009 CHC law, to upgrade prior to the life cycle of that investment (15 years for a rebuilt engines, 25 years for reengine/new construction) is realized.
- That exempt ATBs and Tugs in Ocean Transport from the CHC rules, simply because they are not harbor craft, and treating them as such is punitive and serves only to reduce the number of operators in the global supply chain.
- Establishes funding initiatives to promote the early adoption of new technologies and infrastructure that reduces emissions.

3121.1

Such a framework would accelerate the reduction of emissions from CHC, by promoting real, cost-effective investment and the adoption of the best technology at the time. The currently proposed rule works against this by requiring constant incremental investment in technologies that are unproven and only offer marginal improvement at a very high cost. Capital that could be spent on the development of a zero-emission escort tug, will be spent, and arguably wasted, on industry trying to squeeze a non-existent diesel particulate filter (DPF) onto a vessel that it was not designed to receive it.

Comments on the Current Regulations

In response to CARB's continued failure to address or even respond to these concerns, and in conjunction with our industry partners through our trade organization the American Waterways Operators (AWO) we have retained Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and to look at and comment on the Health Study section of the rulemaking packet. Their report to AWO can be found attached to AWO's official comments to this rulemaking. We believe the work and insight provided by Ramboll validates the concerns we have been asserting to CARB staff all along,

- CARB has misrelied a United States Coast Guard (USCG) database that has led them to the false conclusion that there is a 39% underreporting of CHC emissions to CARB. Ramboll data has shown us that for the towing industry that number is only 2.3%.

3121.2

- The unaddressed and unacknowledged uncertainty of the CARB model’s calculations of the health risk created by harbor craft emissions overstates their impact on the public, likely far beyond just the improper inflation created by the overstated vessel inventory. 3121.3
- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions to ocean-going tugs and barges that meet the exact same criteria. 3121.4
- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. AmNav supports CARB’s goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions. 3121.5
- This rule puts living wage jobs and the lives of our mariners at risk. Attempting to install or operate unproven technology in the marine environment is filled with risk. Unlike trucks and off-road applications, our mariners cannot just pull over to the side of the road and call the fire department. *Unproven technology has no place in maritime applications.* 3121.6

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

The U.S. Coast Guard database used by CARB to determine the vessel population affected by the rule was designed to track the ownership and regulatory status of a vessel and provides no insight or information into where a vessel is operated. CARB’s use of this database overstates the population of tug and towing vessels to reach the false conclusion that there is a significant number of vessels that are not reporting their engine hours to CARB. 3121.7

We have shown ample evidence in previous comment letters and multiple meetings with CARB personnel to validate our position that emissions from vessels who have not reported their hours is only a fraction of the scaling factor CARB used to inflate the emission inventory. We have pointed out to CARB staff on these occasions that overcounting number of tug and towing vessels operating in California overinflates health risk assessment that is the justification for this rulemaking. We have explained the basis for the discrepancies and told the agency how it can obtain accurate data through the use of readily available AIS data that will show not only every vessel that enters CARB regulated waters, but when those vessels are actually underway. Inexplicably, CARB has done nothing to revise its figures or update its model. Indeed, at the CHC Workshop #4 held on March 16, 2021, CARB acknowledged that the agency was aware that its vessel counts did not accurately reflect the actual number of vessels in the applicable airshed, but informed attendees, without further explanation, that CARB would not be revising the vessel count numbers in the draft regulation. These technical and procedural errors jeopardize the entire basis for the regulation and subject it to heightened legal scrutiny.

For the purposes of this comment letter our trade organization, AWO, contracted with Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and the likely impact of emissions from those vessels. Using Automatic Identification System (AIS) data for 2019, Ramboll was able to account for every tug and towing vessel within California waters during that year. The AIS data affirms that CARB has significantly overcounted the size of California’s tug and towing vessel fleet. Specifically, Ramboll found that 200 tug and towing vessels operated within a 100 nm of the California Coast, not the 229 tug and towing vessels

estimated by CARB. Additionally, the CARB model assumes that non-reporting vessels operated with the same number of hours as reporting vessels. From the AIS data we can determine the number of hours when the vessels were moving, which when compared to hours reported to CARB, proved to be a reliable predictor of main engine hours. We were able to isolate the vessels CARB shows as having filed reports from those vessels that have not. The non-reporting vessels averaged only 18% of the hours of the reporting vessels. This means that the total unreported hours are just 2.3% of the total reported hours, not the 29% that the CARB scaling factors estimated.

3121.7
(cont)

Towing Vessel AIS Average Hours >.1 knot - Year 2019

Vessel Type	Reporting Vessels	Non-Reporting Vessels	Non-Reporting as % of Reporting
ATBs	1,613	278	17%
Tugboat Push/Tow	1,022	300	29%
Tugboat SA	2,336	239	10%
Total of Tug Categories	1,637	291	18%
Reporting Vessels	177		
Non-Reporting Vessels	200		
% of Vessel's not reporting	12%		
% of Unreported Hours	2.3%		

Ramboll ran estimates based on these accurately captured tug and towing vessel hours and found that NOx and PM emissions were only 72% and 62%, respectively, of the figures the improperly inflated CARB's model produced. We suspect a similar over estimation may exist with the other vessel categories of harbor craft and given that CARB's assumption was that 39% of the CHC were not reporting, the potential for a massive overestimation of the impact of all harbor craft is possible.

HEALTH STUDY CONCERNS

Given the above-noted inflation of the tug and towing vessel fleet size and operating hours we expect that CARB's assessment of harbor craft emissions is similarly skewed. In fact, Ramboll's estimates based on updated vessel fleet size and operating hours indicates that CARB's emissions are overstated. AWO also asked Ramboll to look at and comment on the Health Study section of the CARB rulemaking packet. Based on this assessment, Ramboll raised serious questions about the methodology CARB used both in its assessment of cumulative harbor craft emissions as well the resulting health effects. Most concerning to AWO is Ramboll's observation that CARB has made no apparent effort to validate its air quality model with verifiable, real-world results. Ramboll conducted a preliminary analysis to validate the agency's harbor craft- related exposure estimates by comparing the CARB modeled air concentrations at receptor points near Long Beach, Anaheim, Pico Rivera, and Los Angeles with the PM_{2.5} concentrations measured at the sampling stations installed at these locations. Because the sampling stations are designed to capture emissions from all nearby sources, the agency's modeled concentrations for harbor craft specifically would be expected to be within the range of the total measured emissions or, more likely, even lower. Below is the table of results from this exercise, extracted from the Ramboll report.

3121.8

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

The second column above shows the average annual PM_{2.5} concentrations measured at the sampling stations listed on the left. Again, these figures show estimated PM concentrations from all sources in the area, including from cars and trucks, rail and harbor craft as well as other sources. They also reflect locations near the shoreline that are most likely to be impacted by harbor craft emissions. The four columns on the right show the CARB's modeled concentrations calculated at four locations nearest to each sampling station. As highlighted in the table, Ramboll found from this preliminary check of the data that CARB's modeled estimates are up to 4 times higher than actual measured concentrations of from all sources captured at sampling stations in the same general area. It makes no sense that the emissions just from harbor craft would be higher than the emissions captured in these areas from all possible sources. This raises serious questions about the legitimacy of CARB's model and what if any efforts CARB has made to validate it.

3121.8
(cont)

Ramboll and AWO made numerous requests for information from CARB staff that would help us understand the methodology the agency used to determine health impacts associated with harbor craft emissions. CARB staff were unable or unwilling to provide much of the necessary information, which has forced Ramboll to make more generalized observations about CARB's approach. Those observations are offered in detail in Section 2.2 of the attached report, but in short, (1) there is enormous uncertainty in the health effects data that CARB has presented calling into question the purported benefits of the proposed rulemaking; and (2) CARB has applied health effects analyses in an unconventional way and has failed to report its findings in a way that transparently acknowledges the lack of certainty inherent in their findings.

What we can say with certainty is that the health risks are overstated, if only by the overestimation of the vessel inventory and emissions, but likely to a much greater extent due to the unaddressed issues with the modeling itself. CARB's overstating the emissions from harbor craft is magnified in each step of the model, with each highly conservative assumption or input that is propagated throughout both risk assessments. Based on the comparison of the model output with actual PM levels at monitoring sites we have reason to believe that the errors in the model are overestimating the actual exposures to communities along the shoreline, and thus overestimating any potential benefits of the proposed CHC rules by a significant margin. This is too important a rulemaking to be based on a health study with so much unaddressed uncertainty. CARB needs to take the time to get this right.

To that end AmNav urges CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Validate the emission model to ensure inputs and results are realistic and accurately portray the impact of CHC emissions
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations in collaboration with the CHC industry and other stakeholders to reflect the conclusions of the new study, and the best path achieving our common goal of a cleaner and healthier environment.

3121.8
(cont)

Moving forward with regulation without correcting errors in the underlying data set undermines the legitimacy of the regulatory process.

CARB'S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

CARB's decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

CARB's rationale for excluding these vessels applies to the towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins.
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits.
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

3121.9

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO submitted information in April of 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB's decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be remedied in any final rule.

CARB'S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

- This study of one large and spacious ship assists and escort tug is not representative of the diverse tug and towing vessel fleet.
- The Jensen Review Summary notes “the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.”
- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB’s proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many tug and towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of tug and towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, AmNav will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have only recently been repowered to meet the last iteration of the CHC regulations. In the most egregious case, AmNav has vessels that have just been delivered or it will take delivery off that will be forced to be retrofitted just a few short years after they are first put into service. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally “taking” property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

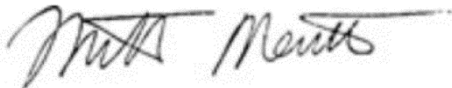
CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

Conclusion

AmNav appreciates this opportunity to comment on CARB’s Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the

State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. AmNav does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data inflates the emissions generated by the tug and towing vessel fleet and in turn inflates the impact the fleet's emissions have on the air quality and health of the residents of the regions in which we operate. AmNav stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry, finding feasible solutions to reducing emissions in the harbors of California. AmNav urges CARB to adopt a more collaborative approach and abandon this seriously flawed effort at rulemaking. Thoughtful and honest collaboration will benefit the State's economic and environmental health. AmNav looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Milt Merritt". The signature is fluid and cursive, with a horizontal line extending from the end.

Milt Merritt
President

cc: Jennifer A. Carpenter | President & CEO American Waterways Operators

Attachments

- Appendix A – Ramboll Report
- Appendix B – May 2021 Comment Letter to CARB
- Appendix C – April 2020 Comment Letter to CARB

MEMORANDUM

Date: November 11, 2021

To: American Waterways Operators

From: Amnon Bar-Ilan, Christian Lindhjem, Sonja Sax

Subject: Ramboll Comments on the California Air Resources Board (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation

1. REVIEW OF HARBOR CRAFT EMISSIONS IMPACTS AND COMPARISON OF CALIFORNIA HARBOR CRAFT EMISSION INVENTORY

1.1 Introduction

The California Air Resources Board (CARB) air emissions inventory and proposed rule effectiveness are presented in Appendix H of the proposed regulation supporting documentation. This 2021 document updates CARB’s emission inventory methods from the 2007/2009 Commercial Harbor Craft (CHC) emission inventory methods.¹ In general, the approach is similar, but many of the default inputs were substantially revised to lower overall emissions as shown in Figure 1.

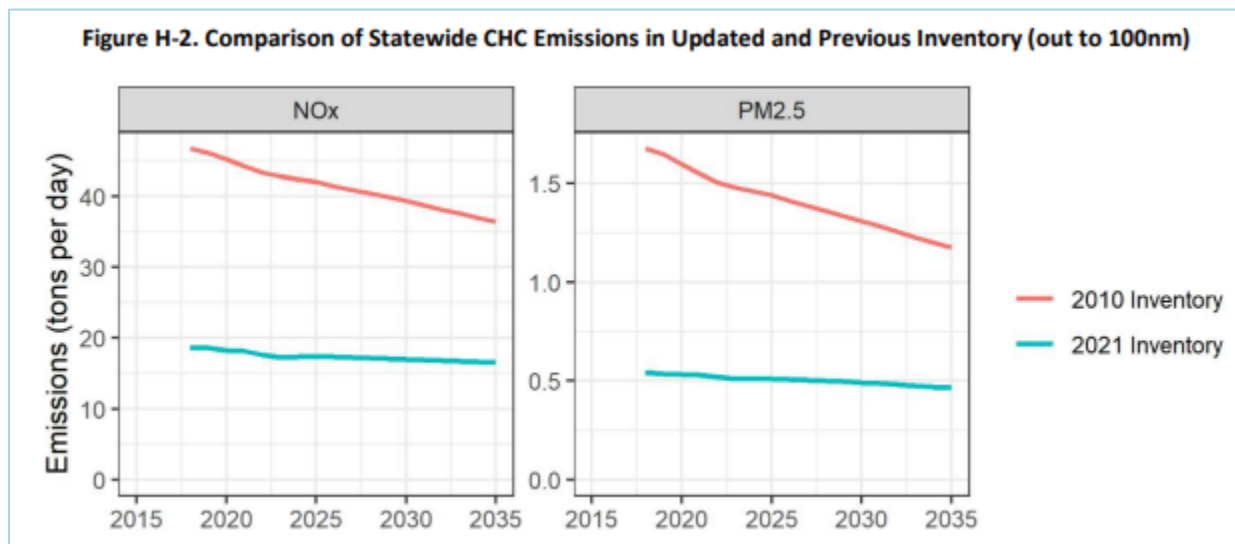


Figure 1. CARB commercial harbor craft emissions inventory comparison. (CARB 2021)

¹ <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road>

CARB segregated the vessels by type (including vocation) shown in Figure 2. In this report, we focus on the Tugboat types, which include Tugboat-Escort/Ship Assist, Tugboat-Push/Tow, and Tugboat-Articulated Tug and Barge (ATB).

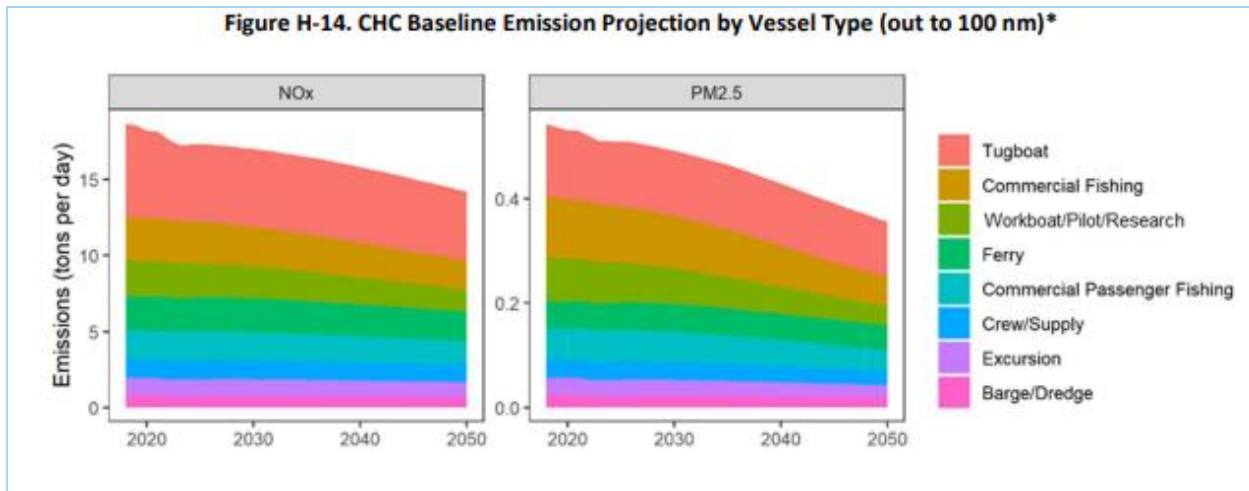


Figure 2. CARB commercial harbor craft emissions inventory by vessel type. (CARB 2021)

Alternative source of activity data includes AIS data that is publicly and freely available from a trusted source.² The AIS data identifies tug and towboats using vessel codes 31 for towboats and 52 for tugs and provide position, speed, and course. The AIS data identifies every vessel operating in US continental waters identified by MMSI for a given year.

Emissions estimates depend on input factors related to the vessel activity and engine characteristics. The AIS data provides the population and activity for all vessels operating in a defined domain. Emissions estimates also require that the new engine emission factors be identified by Tier level in Table H-5 of Appendix H of CARB (2021), age, and fuel correction.

$$\text{Emissions} = \text{Pop} \times \text{Power} \times \text{Activity (hrs)} \times \text{Load Factor} \times (\text{zhEF} + \text{DF} \times (\text{Age}/\text{Life})) \times \text{Fuel Correction}$$

- Pop – Population of vessels (activity input)
- Power – Engine power (activity input)
- Activity – Hours of engine operation (activity input)
- Load Factor – Average fraction of available power (CARB input estimate)
- zhEF – Emission factor when new (zero-hour) (CARB input estimate)
- DF – Deterioration factor (CARB input estimate)
- Age – Engine age (activity input)
- Life – Useful Life (CARB input estimate)
- Fuel Correction – In-use relative to engine certification fuel (CARB input estimate for 2011+ engines is 0.948 – NOx and 0.852 - PM³ and PM correction is more significant for older engines)

² <https://marinecadastre.gov/ais/>

³ <https://ww3.arb.ca.gov/msei/chc-appendix-b-emission-estimates-ver02-27-2012.pdf>

The vessel types average load factor estimates according to primary vocation for the range for tugs and towboats is shown in Table 1. Because of the difference in assumed load factor, it is important to appropriately characterize the activity that each vessel performs.

Table 1. CARB Load Factor input by vessel type. (Table H-9, CARB 2021)

Vessel Type	Load Factor	
	Main	Auxiliary
Tugboat-ATB	0.50	0.50
Tugboat-Push/Tow	0.33	0.37
Tugboat-Escort/Ship Assist	0.16	0.34

1.2 Vessel and Emission Inventory and Comparison with CARB Estimates

We used the AIS records to identify tug and towboats using vessel identification numbers 31 and 52, and American Waterways Operators (AWO) provided more detailed input for their vessel fleet including primary vocation, engine power, Tier level, and, in some cases, hours of operation in California waters. Table 2 shows the comparison of the vessel population found operating within 100 nm of the California coast during 2019. CARB (2021) reported that they identified the population of 177 tugs and towboats through the harbor craft reporting in Table H-3 and upwardly adjusted that inventory to account for unreported vessels through Coast Guard lists at California home ports. The AIS records find only 200 tug and towboats (23 vessels or about 13% more than reported by CARB) during 2019 compared with CARB’s estimate in Table H-3 of 229 vessels or 29 more than were reported in the AIS records.

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Table 2. Vessel population found in California waters <100 nm in 2019

Vessel Type	CARB App. H			AIS Records		
	Table H-3	Adjusted Total Table H-3	Average Hours Table H-4	Population	Average Hours (>0.1 knots)	Average Hours (<0.1 knots)
Tugboat-ATB ^a	11	19	2,466	14 ^a	1,991	1,380
Tugboat-Push/Tow	108	147	1,550	118	817	1,216
Tugboat-Escort/Ship Assist	58	63	2,676	68	2,141	3,855
Combined Tug and Towboat	177	229	1,936	200	1,350	

^a – AIS does not distinguish ATBs from Towboats; AWO identified six fleet vessels and eight others found in AIS records as ATB.

We used the AIS records to determine hours of operation for each tug and towboat operating in California waters out to 100nm during 2019. The average hours for AIS compared favorably with the CARB averages except for towboats where the operating hours about half that estimated by CARB. Total and average hours at less than 0.1 knots speed were considered to use no propulsion power, but auxiliary engines running at normal loads, though many tugs at their base will use shore power for auxiliary loads such as to keep the AIS transponders emitting a signal.

AWO supplied tier and power of the main and auxiliary engines for their members’ fleets as summarized in Table 3. For other tugs and towboats found in the AIS data, we used CARB default information with Tier 1 emissions rates to towboats (including ATB) and Tier 2 to tugboats to hours of operation. The AWO supplied fleets generally had higher installed power

than the CARB averages by vessel type, so using the CARB default for AIS extra (non-AWO) fleets leads to a conservative overestimate of emissions.

Table 3. Vessel population and inputs use found in California waters <100 nm in 2019

Vessel Type	CARB App. H Default Inputs			AWO Fleet		
	AIS Extra Population	Main Engines (hp)	Tier	AIS AWO Population	Main Engines (hp)	Tier
Tugboat-ATB ^a	8	4395	1	6 ^a	6400	2, 3
Tugboat-Push/Tow	94	731	1	24	2700	0 – 3
Tugboat-Escort/Ship Assist	7	2450	2	61	3898	0 – 4
Combined Tug and Towboat	109			91		

^a – AIS does not distinguish ATBs from Towboats, AWO identified six vessels in AWO fleets and eight in AIS records as ATB.

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The CARB default and AIS hours of operation were combined in the emissions to estimate tug and towboat emissions for 2019 as shown in Table 4. When applied, deterioration and fuel corrections primarily increase PM emissions relative to our baseline estimate. We also investigate the impact that fleet mix of engine Tier levels could have on average emissions rates primarily increasing PM emissions rates. The Tier levels for the AWO fraction of all vessels was provided, while CARB default fleet mix was used for the other tugs and towboats found in the AIS records.

Table 4. Tug and towboat emissions in California waters <100 nm in 2019.

Vessel Type	AIS Emissions Estimates		AIS (with deterioration, fuel correction)		AIS Additional Correction for Fleet Mix	
	NOx tpd	PM tpd	NOx tpd	PM tpd	NOx tpd	PM tpd
Tugboat-ATB ^a	1.36	0.020	0.92	0.019	0.85	0.020
<i>Idle <0.1 knots</i>	4%	5%				
<i>Fraction within 24 nm</i>	87%	83%				
Tugboat-Push/Tow	0.97	0.023	1.11	0.032	1.05	0.039
<i>Idle <0.1 knots</i>	9%	15%				
<i>Fraction within 24 nm</i>	82%	85%				
Tugboat-Escort/Ship Assist	2.04	0.041	2.31	0.057	2.31	0.057
<i>Idle <0.1 knots</i>	17%	26%				
<i>Fraction within 24 nm</i>	99%	99%				
Sum Tug and Towboats	4.37	0.086	4.34	0.109	4.22	0.117
CARB App. H (Estimated from Figure H-14)	6.1	0.14				
Relative to CARB Figure H-14	72%	62%	71%	78%	69%	83%

1.3 Assumptions

- AIS data using a <0.1 knot cutoff to eliminate vessel activity when main (and often auxiliary) engines are at least low power or entirely off. The '<0.1knot' criteria best matched the propulsion engine time for tugboat (4% overestimate) and towboats and others identified in AWO fleets (4% underestimate).
 - Under <0.1 knot, the auxiliary engines were assumed to continue to be used to supply power for the AIS and other electrical demands. This is a known overestimate because many tugs plug into shore power while at base.
- Based on the CARB default model year, we used Tier 1 engines for towboats (both ATB and others) and Tier 2 for tugboat-Escort/Ship Assist.
 - CARB reported to have used a distribution of Tier levels; Andrew Daminao (CARB, email to Charles Constanzo, Friday, September 3, 2021 8:55 AM) provided a file 'Towing Vessel Inventory 2019' that provided information about the fleet mix by tier level.
 - Shown in Table 5 is a comparison of the impact on emissions that fleet mix could have compared with either Tier 1 or Tier 2. The small fraction of Tier 0 in the fleet has a significant impact (greater than 50% for DPM) on towboat emissions rates estimated and less but still significant on the tugboats.
 - AWO provide fleets' engines characteristics for 2019 that had generally higher Tier levels and averaged lower emissions levels than the fleets provided by CARB.

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Table 5. Fleet mix emissions impacts from CARB towing vessels file and AWO Submittals for 2019.

Vocation	Tier	Count	AWO Count	Emission Factor by Tier (g/hp-hr)		CARB Tier 0, 1 Contribution	
				NOx	DPM	NOx	DPM
Tugboat-ATB	0	2	0	7.34	0.37	25%	49%
Tugboat-ATB	1	1	0	6.97	0.12	12%	8%
Tugboat-ATB	2	6	2	5.08	0.09		
Tugboat-ATB	3	2	4	3.69	0.05		
Tugboat-ATB	4	0	0	1.04	0.03		
Average ATB (CARB)		11		5.41	0.136		
Average ATB (CARB)		Ratio vs. Tier 1		0.78	1.14		
Average ATB (AWO)		6		4.15	0.063		
Tugboat-Push/Tow	0	32	1	7.34	0.37	39%	65%
Tugboat-Push/Tow	1	14	4	6.97	0.12	16%	9%
Tugboat-Push/Tow	2	42	8	5.08	0.09		
Tugboat-Push/Tow	3	17	11	3.69	0.05		
Tugboat-Push/Tow	4	0	0	1.04	0.03		
Average Towboat (CARB)		105		5.80	0.173		
Average Towboat (CARB)		Ratio vs. Tier 1		0.83	1.44		
Average Towboat (AWO)		24		4.85	0.088		
Tugboat-Escort/Ship Assist	0	4	5	7.34	0.37	15%	34%
Tugboat-Escort/Ship Assist	1	8	12	6.97	0.12	28%	22%
Tugboat-Escort/Ship Assist	2	18	22	5.08	0.09		
Tugboat-Escort/Ship Assist	3	6	21	3.69	0.05		
Tugboat-Escort/Ship Assist	4	0	1	1.04	0.03		
Average Tugboat (CARB)		36		5.52	0.121		
Average Tugboat (CARB)		Ratio vs. Tier 2		1.09	1.35		
Average Tugboat (AWO)		61		5.09	0.104		

- The deterioration of emissions due to age is a large uncertainty given that engines are regularly rebuilt and that historic regulations have encouraged engine rebuilds with emission upgrades to higher Tier levels.
 - CARB (2021) assumed that towboats would average a model year of 2003 (Table H-1), which in 2019 is 16 years old and past their useful life (Table H-8) of 14 years for main engines. This would increase NOx emission rates by 24% and PM by 77% for towboats.
 - CARB (2021) assumed that tugboats would average a model year of 2009 and be 10 years old in 2019. This would increase NOx emission rates by 15% and PM by 48% for towboats.

1.4 Conclusion

We demonstrated using publicly available AIS records that it is possible to accurately identify vessel activity spatially defined. Individual vessels are identifiable through MMSI numbers unique to the AIS transmitters along with their actual activity within California waters. Using the AIS data, CARB can more accurately identify the unreported vessels and not rely on a less reliable list of vessels by home port.

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Overall, the number and emissions from tugs for both NOx and PM (including towboats) appear to have been overestimated in Appendix H. The emissions overestimate depends on several input variables, but engine emissions deterioration and fleet fraction, especially the remaining Tier 0 engines still in operation, have a significant effect on PM emissions rates.

2. COMMENTS ON THE HEALTH STUDY (APPENDIX G)

2.1 Health Risk Assessment for South Coast and Bay Area Air Basins

CalPuff Modeling

The CalPuff modeling conducted in support of the Proposed Amendments to the CHC Rulemaking involve a number of model inputs and assumptions as outlined in Appendix G. Ramboll reviewed the modelling methodology as well as supporting documentation provided by CARB.

A missing element of the modeling was any validation of the key model inputs as well as the model results. Because of the complex nature of the modeling, including a number of assumptions regarding the emissions inventory, spatial and temporal allocation of emissions, complex terrain and meteorology, it is paramount that CARB validate to the extent possible the model inputs and results.

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With regards to model inputs, at the very least CARB should verify that the meteorological estimates used in the model compare to actual measured estimates from a relevant meteorological station. In addition, CARB used a single year of meteorological data and it would also be important to consider using more than one year in order to capture any variability in meteorological parameters that tend to vary from year to year.

With regards to model results, one important way to validate results includes comparing modeled results with measured values at monitor locations at or near the modeled receptor points. While we understand that the CARB is only considering contributions from CHCs in the form of diesel particulate matter, the modeling is used to estimate exposures to diesel

particulate matter and PM_{2.5}. We also understand that ambient monitors will be measuring PM_{2.5} from all sources. Therefore, we expect that modeled concentrations would be within the range of measured estimates or lower.

Ramboll conducted a check of how modeled PM concentrations compare to measured PM_{2.5} concentrations for the South Coast Air Basin. Table 6 shows the results of the comparison between measured concentrations at monitoring sites in the South Coast Air Basin and nearby receptors.

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As shown in Table 6, the results from this preliminary check of the data show that the modeled estimates are overestimating exposures as these estimates are up to 4 times higher than actual measured concentrations of PM_{2.5} particularly in the most impacted regions (i.e., near the shoreline). Inland modeled estimates (which are expected to be less impacted by CHC emission) are closer to the measured concentrations although still exceed these concentrations for some receptors. This indicates that overall the modeled estimates are overestimating exposures. CARB should similarly verify the results for the Bay Area Air Basin.

An additional source of uncertainty is associated with scaling the concentrations for future years based on changes in emissions. Because the concentrations are not only based on the changes in emissions, but other key factors including meteorology, this introduces a significant amount of uncertainty, making the validation of model estimates even more critical. Also, because we believe that emissions are overstated this will contribute to even more uncertain exposure estimates based on simply scaling.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

Cancer Health Risk Assessment

The cancer risk assessment also relies on a number data inputs and assumptions, starting with the estimates from the CalPuff modeling. Many of the inputs and assumptions are considerably conservative as they are meant to be health protective and are screening-level analyses. It is important to note that screening level analyses are often followed by more targeted analyses with refined parameters that are more site-specific and/or based on more realistic parameters in order to yield more realistic risk results. Importantly, the numerous levels of

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conservativeness in screening level analyses result in risk values that are often highly overestimated and do not necessarily reflect actual risks.

One key data input includes the exposure estimates, which are based on the CalPuff model inputs and a number of additional key assumptions. As noted above, based on Ramboll’s check of the modeled DPM estimates, it is likely that these estimates are overestimating exposures, both due to overestimated emissions (see Section 1) contributing to overestimates of about least about 20-60%, in addition model assumptions that result in overestimates compared to measured estimates by as much as a factor of 4 (see comments above) at some receptor locations.

Exposure estimates are also based on updated methodology that also increases the risk estimates because of the application of high (95/80%) breathing rates and multiplicative factors for greater susceptibility in children. In addition, the risk assessment includes several conservative assumptions for estimating exposures including exposures across a residence time of 70 years⁴ and assuming a person is home 24 hours a day over those 70 years. All of these conservative assumptions compound to generate highly inflated risks.

Another key input for the risk assessment is the use of a cancer potency factor (CPF). CARB relied on the estimate developed by OEHHA of 1.1 (mg/kg-day)⁻¹ or 3 x 10⁻⁴ per µg/m³. This cancer potency value, which represents a 95% upper confidence interval of the lifetime risk, is dated and overly conservative compared to more recent evaluations of the literature on which the cancer potency is based.

At the time of the development of the cancer potency EPA deemed the evidence to be too uncertain to use for cancer risk assessment (US EPA 1994⁵). An HEI study (HEI 1995⁶) found similar limitations associated with the studies that were the basis of the OEHHA value. These limitations included (1) questions about the quality and specificity of the exposure assessments for diesel exhaust, (2) a lack of quantitative estimates of exposure to allow derivation of an exposure–response function, and (3) lack of adequate data to account quantitatively for individual other factors that might also be associated with lung cancer, such as smoking. In 2002, EPA⁷ again concluded that data were too uncertain for developing a cancer potency, but using more qualitative methods determined the risk to be in the range of 10⁻⁵ to 10⁻³. Therefore, the risk could potentially be about 300 times lower than the OEHHA value.

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Another important issue in extrapolating results from older epidemiology studies, as OEHHA did, is that diesel exhaust exposure in these studies is based on diesel exhaust composition that is very different compared to more contemporary diesel exhaust, and also quite different from marine vessel emissions (as these studies evaluated exposures in railroad workers and truck drivers). Specifically, because of the long latency period for lung cancer, epidemiology studies need to examine workers whose exposures started more than 20 years earlier. These particular studies are based on exposures from the 1950s and 1960s. However, the US EPA and CARB have progressively tightened standards for particulate emissions from diesel engines, including marine engines, resulting in the development of new technology diesel engines with significantly lower emissions and also likely different composition. Because these

⁴ A 30 year residence time is considered to be a more realistic residence time period.
⁵ US EPA. Health Assessment Document for Diesel Emissions (External Review Draft, 1994) - Volume 1. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/8-90/057Ba (NTIS PB95192092)
⁶ HEI. Diesel Exhaust: A Critical Analysis of Emissions, Exposure, and Health Effects. 1995. Diesel Exhaust New Scan.pdf (healtheffects.org)
⁷ U.S. EPA. Health Assessment Document for Diesel Engine Exhaust (Final 2002). U.S. Environmental Protection Agency, Office of Research and Development, National Center for Environmental Assessment, Washington Office, Washington, DC, EPA/600/8-90/057F, 2002

changes have resulted in not only quantitative reduction in mass emitted, but have also resulted in differences in the composition with respect to size and chemicals associated with the exhaust (e.g., Hesterberg et al. 2011⁸), the epidemiology studies based on old generation engines may not be applicable to current emission conditions.

Even if the epidemiology data were deemed robust enough for use in quantifying the cancer risks of DPM, the uncertainty suggests that cancer risks could be over 100 fold lower than estimates by CARB, which would bring the cancer risks into an acceptable range by US EPA and California standards (i.e., 10⁻⁶ to 10⁻⁴) under the current regulations, without the need for application of the proposed regulations.

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At a minimum, CARB should provide a more detailed discussion of the uncertainties noted in these comments and the impact on the estimated risks, which we note are likely highly inflated. The cumulative impact of application of multiple conservative assumptions needs to be acknowledged.

2.2 Regional PM_{2.5} Mortality and Illness Analysis for California Air Basins

CARB used two different methods to estimate the impacts of the Proposed Amendments to the CHC Regulation on mortality and other health effects (hospital admissions for cardiovascular and respiratory diseases and emergency department visits for asthma). The first method relies on the modeled estimates for the two air basins (San Francisco Bay and South Coast) and the second method is a reduced form analysis that is applied to other air basins as well as to impacts from reductions in NOx.

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While the CARB health analysis is based on standard methodology used by EPA to calculate health impacts, we were not able to check the results based on the data provided by CARB as many of the model inputs were missing. Also, even though the methods appear to be applied correctly, given what we were provided for review, the approach taken by CARB is unconventional. First, CARB is using two different methods to calculate health impacts, one based on modeled results and a second based on a reduced-form method with large simplifying assumptions. Both methods are subject to large uncertainties, but the reduced-form method has significantly more uncertainty.

Also, the way the CARB approaches the health analysis is also significantly different from the way EPA and others have conducted similar analyses (i.e., using BenMAP). CARB essentially is computing effects based on changes in PM_{2.5} modeled estimates (or PM emission reductions) for each year starting in 2023 and up to 2038 between the current regulations and the proposed amendments. The impacts are summed across air basins for each year, and then summed across all years. To our knowledge, this type of cumulative assessment of health benefits across a long time period in the future has not been conducted previously using the methods CARB is using. We welcome other examples where this has been done.

The implications are that these impacts are cumulative over time. In addition, the impacts actually increase over the years (presumably as the difference in emissions or concentrations increase between current and proposed regulations).

⁸Hesterberg, T. W., Long, C. M., Sax, S. N., Lapin, C. A., McClellan, R. O., Bunn, W. B., & Valberg, P. A. (2011). Particulate Matter in New Technology Diesel Exhaust (NTDE) is Quantitatively and Qualitatively Very Different from that Found in Traditional Diesel Exhaust (TDE). *Journal of the Air & Waste Management Association*, 61(9), 894-913.

The amount of uncertainty associated with this analysis is very large and propagated across all the steps in the risk assessment process including 1) emissions estimation, 2) modeling and scaling of PM concentrations (which rely on emission inputs), 3) deriving PM from diesel PM, 4) assumptions regarding conversion of NO_x to PM, 5) application of health functions from epidemiology studies, and 6) estimation of baseline health statistics and population statistics for future years. The magnitude of the uncertainty and the impact on the direction of bias has not been evaluated by the CARB, but our analysis, based on available data, suggest that the magnitude is quite large (and larger than expressed by the 95% confidence intervals provided by CARB) and most likely are overstating the health benefits of the proposed amendments.

In light of the significant amount of uncertainty in the health analysis, we strongly suggest that CARB present the findings so that they are more transparent and in a way that acknowledges the level of uncertainty, as well as amount of confidence that can be placed on the results. For example, we don't think it is appropriate to present the combined results for the health analysis based on modeled data and those based on the IPT methodology, because the IPT results would tend to be much more uncertain and less reliable. Also, instead of presenting a total number of deaths as the sum across air basins and years, CARB should present results as a range on potential annual impacts for each air basin, separately. This again, with the acknowledgement that year to year there is uncertainty and the numbers could be more or less than estimated depending on many different model assumptions at every step in the risk assessment process.

Some of the key limitations and sources of uncertainty of these two methodologies for estimating the potential health impacts from the Proposed Amendments are discussed below.

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Analysis for the San Francisco Bay and South Coast

As is the case for the cancer health risk assessment, the PM mortality and illness analysis relies on a number of model inputs and assumptions, many that are associated with significant uncertainty that tends to overstate the risks.

In interpreting the mortality and illness results, it is important to consider that the health impacts are based on a single population-based epidemiological study that infer statistical associations between health effects and air pollution exposures, but that cannot provide definite evidence of a cause and effect. This is because these studies have important limitations that preclude definite conclusions regarding a causal link between PM and mortality or illness, including uncertainty regarding the exposure estimates, the potential role of other pollutants or factors that might explain the effects, and evidence that there is likely a threshold below which health impacts are unlikely. In addition, the components of PM that may be associated with adverse health effects are yet unknown, but the analyses assume that all PM is equally toxic, making it a very conservative analysis.

The epidemiological studies that form the basis of the health study, including the mortality study by Krewski *et al.* (2009)⁹ rely on data from central-site monitors to estimate personal exposures. This results in exposure measurement error because central-site monitors may not accurately capture population mobility, the uneven distribution of PM exposure attributable to local sources, pollution patterns that can be affected by terrain features and weather, and daily variations in PM concentrations or composition that may differ from variations experienced by

⁹ Krewski, D. et al., 2009. Extended Follow-up and Spatial Analysis of the American Cancer Society Study Linking Particulate Air Pollution and Mortality Report. Health Effects Institute, 140 <https://www.healtheffects.org/system/files/Krewski140.pdf>

individuals. These factors can bias the results of an epidemiology analysis in either direction. The direction and magnitude of the bias depends on the type of measurement error. For PM_{2.5}, however, because of the spatial variability of air pollutant concentrations the bias is likely to result in effects being overestimated (e.g., Goldman *et al.*, 2011¹⁰, Rhomberg *et al.* 2011¹¹).

The bias associated with confounding effects is particularly difficult to address in epidemiology studies because it is challenging to account for all potential confounding factors. A confounder is a factor that is associated with both an exposure and an outcome, and may make it appear that the exposure is associated with (or caused) the outcome. In PM mortality studies there is evidence that co-pollutants can confound the PM mortality association, especially because many of the pollutants are strongly correlated, and disentangling the effects of any single pollutant (if any) is difficult. Even if potential confounders are accounted for in studies, there may still be issues of how well the confounding variables are measured and controlled for. For example, in the study by Krewski *et al.* (2009), which is used by CARB for the mortality estimates, data on potential confounders such as smoking and body mass index were determined at the beginning of the study for all participants, but were not re-evaluated over the follow up study period. Changes in these variables over time could alter confounding effects. The issue of confounding relates to both the assumption of causality, where another factor may actually be the causal agent, and to the magnitude of the association, where a co-factor may account for some of the observed risk. In either case, ignoring the effects of confounding results in overstated effects estimates.

Another source of uncertainty is the assumption of a log-linear response between exposure and health effects, without consideration for a threshold below which effects may not be measurable. The issue of a threshold for PM_{2.5} is highly debated and can have significant implications for health impacts analyses as it requires consideration of current air pollution levels and calculating effects only for areas that exceed threshold levels. Without consideration of a threshold, effects of any change in air pollution below or above the threshold are assumed to impact health. Interestingly, although EPA traditionally does not consider thresholds in its cost-benefit analyses, the NAAQS itself is a health-based threshold level that EPA has developed based on evaluating the most current evidence of health effects. Most epidemiological studies do not indicate that a threshold exists, but these studies often do not have the statistical power to detect thresholds. Some studies that have employed different statistical methods have shown evidence of a threshold for PM-mortality effects. For example, Abrahamowicz *et al.* (2003)¹² found evidence for a PM_{2.5} threshold at about 16 µg/m³ below which mortality effects were not observed. Considering a threshold for PM effects would mean that effects would occur only when threshold levels of PM is exceeded.

Sensitivity analyses are often warranted using different health functions from different studies in order to evaluate the potential variability and/or uncertainty in health estimates. For example, some epidemiological studies have reported no mortality impacts from PM_{2.5}

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¹⁰ Goldman, GT; Mulholland, JA; Russell, AG; Strickland, MJ; Klein, M; Waller, LA; Tolbert, PE. 2011. "Impact of exposure measurement error in air pollution epidemiology: Effect of error type in time-series studies." *Environ. Health* 10 (1) :61. 211-5049
¹¹ Rhomberg, LR; Chandalia, JK; Long, CM; Goodman, JE. 2011. "Measurement error in environmental epidemiology and the shape of exposure-response curves." *Crit. Rev. Toxicol.* 41 (8) :651-671. 211-7617
¹² Abrahamowicz M, Schopflocher T, Leffondré K, du Berger R, Krewski D. Flexible modeling of exposure-response relationship between long-term average levels of particulate air pollution and mortality in the American Cancer Society study. *J Toxicol Environ Health A.* 2003 Aug 22-Oct 10;66(16-19):1625-54.

exposures (Beelen et al., 2009¹³; Enstrom, 2005¹⁴, Lipfert et al., 2006¹⁵). This means that if the BenMAP analyses used different concentration-response functions, the actual impacts may be very different from those reported in this analysis and could include a zero effect.

One additional important uncertainty stems from the assumption that all PM_{2.5}, regardless of composition, is equally potent in causing health effects such as mortality. This is important because PM_{2.5} varies significantly in composition depending on the source, and this is particularly important because the composition of particulate matter from diesel has also changed over time as a function of changes in both diesel fuel composition as well as the use of emission controls. Several reviews have evaluated the scientific evidence of health effects from specific particulate components (e.g., Rohr and Wyzga 2012¹⁶; Lippmann and Chen, 2009¹⁷; Kelly and Fussell, 2007¹⁸). These reviews indicate that the evidence is strongest for combustion-derived components of PM including elemental carbon (EC), organic carbon (OC) and various metals (e.g., nickel and vanadium), however, there is still no definitive data that points to any particular component of PM as being more toxic than other components. EPA also stated that results from various studies have shown the importance of considering particle size, composition, and particle source in determining the health impacts of PM (US EPA, 2009¹⁹). Further, EPA (2009) found that studies have reported that particles from industrial sources and from coal combustion appear to be the most significant contributors to PM-related mortality, consistent with the findings by Rohr and Wyzga (2012) and others. Therefore, by not considering the relative toxicity of PM components, BenMAP analyses are likely to be conservative.

Analysis Using the IPT methodology for Other Air Basins (and NOx)

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In addition to the analysis conducted on modeled PM_{2.5}, CARB applied a reduced-form methodology (IPT) to estimate additional health impacts for other air basins and from PM_{2.5} derived from NOx emissions. These reduced-form analyses involve important simplifying assumptions that can greatly affect the reliability of the estimated health impacts.

The uncertainties described in the previous section also apply to the development of the IPT factors that are used to estimate the impacts for other air basins. Additional uncertainty is introduced when applying these IPT factors to the estimated emissions for this rulemaking. The IPT factors are based on a specific time period, and therefore important variability due to meteorological changes and or spatial differences are not accounted for. Most of these uncertainties were not discussed or considered by CARB. Importantly, a large majority of the assumptions and uncertainties likely result in overestimated benefits, particularly when considering the compounding effects of the uncertainties in the various modeling inputs, starting with the emissions estimates, on the final calculation.

¹³ Beelen, R; Hoek, G; van den Brandt, PA; Goldbohm, RA; Fischer, P; Schouten, LJ; Jerrett, M; Hughes, E; Armstrong, B; Brunekreef, B. 2008. "Long-term effects of traffic-related air pollution on mortality in a Dutch cohort (NLCS-AIR Study)." *Environ. Health Perspect.* 116 (2) :196-202
¹⁴ Enstrom, JE. 2005. "Fine particulate air pollution and total mortality among elderly Californians, 1973-2002." *Inhal. Toxicol.* 17 (14) :803-816. 209-6826
¹⁵ Lipfert, FW; Wyzga, RE; Baty, JD; Miller, JP. 2006. "Traffic density as a surrogate measure of environmental exposures in studies of air pollution health effects: Long-term mortality in a cohort of US veterans." *Atmos. Environ.* 40 (1) :154-169. 206-7558
¹⁶ Rohr A.C., R.E. Wyzga, 2012. Attributing health effects to individual particulate matter constituents. *Atmos Environ.*, 62, 130-152. doi:10.1016/j.atmosenv.07.036.
¹⁷ Lippmann, M., L.C. Chen, 2009. Health effects of concentrated ambient air particulate matter (CAPs) and its components. *Crit. Rev. Toxicol.*, 39, 865e913.
¹⁸ Kelly, F.J., J.C. Fussell, 2007. Particulate Toxicity Ranking Report. Report Number 2/07. Environmental Research Group, Kings College, London.
¹⁹ U.S. EPA. Integrated Science Assessment (ISA) for Particulate Matter (Final Report, Dec 2009). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009

As noted previously, we don't believe it is appropriate for CARB to combine the results from this analysis with the analysis for the two air basins, for which modeled estimates are available. In addition, the estimated range of annual impacts for each air basin should be reported instead of summing the cumulative results across years.

2.3 Conclusions

The health risk assessments conducted by CARB are subject to a significant number of uncertainties that are propagated through the risk assessment steps and that we have shown to overestimate the health impacts. We first show that emissions estimates are inflated (see Section 1) and these estimates are inputs to the CalPuff modeling used to estimate exposures and risks for the Bay Area and South Coast Air Basins. We also note that CARB did not validate the model estimate against measured levels of PM_{2.5}. Our preliminary analysis indicates that the modeled estimates are overestimating the measured levels for receptors near monitoring stations, particularly in highly impacted areas. Lastly, we highlight many of the risk assessment model assumptions that will also contribute to overstated health impacts in both the cancer risk assessment and the mortality and illness assessment.

Specifically, in the cancer risk assessment the use of highly conservative exposure assumptions (e.g., high breathing rates, 70 years of exposures 24 hours a day), application of sensitivity factors, and use of a highly conservative cancer slope factor all add up to highly inflated cancer risks. Similarly, in the mortality and illness analysis, risks are also likely to be overstated because of assumptions related to the choice of epidemiological study as the basis of the analysis, as well as the assumptions regarding the year to year changes in emissions across the air basins. Importantly, because the two methods used by CARB are associated with significantly different amount of uncertainty, the mortality and illness results should be presented as annual effects, and shown separately by air basin and by methodology, noting that results using the IPT approach will be more uncertain than those based on modeled results.

Overall, CARB needs to provide a more robust validation of modeled assumptions, a more thorough discussion of the underlying uncertainties and impact on the results, and a more transparent representation of the study results.

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May 3rd, 2020

Ms. Bonnie Soriano
Chief, Freight Activity Branch
Transportation and Toxics Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: AWO Comments relating to Proposed
Amendments to the Regulations to Reduce
Emissions from Diesel Engines On
Commercial Harbor Craft Operated Within
California Waters and 24 Nautical Miles of
the California Baseline

Dear Ms. Soriano:

We appreciate the opportunity to comment on the "Proposed Concepts for Commercial Harbor Craft in California." Since 1976, AMNAV Maritime (AmNav) has been the leading provider of marine and harbor services in the San Francisco Bay area. Established on the "best value" service solution, AMNAV has expanded operations to Los Angeles/Long Beach, and continues to be a leader in ship-assist, tanker and barge escorts, marine construction support, salvage, emergency response, military operations, shipyard vessel assist, logistics for oversized equipment, and vessel and barge towing services. Committed to providing the "Best Value" with the highest standards in reliability, safety and environmental stewardship, AMNAV Maritime boasts a wide range of modern vessels. Our diverse fleet with horsepower in excess of 5,000, including ASD/Z-Drive tractor and conventional, twin-screw equipment, AMNAV is always able to meet the precise needs of our clients. We are privileged to do business in California and committed to be a proactive partner in the regulatory process with CARB.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian's rely on to deliver and support the delivery of their essential goods and services. We were disappointed by CARB's 16-day comment window, on a 113-page draft rule published on April 1st. These proposed rules involve highly technical subjects and the time allowed is not ample to both review the changes from the last draft, nor to prepare constructive comments to address what we believe are significant short-comings, errors, and misrepresentation of facts in the latest version. We did receive notice from Mr. David Quiros that CARB was granting an unpublished open-ended extension period. And while we feel this extension should have been formal and published, we trust that CARB is sincere, and are taking advantage of the opportunity by submitting the following comments for CARBs consideration and action.

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Over the years AmNav has been associated with several highly technical rulemaking processes. Among these were the Escort Rules for San Francisco Bay and the Ports of Los Angeles and Long Beach. The regulatory bodies involved included the United States Coast Guard and the California Office of Spill Prevention and Response. Private and industry partners in the process included including harbor and bar pilot associations, marine exchanges, shipping companies, harbor safety committees, tug and barge companies and other interested stakeholders. While at times the opinions of the regulators and regulated differed we were all guided by a commitment to get it right and to base our findings on accurate and verifiable data and sound scientific principles. The result was rules that have produced safer waterways, while allowing the commerce they regulate to continue to operate in a safe and efficient manner. The science behind the latest draft of the proposed CHC regulations has deviated from this proven path. We continue to be concerned by CARB's willingness to move forward with the rules without first addressing the known and significant errors in the foundational elements that they are based upon. These inaccuracies include:

- Errors in the vessel population data used by CARB, that drastically overstates the towing vessel population operating in CARB waters. AmNav and AWO have repeatedly demonstrated to CARB staff that the U.S. Coast Guard vessel database, the foundation of all their vessel counts, has no information related to a vessel's utilization or location of operation. Further we have shared with CARB real-time sources of vessel operating data that could provide accurate usage data. Sources that showed:

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- Of the 219 towing vessels CARB used as operating in California, only 73 of those vessels were operated in California.
- That the 219 vessels did not include vessels registered out of state, that were operating in California.
- That CARB asserted, based on the false number of 219 towing vessels in their database, there was a 48% under-reporting of towing vessel emissions in California. Accurate real-time data refutes this claim and shows that any errors in reporting are likely insignificant.

It defies logic and scientific rigor that CARB is continuing to promote a regulation based on such an erroneous data set that has created incorrect and invalid conclusions.

- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions ocean-going tugs and barges that meet the exact same criteria. These vessels trade in direct competition with self-propelled cargo and tank ships that are not covered by the CHC rule, putting them at a financial disadvantage.

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- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. AmNav supports CARB's goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions.

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In support of our comments, we have included two additional letters, previously received by CARB. Attached as Appendix A is AWO's Comments submitted to CARB on 4/30/21. AmNav assisted AWO staff in the preparation of their comments and fully supports the observations and statements contained therein. In Appendix B is the AmNav comments on the rule submitted last year, dated 4/30/2020. As few if any of these comments were directly addressed by CARB staff in either the revised draft of the rules or in the meetings leading up to their release, we urge CARB to reread these comments. We believe they offer a practical basis for renewed discussion and collaboration to create a rule set that will address the real challenge of emissions reductions and their true impact on health based in real data and the fair application of regulation.

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

AmNav directs you to the comments contained in the AWO comment letter in Appendix A. As the U.S. Coast Guard will attest, the database used by CARB to describe the population was designed to track the ownership and regulatory status of a vessel and does not provide any insight or information into where a vessel is operated. CARB staff has acknowledged this fact and yet continues to use the numbers in the database to justify the conclusions of the study and the proposed rules. These are not insignificant errors. The vessel count includes:

- 146 towing vessels that did not operate in CARB waters during the last three years.
- Excludes 69 towing vessels that were registered out of state but did operate in CARB waters.
- Includes 33 vessels that did not have a valid Certificate of Documentation, either having retired it or having it marked as "Not in Operation." There is no evidence these vessels operated in CARB waters during the last three years.

Using real-time sources from the Marine Exchanges in both San Francisco and Los Angeles Long Beach, based on Automatic Identification System (AIS) and regulatory reporting requirements, we demonstrated the flaws in the vessel counts that CARB was using for towing vessels. Most importantly we clearly showed that there was no justification for CARB to inflate the towing vessel numbers by 48% for under reporting. AWO and AmNav shared all our data with CARB in the spirit of full transparency and would welcome the opportunity to assist CARB in obtaining accurate vessel information. But we are confused and dismayed that while CARB openly acknowledged these errors in the CHC Workshop #4 held on March 16, 2021, they informed the attendees of the workshop that they would not be revising their vessel count numbers in the draft regulation.

To that end AmNav joins with AWO to urge CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations to reflect the conclusions of the new study.

Moving forward with regulation without correcting errors in the underlying data set will undermine the legitimacy of the regulatory process.

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CARB'S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

AmNav directs you to the comments from AWO, contained in Appendix A. CARB's decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

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CARB's rationale for excluding these vessels apply to the towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins;
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits;
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO members have offered to confidentially share with CARB financial data that demonstrates the small profit margins in the towing industry. AWO submitted information in April of 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB's decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be addressed prior to formal rulemaking. In our comment letter from last year, found in Appendix B, AmNav offers draft language that could address this issue and separate vessels engaged in "ocean-going voyages" from the burdens on rules designed for "harbor craft".¹

CARB'S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

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¹ Appendix B, "Concept I: Expanding Vessel Categories Subject to In-Use Requirements", Page 2, beginning at the 2nd Paragraph.

- This study of one large and spacious ship assist and escort tug is not representative of the diverse towing vessel fleet.
- The Jensen Review Summary notes “the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.”
- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB’s proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

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CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, AmNav will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have are being or have recently been repowered to meet the last iteration of the CHC regulations. In the most egregious case, AmNav has vessels that have just been delivered or will soon take delivery of that will be forced to be retrofitted just a few short years after they were first put into service. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally “taking” property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

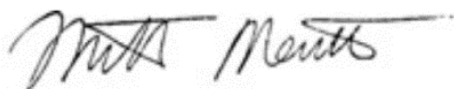
CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

Conclusion

AmNav appreciates this opportunity to comment on CARB’s Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. AmNav does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data not only inflates the emissions generated by the towing vessel fleet and in turn the impact the fleet has on the air quality and health of the residents of the regions in which we operate. AmNav stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on

their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry finding feasible solutions to reducing emissions in the harbors of California. AmNav urges CARB to adopt a more collaborative approach in advance of the 45-day formal rulemaking. Thoughtful and honest collaboration will benefit the state's economic and environmental health. AmNav looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Milt Merritt". The signature is written in a cursive, flowing style with a long horizontal stroke extending to the right.

Milt Merritt
President

Cc: Charles Costanzo, AWO's General Counsel and VP – Pacific Region



April 30th, 2020

David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Concepts for Commercial Harbor
Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the “Proposed Concepts for Commercial Harbor Craft in California.” Since 1976, AMNAV Maritime has been the leading provider of marine and harbor services in the San Francisco Bay area. Established on the “best value” service solution, AMNAV has expanded operations to Los Angeles/Long Beach, and continues to be a leader in ship-assist, tanker and barge escorts, marine construction support, salvage, emergency response, military operations, shipyard vessel assist, logistics for oversized equipment, and vessel and barge towing services. Committed to providing the “Best Value” with the highest standards in reliability, safety and environmental stewardship, AMNAV Maritime boasts a wide range of modern vessels. Our diverse fleet with horsepower in excess of 5,000, including ASD/Z-Drive tractor and conventional, twin-screw equipment, AMNAV is always able to meet the precise needs of our clients. We are privileged to do business in California and committed to be a proactive partner in the regulatory process with CARB.

It is our sincere desire to be a constructive participant in the rule making process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian’s rely on to deliver and support the delivery of their essential goods and services. Our experience with the first Hybrid Tug technology deployed in California waters and the first conversion of a conventionally powered vessel to Hybrid technology makes us uniquely qualified to comment on the concepts proposed by CARB. Our comments follow the table of contents for your Proposed Concepts Commercial Harbor Craft (CHC) Regulations. You will find our responses to the Staff Questions for Stakeholder Input.

Concept I: Expanding Vessel Categories Subject to In-Use Requirements

We want to be clear that we concur with CARB’s reasoning and support the exclusion of the commercial fishing vessels from the proposed regulations. However, we would ask CARB to consider that those same points can be made about other vessel categories that are included in the list of regulated CHC. Under the heading of Justification/Reasoning, CARB sites their reason for not including commercial fishing vessels, as: “the small profit margins in the industry, demonstrated lack of feasibility for Tier 4 repowers and retrofits , competition with out of state and global markets, and tendency to conduct the

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majority of their operations far from the coast.” All these points can be made regarding tank barges over 400 feet and 10,000 gross tons and the tugs that tow them. These vessels operate in stiff competition to both international tankers that are able to move supply to and from foreign ports, US ocean going tankers that are exempted and trucks and rail that while regulated by CARB present a much higher emission profile per ton of cargo moved than their marine counterpart¹. Further their routes are those of ocean-going vessels and not CHC, and we feel they should not be unduly burdened with regulations that don’t apply to their competition.

It is our belief that CARB should determine the applicability of the CHC rules based on the service the vessel is performing, rather than generic classification of the vessel. We would propose the following amendments:

- *A vessel engaged in ocean voyage or a barge engaged in ocean voyage shall be exempt from the CHC rules. The following shall be the criteria for defining an ocean voyage exempt from regulation under the CHCRs.*
 - *A tug and loaded barge, whose arrival or departure is transporting a cargo with the destination outside of the load ports line of demarcation and beyond the 24nm control zone.*
 - *A lite tug and barge, whose arrival or departure is for the purpose of loading a cargo with a destination outside of the load ports line of demarcation and beyond the 24nm control zone.*
 - *Any moves or engine hours within the line of demarcation that is solely for the purpose of preparing for an ocean voyage as defined above.*

So long as the vessels movements comply with the criteria above, they will not be required to comply with the CHCR, nor count any hours against the low-use operational requirements of the regulations.

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We believe adopting the service-based criteria above will ensure that barge moves that are clearly ocean voyages are not unduly burdened versus other modes of transportation that serve the same markets. This would also preserve the intent of the CHCRs to ensure that vessels performing services inside of the regulated control area are subject to the regulation.

Concept II. More Stringent In-Use Requirements

AmNav has a long history of working with CARB and other agencies to reduce the air emissions from our fleet ahead of regulatory requirements. This includes:

- Upgrading the tug Liberty to Tier 2
- Upgrading the tug Sandra Hugh to Tier 3
- Upgrading the tug Revolution to Tier 3
- Upgrading the tug Sandra Hugh to Tier 3 (June 2020)
- Upgrading the tug Independence (January 2021 Tier 2 to 3 100% funded by AmNav)
- Completing a Tier 4 Harbor Assist Tug in 2020 with three to follow in 2020/2021 replacing tugs that are tiering out due to the current CHCRs, but not done with their useful life.

¹ All Figures adapted from Texas Transportation Institute, “A Modal Comparison of Domestic Freight Transportation Effects of the General Public: 2001-2014,” January 2107, as reflected in the PricewaterhouseCoopers industry study.

Appendix C - Amnav April 2020 Comments

There are other repetitive down time costs when introducing new rules. For instance, going from Tier 2 to 3, requires drydocking (installation of higher capacity cooling system) and engine rebuilding. The vessel is out of service (not making money) for over 30 days. With the new rules we would have to shut this tier 3 tug down again. This will be magnified when we are looking at conversions to Tier 4, and the additional cost and downtime associated with the operation of those systems.

Through all these projects we have learned many lessons about what works well and what does not. The key to every successful project is having a complete understanding of the technology we are working with, using proven components, taking the time to properly engineer and plan the project and being able to operate the vessel long enough after the modifications to offset the capital expense of the project. These lessons learned inform our comments below.

Marine Harbor Craft applications are unlike the shore-based power installations that CARB draws parallels in justifying the requirement for DPFs. Specifically stating that DPFs are “widely commercialized and proven technology on light-duty and heavy-duty equipment that has been used on-road, off-road and in port applications.” The evidence contradicts this comparison. Concern is that to date there has been little marine application of DPFs. The size of our engines and available space for installation makes a DPF installation extremely difficult. The back pressure created by a DPF on the exhaust system may exceed the tolerances of many of our existing or future engines to properly operate. Many if not all our vessels currently have no OEM approved DPF available for the engines. Until one is available, and its characteristics defined, we cannot begin the process of determining if it is feasible to operate with a DPF.

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The application of DPFs will also have to consider that the duty cycle of a marine vessel, is unlike that of on-road, off-road or port application equipment. As noted in CARB's proposed concepts “escort and harbor assist tugs have a highly variable duty cycles operating with relatively larger engines but lower average loads . . .” Additionally, our vessels also use their engines as the primary mode of braking and often maneuvering. Doing so requires the rapid acceleration and deceleration of the engines. Operators do not have the luxury of shore-based equipment that can maintain a much more moderate increase of power through multi-ratio transmissions and the gradual application of fuel. On vessels, power is often needed immediately to avoid collision, allision or losing propulsion. Overloading the propeller and stalling the engine is a real risk when maneuvering in tight quarters. For this reason, the manufacturer provided fuel curves must be very dynamic, considering the variable nature of the load requirements of the engines. This variable engine loading is exactly the situation that has caused many of the issues, including fire and premature failure, that other industries have experienced when they attempted to incorporate the use of DPFs.

The process of repowering or modifying the propulsion or power generation plants of a marine harbor craft takes years to plan, obtain regulatory approval and execute. The planning and engineering must begin years prior to commencing the work and even relatively simple changes must be evaluated against the impact to the vessel's stability, maneuverability, available space and watertight integrity. Each component's specifications, characteristics and operating parameters must be known far enough in advance to ensure a thorough design review and engineering process that can take place. Engineering can take from 3 to 9 months depending on the complexity of the project. Many projects will also require the approval from the vessel's Class Society or the USCG, which can add months to the timeline. It can then take an additional 3 to 6 months to identify a shipyard and negotiate a contract for the modifications. When you add this up, the process must begin years before the work is to be done, and

the process can only begin when all the equipment that is to be used has been approved and accepted for the purpose.

The costs identified in the California Maritime Academy report do not reflect the entire financial impact of performing these modifications. With only a few tugs in our regional fleets, losing a single vessel has significant economic impact either in lost revenue or in the cost of sourcing a temporary replacement tug. While each situation is unique a conservative cost would run well above \$5,000 per day. With a conversion from Tier 2 to Tier 4 engines taking upwards of 2 months the cost the company will endure will be 100's of thousands not captured in the CMA report. To minimize the downtime, our engineering teams will generally begin the process years in advance, with work timed to ensure the modifications can be completed during one of the vessel's scheduled yard or other planned maintenance periods.

With all these challenges in mind, we encourage CARB to consider modifying their proposed rules as follows:

- *Expanding the implementation dates to better recognize the investment owners have already made to comply with previous regulations, we would ask CARB to adjust their implementation dates to allow any engine that is currently in compliance to be able to operate at least 20 years from the date it went into service without modification. For instance, AmNav has a new vessel currently under construction that under the current proposal will be required to have DPFs installed by 2028, less than 8 years after it was built. A modification that was not foreseen during the design and planning stage of the vessel.*
- *Additionally, any engine modified to comply with the current regulation should be allowed 15 years at a minimum, from the date it was modified, before being compelled to comply with the new CHCR.*
- *Delay the implementation date for installation of a Diesel Particulate Filter (DPF) to 5 years after a model approved by both the manufacturer and appropriate regulatory authority is available. Only when the exact characteristics and specifications of a DPF are known can a company begin the engineering and planning necessary to determine if the project is feasible and then schedule a time to do the work.*
- *Tugs where it proves infeasible to install a Tier 4 engine and a DPF will be considered in compliance if they are Tier 3, with a DPF.*
- *Company's should be afforded the ability to defer projects in one-year increments beyond the implementation date to avoid having to manage multiple projects in the same year.*

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Concept III: More Stringent Requirements for New-Build Vessels

New-Build construction allows us to overcome many of the hurdles present in the conversion of an existing vessel. However, new builds are not without their challenges. Most notably, a new build program is part of a company's long-term strategic plan, designed to meet their customers' needs and remaining competitive in the market. Vessel designs are completed years in advance, with the actual construction process taking more than a year to complete. Most build programs involve the delivery of multiple vessels allowing the owner to take advantage of the lower cost series construction and reduced operating costs associated with having a homogenous fleet. Common spare parts, similar repair procedures and common operating characteristics all helps to make an operation more efficient. Changing vessel plans in the middle of a build program can be costly and disruptive to the company's ability to successfully compete. As stated in the concept document, CARB's vision is that "New build vessels can be designed around the cleanest available equipment and present the best opportunity for cost-effectively reducing emissions from harbor craft in California." If owners are expected to meet this vision, we would ask that they be given the time necessary to incorporate the final rule into a well

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thought out build strategy.

To do this we would encourage CARB to consider the following comments/recommendations to their proposed concepts:

- Set the implementation for the requirement to install a Diesel Particulate Filter (DPF) to 5 years after a model approved by both the manufacturer and appropriate regulatory authority is available. Only when the exact characteristics and specifications of a DPF are known can a company begin the engineering and planning necessary to determine if the project is feasible and then schedule the time to do the work.
- Any vessel completed before this point should be allowed to operate 15 years before being asked to re-engineer and add the DPF.

3121.24
(cont)

Concept IV: Mandates for Zero-Emission and Advanced Technologies

As with Concept III, a technology change of this type will take time to plan and incorporate in existing vessel designs. To facilitate this process, we would ask CARB to consider the following comments:

- Extend the phase in date to 5 years after the rule goes into effect. This will allow companies the time to properly transition their build programs to incorporate the new technology.
- Clarify the phase in date as the "Keel Laying Date", defined in 46 CFR 30.10-37.
- Clarify the expectation. Currently the documents reference a specific technology employed by one tug company. There are many competing technologies that achieve the same effect. What will be the test for a compliant system?
- Can you clarify under the Zero-Emission Capable Hybrid, would a company be allowed to average the percent of power from zero-emission sources over 24 hours? In other words is it CARBs intent that at all times and in all modes you must be drawing 30% of your power from non-tailpipe emission sources, or just that 30% of the power you use over a period of time comes from non-tailpipe emission sources?

3121.25

Concept V: Removing Exemptions for Under 50 horsepower

Vessel's carry several "portable" engines for a variety of purposes. These include trash and salvage pump motors for dewatering compartments and outboard motors for skiffs.

- Can you clarify if it is CARBs intent to have these engines fall under the CHCR?

3121.26

Concept VI: Requiring Replacement Vessels for Certain Vessel Categories

Tug and Barge owners have in good faith built and designed vessels in compliance with federal, state and local laws and regulations. A jurisdiction should not be able to enact a new set of regulations that prevent an owner from realizing the benefit of their investment. We would ask CARB to consider the following comments:

- As stated in our comments under Concept II we would ask that no vessel be required to modify an engine sooner than 20 years from the date it first went into service. If at that time an owner can prove both that the upgrade is not feasible and that it would present a financial hardship to meet the date an extension would be granted.
- As stated in our comments under Concept II any engine modified to comply with the current regulation be allowed 15 years at a minimum from the date it was modified, before being compelled to comply with the new CHCR. If at that time an owner can prove both that the upgrade is not feasible and that it would present a financial hardship to meet the date, an extension would be granted.

3121.27

Concept VII: Compliance Extensions

While we concur with the need for extensions as it is not only likely but almost certain that there are vessels within the current harbor craft fleet for which it will not be feasible, nor financially sustainable to comply with the new regulations. The challenge will be in defining the very subjective terms of “feasible” and “financial hardship”. We offer the following comments.

The determination of what is or is not feasible often bleeds into what is or is not financially viable. In the CMA study they found that it was not feasible to retrofit a SCR and DPF on the representative ship assist tug. However, their conclusion was based on the amount of work that would have been needed to modify the vessel to safely house the systems. Simply put, it would not be practical because the cost would far exceed the value of the modifications.

3121.28

CARBs intent to assess financial hardship of complying with a regulation, based on the financial health of a company is fundamentally the wrong approach. The effect of such a methodology would be to potentially prop up companies that are struggling financially by allowing them to avoid regulation and gain an economic advantage over companies that are financially sound. Regulators should not be in the position of bailing out companies, but rather they should strive to create an equitable regulatory regime. We would argue that financial hardship should be measured in the impact on an assets ability to compete. If due to the vessel’s design or configuration the modification required to comply is so expensive that performing the modification would render the vessel too costly to be profitable then relief should be given in the form of an extension. In order to achieve an equitable measure of both the feasibility and hardship measure we would ask you to consider the following revisions:

- *Modifications whose estimates, as verified by a yet to be determined third party or agency, exceeds the High Estimated Cost as offered in the CMA Report, and adjusted for inflation, would be granted an extension.*

This would provide a much simpler and more equitable approach to granting extensions and would be very similar to the methodology used in the CMA study.

Concept VIII: Alternative Compliance Pathways

We need a defined submittal plan, requirements and package to access and comment effectively on this concept. Under the existing regulations we petitioned CARB to recognize that the emission profile for the Hybrid Tug CAROLYN DOROTHY was already favorable to that of a vessel with the Tier Engines to which we were being required to upgrade. As explained to us, CARB was unable to look at emissions over time as the offset to point of time emissions.

3121.29

- *Has CARB changed their position on this issue, and will they be willing to look at 24-hour profile versus a point of time approach?*

Concept X: Proposed Implementation Timeline

- *See comments under Concept II & III*

Concept XI: Idling Limits and Shore Power Requirements

AmNav supports the idea of minimizing idle time as a way of reducing unnecessary emissions. Further we feel 15 minutes is adequate time to perform a proper start-up and shutdown, except where a watch change has occurred and the individual responsible for the machinery must ensure everything is running properly. We offer the following comments and questions.

3121.30

Appendix C - Amnav April 2020 Comments

- *Is our read that the initial daily startup allows for an additional 15 minutes, for 30 minutes total. If so, we would ask that the wording be changed to recognize that a watch change would constitute a new work period.*
- *We are concerned by the unintended consequences this might have on finding adequate lay berths. Unlike ferries we do not transit between two docks that are dedicated to our service. Outside of our home dock, we have arrangements with several facility owners to utilize their docks in between ship jobs and barge moves. Most of these locations do not currently have infrastructure to provide shore power connections, so while we can shutdown our main engines, we must still run our generators. We believe most of these operators will deny us the ability to dock, rather than make the investment in shore power or deal with the increased regulatory burden. There is simply not enough money in it for them to make that type of investment. This will force us to idle in the harbor between jobs or return across the harbor to our home dock increasing our fuel burn and emission output. We suggest CARB look at an incentive-based program for facilities to get credit for providing shore power infrastructure to the Harbor Craft vessels.*

3121.30
(cont)

Concept XII: Facility Infrastructure

We have similar concerns about the requirements of this concept driving facilities away from providing moorage to Harbor Craft. We currently struggle to find suitable locations around the ports in California to moor our vessels. Most port operations are looking to maximize their waterfront space on cargo and other high revenue generating activities. While moorage for Harbor Craft is essential to the port economy, it is often lost on the individual facility operator. As mentioned in our comments under Concept XI, we worry this will drive more and more facility operators away from offering moorage.

3121.31

Concept XIII: Reporting – Facilities

As with Concept XI and XII the additional burden of reporting will likely have a negative impact on those facilities willing to rent or lease space to harbor craft. *Our recommendation is that negative impact on our CHC's ability to tie up and reduce emissions will offset any potential upside to CARB of finding potential non-reporters.*

3121.32

Concept XIV: Reporting – Operators

In general, AmNav does not take issue with the increase in reporting requirements, so long as it does not come with an unnecessary administrative burden. To that end we request CARB consider the comments below:

3121.33

- *In developing the form for input, care should be taken to ensure data can be uploaded in batch or bulk form from a database or spreadsheet. We would be opposed to an annual reporting requirement that involved filling in the individual fields for each vessel in our fleet, creating hours of unnecessary work.*
- *We have concerns with the switch to engine model year, which does not reflect accurately how long the engine has been operated or how long the owner has had to recoup his investment. We would much prefer CARB use the initial in-service date as the baseline for determining any implementation dates for that engine.*
- *We believe CARB misunderstands the term Home Port. Home Port or Hailing Port as defined in the CFRs is "the name of the port from which a vessel hails, required by law to be painted on the stern of all documented vessels in the United States; the port in which the managing owner of the vessel lives, or which is nearest to his place of residence; the home port of a vessel." It is not*

intended to indicate where a vessel is being operated. CARB may want to ask that specific question. 3121.33 (cont)

Concept XV: Vessel Identifiers

We recognize that properly tracking vessels is a critical part of implementing any regulation. And while it is true . . . “There is currently no single identifier that can be used across all vessel types...” every vessel covered by the regulation will have either an Official Number, IMO Number or CF Number that will be unique. *Our recommendation is that vessels be required to provide CARB one of these numbers for tracking and those vessels that are not already required to display their chosen identification number, could be required under the regulation to do so.* 3121.34

Concept XVI: Opacity Testing

The proposed rule is unclear in the method of testing that will be used for Harbor Craft. As described earlier in our comments, Marine Harbor Craft have a highly variable duty cycle. Engines must be tuned such that they can successfully accelerate and decelerate to provide the vessel with the power, maneuverability and braking necessary to safely operate. The text of the Concept suggests that CARB would like to test during the transitional phase of our fuel map (accelerating or decelerating the engine) and not at steady state (i.e. at constant RPM under a consistent load) where the engines were designed to operate most efficiently. The result will be almost certainly some level of smokiness. Tuning the engine to get rid of this momentary smokiness will put the engine at risk of stalling or shutting down just when the operator needs an immediate response. To ensure the engines are tested in the manner that they are certified by the EPA we ask CARB to consider: 3121.35

- *Any Opacity testing of marine equipment should be done at steady state, either prior to or post acceleration/deceleration.*
- *Testing should not be annual and serves no purpose other than to increase the operating cost and down time on the vessel. Like automobile emission testing it should be based on known risk factors such as age of the equipment and history. Propose once in the first 5 years to set a baseline, then every 5 years after that.*
- *Opacity testing should not be required for vessels qualifying under the low-use operating requirements.*

Concept XVII: Applicability and Exemptions

No comments currently.

Concept XVIII: Compliance Fee

Compliance with this new regulation will cost companies millions of dollars in upgrades. A fee on top will be an additional burden that will be shared by our shareholders, customers and the end consumer. We ask CARB to do everything possible to minimize the cost of administration, including reducing the frequency of reporting and opacity testing to minimum required to regulate the rule. 3121.36

- *We would propose a fee based on the size of fleet and number of engines, with a cap. Suggest something about \$100 per year per engine, up to \$400 per vessel, with a cap of \$2,000 per company fleet.*
- *We would be opposed to any fee that was based on hours or activity as neither impacts the work required by CARB to regulate nor should it be there be a penalty for being busy.*

Additional Comments

Overstatement of CHC Air Emissions

AmNav has serious concerns that CARB has relied on inaccurate information to justify the proposed regulatory concepts. We see no justification for upwardly scaling the CHC vessel population from the February 2019 reported figure of 1,928 vessels to align with a U.S. Coast Guard dataset showing 3,698 vessels. The misuse and misinterpretation of the data set has led to CARB artificially inflating California's vessel population and consequently the overstatement of air emissions from towing vessels in California.

3121.37

While our examination of the data was hampered by our company's response to the COVID-19 crisis and CARB's unwillingness to extend the comment period, we can still safely conclude that there is no rationale for CARB making the conclusion that our industry is under-reporting in any significant way. We find the following flaws in CARB's use of the dataset and the conclusion they draw from the data.

- CARB is confusing Hailing Port with area of operation and counting vessels that do not operate in California as non-reporting vessels.
- CARB is counting vessels that are either not properly documented to operate or are no longer in commercial service because of their age.
- CARB failed to use readily available sources of vessel information to validate their assumptions.

All California harbor craft must maintain and provide extensive records of operation pursuant to 17 California Code of Regulations (CCR) § 93118.5. But CARB is asserting that nearly half of the harbor craft in California do not comply with reporting requirements – i.e. 1,928 CHC operators report their operations to CARB while U.S. Coast Guard data reflects an additional 1,770 vessels with hailing ports from California. CARB's incorrect starting assumption is that "hailing port" is synonymous with operating area and that 1,770 vessels are not only not reporting but are operating with hours that are equivalent to the industry average per vessel. A vessel is not required to set their hailing port as the area they operate in and hailing port is more often reflective of the owner's offices or state of legal presence. In truth towing vessels reporting to CARB have hailing ports in many states. This lack of rigor suggests that CARB is inflating the number of purported CHC vessels to demonstrate a greater risk to the airshed and to help justify the proposed concepts.

CARB's use of the Coast Guard dataset is also flawed because many vessels included in the dataset are not legally allowed to operate under current regulations. AWO discovered that at least 37 of the tank barges in the list are built before 1983 – most likely with single hulls and legally prohibited from carrying oil in U.S. waters. These vessels likely do not operate in California or anywhere else. Other vessels in the dataset lack Certificates of Documentation (COD) and therefore cannot legally operate in U.S. waters. All told, from the data that AWO members had extraordinarily little time to review, at least 69 out of 217 towing vessels included in the Coast Guard's data have either expired CODs or work outside California.

CARB references 244 as the number of towing sector vessels, excluding barges and tank vessels, within California (13 ATBs, 73 ship assist/escort tugs, and 158 near-shore/ocean-going vessels). Based on the

Appendix C - Amnav April 2020 Comments

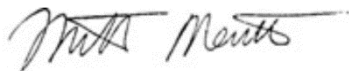
above we know this number to be inaccurate. To find the facts our trade organization, AWO, obtained towing vessel population data from the Marine Exchange of Southern California and the San Francisco Marine Exchange, data clearinghouses for vessel activity throughout the state. This data included details on all tug escorts, assists, tank barge escort transit logs and an AIS search for active towing vessels in SF, SoCal, San Diego and Port Hueneme. This data showed that in the two-year time period a total of 142 vessels, classified as towing vessels by the USCG, were active in CARB regulated waters. This includes 13 ATB units that call these ports and more than 10 tug barge combinations that called less than 10 times in the two years, likely leaving them well below the 300 / 80-hour low operation limit. We concur with AWO's conclusion that CARB should also disclose its exact methodology for determining its vessel inventory and justify its decision to augment that inventory with misinterpreted Coast Guard data of questionable applicability.

3121.37
(cont)

Conclusion

AmNav appreciates the opportunity to comment on CARB's Proposed Concepts for Commercial Harbor Craft in California. We hope CARB will take note of both our concerns captured in our comments and our recommendations. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. The proposed concepts present a significant change in policy direction for CARB from incentive-driven emission control programs to prescriptive and mandatory emission control programs. We have proven over the years that the previous approach not only achieved the desired results in terms of emission reductions, but it also fostered successful technology innovations, well-managed industry costs, and substantive air quality improvements. As a final comment we would ask for CARB to relook at modeling what has worked in the past and propose an incentive-driven emission control program.

Sincerely,



Milt Merritt
President

Cc; Charles Costanzo, AWO's General Counsel and VP - Pacific Region



Comment Log Display

**Below is the comment you selected to display.
Comment 3122 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Scott
Last Name: Merritt
Email Address: scott@merrittws.com
Affiliation: Merritt Waterline Solutions, LLC

Subject: Foss Maritime Company Comments on CHC Proposed Regs

Comment:

The attached comment file is submitted on behalf of Will Roberts,
President and COO of Foss Maritime Company.
Best regards,
Scott

Attachment: www.arb.ca.gov/lists/com-attach/3543-chc2021-VmRSZFZIAmBSZQQ1.pdf

Original File Name: 202111 Foss Maritime Company LLC CHC Comment Letter Final with Appendices.pdf

Date and Time Comment Was Submitted: 2021-11-15 13:46:26

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(800) 242-4450 | helpline@arb.ca.gov
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November 15th, 2021

Mr. David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Regulations for Commercial
Harbor Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the California Air Resources Board (CARB) proposed concepts for further reducing pollution from Commercial Harbor Craft (CHC). Foss Maritime Company (Foss) is a 132-year-old company that provides comprehensive marine transportation and logistical services throughout North America and the Hawaiian Islands. This includes ocean towing and project support in extreme environments throughout the world. Foss provides a wide range of engineering and technical support services from naval architecture and marine engineering to vessel design, construction, and repair. Foss is committed to reducing its carbon and emissions footprints and adhering to the principles of sustainability and safety in its operations. Foss has taken the lead in our industry to aggressively pursue opportunities to reduce emissions and work our environmental values into all our strategies.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian's rely on to deliver and support the delivery of their essential goods and services. At no time in our history has the fragility of the supply chain been so evident. That is not a reason to back away from our commitment to the environment, but a reason to pursue practical, science-based solutions. Foss has a long history of taking the lead on the environment implementing creative and technologically advanced solutions. We have spent well in excess of 100 million dollars on clean air new builds and upgrades. We built and operated the first two Hybrid tugs in the Los Angeles/Long Beach harbors. We built and operated the first fleet of double hull bunker barges in California to incorporate vapor collections systems, preventing the harmful release of hydrocarbons during loading operations. Over the last 20 years we have performed dozens of engine upgrades and clean-air rebuilds in advance of the regulatory requirements of the 2009 CHC rulemaking. In the last two years we have built and delivered four state-of-the-art 90 ton Tier 4 escort tugs to the California Market. Tugs, that under the proposed rules, will require significant modification just 7 years after being delivered.

We completed these projects in concert with many federal, state and port agencies. So, it is with a sense of frustration that we continue to be disappointed by CARB's failure to engage in a meaningful dialog with industry. This will be our third series of formal written comments on this rule, we've

attached the previous two for your reference, and we have yet to see CARB respond to any of our legitimate concerns as to the feasibility of the new rules, or the evidence that they are relying on false assumptions, unvalidated models and antiquated formulas to exaggerate the impact of harbor craft emissions. We believe that moving forward with the regulations as written, in light of the unaddressed and unacknowledged uncertainty of the CARB model's calculations regarding the health risk from CHC emissions is irresponsible. We urge CARB to stop pushing this clearly flawed and unsupported by science regulation and work in collaboration with the CHC industry and other impacted stakeholders to craft a regulation that makes a difference. One that:

- Develops rules that require those entering California must meet existing Best Available Technology Standard (BATS) at the time of entry or at the time construction began, whichever is first. (BATS defined as technology that is approved by both manufacturer and the regulator for use).
- Sets up a technical advisory committee of both industry and regulatory members to determine what is the BATS.
- Doesn't require adoption of unproven and unapproved technology (i.e. DPFs). Timelines should set adoption from the time of approval or production begins.
- Doesn't require those who in good faith upgraded or built new to comply with existing regulations, i.e. 2007/2009 CHC law, to upgrade prior to the life cycle of that investment (15 years for a rebuilt engines, 25 years for reengine/new construction) is realized.
- That exempt ATBs and Tugs in Ocean Transport from the CHC rules, simply because they are not harbor craft, and treating them as such is punitive and serves only to reduce the number of operators in the global supply chain.
- Establishes funding initiatives to promote the early adoption of new technologies and infrastructure that reduces emissions.

Such a framework would accelerate the reduction of emissions from CHC, by promoting real, cost-effective investment and the adoption of the best technology at the time. The currently proposed rule works against this by requiring constant incremental investment in technologies that are unproven and only offer marginal improvement at a very high cost. Capital that could be spent on the development of a zero-emission escort tug, will be spent, and arguably wasted, on industry trying to squeeze a non-existent diesel particulate filter (DPF) onto a vessel that it was not designed to receive it.

Comments on the Current Regulations

In response to CARB's continued failure to address or even respond to these concerns, and in conjunction with our industry partners through our trade organization the American Waterways Operators (AWO) we have retained Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and to look at and comment on the Health Study section of the rulemaking packet. Their report to AWO can be found attached to AWO's official comments to this rulemaking. We believe the work and insight provided by Ramboll validates the concerns we have been asserting to CARB staff all along,

- CARB has misrelied a United States Coast Guard (USCG) database that has led them to the false conclusion that there is a 39% underreporting of CHC emissions to CARB. Ramboll data has shown us that for the tug and towing industry that number is only 2.3%.
- The unaddressed and unacknowledged uncertainty of the CARB model's calculations of the health risk created by harbor craft emissions overstates their impact on the public, likely far beyond just the improper inflation created by the overstated vessel inventory.

- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions to ocean-going tugs and barges that meet the exact same criteria.
- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. Foss supports CARB's goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions.
- This rule puts living wage jobs and the lives of our mariners at risk. Attempting to install or operate unproven technology in the marine environment is filled with risk. Unlike trucks and off-road applications, our mariners cannot just pull over to the side of the road and call the fire department. *Unproven technology has no place in maritime applications.*

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

The U.S. Coast Guard database used by CARB to determine the vessel population affected by the rule was designed to track the ownership and regulatory status of a vessel and provides no insight or information into where a vessel is operated. CARB's use of this database overstates the population of tug and towing vessels to reach the false conclusion that there is a significant number of vessels that are not reporting their engine hours to CARB.

We have shown ample evidence in previous comment letters and multiple meetings with CARB personnel to validate our position that emissions from vessels who have not reported their hours is only a fraction of the scaling factor CARB used to inflate the emission inventory. We have pointed out to CARB staff on these occasions that overcounting number of tug and towing vessels operating in California overinflates health risk assessment that is the justification for this rulemaking. We have explained the basis for the discrepancies and told the agency how it can obtain accurate data through the use of readily available AIS data that will show not only every vessel that enters CARB regulated waters, but when those vessels are actually underway. Inexplicably, CARB has done nothing to revise its figures or update its model. Indeed, at the CHC Workshop #4 held on March 16, 2021, CARB acknowledged that the agency was aware that its vessel counts did not accurately reflect the actual number of vessels in the applicable airshed, but informed attendees, without further explanation, that CARB would not be revising the vessel count numbers in the draft regulation. These technical and procedural errors jeopardize the entire basis for the regulation and subject it to heightened legal scrutiny.

For the purposes of this comment letter our trade organization, AWO, contracted with Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and the likely impact of emissions from those vessels. Using Automatic Identification System (AIS) data for 2019, Ramboll was able to account for every tug and towing vessel within California waters during that year. The AIS data affirms that CARB has significantly overcounted the size of California's tug and towing vessel fleet. Specifically, Ramboll found that 200 tug and towing vessels operated within a 100 nm of the California Coast, not the 229 tug and towing vessels estimated by CARB. Additionally, the CARB model assumes that non-reporting vessels operated with the same number of hours as reporting vessels. From the AIS data we can determine the number of hours when the vessels were moving, which when compared to hours reported to CARB, proved to be a reliable predictor of main engine hours. We were able to isolate the vessels CARB shows as having

filed reports from those vessels that have not. The non-reporting vessels averaged only 18% of the hours of the reporting vessels. This means that the total unreported hours are just 2.3% of the total reported hours, not the 29% that the CARB scaling factors estimated.

Towing Vessel AIS Average Hours >.1 knot - Year 2019

Vessel Type	Reporting Vessels	Non-Reporting Vessels	Non-Reporting as % of Reporting
ATBs	1,613	278	17%
Tugboat Push/Tow	1,022	300	29%
Tugboat SA	2,336	239	10%
Total of Tug Categories	1,637	291	18%
Reporting Vessels	177		
Non-Reporting Vessels	200		
% of Vessel's not reporting	12%		
% of Unreported Hours	2.3%		

Ramboll ran estimates based on these accurately captured tug and towing vessel hours and found that NOx and PM emissions were only 72% and 62%, respectively, of the figures the improperly inflated CARB’s model produced. We suspect a similar over estimation may exist with the other vessel categories of harbor craft and given that CARB’s assumption was that 39% of the CHC were not reporting, the potential for a massive overestimation of the impact of all harbor craft is possible.

HEALTH STUDY CONCERNS

Given the above-noted inflation of the tug and towing vessel fleet size and operating hours we expect that CARB’s assessment of harbor craft emissions is similarly skewed. In fact, Ramboll’s estimates based on updated vessel fleet size and operating hours indicates that CARB’s emissions are overstated. AWO also asked Ramboll to look at and comment on the Health Study section of the CARB rulemaking packet. Based on this assessment, Ramboll raised serious questions about the methodology CARB used both in its assessment of cumulative harbor craft emissions as well the resulting health effects. Most concerning to AWO is Ramboll’s observation that CARB has made no apparent effort to validate its air quality model with verifiable, real-world results. Ramboll conducted a preliminary analysis to validate the agency’s harbor craft- related exposure estimates by comparing the CARB modeled air concentrations at receptor points near Long Beach, Anaheim, Pico Rivera, and Los Angeles with the PM_{2.5} concentrations measured at the sampling stations installed at these locations. Because the sampling stations are designed to capture emissions from all nearby sources, the agency’s modeled concentrations for harbor craft specifically would be expected to be within the range of the total measured emissions or, more likely, even lower. Below is the table of results from this exercise, extracted from the Ramboll report.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

The second column above shows the average annual PM_{2.5} concentrations measured at the sampling stations listed on the left. Again, these figures show estimated PM concentrations from all sources in the area, including from cars and trucks, rail and harbor craft as well as other sources. They also reflect locations near the shoreline that are most likely to be impacted by harbor craft emissions. The four columns on the right show the CARB's modeled concentrations calculated at four locations nearest to each sampling station. As highlighted in the table, Ramboll found from this preliminary check of the data that CARB's modeled estimates are up to 4 times higher than actual measured concentrations of from all sources captured at sampling stations in the same general area. It makes no sense that the emissions just from harbor craft would be higher than the emissions captured in these areas from all possible sources. This raises serious questions about the legitimacy of CARB's model and what if any efforts CARB has made to validate it.

Ramboll and AWO made numerous requests for information from CARB staff that would help us understand the methodology the agency used to determine health impacts associated with harbor craft emissions. CARB staff were unable or unwilling to provide much of the necessary information, which has forced Ramboll to make more generalized observations about CARB's approach. Those observations are offered in detail in Section 2.2 of the attached report, but in short, (1) there is enormous uncertainty in the health effects data that CARB has presented calling into question the purported benefits of the proposed rulemaking; and (2) CARB has applied health effects analyses in an unconventional way and has failed to report its findings in a way that transparently acknowledges the lack of certainty inherent in their findings.

What we can say with certainty is that the health risks are overstated, if only by the overestimation of the vessel inventory and emissions, but in all likelihood to a much greater extent due to the unaddressed issues with the modeling itself. CARB's overstating the emissions from harbor craft is magnified in each step of the model, with each highly conservative assumption or input that is propagated throughout both risk assessments. Based on the comparison of the model output with actual PM levels at monitoring sites we have reason to believe that the errors in the model are overestimating the actual exposures to communities along the shoreline, and thus overestimating any potential benefits of the proposed CHC rules by a significant margin. This is too important a rulemaking to be based on a health study with so much unaddressed uncertainty. CARB needs to take the time to get this right.

To that end Foss urges CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Validate the emission model to ensure inputs and results are realistic and accurately portray the impact of CHC emissions
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations in collaboration with the CHC industry and other stakeholders to reflect the conclusions of the new study, and the best path achieving our common goal of a cleaner and healthier environment.

Moving forward with regulation without correcting errors in the underlying data set undermines the legitimacy of the regulatory process.

CARB'S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

CARB's decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

CARB's rationale for excluding these vessels applies to the tug and towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins.
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits;
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO submitted information in April of 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB's decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be remedied in any final rule. In our comment letter from last year, attached to this letter, Foss offers draft language that could address this issue and separate vessels engaged in "ocean-going voyages" from the burdens on rules designed for "harbor craft".¹

CARB'S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

¹ Appendix B, "Concept I: Expanding Vessel Categories Subject to In-Use Requirements", Page 2, beginning at the 2nd Paragraph.

- This study of one large and spacious ship assist and escort tug is not representative of the diverse tug and towing vessel fleet.
- The Jensen Review Summary notes “the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.”
- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB’s proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many tug and towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of tug and towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, Foss will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have only recently been repowered to meet the last iteration of the CHC regulations. In the most egregious case, Foss has vessels that have just been delivered or it will take delivery off that will be forced to be retrofitted just a few short years after they are first put into service. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally “taking” property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

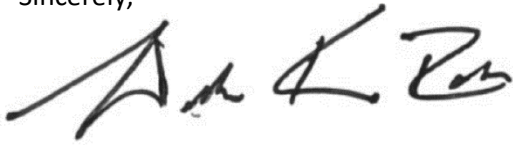
CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

Conclusion

Foss appreciates this opportunity to comment on CARB’s Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. Foss does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data inflates the emissions generated by the tug and towing vessel fleet and in turn inflates the impact the fleet’s emissions have on the air quality and health of the residents of the regions in which we operate. Foss stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry, finding feasible solutions to

reducing emissions in the harbors of California. Foss urges CARB to adopt a more collaborative approach and abandon this seriously flawed effort at rulemaking. Thoughtful and honest collaboration will benefit the State's economic and environmental health. Foss looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Roberts". The signature is fluid and cursive, with a large initial "W" and a stylized "R".

William Roberts
President and Chief Operating Officer

cc: Jennifer A. Carpenter | President & CEO American Waterways Operators

Attachments

- Appendix A – Ramboll Report
- Appendix B – May 2021 Comment Letter to CARB
- Appendix C – April 2020 Comment Letter to CARB

MEMORANDUM

Date: November 11, 2021

To: American Waterways Operators

From: Amnon Bar-Ilan, Christian Lindhjem, Sonja Sax

Subject: Ramboll Comments on the California Air Resources Board (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation

1. REVIEW OF HARBOR CRAFT EMISSIONS IMPACTS AND COMPARISON OF CALIFORNIA HARBOR CRAFT EMISSION INVENTORY

1.1 Introduction

The California Air Resources Board (CARB) air emissions inventory and proposed rule effectiveness are presented in Appendix H of the proposed regulation supporting documentation. This 2021 document updates CARB’s emission inventory methods from the 2007/2009 Commercial Harbor Craft (CHC) emission inventory methods.¹ In general, the approach is similar, but many of the default inputs were substantially revised to lower overall emissions as shown in Figure 1.

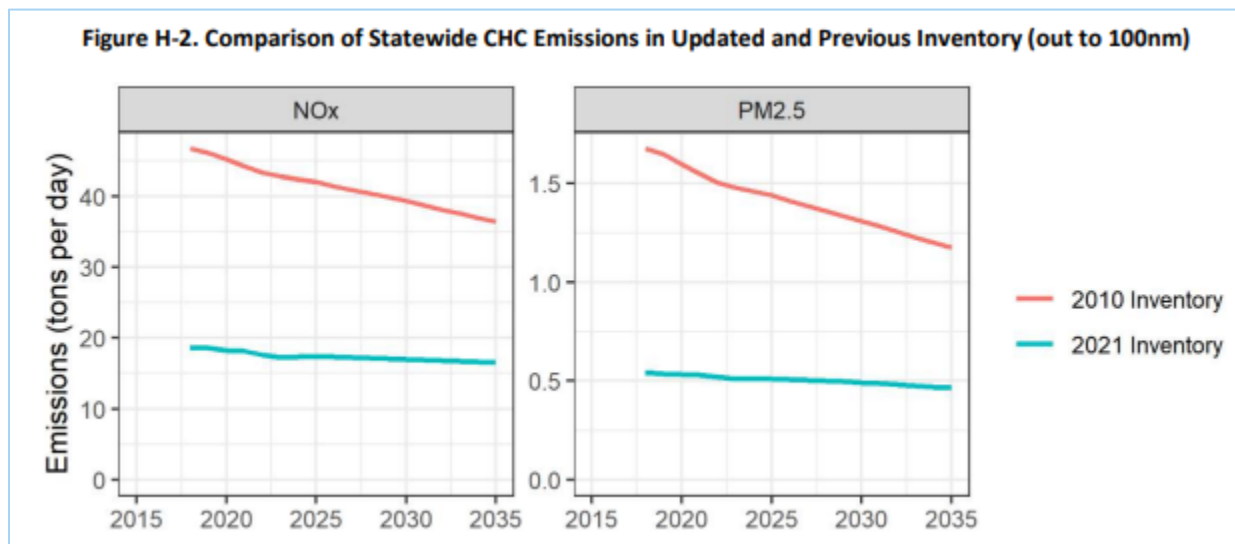


Figure 1. CARB commercial harbor craft emissions inventory comparison. (CARB 2021)

¹ <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road>

CARB segregated the vessels by type (including vocation) shown in Figure 2. In this report, we focus on the Tugboat types, which include Tugboat-Escort/Ship Assist, Tugboat-Push/Tow, and Tugboat-Articulated Tug and Barge (ATB).

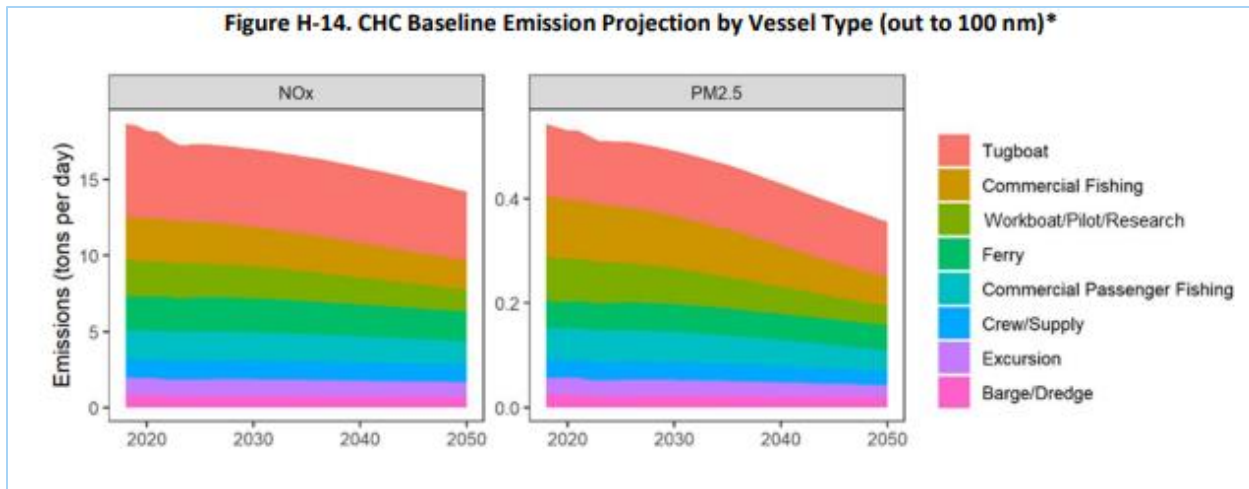


Figure 2. CARB commercial harbor craft emissions inventory by vessel type. (CARB 2021)

Alternative source of activity data includes AIS data that is publicly and freely available from a trusted source.² The AIS data identifies tug and towboats using vessel codes 31 for towboats and 52 for tugs and provide position, speed, and course. The AIS data identifies every vessel operating in US continental waters identified by MMSI for a given year.

Emissions estimates depend on input factors related to the vessel activity and engine characteristics. The AIS data provides the population and activity for all vessels operating in a defined domain. Emissions estimates also require that the new engine emission factors be identified by Tier level in Table H-5 of Appendix H of CARB (2021), age, and fuel correction.

$$\text{Emissions} = \text{Pop} \times \text{Power} \times \text{Activity (hrs)} \times \text{Load Factor} \times (\text{zhEF} + \text{DF} \times (\text{Age}/\text{Life})) \times \text{Fuel Correction}$$

Pop – Population of vessels (activity input)

Power – Engine power (activity input)

Activity – Hours of engine operation (activity input)

Load Factor – Average fraction of available power (CARB input estimate)

zhEF – Emission factor when new (zero-hour) (CARB input estimate)

DF – Deterioration factor (CARB input estimate)

Age – Engine age (activity input)

Life – Useful Life (CARB input estimate)

Fuel Correction – In-use relative to engine certification fuel (CARB input estimate for 2011+ engines is 0.948 – NO_x and 0.852 - PM³ and PM correction is more significant for older engines)

² <https://marinecadastre.gov/ais/>

³ <https://ww3.arb.ca.gov/msei/chc-appendix-b-emission-estimates-ver02-27-2012.pdf>

The vessel types average load factor estimates according to primary vocation for the range for tugs and towboats is shown in Table 1. Because of the difference in assumed load factor, it is important to appropriately characterize the activity that each vessel performs.

Table 1. CARB Load Factor input by vessel type. (Table H-9, CARB 2021)

Vessel Type	Load Factor	
	Main	Auxiliary
Tugboat-ATB	0.50	0.50
Tugboat-Push/Tow	0.33	0.37
Tugboat-Escort/Ship Assist	0.16	0.34

1.2 Vessel and Emission Inventory and Comparison with CARB Estimates

We used the AIS records to identify tug and towboats using vessel identification numbers 31 and 52, and American Waterways Operators (AWO) provided more detailed input for their vessel fleet including primary vocation, engine power, Tier level, and, in some cases, hours of operation in California waters. Table 2 shows the comparison of the vessel population found operating within 100 nm of the California coast during 2019. CARB (2021) reported that they identified the population of 177 tugs and towboats through the harbor craft reporting in Table H-3 and upwardly adjusted that inventory to account for unreported vessels through Coast Guard lists at California home ports. The AIS records find only 200 tug and towboats (23 vessels or about 13% more than reported by CARB) during 2019 compared with CARB’s estimate in Table H-3 of 229 vessels or 29 more than were reported in the AIS records.

Table 2. Vessel population found in California waters <100 nm in 2019

Vessel Type	CARB App. H			AIS Records		
	Table H-3	Adjusted Total Table H-3	Average Hours Table H-4	Population	Average Hours (>0.1 knots)	Average Hours (<0.1 knots)
Tugboat-ATB ^a	11	19	2,466	14 ^a	1,991	1,380
Tugboat-Push/Tow	108	147	1,550	118	817	1,216
Tugboat-Escort/Ship Assist	58	63	2,676	68	2,141	3,855
Combined Tug and Towboat	177	229	1,936	200	1,350	

^a – AIS does not distinguish ATBs from Towboats; AWO identified six fleet vessels and eight others found in AIS records as ATB.

We used the AIS records to determine hours of operation for each tug and towboat operating in California waters out to 100nm during 2019. The average hours for AIS compared favorably with the CARB averages except for towboats where the operating hours about half that estimated by CARB. Total and average hours at less than 0.1 knots speed were considered to use no propulsion power, but auxiliary engines running at normal loads, though many tugs at their base will use shore power for auxiliary loads such as to keep the AIS transponders emitting a signal.

AWO supplied tier and power of the main and auxiliary engines for their members’ fleets as summarized in Table 3. For other tugs and towboats found in the AIS data, we used CARB default information with Tier 1 emissions rates to towboats (including ATB) and Tier 2 to tugboats to hours of operation. The AWO supplied fleets generally had higher installed power

than the CARB averages by vessel type, so using the CARB default for AIS extra (non-AWO) fleets leads to a conservative overestimate of emissions.

Table 3. Vessel population and inputs use found in California waters <100 nm in 2019

Vessel Type	CARB App. H Default Inputs			AWO Fleet		
	AIS Extra Population	Main Engines (hp)	Tier	AIS AWO Population	Main Engines (hp)	Tier
Tugboat-ATB ^a	8	4395	1	6 ^a	6400	2, 3
Tugboat-Push/Tow	94	731	1	24	2700	0 – 3
Tugboat-Escort/Ship Assist	7	2450	2	61	3898	0 – 4
Combined Tug and Towboat	109			91		

^a – AIS does not distinguish ATBs from Towboats, AWO identified six vessels in AWO fleets and eight in AIS records as ATB.

The CARB default and AIS hours of operation were combined in the emissions to estimate tug and towboat emissions for 2019 as shown in Table 4. When applied, deterioration and fuel corrections primarily increase PM emissions relative to our baseline estimate. We also investigate the impact that fleet mix of engine Tier levels could have on average emissions rates primarily increasing PM emissions rates. The Tier levels for the AWO fraction of all vessels was provided, while CARB default fleet mix was used for the other tugs and towboats found in the AIS records.

Table 4. Tug and towboat emissions in California waters <100 nm in 2019.

Vessel Type	AIS Emissions Estimates		AIS (with deterioration, fuel correction)		AIS Additional Correction for Fleet Mix	
	NOx tpd	PM tpd	NOx tpd	PM tpd	NOx tpd	PM tpd
Tugboat-ATB ^a	1.36	0.020	0.92	0.019	0.85	0.020
<i>Idle <0.1 knots</i>	4%	5%				
<i>Fraction within 24 nm</i>	87%	83%				
Tugboat-Push/Tow	0.97	0.023	1.11	0.032	1.05	0.039
<i>Idle <0.1 knots</i>	9%	15%				
<i>Fraction within 24 nm</i>	82%	85%				
Tugboat-Escort/Ship Assist	2.04	0.041	2.31	0.057	2.31	0.057
<i>Idle <0.1 knots</i>	17%	26%				
<i>Fraction within 24 nm</i>	99%	99%				
Sum Tug and Towboats	4.37	0.086	4.34	0.109	4.22	0.117
CARB App. H (Estimated from Figure H-14)	6.1	0.14				
Relative to CARB Figure H-14	72%	62%	71%	78%	69%	83%

1.3 Assumptions

- AIS data using a <0.1 knot cutoff to eliminate vessel activity when main (and often auxiliary) engines are at least low power or entirely off. The '<0.1knot' criteria best matched the propulsion engine time for tugboat (4% overestimate) and towboats and others identified in AWO fleets (4% underestimate).
 - Under <0.1 knot, the auxiliary engines were assumed to continue to be used to supply power for the AIS and other electrical demands. This is a known overestimate because many tugs plug into shore power while at base.
- Based on the CARB default model year, we used Tier 1 engines for towboats (both ATB and others) and Tier 2 for tugboat-Escort/Ship Assist.
 - CARB reported to have used a distribution of Tier levels; Andrew Daminao (CARB, email to Charles Constanzo, Friday, September 3, 2021 8:55 AM) provided a file 'Towing Vessel Inventory 2019' that provided information about the fleet mix by tier level.
 - Shown in Table 5 is a comparison of the impact on emissions that fleet mix could have compared with either Tier 1 or Tier 2. The small fraction of Tier 0 in the fleet has a significant impact (greater than 50% for DPM) on towboat emissions rates estimated and less but still significant on the tugboats.
 - AWO provide fleets' engines characteristics for 2019 that had generally higher Tier levels and averaged lower emissions levels than the fleets provided by CARB.

Table 5. Fleet mix emissions impacts from CARB towing vessels file and AWO Submittals for 2019.

Vocation	Tier	Count	AWO Count	Emission Factor by Tier (g/hp-hr)		CARB Tier 0, 1 Contribution	
				NOx	DPM	NOx	DPM
Tugboat-ATB	0	2	0	7.34	0.37	25%	49%
Tugboat-ATB	1	1	0	6.97	0.12	12%	8%
Tugboat-ATB	2	6	2	5.08	0.09		
Tugboat-ATB	3	2	4	3.69	0.05		
Tugboat-ATB	4	0	0	1.04	0.03		
Average ATB (CARB)		11		5.41	0.136		
Average ATB (CARB)		Ratio vs. Tier 1		0.78	1.14		
Average ATB (AWO)		6		4.15	0.063		
Tugboat-Push/Tow	0	32	1	7.34	0.37	39%	65%
Tugboat-Push/Tow	1	14	4	6.97	0.12	16%	9%
Tugboat-Push/Tow	2	42	8	5.08	0.09		
Tugboat-Push/Tow	3	17	11	3.69	0.05		
Tugboat-Push/Tow	4	0	0	1.04	0.03		
Average Towboat (CARB)		105		5.80	0.173		
Average Towboat (CARB)		Ratio vs. Tier 1		0.83	1.44		
Average Towboat (AWO)		24		4.85	0.088		
Tugboat-Escort/Ship Assist	0	4	5	7.34	0.37	15%	34%
Tugboat-Escort/Ship Assist	1	8	12	6.97	0.12	28%	22%
Tugboat-Escort/Ship Assist	2	18	22	5.08	0.09		
Tugboat-Escort/Ship Assist	3	6	21	3.69	0.05		
Tugboat-Escort/Ship Assist	4	0	1	1.04	0.03		
Average Tugboat (CARB)		36		5.52	0.121		
Average Tugboat (CARB)		Ratio vs. Tier 2		1.09	1.35		
Average Tugboat (AWO)		61		5.09	0.104		

- The deterioration of emissions due to age is a large uncertainty given that engines are regularly rebuilt and that historic regulations have encouraged engine rebuilds with emission upgrades to higher Tier levels.
 - CARB (2021) assumed that towboats would average a model year of 2003 (Table H-1), which in 2019 is 16 years old and past their useful life (Table H-8) of 14 years for main engines. This would increase NOx emission rates by 24% and PM by 77% for towboats.
 - CARB (2021) assumed that tugboats would average a model year of 2009 and be 10 years old in 2019. This would increase NOx emission rates by 15% and PM by 48% for towboats.

1.4 Conclusion

We demonstrated using publicly available AIS records that it is possible to accurately identify vessel activity spatially defined. Individual vessels are identifiable through MMSI numbers unique to the AIS transmitters along with their actual activity within California waters. Using the AIS data, CARB can more accurately identify the unreported vessels and not rely on a less reliable list of vessels by home port.

Overall, the number and emissions from tugs for both NOx and PM (including towboats) appear to have been overestimated in Appendix H. The emissions overestimate depends on several input variables, but engine emissions deterioration and fleet fraction, especially the remaining Tier 0 engines still in operation, have a significant effect on PM emissions rates.

2. COMMENTS ON THE HEALTH STUDY (APPENDIX G)

2.1 Health Risk Assessment for South Coast and Bay Area Air Basins

CalPuff Modeling

The CalPuff modeling conducted in support of the Proposed Amendments to the CHC Rulemaking involve a number of model inputs and assumptions as outlined in Appendix G. Ramboll reviewed the modelling methodology as well as supporting documentation provided by CARB.

A missing element of the modeling was any validation of the key model inputs as well as the model results. Because of the complex nature of the modeling, including a number of assumptions regarding the emissions inventory, spatial and temporal allocation of emissions, complex terrain and meteorology, it is paramount that CARB validate to the extent possible the model inputs and results.

With regards to model inputs, at the very least CARB should verify that the meteorological estimates used in the model compare to actual measured estimates from a relevant meteorological station. In addition, CARB used a single year of meteorological data and it would also be important to consider using more than one year in order to capture any variability in meteorological parameters that tend to vary from year to year.

With regards to model results, one important way to validate results includes comparing modeled results with measured values at monitor locations at or near the modeled receptor points. While we understand that the CARB is only considering contributions from CHCs in the form of diesel particulate matter, the modeling is used to estimate exposures to diesel

particulate matter and PM_{2.5}. We also understand that ambient monitors will be measuring PM_{2.5} from all sources. Therefore, we expect that modeled concentrations would be within the range of measured estimates or lower.

Ramboll conducted a check of how modeled PM concentrations compare to measured PM_{2.5} concentrations for the South Coast Air Basin. Table 6 shows the results of the comparison between measured concentrations at monitoring sites in the South Coast Air Basin and nearby receptors.

As shown in Table 6, the results from this preliminary check of the data show that the modeled estimates are overestimating exposures as these estimates are up to 4 times higher than actual measured concentrations of PM_{2.5} particularly in the most impacted regions (i.e., near the shoreline). Inland modeled estimates (which are expected to be less impacted by CHC emission) are closer to the measured concentrations although still exceed these concentrations for some receptors. This indicates that overall the modeled estimates are overestimating exposures. CARB should similarly verify the results for the Bay Area Air Basin.

An additional source of uncertainty is associated with scaling the concentrations for future years based on changes in emissions. Because the concentrations are not only based on the changes in emissions, but other key factors including meteorology, this introduces a significant amount of uncertainty, making the validation of model estimates even more critical. Also, because we believe that emissions are overstated this will contribute to even more uncertain exposure estimates based on simply scaling.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

Cancer Health Risk Assessment

The cancer risk assessment also relies on a number data inputs and assumptions, starting with the estimates from the CalPuff modeling. Many of the inputs and assumptions are considerably conservative as they are meant to be health protective and are screening-level analyses. It is important to note that screening level analyses are often followed by more targeted analyses with refined parameters that are more site-specific and/or based on more realistic parameters in order to yield more realistic risk results. Importantly, the numerous levels of

conservativeness in screening level analyses result in risk values that are often highly overestimated and do not necessarily reflect actual risks.

One key data input includes the exposure estimates, which are based on the CalPuff model inputs and a number of additional key assumptions. As noted above, based on Ramboll's check of the modeled DPM estimates, it is likely that these estimates are overestimating exposures, both due to overestimated emissions (see Section 1) contributing to overestimates of about least about 20-60%, in addition model assumptions that result in overestimates compared to measured estimates by as much as a factor of 4 (see comments above) at some receptor locations.

Exposure estimates are also based on updated methodology that also increases the risk estimates because of the application of high (95/80%) breathing rates and multiplicative factors for greater susceptibility in children. In addition, the risk assessment includes several conservative assumptions for estimating exposures including exposures across a residence time of 70 years⁴ and assuming a person is home 24 hours a day over those 70 years. All of these conservative assumptions compound to generate highly inflated risks.

Another key input for the risk assessment is the use of a cancer potency factor (CPF). CARB relied on the estimate developed by OEHHA of $1.1 \text{ (mg/kg-day)}^{-1}$ or 3×10^{-4} per $\mu\text{g/m}^3$. This cancer potency value, which represents a 95% upper confidence interval of the lifetime risk, is dated and overly conservative compared to more recent evaluations of the literature on which the cancer potency is based.

At the time of the development of the cancer potency EPA deemed the evidence to be too uncertain to use for cancer risk assessment (US EPA 1994⁵). An HEI study (HEI 1995⁶) found similar limitations associated with the studies that were the basis of the OEHHA value. These limitations included (1) questions about the quality and specificity of the exposure assessments for diesel exhaust, (2) a lack of quantitative estimates of exposure to allow derivation of an exposure-response function, and (3) lack of adequate data to account quantitatively for individual other factors that might also be associated with lung cancer, such as smoking. In 2002, EPA⁷ again concluded that data were too uncertain for developing a cancer potency, but using more qualitative methods determined the risk to be in the range of 10^{-5} to 10^{-3} . Therefore, the risk could potentially be about 300 times lower than the OEHHA value.

Another important issue in extrapolating results from older epidemiology studies, as OEHHA did, is that diesel exhaust exposure in these studies is based on diesel exhaust composition that is very different compared to more contemporary diesel exhaust, and also quite different from marine vessel emissions (as these studies evaluated exposures in railroad workers and truck drivers). Specifically, because of the long latency period for lung cancer, epidemiology studies need to examine workers whose exposures started more than 20 years earlier. These particular studies are based on exposures from the 1950s and 1960s. However, the US EPA and CARB have progressively tightened standards for particulate emissions from diesel engines, including marine engines, resulting in the development of new technology diesel engines with significantly lower emissions and also likely different composition. Because these

⁴ A 30 year residence time is considered to be a more realistic residence time period.

⁵ US EPA. Health Assessment Document for Diesel Emissions (External Review Draft, 1994) - Volume 1. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/8-90/057Ba (NTIS PB95192092)

⁶ HEI. Diesel Exhaust: A Critical Analysis of Emissions, Exposure, and Health Effects. 1995. [Diesel Exhaust New Scan.pdf \(healtheffects.org\)](http://www.healtheffects.org)

⁷ U.S. EPA. Health Assessment Document for Diesel Engine Exhaust (Final 2002). U.S. Environmental Protection Agency, Office of Research and Development, National Center for Environmental Assessment, Washington Office, Washington, DC, EPA/600/8-90/057F, 2002

changes have resulted in not only quantitative reduction in mass emitted, but have also resulted in differences in the composition with respect to size and chemicals associated with the exhaust (e.g., Hesterberg et al. 2011⁸), the epidemiology studies based on old generation engines may not be applicable to current emission conditions.

Even if the epidemiology data were deemed robust enough for use in quantifying the cancer risks of DPM, the uncertainty suggests that cancer risks could be over 100 fold lower than estimates by CARB, which would bring the cancer risks into an acceptable range by US EPA and California standards (i.e., 10^{-6} to 10^{-4}) under the current regulations, without the need for application of the proposed regulations.

At a minimum, CARB should provide a more detailed discussion of the uncertainties noted in these comments and the impact on the estimated risks, which we note are likely highly inflated. The cumulative impact of application of multiple conservative assumptions needs to be acknowledged.

2.2 Regional PM_{2.5} Mortality and Illness Analysis for California Air Basins

CARB used two different methods to estimate the impacts of the Proposed Amendments to the CHC Regulation on mortality and other health effects (hospital admissions for cardiovascular and respiratory diseases and emergency department visits for asthma). The first method relies on the modeled estimates for the two air basins (San Francisco Bay and South Coast) and the second method is a reduced form analysis that is applied to other air basins as well as to impacts from reductions in NOx.

While the CARB health analysis is based on standard methodology used by EPA to calculate health impacts, we were not able to check the results based on the data provided by CARB as many of the model inputs were missing. Also, even though the methods appear to be applied correctly, given what we were provided for review, the approach taken by CARB is unconventional. First, CARB is using two different methods to calculate health impacts, one based on modeled results and a second based on a reduced-form method with large simplifying assumptions. Both methods are subject to large uncertainties, but the reduced-form method has significantly more uncertainty.

Also, the way the CARB approaches the health analysis is also significantly different from the way EPA and others have conducted similar analyses (i.e., using BenMAP). CARB essentially is computing effects based on changes in PM_{2.5} modeled estimates (or PM emission reductions) for each year starting in 2023 and up to 2038 between the current regulations and the proposed amendments. The impacts are summed across air basins for each year, and then summed across all years. To our knowledge, this type of cumulative assessment of health benefits across a long time period in the future has not been conducted previously using the methods CARB is using. We welcome other examples where this has been done.

The implications are that these impacts are cumulative over time. In addition, the impacts actually increase over the years (presumably as the difference in emissions or concentrations increase between current and proposed regulations).

⁸Hesterberg, T. W., Long, C. M., Sax, S. N., Lapin, C. A., McClellan, R. O., Bunn, W. B., & Valberg, P. A. (2011). Particulate Matter in New Technology Diesel Exhaust (NTDE) is Quantitatively and Qualitatively Very Different from that Found in Traditional Diesel Exhaust (TDE). *Journal of the Air & Waste Management Association*, 61(9), 894–913.

The amount of uncertainty associated with this analysis is very large and propagated across all the steps in the risk assessment process including 1) emissions estimation, 2) modeling and scaling of PM concentrations (which rely on emission inputs), 3) deriving PM from diesel PM, 4) assumptions regarding conversion of NO_x to PM, 5) application of health functions from epidemiology studies, and 6) estimation of baseline health statistics and population statistics for future years. The magnitude of the uncertainty and the impact on the direction of bias has not been evaluated by the CARB, but our analysis, based on available data, suggest that the magnitude is quite large (and larger than expressed by the 95% confidence intervals provided by CARB) and most likely are overstating the health benefits of the proposed amendments.

In light of the significant amount of uncertainty in the health analysis, we strongly suggest that CARB present the findings so that they are more transparent and in a way that acknowledges the level of uncertainty, as well as amount of confidence that can be placed on the results. For example, we don't think it is appropriate to present the combined results for the health analysis based on modeled data and those based on the IPT methodology, because the IPT results would tend to be much more uncertain and less reliable. Also, instead of presenting a total number of deaths as the sum across air basins and years, CARB should present results as a range on potential annual impacts for each air basin, separately. This again, with the acknowledgement that year to year there is uncertainty and the numbers could be more or less than estimated depending on many different model assumptions at every step in the risk assessment process.

Some of the key limitations and sources of uncertainty of these two methodologies for estimating the potential health impacts from the Proposed Amendments are discussed below.

Analysis for the San Francisco Bay and South Coast

As is the case for the cancer health risk assessment, the PM mortality and illness analysis relies on a number of model inputs and assumptions, many that are associated with significant uncertainty that tends to overstate the risks.

In interpreting the mortality and illness results, it is important to consider that the health impacts are based on a single population-based epidemiological study that infer statistical associations between health effects and air pollution exposures, but that cannot provide definite evidence of a cause and effect. This is because these studies have important limitations that preclude definite conclusions regarding a causal link between PM and mortality or illness, including uncertainty regarding the exposure estimates, the potential role of other pollutants or factors that might explain the effects, and evidence that there is likely a threshold below which health impacts are unlikely. In addition, the components of PM that may be associated with adverse health effects are yet unknown, but the analyses assume that all PM is equally toxic, making it a very conservative analysis.

The epidemiological studies that form the basis of the health study, including the mortality study by Krewski *et al.* (2009)⁹ rely on data from central-site monitors to estimate personal exposures. This results in exposure measurement error because central-site monitors may not accurately capture population mobility, the uneven distribution of PM exposure attributable to local sources, pollution patterns that can be affected by terrain features and weather, and daily variations in PM concentrations or composition that may differ from variations experienced by

⁹ Krewski, D. et al., 2009. Extended Follow-up and Spatial Analysis of the American Cancer Society Study Linking Particulate Air Pollution and Mortality Report. Health Effects Institute, 140 <https://www.healtheffects.org/system/files/Krewski140.pdf>

individuals. These factors can bias the results of an epidemiology analysis in either direction. The direction and magnitude of the bias depends on the type of measurement error. For PM_{2.5}, however, because of the spatial variability of air pollutant concentrations the bias is likely to result in effects being overestimated (e.g., Goldman *et al.*, 2011¹⁰, Rhomberg *et al.* 2011¹¹).

The bias associated with confounding effects is particularly difficult to address in epidemiology studies because it is challenging to account for all potential confounding factors. A confounder is a factor that is associated with both an exposure and an outcome, and may make it appear that the exposure is associated with (or caused) the outcome. In PM mortality studies there is evidence that co-pollutants can confound the PM mortality association, especially because many of the pollutants are strongly correlated, and disentangling the effects of any single pollutant (if any) is difficult. Even if potential confounders are accounted for in studies, there may still be issues of how well the confounding variables are measured and controlled for. For example, in the study by Krewski *et al.* (2009), which is used by CARB for the mortality estimates, data on potential confounders such as smoking and body mass index were determined at the beginning of the study for all participants, but were not re-evaluated over the follow up study period. Changes in these variables over time could alter confounding effects. The issue of confounding relates to both the assumption of causality, where another factor may actually be the causal agent, and to the magnitude of the association, where a co-factor may account for some of the observed risk. In either case, ignoring the effects of confounding results in overstated effects estimates.

Another source of uncertainty is the assumption of a log-linear response between exposure and health effects, without consideration for a threshold below which effects may not be measurable. The issue of a threshold for PM_{2.5} is highly debated and can have significant implications for health impacts analyses as it requires consideration of current air pollution levels and calculating effects only for areas that exceed threshold levels. Without consideration of a threshold, effects of any change in air pollution below or above the threshold are assumed to impact health. Interestingly, although EPA traditionally does not consider thresholds in its cost-benefit analyses, the NAAQS itself is a health-based threshold level that EPA has developed based on evaluating the most current evidence of health effects. Most epidemiological studies do not indicate that a threshold exists, but these studies often do not have the statistical power to detect thresholds. Some studies that have employed different statistical methods have shown evidence of a threshold for PM-mortality effects. For example, Abrahamowicz *et al.* (2003)¹² found evidence for a PM_{2.5} threshold at about 16 $\mu\text{g}/\text{m}^3$ below which mortality effects were not observed. Considering a threshold for PM effects would mean that effects would occur only when threshold levels of PM is exceeded.

Sensitivity analyses are often warranted using different health functions from different studies in order to evaluate the potential variability and/or uncertainty in health estimates. For example, some epidemiological studies have reported no mortality impacts from PM_{2.5}

¹⁰ Goldman, GT; Mulholland, JA; Russell, AG; Strickland, MJ; Klein, M; Waller, LA; Tolbert, PE. 2011. "Impact of exposure measurement error in air pollution epidemiology: Effect of error type in time-series studies." *Environ. Health* 10 (1) :61. 211-5049

¹¹ Rhomberg, LR; Chandalia, JK; Long, CM; Goodman, JE. 2011. "Measurement error in environmental epidemiology and the shape of exposure-response curves." *Crit. Rev. Toxicol.* 41 (8) :651-671. 211-7617

¹² Abrahamowicz M, Schopflocher T, Leffondré K, du Berger R, Krewski D. Flexible modeling of exposure-response relationship between long-term average levels of particulate air pollution and mortality in the American Cancer Society study. *J Toxicol Environ Health A.* 2003 Aug 22-Oct 10;66(16-19):1625-54.

exposures (Beelen et al., 2009¹³; Enstrom, 2005¹⁴, Lippfert et al., 2006¹⁵). This means that if the BenMAP analyses used different concentration-response functions, the actual impacts may be very different from those reported in this analysis and could include a zero effect.

One additional important uncertainty stems from the assumption that all PM_{2.5}, regardless of composition, is equally potent in causing health effects such as mortality. This is important because PM_{2.5} varies significantly in composition depending on the source, and this is particularly important because the composition of particulate matter from diesel has also changed over time as a function of changes in both diesel fuel composition as well as the use of emission controls. Several reviews have evaluated the scientific evidence of health effects from specific particulate components (e.g., Rohr and Wyzga 2012¹⁶; Lippmann and Chen, 2009¹⁷; Kelly and Fussell, 2007¹⁸). These reviews indicate that the evidence is strongest for combustion-derived components of PM including elemental carbon (EC), organic carbon (OC) and various metals (e.g., nickel and vanadium), however, there is still no definitive data that points to any particular component of PM as being more toxic than other components. EPA also stated that results from various studies have shown the importance of considering particle size, composition, and particle source in determining the health impacts of PM (US EPA, 2009¹⁹). Further, EPA (2009) found that studies have reported that particles from industrial sources and from coal combustion appear to be the most significant contributors to PM-related mortality, consistent with the findings by Rohr and Wyzga (2012) and others. Therefore, by not considering the relative toxicity of PM components, BenMAP analyses are likely to be conservative.

Analysis Using the IPT methodology for Other Air Basins (and NOx)

In addition to the analysis conducted on modeled PM_{2.5}, CARB applied a reduced-form methodology (IPT) to estimate additional health impacts for other air basins and from PM_{2.5} derived from NOx emissions. These reduced-form analyses involve important simplifying assumptions that can greatly affect the reliability of the estimated health impacts.

The uncertainties described in the previous section also apply to the development of the IPT factors that are used to estimate the impacts for other air basins. Additional uncertainty is introduced when applying these IPT factors to the estimated emissions for this rulemaking. The IPT factors are based on a specific time period, and therefore important variability due to meteorological changes and or spatial differences are not accounted for. Most of these uncertainties were not discussed or considered by CARB. Importantly, a large majority of the assumptions and uncertainties likely result in overestimated benefits, particularly when considering the compounding effects of the uncertainties in the various modeling inputs, starting with the emissions estimates, on the final calculation.

¹³ Beelen, R; Hoek, G; van den Brandt, PA; Goldbohm, RA; Fischer, P; Schouten, LJ; Jerrett, M; Hughes, E; Armstrong, B; Brunekreef, B. 2008. "Long-term effects of traffic-related air pollution on mortality in a Dutch cohort (NLCS-AIR Study)." *Environ. Health Perspect.* 116 (2) :196-202

¹⁴ Enstrom, JE. 2005. "Fine particulate air pollution and total mortality among elderly Californians, 1973-2002." *Inhal. Toxicol.* 17 (14) :803-816. 209-6826

¹⁵ Lippfert, FW; Wyzga, RE; Baty, JD; Miller, JP. 2006. "Traffic density as a surrogate measure of environmental exposures in studies of air pollution health effects: Long-term mortality in a cohort of US veterans." *Atmos. Environ.* 40 (1) :154-169. 206-7558

¹⁶ Rohr A.C., R.E. Wyzga, 2012. Attributing health effects to individual particulate matter constituents. *Atmos Environ.*, 62, 130-152. doi:10.1016/j.atmosenv.07.036.

¹⁷ Lippmann, M., L.C. Chen, 2009. Health effects of concentrated ambient air particulate matter (CAPs) and its components. *Crit. Rev. Toxicol.*, 39, 865e913.

¹⁸ Kelly, F.J., J.C. Fussell, 2007. Particulate Toxicity Ranking Report. Report Number 2/07. Environmental Research Group, Kings College, London.

¹⁹ U.S. EPA. Integrated Science Assessment (ISA) for Particulate Matter (Final Report, Dec 2009). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009

As noted previously, we don't believe it is appropriate for CARB to combine the results from this analysis with the analysis for the two air basins, for which modeled estimates are available. In addition, the estimated range of annual impacts for each air basin should be reported instead of summing the cumulative results across years.

2.3 Conclusions

The health risk assessments conducted by CARB are subject to a significant number of uncertainties that are propagated through the risk assessment steps and that we have shown to overestimate the health impacts. We first show that emissions estimates are inflated (see Section 1) and these estimates are inputs to the CalPuff modeling used to estimate exposures and risks for the Bay Area and South Coast Air Basins. We also note that CARB did not validate the model estimate against measured levels of PM_{2.5}. Our preliminary analysis indicates that the modeled estimates are overestimating the measured levels for receptors near monitoring stations, particularly in highly impacted areas. Lastly, we highlight many of the risk assessment model assumptions that will also contribute to overstated health impacts in both the cancer risk assessment and the mortality and illness assessment.

Specifically, in the cancer risk assessment the use of highly conservative exposure assumptions (e.g., high breathing rates, 70 years of exposures 24 hours a day), application of sensitivity factors, and use of a highly conservative cancer slope factor all add up to highly inflated cancer risks. Similarly, in the mortality and illness analysis, risks are also likely to be overstated because of assumptions related to the choice of epidemiological study as the basis of the analysis, as well as the assumptions regarding the year to year changes in emissions across the air basins. Importantly, because the two methods used by CARB are associated with significantly different amount of uncertainty, the mortality and illness results should be presented as annual effects, and shown separately by air basin and by methodology, noting that results using the IPT approach will be more uncertain than those based on modeled results.

Overall, CARB needs to provide a more robust validation of modeled assumptions, a more thorough discussion of the underlying uncertainties and impact on the results, and a more transparent representation of the study results.



May 5th, 2020

Ms. Bonnie Soriano
Chief, Freight Activity Branch
Transportation and Toxics Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: AWO Comments relating to Proposed
Amendments to the Regulations to Reduce
Emissions from Diesel Engines On
Commercial Harbor Craft Operated Within
California Waters and 24 Nautical Miles of
the California Baseline

Dear Ms. Soriano:

We appreciate the opportunity to comment on the California Air Resources Board (CARB) proposed concepts for further reducing pollution from Commercial Harbor Craft (CHC). Foss Maritime Company (Foss) is a 132-year-old company that provides comprehensive marine transportation and logistical services throughout North America and the Hawaiian Islands. This includes ocean towing and project support in extreme environments throughout the world. Foss's Pacific Northwest shipyard in Seattle, Washington offers a wide range of services from naval architecture and marine engineering to vessel design, construction, and repair. Foss is committed to reducing its carbon and emissions footprints and adhering to the principles of sustainability and safety in its operations. Foss has taken the lead in our industry to aggressively pursue opportunities to reduce emissions and work our environmental values into all our strategies.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian's rely on to deliver and support the delivery of their essential goods and services. We were disappointed by CARB's 16-day comment window, on a 113-page draft rule published on April 1st. These proposed rules involve highly technical subjects and the time allowed is not ample to both review the changes from the last draft, nor to prepare constructive comments to address what we believe are significant short-comings, errors, and misrepresentation of facts in the latest version. We did receive notice from Mr. David Quiros that CARB was granting an unpublished open-ended extension period. And while we feel this extension should have been formal and published, we trust that CARB is sincere, and are taking advantage of the opportunity by submitting the following comments for CARB's consideration and action.

Over the years Foss has been associated with several highly technical rulemaking processes. Among these were the Escort Rules for Prince William Sound, Puget Sound, San Francisco Bay and the Ports of

Appendix B - May 2021 Comments

Los Angeles and Long Beach. The regulatory bodies involved included the United States Coast Guard, Washington Department of Ecology and California Office of Spill Prevention and Response. Private and industry partners in the process included including harbor and pilot associations, marine exchanges, shipping companies, harbor safety committees, tug and barge companies and other interested stakeholders. While at times the opinions of the regulators and regulated differed we were all guided by a commitment to get it right and to base our findings on accurate and verifiable data and sound scientific principles. The result was rules that have produced safer waterways, while allowing the commerce they regulate to continue to operate in a safe and efficient manner. The science behind the latest draft of the proposed CHC regulations has deviated from this proven path. We continue to be concerned by CARB's willingness to move forward with the rules without first addressing the known and significant errors in the foundational elements that they are based upon. These inaccuracies include:

- Errors in the vessel population data used by CARB, that drastically overstates the towing vessel population operating in CARB waters. Foss and AWO have repeatedly demonstrated to CARB staff that the U.S. Coast Guard vessel database, the foundation of all their vessel counts, has no information related to a vessel's utilization or location of operation. Further we have shared with CARB real-time sources of vessel operating data that could provide accurate usage data. Sources that showed:
 - Of the 219 towing vessels CARB used as operating in California, only 73 of those vessels were operated in California.
 - That the 219 vessels did not include vessels registered out of state, that were operating in California.
 - That CARB asserted, based on the false number of 219 towing vessels in their database, there was a 48% under-reporting of towing vessel emissions in California. Accurate real-time data refutes this claim and shows that any errors in reporting are likely insignificant.

It defies logic and scientific rigor that CARB is continuing to promote a regulation based on such an erroneous data set that has created incorrect and invalid conclusions.

- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions ocean-going tugs and barges that meet the exact same criteria. These vessels trade in direct competition with self-propelled cargo and tank ships that are not covered by the CHC rule, putting them at a financial disadvantage.
- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. Foss supports CARB's goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions.

In support of our comments, we have included two additional letters, previously received by CARB. Attached as Appendix A is AWO's Comments submitted to CARB on 4/30/21. Foss assisted AWO staff in the preparation of their comments and fully supports the observations and statements contained therein. In Appendix B is the Foss comments on the rule submitted last year, dated 4/30/2020. As few if

any of these comments were directly addressed by CARB staff in either the revised draft of the rules or in the meetings leading up to their release, we urge CARB to reread these comments. We believe they offer a practical basis for renewed discussion and collaboration to create a rule set that will address the real challenge of emissions reductions and their true impact on health based in real data and the fair application of regulation.

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

Foss directs you to the comments contained in the AWO comment letter in Appendix A. As the U.S. Coast Guard will attest, the database used by CARB to describe the population was designed to track the ownership and regulatory status of a vessel and does not provide any insight or information into where a vessel is operated. CARB staff has acknowledged this fact and yet continues to use the numbers in the database to justify the conclusions of the study and the proposed rules. These are not insignificant errors. The vessel count includes:

- 146 towing vessels that did not operate in CARB waters during the last three years.
- Excludes 69 towing vessels that were registered out of state but did operate in CARB waters.
- Includes 33 vessels that did not have a valid Certificate of Documentation, either having retired it or having it marked as “Not in Operation.” There is no evidence these vessels operated in CARB waters during the last three years.

Using real-time sources from the Marine Exchanges in both San Francisco and Los Angeles Long Beach, based on Automatic Identification System (AIS) and regulatory reporting requirements, we demonstrated the flaws in the vessel counts that CARB was using for towing vessels. Most importantly we clearly showed that there was no justification for CARB to inflate the towing vessel numbers by 48% for under reporting. AWO and Foss shared all our data with CARB in the spirit of full transparency and would welcome the opportunity to assist CARB in obtaining accurate vessel information. But we are confused and dismayed that while CARB openly acknowledged these errors in the CHC Workshop #4 held on March 16, 2021, they informed the attendees of the workshop that they would not be revising their vessel count numbers in the draft regulation.

To that end Foss joins with AWO to urge CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations to reflect the conclusions of the new study.

Moving forward with regulation without correcting errors in the underlying data set will undermine the legitimacy of the regulatory process.

CARB’S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

Foss directs you to the comments from AWO, contained in Appendix A. CARB’s decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is

arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

CARB's rationale for excluding these vessels apply to the towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins;
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits;
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO members have offered to confidentially share with CARB financial data that demonstrates the small profit margins in the towing industry. AWO submitted information in April of 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB's decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be addressed prior to formal rulemaking. In our comment letter from last year, found in Appendix B, Foss offers draft language that could address this issue and separate vessels engaged in "ocean-going voyages" from the burdens on rules designed for "harbor craft".¹

CARB'S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

- This study of one large and spacious ship assists and escort tug is not representative of the diverse towing vessel fleet.

¹ Appendix B, "Concept I: Expanding Vessel Categories Subject to In-Use Requirements", Page 2, beginning at the 2nd Paragraph.

- The Jensen Review Summary notes “the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.”
- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB’s proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, Foss will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have only recently been repowered to meet the last iteration of the CHC regulations. In the most egregious case, Foss has vessels that have just been delivered or it will take delivery off that will be forced to be retrofitted just a few short years after they are first put into service. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally “taking” property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

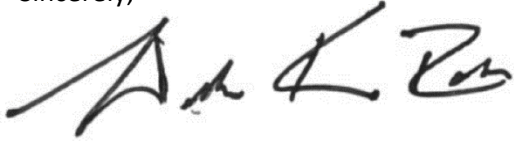
Conclusion

Foss appreciates this opportunity to comment on CARB’s Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. Foss does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data not only inflates the emissions generated by the towing vessel fleet and in turn the impact the fleet has on the air quality and health of the residents of the regions in which we operate. Foss stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry finding feasible solutions to reducing emissions in the harbors of California. Foss urges CARB to adopt a more collaborative approach in advance of the 45-day

Appendix B - May 2021 Comments

formal rulemaking. Thoughtful and honest collaboration will benefit the state's economic and environmental health. Foss looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Roberts". The signature is fluid and cursive, with the first letter of each name being capitalized and prominent.

William Roberts
President and Chief Operating Officer

cc: Charles Costanzo, AWO's General Counsel and VP - Pacific Region

Appendix C - April 2020 Foss Comments

ALWAYS SAFE. ALWAYS READY.



April 30th, 2020

David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Concepts for Commercial Harbor
Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the “Proposed Concepts for Commercial Harbor Craft in California.” Foss Maritime is a 131-year-old company that provides comprehensive marine transportation and logistical services from local harbor services throughout North America and the Hawaiian Islands. This includes ocean towing and project support in extreme environments throughout the world. Foss Maritime’s Pacific Northwest shipyard in Seattle, Washington offers a wide range of services from naval architecture and marine engineering to vessel design, construction, and repair. Foss is committed to reducing its carbon and emissions footprints and adhering to the principles of sustainability and safety in its operations. Foss has taken the lead in our industry to aggressively pursue opportunities to reduce emissions and work our environmental values into all our strategies.

It is our sincere desire to be a constructive participant in the rule making process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californian’s rely on to deliver and support the delivery of their essential goods and services. Our experience with the first Hybrid Tug technology deployed in California waters and the first conversion of a conventionally powered vessel to Hybrid technology makes us uniquely qualified to comment on the concepts proposed by CARB. Our comments follow the table of contents for your Proposed Concepts Commercial Harbor Craft (CHC) Regulations.

Concept I: Expanding Vessel Categories Subject to In-Use Requirements

We want to be clear that we concur with CARB’s reasoning and support the exclusion of the commercial fishing vessels from the proposed regulations. However, we would ask CARB to consider that those same points can be made about other vessel categories that are included in the list of regulated CHC. Under the heading of Justification/Reasoning, CARB sites their reason for not including commercial fishing vessels, as: “the small profit margins in the industry, demonstrated lack of feasibility for Tier 4 repowers and retrofits , competition with out of state and global markets, and tendency to conduct the majority of their operations far from the coast.” All these points can be made regarding tank barges over 400 feet and 10,000 gross tons and the tugs that tow them. These vessels operate in stiff competition to both international tankers that are able to move supply to and from foreign ports, US ocean going tankers that are exempted and trucks and rail that while regulated by CARB present a much

higher emission profile per ton of cargo moved than their marine counterpart¹. Further their routes are those of ocean-going vessels and not CHC, and we feel they should not be unduly burdened with regulations that don't apply to their competition.

It is our belief that CARB should determine the applicability of the CHC rules based on the service the vessel is performing, rather than generic classification of the vessel. We would propose the following amendments:

- *A vessel engaged in ocean voyage or a barge engaged in ocean voyage shall be exempt from the CHC rules. The following shall be the criteria for defining an ocean voyage exempt from regulation under the CHCRs.*
 - *A tug and loaded barge, whose arrival or departure is transporting a cargo with the destination outside of the load ports line of demarcation and beyond the 24nm control zone.*
 - *A lite tug and barge, whose arrival or departure is for the purpose of loading a cargo with a destination outside of the load ports line of demarcation and beyond the 24nm control zone.*
 - *Any moves or engine hours within the line of demarcation that is solely for the purpose of preparing for an ocean voyage as defined above.*

So long as the vessels movements comply with the criteria above, they will not be required to comply with the CHCR, nor count any hours against the low-use operational requirements of the regulations.

We believe adopting the service-based criteria above will ensure that barge moves that are clearly ocean voyages are not unduly burdened versus other modes of transportation that serve the same markets. This would also preserve the intent of the CHCRs to ensure that vessels performing services inside of the regulated control area are subject to the regulation.

Concept II. More Stringent In-Use Requirements

Foss has a long history of working with CARB and other agencies to reduce the air emissions from our fleet ahead of regulatory requirements. This includes:

- Rebuilding existing engines with EPA compliant Tier 1, Tier 2 and Tier 3 kits.
- Re-powering vessels with new Tier 1, 2 and 3 engines.
- Building a new Hybrid powered ship assist tug, the CAROLYN DOROTHY.
- Converting an existing conventionally powered tug to a HYBRID powered tug, CAMPBELL FOSS.
- Adding Carbon Filtration to our bunker barge fleet to capture hydrocarbons during loading operations.
- Burning Ultra Low Sulfur Fuel Oil in advance of the regulatory requirement.
- Completing a Tier 4 Harbor Assist Tug in 2020 with three to follow in 2020/2021 replacing tugs that are tiering out due to the current CHCRs, but not done with their useful life.

Not counting the assistance funds from the Carl Moyer Program, CARB and federal grants Foss has made an investment in excess of \$50 million dollars to ensure our fleet remains among the greenest in operation.

¹ All Figures adapted from Texas Transportation Institute, "A Modal Comparison of Domestic Freight Transportation Effects of the General Public: 2001-2014," January 2107, as reflected in the PricewaterhouseCoopers industry study.

Appendix C - April 2020 Foss Comments

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Through all these projects we have learned many lessons about what works well and what does not. The key to every successful project is having a complete understanding of the technology we are working with, using proven components, taking the time to properly engineer and plan the project and being able to operate the vessel long enough after the modifications to offset the capital expense of the project. These lessons learned inform our comments below.

Marine Harbor Craft applications are unlike the shore-based power installations that CARB draws parallels in justifying the requirement for DPFs. Specifically stating that DPFs are “widely commercialized and proven technology on light-duty and heavy-duty equipment that has been used on-road, off-road and in port applications.” The evidence contradicts this comparison. Concern is that to date there has been little marine application of DPFs. The size of our engines and available space for installation makes a DPF installation extremely difficult. The back pressure created by a DPF on the exhaust system may exceed the tolerances of many of our existing or future engines to properly operate. Many, if not all our vessels currently have no OEM approved DPF available for the engines. Until one is available, and its characteristics defined, we cannot begin the process of determining if it is feasible to operate with a DPF.

The application of DPFs will also have to consider that the duty cycle of a marine vessel, is unlike that of on-road, off-road or port application equipment. As noted in CARB's proposed concepts “escort and harbor assist tugs have a highly variable duty cycles operating with relatively larger engines but lower average loads . . .” Additionally, our vessels also use their engines as the primary mode of braking and often maneuvering. Doing so requires the rapid acceleration and deceleration of the engines. Operators do not have the luxury of shore-based equipment that can maintain a much more moderate increase of power through multi-ratio transmissions and the gradual application of fuel. On vessels, power is often needed immediately to avoid collision, allision or losing propulsion. Overloading the propeller and stalling the engine is a real risk when maneuvering in tight quarters. For this reason, the manufacturer provided fuel curves must be very dynamic, considering the variable nature of the load requirements of the engines. This variable engine loading is exactly the situation that has caused many of the issues, including fire and premature failure, that other industries have experienced when they attempted to incorporate the use of DPFs.

The process of repowering or modifying the propulsion or power generation plants of a marine harbor craft takes years to plan, obtain regulatory approval and execute. The planning and engineering must begin years prior to commencing the work and even relatively simple changes must be evaluated against the impact to the vessel's stability, maneuverability, available space and watertight integrity. Each component's specifications, characteristics and operating parameters must be known far enough in advance to ensure a thorough design review and engineering process that can take place. Engineering can take from 3 to 9 months depending on the complexity of the project. Many projects will also require the approval from the vessel's Class Society or the USCG, which can add months to the timeline. It can then take an additional 3 to 6 months to identify a shipyard and negotiate a contract for the modifications. When you add this up, the process must begin years before the work is to be done, and the process can only begin when all the equipment that is to be used has been approved and accepted for the purpose.

The costs identified in the California Maritime Academy report do not reflect the entire financial impact of performing these modifications. With only a few tugs in our regional fleets, losing a single vessel has significant economic impact either in lost revenue or in the cost of sourcing a temporary replacement tug. While each situation is unique, a conservative cost would run well above \$5,000 per day. With a

conversion from Tier 2 to Tier 4 engines taking upwards of 2 months, the cost to the company will be 100's of thousands more than those captured in the CMA report. To minimize the downtime our engineering teams will generally begin the process years in advance, with work timed to ensure the modifications can be completed during one of the vessel's scheduled yard or other planned maintenance periods.

With all these challenges in mind, we encourage CARB to consider modifying their proposed rules as follows:

- *Expanding the implementation dates to better recognize the investment owners have already made to comply with previous regulation. We would ask CARB to adjust their implementation dates to allow any engine that is currently in compliance to be able to operate at least 20 years from the date it went into service without modification. For instance, Foss has a new vessel currently under construction that under the current proposal will be required to have DPFs installed by 2028, less than 8 years after it was built. A modification that was not foreseen during the design and planning stage of the vessel.*
- *Additionally, any engine modified to comply with the current regulation should be allowed 15 years at a minimum, from the date it was modified, before being compelled to comply with the new CHCR.*
- *Delay the implementation date for installation of a Diesel Particulate Filter (DPF) to 5 years after a model approved by both the manufacturer and appropriate regulatory authority is available. Only when the exact characteristics and specifications of a DPF are known can a company begin the engineering and planning necessary to determine if the project is feasible and then schedule a time to do the work.*
- *Tugs where it proves infeasible to install a Tier 4 engine and a DPF will be considered in compliance if they are Tier 2 or Tier 3, with a DPF.*
- *Company's should be afforded the ability to defer projects in one-year increments beyond the implementation date to avoid having to manage multiple projects in the same year.*

Concept III: More Stringent Requirements for New-Build Vessels

New-Build construction allows us to overcome many of the hurdles present in the conversion of an existing vessel. However, new builds are not without their challenges. Most notably, a new build program is part of a company's long-term strategic plan, designed to meet their customers' needs and remaining competitive in the market. Vessel designs are completed years in advance, with the actual construction process taking more than a year to complete. Most build programs involve the delivery of multiple vessels allowing the owner to take advantage of the lower cost series construction and reduced operating costs associated with having a homogenous fleet. Common spare parts, similar repair procedures and common operating characteristics all helps to make an operation more efficient. Changing vessel plans in the middle of a build program can be costly and disruptive to the company's ability to successfully compete. As stated in the concept document, CARB's vision is that "New build vessels can be designed around the cleanest available equipment and present the best opportunity for cost-effectively reducing emissions from harbor craft in California." If owners are expected to meet this vision, we would ask that they be given the time necessary to incorporate the final rule into a well thought out build strategy.

To do this we would encourage CARB to consider the following comments/recommendations to their proposed concepts:

- *Set the implementation for the requirement to install a Diesel Particulate Filter (DPF) to 5 years after a model approved by both the manufacturer and appropriate regulatory authority is available. Only when the exact characteristics and specifications of a DPF are known can a company begin the engineering and planning necessary to determine if the project is feasible and then schedule the time to do the work.*
- *Any vessel completed before this point should be allowed to operate 15 years before being asked to re-engineer and add the DPF.*

Concept IV: Mandates for Zero-Emission and Advanced Technologies

As with Concept III, a technology change of this type will take time to plan and incorporate in existing vessel designs. To facilitate this process, we would ask CARB to consider the following comments:

- *Extend the phase in date to 5 years after the rule goes into effect. This will allow companies the time to properly transition their build programs to incorporate the new technology.*
- *Clarify the phase in date as the “Keel Laying Date”, defined in 46 CFR 30.10-37.*
- *Clarify the expectation. Currently the documents reference a specific technology employed by one tug company. There are many competing technologies that achieve the same effect. What will be the test for a compliant system?*
- *Can you clarify under the Zero-Emission Capable Hybrid, would a company be allowed to average the percent of power from zero-emission sources over 24 hours? In other words is it CARBs intent that at all times and in all modes you must be drawing 30% of your power from non-tailpipe emission sources, or just that 30% of the power you use over a period of time comes from non-tailpipe emission sources?*

Concept V: Removing Exemptions for Under 50 horsepower

Vessel’s carry several “portable” engines for a variety of purposes. These include trash and salvage pump motors for dewatering compartments and outboard motors for skiffs.

- *Can you clarify if it is CARBs intent to have these engines fall under the CHCR?*

Concept VI: Requiring Replacement Vessels for Certain Vessel Categories

Tug and Barge owners have in good faith built and designed vessels in compliance with federal, state and local laws and regulations. A jurisdiction should not be able to enact a new set of regulations that prevent an owner from realizing the benefit of their investment. We would ask CARB to consider the following comments:

- *As stated in our comments under Concept II we would ask that no vessel be required to modify an engine sooner than 20 years from the date it first went into service. If at that time an owner can prove both that the upgrade is not feasible and that it would present a financial hardship to meet the date an extension would be granted.*
- *As stated in our comments under Concept II any engine modified to comply with the current regulation be allowed 15 years at a minimum from the date it was modified, before being compelled to comply with the new CHCR. If at that time an owner can prove both that the upgrade is not feasible and that it would present a financial hardship to meet the date, an extension would be granted.*

Concept VII: Compliance Extensions

While we concur with the need for extensions as it is not only likely but almost certain that there are vessels within the current harbor craft fleet for which it will not be feasible, nor financially sustainable to

comply with the new regulations. The challenge will be in defining the very subjective terms of “feasible” and “financial hardship”. We offer the following comments.

The determination of what is or is not feasible often bleeds into what is or is not financially viable. In the CMA study they found that it was not feasible to retrofit a SCR and DPF on the representative ship assist tug. However, their conclusion was based on the amount of work that would have been needed to be done to modify the vessel to safely house the systems. Simply put, it would not be practical because the cost would far exceed the value of the modifications.

CARBs intent to assess financial hardship of complying with a regulation, based on the financial health of a company is fundamentally the wrong approach. The effect of such a methodology would be to potentially prop up companies that are struggling financially by allowing them to avoid regulation and gain an economic advantage over companies that are financially sound. Regulators should not be in the position of bailing out companies, but rather they should strive to create an equitable regulatory regime. We would argue that financial hardship should be measured in the impact on an assets ability to compete. If due to the vessel’s design or configuration the modification required to comply is so expensive that performing the modification would render the vessel too costly to be profitable then relief should be given in the form of an extension. In order to achieve an equitable measure of both the feasibility and hardship measure, we would ask you to consider the following revisions:

- *Modifications whose estimates, as verified by a yet to be determined third party or agency, exceeds the High Estimated Cost as offered in the CMA Report, and adjusted for inflation, would be granted an extension.*

This would provide a much simpler and more equitable approach to granting extensions and would be like the methodology used in the CMA study.

Concept VIII: Alternative Compliance Pathways

We need a defined submittal plan, requirements and package to access and comment effectively on this concept. Under the existing regulations we petitioned CARB to recognize that the emission profile for the Hybrid Tug CAROLYN DOROTHY was already favorable to that of a vessel with the Tier Engines to which we were being required to upgrade. As explained to us, CARB was unable to look at emissions over time as the offset to point of time emissions.

- *Has CARB changed their position on this issue, and will they be willing to look at 24-hour profile versus a point of time approach?*

Concept X: Proposed Implementation Timeline

- *See comments under Concept II & III*

Concept XI: Idling Limits and Shore Power Requirements

Foss Maritime supports the idea of minimizing idle time as a way of reducing unnecessary emissions. Further we feel 15 minutes is adequate time to perform a proper start-up and shutdown, except where a watch change has occurred and the individual responsible for the machinery must ensure everything is running properly. We offer the following comments and questions.

- *Is our read that the initial daily startup allows for an additional 15 minutes, for 30 minutes total. If so, we would ask that the wording be changed to recognize that a watch change would constitute a new work period.*

- *We are concerned by the unintended consequences this might have on finding adequate lay berths. Unlike ferries we do not transit between two docks that are dedicated to our service. Outside of our home dock, we have arrangements with several facility owners to utilize their docks in between ship jobs and barge moves. Most of these locations do not currently have infrastructure to provide shore power connections, so while we can shutdown our main engines, we must still run our generators. We believe most of these operators will deny us the ability to dock, rather than make the investment in shore power or deal with the increased regulatory burden. There is simply not enough money in it for them to make that type of investment. This will force us to idle in the harbor between jobs or return across the harbor to our home dock increasing our fuel burn and emission output. We suggest CARB look at an incentive-based program for facilities to get credit for providing shore power infrastructure to the Harbor Craft vessels.*

Concept XII: Facility Infrastructure

We have similar concerns about the requirements of this concept driving facilities away from providing moorage to Harbor Craft. We currently struggle to find suitable locations around the ports in California to moor our vessels. Most port operations are looking to maximize their waterfront space on cargo and other high revenue generating activities. While moorage for Harbor Craft is essential to the port economy, it is often lost on the individual facility operator. As mentioned in our comments under Concept XI, we worry this will drive more and more facility operators away from offering moorage.

Concept XIII: Reporting – Facilities

As with Concept XI and XII the additional burden of reporting will likely have a negative impact on those facilities willing to rent or lease space to harbor craft. *Our recommendation is that negative impact on our CHC's ability to tie up and reduce emissions will offset any potential upside to CARB of finding potential non-reporters.*

Concept XIV: Reporting – Operators

In general Foss Maritime does not take issue with the increase in reporting requirements, so long as it does not come with an unnecessary administrative burden. To that end we request CARB consider the comments below:

- *In developing the form for input, care should be taken to ensure data can be uploaded in batch or bulk form from a database or spreadsheet. We would be opposed to an annual reporting requirement that involved filling in the individual fields for each vessel in our fleet, creating hours of unnecessary work.*
- *We have concerns with the switch to engine model year, which does not reflect accurately how long the engine has been operated or how long the owner has had to recoup his investment. We would much prefer CARB use the initial in-service date as the baseline for determining any implementation dates for that engine.*
- *We believe CARB misunderstands the term Home Port. Home Port or Hailing Port as defined in the CFRs is "the name of the port from which a vessel hails, required by law to be painted on the stern of all documented vessels in the United States; the port in which the managing owner of the vessel lives, or which is nearest to his place of residence; the home port of a vessel." It is not intended to indicate where a vessel is being operated. CARB may want to ask that specific question.*

Concept XV: Vessel Identifiers

We recognize that properly tracking vessels is a critical part of implementing any regulation. And while it is true . . . “There is currently no single identifier that can be used across all vessel types...” every vessel covered by the regulation will have either an Official Number, IMO Number or CF Number that will be unique. *Our recommendation is that vessels be required to provide CARB one of these numbers for tracking and those vessels that are not already required to display their chosen identification number, could be required under the regulation to do so.*

Concept XVI: Opacity Testing

The proposed rule is unclear in the method of testing that will be used for Harbor Craft. As described earlier in our comments, Marine Harbor Craft have a highly variable duty cycle. Engines must be tuned such that they can successfully accelerate and decelerate to provide the vessel with the power, maneuverability and braking necessary to safely operate. The text of the Concept suggests that CARB would like to test during the transitional phase of our fuel map (accelerating or decelerating the engine) and not at steady state (i.e. at constant RPM under a consistent load) where the engines were designed to operate most efficiently. The result will be almost certainly some level of smokiness. Tuning the engine to get rid of this momentary smokiness will put the engine at risk of stalling or shutting down just when the operator needs an immediate response. To ensure the engines are tested in the manner that they are certified by the EPA we ask CARB to consider:

- *Any Opacity testing of marine equipment should be done at steady state, either prior to or post acceleration/deceleration.*
- *Testing should not be annual and serves no purpose other than to increase the operating cost and down time on the vessel. Like automobile emission testing it should be based on known risk factors such as age of the equipment and history. Propose once in the first 5 years to set a baseline, then every 5 years after that.*
- *Opacity testing should not be required for vessels qualifying under the low-use operating requirements.*

Concept XVII: Applicability and Exemptions

No comments currently.

Concept XVIII: Compliance Fee

Compliance with this new regulation will cost companies millions of dollars in upgrades. A fee on top will be an additional burden that will be shared by our shareholders, customers and the end consumer. We ask CARB to do everything possible to minimize the cost of administration, including reducing the frequency of reporting and opacity testing to minimum required to regulate the rule.

- *We would propose a fee based on the size of fleet and number of engines, with a cap. Suggest something about \$100 per year per engine, up to \$400 per vessel, with a cap of \$2,000 per company fleet.*
- *We would be opposed to any fee that was based on hours or activity as neither impacts the work required by CARB to regulate nor should it be there be a penalty for being busy.*

Additional Comments

Overstatement of CHC Air Emissions

Foss has serious concerns that CARB has relied on inaccurate information to justify the proposed regulatory concepts. We see no justification for upwardly scaling the CHC vessel population from the February 2019 reported figure of 1,928 vessels to align with a U.S. Coast Guard dataset showing 3,698 vessels. The misuse and misinterpretation of the data set has led to CARB artificially inflating California's vessel population and consequently the overstatement of air emissions from towing vessels in California.

While our examination of the data was hampered by our company's response to the COVID-19 crisis and CARB's unwillingness to extend the comment period, we can still safely conclude that there is no rationale for CARB making the conclusion that our industry is under-reporting in any significant way. We find the following flaws in CARB's use of the dataset and the conclusion they draw from the data.

- CARB is confusing Hailing Port with area of operation and counting vessels that do not operate in California as non-reporting vessels.
- CARB is counting vessels that are either not properly documented to operate or are no longer in commercial service because of their age.
- CARB failed to use readily available sources of vessel information to validate their assumptions.

All California harbor craft must maintain and provide extensive records of operation pursuant to 17 California Code of Regulations (CCR) § 93118.5. But CARB is asserting that nearly half of the harbor craft in California do not comply with reporting requirements – i.e. 1,928 CHC operators report their operations to CARB while U.S. Coast Guard data reflects an additional 1,770 vessels with hailing ports from California. CARB's incorrect starting assumption is that "hailing port" is synonymous with operating area and that 1,770 vessels are not only not reporting but are operating with hours that are equivalent to the industry average per vessel. A vessel is not required to set their hailing port as the area they operate in and hailing port is more often reflective of the owner's offices or state of legal presence. In truth towing vessels reporting to CARB have hailing ports in many states. This lack of rigor suggests that CARB is inflating the number of purported CHC vessels to demonstrate a greater risk to the airshed and to help justify the proposed concepts.

CARB's use of the Coast Guard dataset is also flawed because many vessels included in the dataset are not legally allowed to operate under current regulations. AWO discovered that at least 37 of the tank barges in the list are built before 1983 – most likely with single hulls and legally prohibited from carrying oil in U.S. waters. These vessels likely do not operate in California or anywhere else. Other vessels in the dataset lack Certificates of Documentation (COD) and therefore cannot legally operate in U.S. waters. All told, from the data that AWO members had extraordinarily little time to review, at least 69 out of 217 towing vessels included in the Coast Guard's data have either expired CODs or work outside California.

CARB references 244 as the number of towing sector vessels, excluding barges and tank vessels, within California (13 ATBs, 73 ship assist/escort tugs, and 158 near-shore/ocean-going vessels). Based on the

Appendix C - April 2020 Foss Comments

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above we know this number to be inaccurate. To find the facts our trade organization, AWO, obtained towing vessel population data from the Marine Exchange of Southern California and the San Francisco Marine Exchange, data clearinghouses for vessel activity throughout the state. This data included details on all tug escorts, assists, tank barge escort transit logs and an AIS search for active towing vessels in SF, SoCal, San Diego and Port Hueneme. This data showed that in the two-year time period a total of 142 vessels, classified as towing vessels by the USCG, were active in CARB regulated waters. This includes 13 ATB units that call these ports and more than 10 tug barge combinations that called less than 10 times in the two years, likely leaving them well below the 300 / 80-hour low operation limit. We concur with AWO's conclusion that CARB should also disclose its exact methodology for determining its vessel inventory and justify its decision to augment that inventory with misinterpreted Coast Guard data of questionable applicability.

Conclusion

Foss appreciates the opportunity to comment on CARB's Proposed Concepts for Commercial Harbor Craft in California. We hope CARB will take note of both our concerns captured in our comments and our recommendations. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. The proposed concepts present a significant change in policy direction for CARB from incentive-driven emission control programs to prescriptive and mandatory emission control programs. We have proven over the years that the previous approach not only achieved the desired results in terms of emission reductions, but it also fostered successful technology innovations, well-managed industry costs, and substantive air quality improvements. As a final comment we would ask for CARB to relook at modeling what has worked in the past and propose an incentive-driven emission control program.

Sincerely,



William Roberts
Chief Operating Officer

cc: Charles Costanzo, AWO's General Counsel and VP - Pacific Region

Comment Log Display

Below is the comment you selected to display. Comment 3123 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ray
Last Name: Smith
Email Address: Ray@raysmithpainting.com
Affiliation: Ray Smith Painting Son, LLC

Subject: CARB

Comment:

Regarding: the California Air Resources Board (CARB) proposed regulations to reduce emissions from engines on ALL harbor craft vessels by January 2023.

Please consider the negative effect that this will have if passed. Considering that there are other alternatives this regulation should not be allowed to pass.

My family is has five generations, the first four all love and enjoy sportfishing. If this passed my grandchildren, the fifth of the generations will never have the opportunity to experience the excitement and joy that the others have.

But even on a larger scale how about the whale watching, kids science trip. A survey of sportfishing boat owners concluded that if the regulations are adopted California's sportfishing fleet would be non-existent within the next 3-6 years, denying millions of California families and tourists' access to recreational fishing, whale watching, diving, and ocean educational activities.

And, what about the tackle industry, marine stores, clothing gear, the list goes on and on.

At a time like this, this is not the time to kill a industry and jobs.

Thanks Much,
Ray Smith

Attachment:

Original File Name:

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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(800) 242-4450 | helpline@arb.ca.gov
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P.O. Box 2815, Sacramento, CA 95812

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Comment Log Display

Below is the comment you selected to display. Comment 3124 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Merritt
Email Address: scott@merrittws.com
Affiliation: Merritt Waterline Solutions, LLC

Subject: Starlight Marine Services Comments on CHC Proposed Regs

Comment:

The attached comment file is submitted on behalf of Ben Ostroff, General Manager of Starlight Marine Services, LLC.
Best regards,
Scott

Attachment: www.arb.ca.gov/lists/com-attach/3546-chc2021-AjBSZAEyUzEGMQg5.pdf

Original File Name: 202111 Starlight Marine Services LLC CHC Comment Letter Final with Appendices.pdf

Date and Time Comment Was Submitted: 2021-11-15 13:59:54

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November 15th, 2021

Mr. David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
1001 "I" Street
Sacramento, CA 95814

Re: Proposed Regulations for Commercial
Harbor Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the "Proposed Concepts for Commercial Harbor Craft in California." Starlight Marine Services, LLC (Starlight) has been actively engaged in the ship assist and tanker escort business of the maritime industry in California since 1998. We have grown to be a leading provider of assist and escort services providing quality service to major shipping lines and oil companies. Our growing fleet of harbor tugs routinely assist container, bulk, and petroleum tankers into and out of port. Our fleet of ship assist tugs are the best in the business, boasting competitive horsepower and green engines serving the LA/Long Beach, San Francisco/Oakland and PNW ports. We are privileged to do business in California and committed to be a proactive partner in the regulatory process with CARB.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of a cleaner environment without doing irreparable damage to an industry that all American's rely on to deliver and support the delivery of their essential goods and services. At no time in our history has the fragility of the supply chain been so evident. That is not a reason to back away from our commitment to the environment, but a reason to pursue practical, science-based solutions. Starlight has a long history of taking the lead on the environment implementing creative and technologically advanced solutions. We have spent tens of millions of dollars on clean air new builds and upgrades. Over the last 20 years we have performed dozens of engine upgrades and clean-air rebuilds in advance of the regulatory requirements of the 2009 CHC rulemaking.

We completed these projects in concert with many federal, state and port agencies. So, it is with a sense of frustration that we continue to be disappointed by CARB's failure to engage in a meaningful dialog with industry. This will be our second set of written comments on this rule, we've attached the previous letter for your reference, and we have yet to see CARB respond to any of our legitimate concerns as to the feasibility of the new rules, or the evidence that they are relying on false assumptions, unvalidated models and antiquated formulas to exaggerate the impact of harbor craft

emissions. We believe that moving forward with the regulations as written, in light of the unaddressed and unacknowledged uncertainty of the CARB model's calculations regarding the health risk from CHC emissions is irresponsible. We urge CARB to stop pushing this clearly flawed and unsupported by science regulation and work in collaboration with the CHC industry and other impacted stakeholders to craft a regulation that makes a difference. One that:

- Develops rules that require those entering California must meet existing Best Available Technology Standard (BATS) at the time of entry or at the time construction began, whichever is first. (BATS defined as technology that is approved by both manufacturer and the regulator for use).
- Sets up a technical advisory committee of both industry and regulatory members to determine what is the BATS.
- Doesn't require adoption of unproven and unapproved technology (i.e. DPFs). Timelines should set adoption from the time of approval or production begins.
- Doesn't require those who in good faith upgraded or built new to comply with existing regulations, i.e. 2007/2009 CHC law, to upgrade prior to the life cycle of that investment (15 years for a rebuilt engines, 25 years for reengine/new construction) is realized.
- That exempt ATBs and Tugs in Ocean Transport from the CHC rules, simply because they are not harbor craft, and treating them as such is punitive and serves only to reduce the number of operators in the global supply chain.
- Establishes funding initiatives to promote the early adoption of new technologies and infrastructure that reduces emissions.

Such a framework would accelerate the reduction of emissions from CHC, by promoting real, cost-effective investment and the adoption of the best technology at the time. The currently proposed rule works against this by requiring constant incremental investment in technologies that are unproven and only offer marginal improvement at a very high cost. Capital that could be spent on the development of a zero-emission escort tug, will be spent, and arguably wasted, on industry trying to squeeze a non-existent diesel particulate filter (DPF) onto a vessel that it was not designed to receive it.

Comments on the Current Regulations

In response to CARB's continued failure to address or even respond to these concerns, and in conjunction with our industry partners through our trade organization the American Waterways Operators (AWO) we have retained Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and to look at and comment on the Health Study section of the rulemaking packet. Their report to AWO can be found attached to AWO's official comments to this rulemaking. We believe the work and insight provided by Ramboll validates the concerns we have been asserting to CARB staff all along,

- CARB has misrelied a United States Coast Guard (USCG) database that has led them to the false conclusion that there is a 39% underreporting of CHC emissions to CARB. Ramboll data has shown us that for the towing industry that number is only 2.3%.
- The unaddressed and unacknowledged uncertainty of the CARB model's calculations of the health risk created by harbor craft emissions overstates their impact on the public, likely far beyond just the improper inflation created by the overstated vessel inventory.
- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions to ocean-going tugs and barges that meet the exact same criteria.

- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. Starlight supports CARB's goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions.
- This rule puts living wage jobs and the lives of our mariners at risk. Attempting to install or operate unproven technology in the marine environment is filled with risk. Unlike trucks and off-road applications, our mariners cannot just pull over to the side of the road and call the fire department. *Unproven technology has no place in maritime applications.*

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

The U.S. Coast Guard database used by CARB to determine the vessel population affected by the rule was designed to track the ownership and regulatory status of a vessel and provides no insight or information into where a vessel is operated. CARB's use of this database overstates the population of tug and towing vessels to reach the false conclusion that there is a significant number of vessels that are not reporting their engine hours to CARB.

We have shown ample evidence in previous comment letters and multiple meetings with CARB personnel to validate our position that emissions from vessels who have not reported their hours is only a fraction of the scaling factor CARB used to inflate the emission inventory. We have pointed out to CARB staff on these occasions that overcounting number of tug and towing vessels operating in California overinflates health risk assessment that is the justification for this rulemaking. We have explained the basis for the discrepancies and told the agency how it can obtain accurate data through the use of readily available AIS data that will show not only every vessel that enters CARB regulated waters, but when those vessels are actually underway. Inexplicably, CARB has done nothing to revise its figures or update its model. Indeed, at the CHC Workshop #4 held on March 16, 2021, CARB acknowledged that the agency was aware that its vessel counts did not accurately reflect the actual number of vessels in the applicable airshed, but informed attendees, without further explanation, that CARB would not be revising the vessel count numbers in the draft regulation. These technical and procedural errors jeopardize the entire basis for the regulation and subject it to heightened legal scrutiny.

For the purposes of this comment letter our trade organization, AWO, contracted with Ramboll, a third-party consulting engineering group, to conduct an independent assessment of the number of tug and towing vessels operating in California and the likely impact of emissions from those vessels. Using Automatic Identification System (AIS) data for 2019, Ramboll was able to account for every tug and towing vessel within California waters during that year. The AIS data affirms that CARB has significantly overcounted the size of California's tug and towing vessel fleet. Specifically, Ramboll found that 200 tug and towing vessels operated within a 100 nm of the California Coast, not the 229 tug and towing vessels estimated by CARB. Additionally, the CARB model assumes that non-reporting vessels operated with the same number of hours as reporting vessels. From the AIS data we can determine the number of hours when the vessels were moving, which when compared to hours reported to CARB, proved to be a reliable predictor of main engine hours. We were able to isolate the vessels CARB shows as having filed reports from those vessels that have not. The non-reporting vessels averaged only 18% of the hours of the reporting vessels. This means that the total unreported hours are just 2.3% of the total reported hours, not the 29% that the CARB scaling factors estimated.

Towing Vessel AIS Average Hours >.1 knot - Year 2019

Vessel Type	Reporting Vessels	Non-Reporting Vessels	Non-Reporting as % of Reporting
ATBs	1,613	278	17%
Tugboat Push/Tow	1,022	300	29%
Tugboat SA	2,336	239	10%
Total of Tug Categories	1,637	291	18%
Reporting Vessels	177		
Non-Reporting Vessels	200		
% of Vessel's not reporting	12%		
% of Unreported Hours	2.3%		

Ramboll ran estimates based on these accurately captured tug and towing vessel hours and found that NOx and PM emissions were only 72% and 62%, respectively, of the figures the improperly inflated CARB’s model produced. We suspect a similar over estimation may exist with the other vessel categories of harbor craft and given that CARB’s assumption was that 39% of the CHC were not reporting, the potential for a massive overestimation of the impact of all harbor craft is possible.

HEALTH STUDY CONCERNS

Given the above-noted inflation of the tug and towing vessel fleet size and operating hours we expect that CARB’s assessment of harbor craft emissions is similarly skewed. In fact, Ramboll’s estimates based on updated vessel fleet size and operating hours indicates that CARB’s emissions are overstated. AWO also asked Ramboll to look at and comment on the Health Study section of the CARB rulemaking packet. Based on this assessment, Ramboll raised serious questions about the methodology CARB used both in its assessment of cumulative harbor craft emissions as well the resulting health effects. Most concerning to AWO is Ramboll’s observation that CARB has made no apparent effort to validate its air quality model with verifiable, real-world results. Ramboll conducted a preliminary analysis to validate the agency’s harbor craft- related exposure estimates by comparing the CARB modeled air concentrations at receptor points near Long Beach, Anaheim, Pico Rivera, and Los Angeles with the PM_{2.5} concentrations measured at the sampling stations installed at these locations. Because the sampling stations are designed to capture emissions from all nearby sources, the agency’s modeled concentrations for harbor craft specifically would be expected to be within the range of the total measured emissions or, more likely, even lower. Below is the table of results from this exercise, extracted from the Ramboll report.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

The second column above shows the average annual PM_{2.5} concentrations measured at the sampling stations listed on the left. Again, these figures show estimated PM concentrations from all sources in the area, including from cars and trucks, rail and harbor craft as well as other sources. They also reflect locations near the shoreline that are most likely to be impacted by harbor craft emissions. The four columns on the right show the CARB's modeled concentrations calculated at four locations nearest to each sampling station. As highlighted in the table, Ramboll found from this preliminary check of the data that CARB's modeled estimates are up to 4 times higher than actual measured concentrations of from all sources captured at sampling stations in the same general area. It makes no sense that the emissions just from harbor craft would be higher than the emissions captured in these areas from all possible sources. This raises serious questions about the legitimacy of CARB's model and what if any efforts CARB has made to validate it.

Ramboll and AWO made numerous requests for information from CARB staff that would help us understand the methodology the agency used to determine health impacts associated with harbor craft emissions. CARB staff were unable or unwilling to provide much of the necessary information, which has forced Ramboll to make more generalized observations about CARB's approach. Those observations are offered in detail in Section 2.2 of the attached report, but in short, (1) there is enormous uncertainty in the health effects data that CARB has presented calling into question the purported benefits of the proposed rulemaking; and (2) CARB has applied health effects analyses in an unconventional way and has failed to report its findings in a way that transparently acknowledges the lack of certainty inherent in their findings.

What we can say with certainty is that the health risks are overstated, if only by the overestimation of the vessel inventory and emissions, but in all likelihood to a much greater extent due to the unaddressed issues with the modeling itself. CARB's overstating the emissions from harbor craft is magnified in each step of the model, with each highly conservative assumption or input that is propagated throughout both risk assessments. Based on the comparison of the model output with actual PM levels at monitoring sites we have reason to believe that the errors in the model are overestimating the actual exposures to communities along the shoreline, and thus overestimating any potential benefits of the proposed CHC rules by a significant margin. This is too important a rulemaking to be based on a health study with so much unaddressed uncertainty. CARB needs to take the time to get this right.

To that end Starlight urges CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Validate the emission model to ensure inputs and results are realistic and accurately portray the impact of CHC emissions
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations in collaboration with the CHC industry and other stakeholders to reflect the conclusions of the new study, and the best path achieving our common goal of a cleaner and healthier environment.

Moving forward with regulation without correcting errors in the underlying data set undermines the legitimacy of the regulatory process.

CARB'S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

CARB's decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

CARB's rationale for excluding these vessels applies to the towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins.
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits.
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO submitted information in April of 2020 showing that "repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs." Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB's rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB's decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be remedied in any final rule.

CARB'S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

- This study of one large and spacious ship assists and escort tug is not representative of the diverse tug and towing vessel fleet.
- The Jensen Review Summary notes "the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs."

- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB's proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many tug and towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of tug and towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, Starlight will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have only recently been repowered to meet the last iteration of the CHC regulations. In the most egregious case, Starlight has vessels that have just been delivered or it will take delivery off that will be forced to be retrofitted just a few short years after they are first put into service. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally "taking" property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

Conclusion

Starlight appreciates this opportunity to comment on CARB's Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. Starlight does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data inflates the emissions generated by the tug and towing vessel fleet and in turn inflates the impact the fleet's emissions have on the air quality and health of the residents of the regions in which we operate. Starlight stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry, finding feasible solutions to reducing emissions in the harbors of California. Starlight urges CARB to adopt a more collaborative approach and abandon this seriously flawed effort at rulemaking. Thoughtful and honest collaboration will benefit the State's economic and environmental health. Starlight looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,

A handwritten signature in black ink, appearing to be 'BO' with a stylized flourish.

Benjamin Ostroff
Manager of Harbor Operations
Starlight Marine Services, LLC.
Company Security Officer

cc: Jennifer A. Carpenter | President & CEO American Waterways Operators

Attachments

- Appendix A – Ramboll Report
- Appendix B – May 2021 Comment Letter to CARB

MEMORANDUM

Date: November 11, 2021

To: American Waterways Operators

From: Amnon Bar-Ilan, Christian Lindhjem, Sonja Sax

Subject: Ramboll Comments on the California Air Resources Board (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation

1. REVIEW OF HARBOR CRAFT EMISSIONS IMPACTS AND COMPARISON OF CALIFORNIA HARBOR CRAFT EMISSION INVENTORY

1.1 Introduction

The California Air Resources Board (CARB) air emissions inventory and proposed rule effectiveness are presented in Appendix H of the proposed regulation supporting documentation. This 2021 document updates CARB’s emission inventory methods from the 2007/2009 Commercial Harbor Craft (CHC) emission inventory methods.¹ In general, the approach is similar, but many of the default inputs were substantially revised to lower overall emissions as shown in Figure 1.

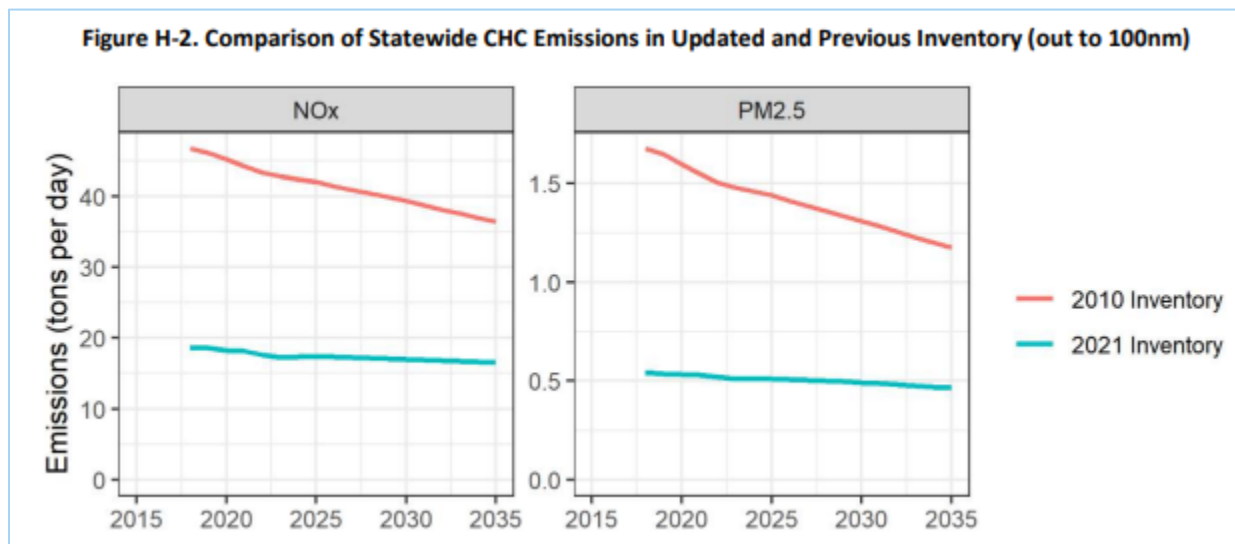


Figure 1. CARB commercial harbor craft emissions inventory comparison. (CARB 2021)

¹ <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/road-documentation/msei-documentation-road>

CARB segregated the vessels by type (including vocation) shown in Figure 2. In this report, we focus on the Tugboat types, which include Tugboat-Escort/Ship Assist, Tugboat-Push/Tow, and Tugboat-Articulated Tug and Barge (ATB).

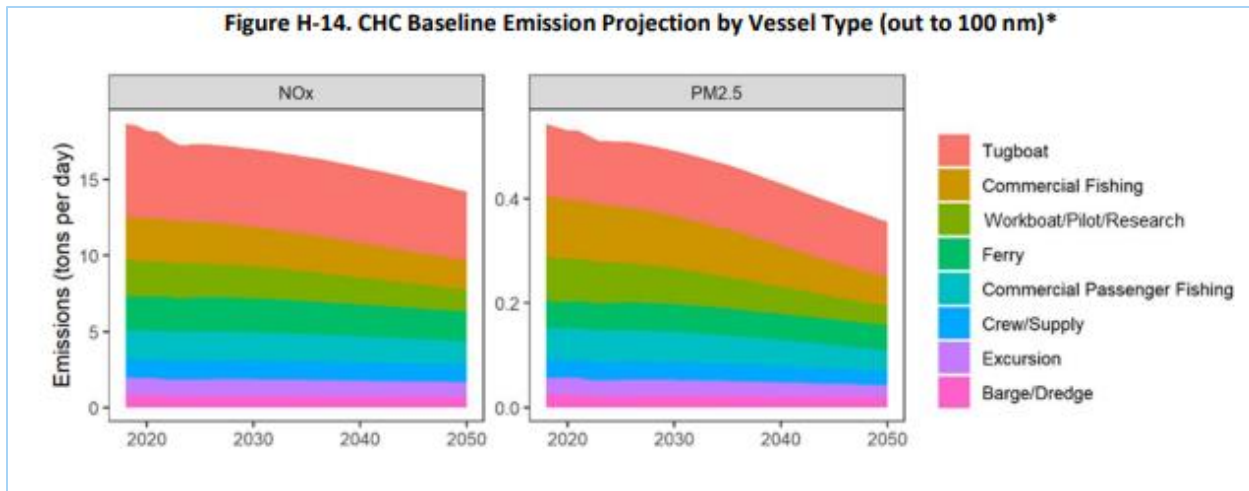


Figure 2. CARB commercial harbor craft emissions inventory by vessel type. (CARB 2021)

Alternative source of activity data includes AIS data that is publicly and freely available from a trusted source.² The AIS data identifies tug and towboats using vessel codes 31 for towboats and 52 for tugs and provide position, speed, and course. The AIS data identifies every vessel operating in US continental waters identified by MMSI for a given year.

Emissions estimates depend on input factors related to the vessel activity and engine characteristics. The AIS data provides the population and activity for all vessels operating in a defined domain. Emissions estimates also require that the new engine emission factors be identified by Tier level in Table H-5 of Appendix H of CARB (2021), age, and fuel correction.

$$\text{Emissions} = \text{Pop} \times \text{Power} \times \text{Activity (hrs)} \times \text{Load Factor} \times (\text{zhEF} + \text{DF} \times (\text{Age}/\text{Life})) \times \text{Fuel Correction}$$

- Pop – Population of vessels (activity input)
- Power – Engine power (activity input)
- Activity – Hours of engine operation (activity input)
- Load Factor – Average fraction of available power (CARB input estimate)
- zhEF – Emission factor when new (zero-hour) (CARB input estimate)
- DF – Deterioration factor (CARB input estimate)
- Age – Engine age (activity input)
- Life – Useful Life (CARB input estimate)
- Fuel Correction – In-use relative to engine certification fuel (CARB input estimate for 2011+ engines is 0.948 – NO_x and 0.852 - PM³ and PM correction is more significant for older engines)

² <https://marinecadastre.gov/ais/>

³ <https://ww3.arb.ca.gov/msei/chc-appendix-b-emission-estimates-ver02-27-2012.pdf>

The vessel types average load factor estimates according to primary vocation for the range for tugs and towboats is shown in Table 1. Because of the difference in assumed load factor, it is important to appropriately characterize the activity that each vessel performs.

Table 1. CARB Load Factor input by vessel type. (Table H-9, CARB 2021)

Vessel Type	Load Factor	
	Main	Auxiliary
Tugboat-ATB	0.50	0.50
Tugboat-Push/Tow	0.33	0.37
Tugboat-Escort/Ship Assist	0.16	0.34

1.2 Vessel and Emission Inventory and Comparison with CARB Estimates

We used the AIS records to identify tug and towboats using vessel identification numbers 31 and 52, and American Waterways Operators (AWO) provided more detailed input for their vessel fleet including primary vocation, engine power, Tier level, and, in some cases, hours of operation in California waters. Table 2 shows the comparison of the vessel population found operating within 100 nm of the California coast during 2019. CARB (2021) reported that they identified the population of 177 tugs and towboats through the harbor craft reporting in Table H-3 and upwardly adjusted that inventory to account for unreported vessels through Coast Guard lists at California home ports. The AIS records find only 200 tug and towboats (23 vessels or about 13% more than reported by CARB) during 2019 compared with CARB’s estimate in Table H-3 of 229 vessels or 29 more than were reported in the AIS records.

Table 2. Vessel population found in California waters <100 nm in 2019

Vessel Type	CARB App. H			AIS Records		
	Table H-3	Adjusted Total Table H-3	Average Hours Table H-4	Population	Average Hours (>0.1 knots)	Average Hours (<0.1 knots)
Tugboat-ATB ^a	11	19	2,466	14 ^a	1,991	1,380
Tugboat-Push/Tow	108	147	1,550	118	817	1,216
Tugboat-Escort/Ship Assist	58	63	2,676	68	2,141	3,855
Combined Tug and Towboat	177	229	1,936	200	1,350	

^a – AIS does not distinguish ATBs from Towboats; AWO identified six fleet vessels and eight others found in AIS records as ATB.

We used the AIS records to determine hours of operation for each tug and towboat operating in California waters out to 100nm during 2019. The average hours for AIS compared favorably with the CARB averages except for towboats where the operating hours about half that estimated by CARB. Total and average hours at less than 0.1 knots speed were considered to use no propulsion power, but auxiliary engines running at normal loads, though many tugs at their base will use shore power for auxiliary loads such as to keep the AIS transponders emitting a signal.

AWO supplied tier and power of the main and auxiliary engines for their members’ fleets as summarized in Table 3. For other tugs and towboats found in the AIS data, we used CARB default information with Tier 1 emissions rates to towboats (including ATB) and Tier 2 to tugboats to hours of operation. The AWO supplied fleets generally had higher installed power

than the CARB averages by vessel type, so using the CARB default for AIS extra (non-AWO) fleets leads to a conservative overestimate of emissions.

Table 3. Vessel population and inputs use found in California waters <100 nm in 2019

Vessel Type	CARB App. H Default Inputs			AWO Fleet		
	AIS Extra Population	Main Engines (hp)	Tier	AIS AWO Population	Main Engines (hp)	Tier
Tugboat-ATB ^a	8	4395	1	6 ^a	6400	2, 3
Tugboat-Push/Tow	94	731	1	24	2700	0 – 3
Tugboat-Escort/Ship Assist	7	2450	2	61	3898	0 – 4
Combined Tug and Towboat	109			91		

^a – AIS does not distinguish ATBs from Towboats, AWO identified six vessels in AWO fleets and eight in AIS records as ATB.

The CARB default and AIS hours of operation were combined in the emissions to estimate tug and towboat emissions for 2019 as shown in Table 4. When applied, deterioration and fuel corrections primarily increase PM emissions relative to our baseline estimate. We also investigate the impact that fleet mix of engine Tier levels could have on average emissions rates primarily increasing PM emissions rates. The Tier levels for the AWO fraction of all vessels was provided, while CARB default fleet mix was used for the other tugs and towboats found in the AIS records.

Table 4. Tug and towboat emissions in California waters <100 nm in 2019.

Vessel Type	AIS Emissions Estimates		AIS (with deterioration, fuel correction)		AIS Additional Correction for Fleet Mix	
	NOx tpd	PM tpd	NOx tpd	PM tpd	NOx tpd	PM tpd
Tugboat-ATB ^a	1.36	0.020	0.92	0.019	0.85	0.020
<i>Idle <0.1 knots</i>	4%	5%				
<i>Fraction within 24 nm</i>	87%	83%				
Tugboat-Push/Tow	0.97	0.023	1.11	0.032	1.05	0.039
<i>Idle <0.1 knots</i>	9%	15%				
<i>Fraction within 24 nm</i>	82%	85%				
Tugboat-Escort/Ship Assist	2.04	0.041	2.31	0.057	2.31	0.057
<i>Idle <0.1 knots</i>	17%	26%				
<i>Fraction within 24 nm</i>	99%	99%				
Sum Tug and Towboats	4.37	0.086	4.34	0.109	4.22	0.117
CARB App. H (Estimated from Figure H-14)	6.1	0.14				
Relative to CARB Figure H-14	72%	62%	71%	78%	69%	83%

1.3 Assumptions

- AIS data using a <0.1 knot cutoff to eliminate vessel activity when main (and often auxiliary) engines are at least low power or entirely off. The '<0.1knot' criteria best matched the propulsion engine time for tugboat (4% overestimate) and towboats and others identified in AWO fleets (4% underestimate).
 - Under <0.1 knot, the auxiliary engines were assumed to continue to be used to supply power for the AIS and other electrical demands. This is a known overestimate because many tugs plug into shore power while at base.
- Based on the CARB default model year, we used Tier 1 engines for towboats (both ATB and others) and Tier 2 for tugboat-Escort/Ship Assist.
 - CARB reported to have used a distribution of Tier levels; Andrew Daminao (CARB, email to Charles Constanzo, Friday, September 3, 2021 8:55 AM) provided a file 'Towing Vessel Inventory 2019' that provided information about the fleet mix by tier level.
 - Shown in Table 5 is a comparison of the impact on emissions that fleet mix could have compared with either Tier 1 or Tier 2. The small fraction of Tier 0 in the fleet has a significant impact (greater than 50% for DPM) on towboat emissions rates estimated and less but still significant on the tugboats.
 - AWO provide fleets' engines characteristics for 2019 that had generally higher Tier levels and averaged lower emissions levels than the fleets provided by CARB.

Table 5. Fleet mix emissions impacts from CARB towing vessels file and AWO Submittals for 2019.

Vocation	Tier	Count	AWO Count	Emission Factor by Tier (g/hp-hr)		CARB Tier 0, 1 Contribution	
				NOx	DPM	NOx	DPM
Tugboat-ATB	0	2	0	7.34	0.37	25%	49%
Tugboat-ATB	1	1	0	6.97	0.12	12%	8%
Tugboat-ATB	2	6	2	5.08	0.09		
Tugboat-ATB	3	2	4	3.69	0.05		
Tugboat-ATB	4	0	0	1.04	0.03		
Average ATB (CARB)		11		5.41	0.136		
Average ATB (CARB)		Ratio vs. Tier 1		0.78	1.14		
Average ATB (AWO)		6		4.15	0.063		
Tugboat-Push/Tow	0	32	1	7.34	0.37	39%	65%
Tugboat-Push/Tow	1	14	4	6.97	0.12	16%	9%
Tugboat-Push/Tow	2	42	8	5.08	0.09		
Tugboat-Push/Tow	3	17	11	3.69	0.05		
Tugboat-Push/Tow	4	0	0	1.04	0.03		
Average Towboat (CARB)		105		5.80	0.173		
Average Towboat (CARB)		Ratio vs. Tier 1		0.83	1.44		
Average Towboat (AWO)		24		4.85	0.088		
Tugboat-Escort/Ship Assist	0	4	5	7.34	0.37	15%	34%
Tugboat-Escort/Ship Assist	1	8	12	6.97	0.12	28%	22%
Tugboat-Escort/Ship Assist	2	18	22	5.08	0.09		
Tugboat-Escort/Ship Assist	3	6	21	3.69	0.05		
Tugboat-Escort/Ship Assist	4	0	1	1.04	0.03		
Average Tugboat (CARB)		36		5.52	0.121		
Average Tugboat (CARB)		Ratio vs. Tier 2		1.09	1.35		
Average Tugboat (AWO)		61		5.09	0.104		

- The deterioration of emissions due to age is a large uncertainty given that engines are regularly rebuilt and that historic regulations have encouraged engine rebuilds with emission upgrades to higher Tier levels.
 - CARB (2021) assumed that towboats would average a model year of 2003 (Table H-1), which in 2019 is 16 years old and past their useful life (Table H-8) of 14 years for main engines. This would increase NOx emission rates by 24% and PM by 77% for towboats.
 - CARB (2021) assumed that tugboats would average a model year of 2009 and be 10 years old in 2019. This would increase NOx emission rates by 15% and PM by 48% for towboats.

1.4 Conclusion

We demonstrated using publicly available AIS records that it is possible to accurately identify vessel activity spatially defined. Individual vessels are identifiable through MMSI numbers unique to the AIS transmitters along with their actual activity within California waters. Using the AIS data, CARB can more accurately identify the unreported vessels and not rely on a less reliable list of vessels by home port.

Overall, the number and emissions from tugs for both NOx and PM (including towboats) appear to have been overestimated in Appendix H. The emissions overestimate depends on several input variables, but engine emissions deterioration and fleet fraction, especially the remaining Tier 0 engines still in operation, have a significant effect on PM emissions rates.

2. COMMENTS ON THE HEALTH STUDY (APPENDIX G)

2.1 Health Risk Assessment for South Coast and Bay Area Air Basins

CalPuff Modeling

The CalPuff modeling conducted in support of the Proposed Amendments to the CHC Rulemaking involve a number of model inputs and assumptions as outlined in Appendix G. Ramboll reviewed the modelling methodology as well as supporting documentation provided by CARB.

A missing element of the modeling was any validation of the key model inputs as well as the model results. Because of the complex nature of the modeling, including a number of assumptions regarding the emissions inventory, spatial and temporal allocation of emissions, complex terrain and meteorology, it is paramount that CARB validate to the extent possible the model inputs and results.

With regards to model inputs, at the very least CARB should verify that the meteorological estimates used in the model compare to actual measured estimates from a relevant meteorological station. In addition, CARB used a single year of meteorological data and it would also be important to consider using more than one year in order to capture any variability in meteorological parameters that tend to vary from year to year.

With regards to model results, one important way to validate results includes comparing modeled results with measured values at monitor locations at or near the modeled receptor points. While we understand that the CARB is only considering contributions from CHCs in the form of diesel particulate matter, the modeling is used to estimate exposures to diesel

particulate matter and PM_{2.5}. We also understand that ambient monitors will be measuring PM_{2.5} from all sources. Therefore, we expect that modeled concentrations would be within the range of measured estimates or lower.

Ramboll conducted a check of how modeled PM concentrations compare to measured PM_{2.5} concentrations for the South Coast Air Basin. Table 6 shows the results of the comparison between measured concentrations at monitoring sites in the South Coast Air Basin and nearby receptors.

As shown in Table 6, the results from this preliminary check of the data show that the modeled estimates are overestimating exposures as these estimates are up to 4 times higher than actual measured concentrations of PM_{2.5} particularly in the most impacted regions (i.e., near the shoreline). Inland modeled estimates (which are expected to be less impacted by CHC emission) are closer to the measured concentrations although still exceed these concentrations for some receptors. This indicates that overall the modeled estimates are overestimating exposures. CARB should similarly verify the results for the Bay Area Air Basin.

An additional source of uncertainty is associated with scaling the concentrations for future years based on changes in emissions. Because the concentrations are not only based on the changes in emissions, but other key factors including meteorology, this introduces a significant amount of uncertainty, making the validation of model estimates even more critical. Also, because we believe that emissions are overstated this will contribute to even more uncertain exposure estimates based on simply scaling.

Table 6. Comparison between annual average PM_{2.5} measured concentrations at monitoring stations in the South Coast to modeled concentrations at the nearest receptors.

PM _{2.5} (mg/m ³) annual average	Average of all POCs (daily)	Average of 1hr	Closest Receptors (Modeled PM _{2.5} mg/m ³ , Receptor #)			
Long Beach (North)	10.81	-	34.82 (1856)	35.68 (1857)	38.30 (1858)	34.15 (1855)
Long Beach (South)	12.82	14.56	51.57 (1874)	48.44 (1876)	59.88 (1900)	58.13 (1901)
Long Beach-Route 710 Near Road	13.87	15.02	24.01 (1825)	24.80 (1826)	22.29 (1827)	22.35 (1824)
Anaheim	11.05	13.62	15.30 (2602)	14.34 (2604)	16.13 (2601)	14.17 (2588)
Compton	13.24	-	18.05 (1683)	18.41 (1677)	18.96 (1685)	18.03 (1684)
Pico Rivera #2	12.49	-	8.41 (1458)	8.55 (1459)	9.04 (1457)	9.09 (1467)
Los Angeles-North Main Street	11.69	-	7.28 (530)	7.22 (491)		

Cancer Health Risk Assessment

The cancer risk assessment also relies on a number data inputs and assumptions, starting with the estimates from the CalPuff modeling. Many of the inputs and assumptions are considerably conservative as they are meant to be health protective and are screening-level analyses. It is important to note that screening level analyses are often followed by more targeted analyses with refined parameters that are more site-specific and/or based on more realistic parameters in order to yield more realistic risk results. Importantly, the numerous levels of

conservativeness in screening level analyses result in risk values that are often highly overestimated and do not necessarily reflect actual risks.

One key data input includes the exposure estimates, which are based on the CalPuff model inputs and a number of additional key assumptions. As noted above, based on Ramboll's check of the modeled DPM estimates, it is likely that these estimates are overestimating exposures, both due to overestimated emissions (see Section 1) contributing to overestimates of about least about 20-60%, in addition model assumptions that result in overestimates compared to measured estimates by as much as a factor of 4 (see comments above) at some receptor locations.

Exposure estimates are also based on updated methodology that also increases the risk estimates because of the application of high (95/80%) breathing rates and multiplicative factors for greater susceptibility in children. In addition, the risk assessment includes several conservative assumptions for estimating exposures including exposures across a residence time of 70 years⁴ and assuming a person is home 24 hours a day over those 70 years. All of these conservative assumptions compound to generate highly inflated risks.

Another key input for the risk assessment is the use of a cancer potency factor (CPF). CARB relied on the estimate developed by OEHHA of $1.1 \text{ (mg/kg-day)}^{-1}$ or 3×10^{-4} per $\mu\text{g/m}^3$. This cancer potency value, which represents a 95% upper confidence interval of the lifetime risk, is dated and overly conservative compared to more recent evaluations of the literature on which the cancer potency is based.

At the time of the development of the cancer potency EPA deemed the evidence to be too uncertain to use for cancer risk assessment (US EPA 1994⁵). An HEI study (HEI 1995⁶) found similar limitations associated with the studies that were the basis of the OEHHA value. These limitations included (1) questions about the quality and specificity of the exposure assessments for diesel exhaust, (2) a lack of quantitative estimates of exposure to allow derivation of an exposure-response function, and (3) lack of adequate data to account quantitatively for individual other factors that might also be associated with lung cancer, such as smoking. In 2002, EPA⁷ again concluded that data were too uncertain for developing a cancer potency, but using more qualitative methods determined the risk to be in the range of 10^{-5} to 10^{-3} . Therefore, the risk could potentially be about 300 times lower than the OEHHA value.

Another important issue in extrapolating results from older epidemiology studies, as OEHHA did, is that diesel exhaust exposure in these studies is based on diesel exhaust composition that is very different compared to more contemporary diesel exhaust, and also quite different from marine vessel emissions (as these studies evaluated exposures in railroad workers and truck drivers). Specifically, because of the long latency period for lung cancer, epidemiology studies need to examine workers whose exposures started more than 20 years earlier. These particular studies are based on exposures from the 1950s and 1960s. However, the US EPA and CARB have progressively tightened standards for particulate emissions from diesel engines, including marine engines, resulting in the development of new technology diesel engines with significantly lower emissions and also likely different composition. Because these

⁴ A 30 year residence time is considered to be a more realistic residence time period.

⁵ US EPA. Health Assessment Document for Diesel Emissions (External Review Draft, 1994) - Volume 1. U.S. Environmental Protection Agency, Washington, D.C., EPA/600/8-90/057Ba (NTIS PB95192092)

⁶ HEI. Diesel Exhaust: A Critical Analysis of Emissions, Exposure, and Health Effects. 1995. [Diesel Exhaust New Scan.pdf \(healtheffects.org\)](#)

⁷ U.S. EPA. Health Assessment Document for Diesel Engine Exhaust (Final 2002). U.S. Environmental Protection Agency, Office of Research and Development, National Center for Environmental Assessment, Washington Office, Washington, DC, EPA/600/8-90/057F, 2002

changes have resulted in not only quantitative reduction in mass emitted, but have also resulted in differences in the composition with respect to size and chemicals associated with the exhaust (e.g., Hesterberg et al. 2011⁸), the epidemiology studies based on old generation engines may not be applicable to current emission conditions.

Even if the epidemiology data were deemed robust enough for use in quantifying the cancer risks of DPM, the uncertainty suggests that cancer risks could be over 100 fold lower than estimates by CARB, which would bring the cancer risks into an acceptable range by US EPA and California standards (i.e., 10^{-6} to 10^{-4}) under the current regulations, without the need for application of the proposed regulations.

At a minimum, CARB should provide a more detailed discussion of the uncertainties noted in these comments and the impact on the estimated risks, which we note are likely highly inflated. The cumulative impact of application of multiple conservative assumptions needs to be acknowledged.

2.2 Regional PM_{2.5} Mortality and Illness Analysis for California Air Basins

CARB used two different methods to estimate the impacts of the Proposed Amendments to the CHC Regulation on mortality and other health effects (hospital admissions for cardiovascular and respiratory diseases and emergency department visits for asthma). The first method relies on the modeled estimates for the two air basins (San Francisco Bay and South Coast) and the second method is a reduced form analysis that is applied to other air basins as well as to impacts from reductions in NO_x.

While the CARB health analysis is based on standard methodology used by EPA to calculate health impacts, we were not able to check the results based on the data provided by CARB as many of the model inputs were missing. Also, even though the methods appear to be applied correctly, given what we were provided for review, the approach taken by CARB is unconventional. First, CARB is using two different methods to calculate health impacts, one based on modeled results and a second based on a reduced-form method with large simplifying assumptions. Both methods are subject to large uncertainties, but the reduced-form method has significantly more uncertainty.

Also, the way the CARB approaches the health analysis is also significantly different from the way EPA and others have conducted similar analyses (i.e., using BenMAP). CARB essentially is computing effects based on changes in PM_{2.5} modeled estimates (or PM emission reductions) for each year starting in 2023 and up to 2038 between the current regulations and the proposed amendments. The impacts are summed across air basins for each year, and then summed across all years. To our knowledge, this type of cumulative assessment of health benefits across a long time period in the future has not been conducted previously using the methods CARB is using. We welcome other examples where this has been done.

The implications are that these impacts are cumulative over time. In addition, the impacts actually increase over the years (presumably as the difference in emissions or concentrations increase between current and proposed regulations).

⁸Hesterberg, T. W., Long, C. M., Sax, S. N., Lapin, C. A., McClellan, R. O., Bunn, W. B., & Valberg, P. A. (2011). Particulate Matter in New Technology Diesel Exhaust (NTDE) is Quantitatively and Qualitatively Very Different from that Found in Traditional Diesel Exhaust (TDE). *Journal of the Air & Waste Management Association*, 61(9), 894–913.

The amount of uncertainty associated with this analysis is very large and propagated across all the steps in the risk assessment process including 1) emissions estimation, 2) modeling and scaling of PM concentrations (which rely on emission inputs), 3) deriving PM from diesel PM, 4) assumptions regarding conversion of NO_x to PM, 5) application of health functions from epidemiology studies, and 6) estimation of baseline health statistics and population statistics for future years. The magnitude of the uncertainty and the impact on the direction of bias has not been evaluated by the CARB, but our analysis, based on available data, suggest that the magnitude is quite large (and larger than expressed by the 95% confidence intervals provided by CARB) and most likely are overstating the health benefits of the proposed amendments.

In light of the significant amount of uncertainty in the health analysis, we strongly suggest that CARB present the findings so that they are more transparent and in a way that acknowledges the level of uncertainty, as well as amount of confidence that can be placed on the results. For example, we don't think it is appropriate to present the combined results for the health analysis based on modeled data and those based on the IPT methodology, because the IPT results would tend to be much more uncertain and less reliable. Also, instead of presenting a total number of deaths as the sum across air basins and years, CARB should present results as a range on potential annual impacts for each air basin, separately. This again, with the acknowledgement that year to year there is uncertainty and the numbers could be more or less than estimated depending on many different model assumptions at every step in the risk assessment process.

Some of the key limitations and sources of uncertainty of these two methodologies for estimating the potential health impacts from the Proposed Amendments are discussed below.

Analysis for the San Francisco Bay and South Coast

As is the case for the cancer health risk assessment, the PM mortality and illness analysis relies on a number of model inputs and assumptions, many that are associated with significant uncertainty that tends to overstate the risks.

In interpreting the mortality and illness results, it is important to consider that the health impacts are based on a single population-based epidemiological study that infer statistical associations between health effects and air pollution exposures, but that cannot provide definite evidence of a cause and effect. This is because these studies have important limitations that preclude definite conclusions regarding a causal link between PM and mortality or illness, including uncertainty regarding the exposure estimates, the potential role of other pollutants or factors that might explain the effects, and evidence that there is likely a threshold below which health impacts are unlikely. In addition, the components of PM that may be associated with adverse health effects are yet unknown, but the analyses assume that all PM is equally toxic, making it a very conservative analysis.

The epidemiological studies that form the basis of the health study, including the mortality study by Krewski *et al.* (2009)⁹ rely on data from central-site monitors to estimate personal exposures. This results in exposure measurement error because central-site monitors may not accurately capture population mobility, the uneven distribution of PM exposure attributable to local sources, pollution patterns that can be affected by terrain features and weather, and daily variations in PM concentrations or composition that may differ from variations experienced by

⁹ Krewski, D. et al., 2009. Extended Follow-up and Spatial Analysis of the American Cancer Society Study Linking Particulate Air Pollution and Mortality Report. Health Effects Institute, 140 <https://www.healtheffects.org/system/files/Krewski140.pdf>

individuals. These factors can bias the results of an epidemiology analysis in either direction. The direction and magnitude of the bias depends on the type of measurement error. For PM_{2.5}, however, because of the spatial variability of air pollutant concentrations the bias is likely to result in effects being overestimated (e.g., Goldman *et al.*, 2011¹⁰, Rhomberg *et al.* 2011¹¹).

The bias associated with confounding effects is particularly difficult to address in epidemiology studies because it is challenging to account for all potential confounding factors. A confounder is a factor that is associated with both an exposure and an outcome, and may make it appear that the exposure is associated with (or caused) the outcome. In PM mortality studies there is evidence that co-pollutants can confound the PM mortality association, especially because many of the pollutants are strongly correlated, and disentangling the effects of any single pollutant (if any) is difficult. Even if potential confounders are accounted for in studies, there may still be issues of how well the confounding variables are measured and controlled for. For example, in the study by Krewski *et al.* (2009), which is used by CARB for the mortality estimates, data on potential confounders such as smoking and body mass index were determined at the beginning of the study for all participants, but were not re-evaluated over the follow up study period. Changes in these variables over time could alter confounding effects. The issue of confounding relates to both the assumption of causality, where another factor may actually be the causal agent, and to the magnitude of the association, where a co-factor may account for some of the observed risk. In either case, ignoring the effects of confounding results in overstated effects estimates.

Another source of uncertainty is the assumption of a log-linear response between exposure and health effects, without consideration for a threshold below which effects may not be measurable. The issue of a threshold for PM_{2.5} is highly debated and can have significant implications for health impacts analyses as it requires consideration of current air pollution levels and calculating effects only for areas that exceed threshold levels. Without consideration of a threshold, effects of any change in air pollution below or above the threshold are assumed to impact health. Interestingly, although EPA traditionally does not consider thresholds in its cost-benefit analyses, the NAAQS itself is a health-based threshold level that EPA has developed based on evaluating the most current evidence of health effects. Most epidemiological studies do not indicate that a threshold exists, but these studies often do not have the statistical power to detect thresholds. Some studies that have employed different statistical methods have shown evidence of a threshold for PM-mortality effects. For example, Abrahamowicz *et al.* (2003)¹² found evidence for a PM_{2.5} threshold at about 16 $\mu\text{g}/\text{m}^3$ below which mortality effects were not observed. Considering a threshold for PM effects would mean that effects would occur only when threshold levels of PM is exceeded.

Sensitivity analyses are often warranted using different health functions from different studies in order to evaluate the potential variability and/or uncertainty in health estimates. For example, some epidemiological studies have reported no mortality impacts from PM_{2.5}

¹⁰ Goldman, GT; Mulholland, JA; Russell, AG; Strickland, MJ; Klein, M; Waller, LA; Tolbert, PE. 2011. "Impact of exposure measurement error in air pollution epidemiology: Effect of error type in time-series studies." *Environ. Health* 10 (1) :61. 211-5049

¹¹ Rhomberg, LR; Chandalia, JK; Long, CM; Goodman, JE. 2011. "Measurement error in environmental epidemiology and the shape of exposure-response curves." *Crit. Rev. Toxicol.* 41 (8) :651-671. 211-7617

¹² Abrahamowicz M, Schopflocher T, Leffondré K, du Berger R, Krewski D. Flexible modeling of exposure-response relationship between long-term average levels of particulate air pollution and mortality in the American Cancer Society study. *J Toxicol Environ Health A.* 2003 Aug 22-Oct 10;66(16-19):1625-54.

exposures (Beelen et al., 2009¹³; Enstrom, 2005¹⁴, Lippfert et al., 2006¹⁵). This means that if the BenMAP analyses used different concentration-response functions, the actual impacts may be very different from those reported in this analysis and could include a zero effect.

One additional important uncertainty stems from the assumption that all PM_{2.5}, regardless of composition, is equally potent in causing health effects such as mortality. This is important because PM_{2.5} varies significantly in composition depending on the source, and this is particularly important because the composition of particulate matter from diesel has also changed over time as a function of changes in both diesel fuel composition as well as the use of emission controls. Several reviews have evaluated the scientific evidence of health effects from specific particulate components (e.g., Rohr and Wyzga 2012¹⁶; Lippmann and Chen, 2009¹⁷; Kelly and Fussell, 2007¹⁸). These reviews indicate that the evidence is strongest for combustion-derived components of PM including elemental carbon (EC), organic carbon (OC) and various metals (e.g., nickel and vanadium), however, there is still no definitive data that points to any particular component of PM as being more toxic than other components. EPA also stated that results from various studies have shown the importance of considering particle size, composition, and particle source in determining the health impacts of PM (US EPA, 2009¹⁹). Further, EPA (2009) found that studies have reported that particles from industrial sources and from coal combustion appear to be the most significant contributors to PM-related mortality, consistent with the findings by Rohr and Wyzga (2012) and others. Therefore, by not considering the relative toxicity of PM components, BenMAP analyses are likely to be conservative.

Analysis Using the IPT methodology for Other Air Basins (and NOx)

In addition to the analysis conducted on modeled PM_{2.5}, CARB applied a reduced-form methodology (IPT) to estimate additional health impacts for other air basins and from PM_{2.5} derived from NOx emissions. These reduced-form analyses involve important simplifying assumptions that can greatly affect the reliability of the estimated health impacts.

The uncertainties described in the previous section also apply to the development of the IPT factors that are used to estimate the impacts for other air basins. Additional uncertainty is introduced when applying these IPT factors to the estimated emissions for this rulemaking. The IPT factors are based on a specific time period, and therefore important variability due to meteorological changes and or spatial differences are not accounted for. Most of these uncertainties were not discussed or considered by CARB. Importantly, a large majority of the assumptions and uncertainties likely result in overestimated benefits, particularly when considering the compounding effects of the uncertainties in the various modeling inputs, starting with the emissions estimates, on the final calculation.

¹³ Beelen, R; Hoek, G; van den Brandt, PA; Goldbohm, RA; Fischer, P; Schouten, LJ; Jerrett, M; Hughes, E; Armstrong, B; Brunekreef, B. 2008. "Long-term effects of traffic-related air pollution on mortality in a Dutch cohort (NLCS-AIR Study)." *Environ. Health Perspect.* 116 (2) :196-202

¹⁴ Enstrom, JE. 2005. "Fine particulate air pollution and total mortality among elderly Californians, 1973-2002." *Inhal. Toxicol.* 17 (14) :803-816. 209-6826

¹⁵ Lippfert, FW; Wyzga, RE; Baty, JD; Miller, JP. 2006. "Traffic density as a surrogate measure of environmental exposures in studies of air pollution health effects: Long-term mortality in a cohort of US veterans." *Atmos. Environ.* 40 (1) :154-169. 206-7558

¹⁶ Rohr A.C., R.E. Wyzga, 2012. Attributing health effects to individual particulate matter constituents. *Atmos Environ.*, 62, 130-152. doi:10.1016/j.atmosenv.07.036.

¹⁷ Lippmann, M., L.C. Chen, 2009. Health effects of concentrated ambient air particulate matter (CAPs) and its components. *Crit. Rev. Toxicol.*, 39, 865e913.

¹⁸ Kelly, F.J., J.C. Fussell, 2007. Particulate Toxicity Ranking Report. Report Number 2/07. Environmental Research Group, Kings College, London.

¹⁹ U.S. EPA. Integrated Science Assessment (ISA) for Particulate Matter (Final Report, Dec 2009). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009

As noted previously, we don't believe it is appropriate for CARB to combine the results from this analysis with the analysis for the two air basins, for which modeled estimates are available. In addition, the estimated range of annual impacts for each air basin should be reported instead of summing the cumulative results across years.

2.3 Conclusions

The health risk assessments conducted by CARB are subject to a significant number of uncertainties that are propagated through the risk assessment steps and that we have shown to overestimate the health impacts. We first show that emissions estimates are inflated (see Section 1) and these estimates are inputs to the CalPuff modeling used to estimate exposures and risks for the Bay Area and South Coast Air Basins. We also note that CARB did not validate the model estimate against measured levels of PM_{2.5}. Our preliminary analysis indicates that the modeled estimates are overestimating the measured levels for receptors near monitoring stations, particularly in highly impacted areas. Lastly, we highlight many of the risk assessment model assumptions that will also contribute to overstated health impacts in both the cancer risk assessment and the mortality and illness assessment.

Specifically, in the cancer risk assessment the use of highly conservative exposure assumptions (e.g., high breathing rates, 70 years of exposures 24 hours a day), application of sensitivity factors, and use of a highly conservative cancer slope factor all add up to highly inflated cancer risks. Similarly, in the mortality and illness analysis, risks are also likely to be overstated because of assumptions related to the choice of epidemiological study as the basis of the analysis, as well as the assumptions regarding the year to year changes in emissions across the air basins. Importantly, because the two methods used by CARB are associated with significantly different amount of uncertainty, the mortality and illness results should be presented as annual effects, and shown separately by air basin and by methodology, noting that results using the IPT approach will be more uncertain than those based on modeled results.

Overall, CARB needs to provide a more robust validation of modeled assumptions, a more thorough discussion of the underlying uncertainties and impact on the results, and a more transparent representation of the study results.



May 5th, 2020

Ms. Bonnie Soriano
Chief, Freight Activity Branch
Transportation and Toxics Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: AWO Comments relating to Proposed
Amendments to the Regulations to Reduce
Emissions from Diesel Engines On
Commercial Harbor Craft Operated Within
California Waters and 24 Nautical Miles of
the California Baseline

Dear Ms. Soriano:

We appreciate the opportunity to comment on the "Proposed Concepts for Commercial Harbor Craft in California." Starlight Marine Services, LLC (Starlight) has been actively engaged in the ship assist and tanker escort business of the maritime industry in California since 1998. We have grown to be a leading provider of assist and escort services providing quality service to major shipping lines and oil companies. Our growing fleet of harbor tugs routinely assist container, bulk, and petroleum tankers into and out of port. Our fleet of ship assist tugs are the best in the business, boasting competitive horsepower and green engines serving the LA/Long Beach, San Francisco/Oakland and PNW ports. We are privileged to do business in California and committed to be a proactive partner in the regulatory process with CARB.

It is our sincere desire to be a constructive participant in the rulemaking process and provide comments that will enable CARB to form meaningful regulations that promote the goal of cleaner air without doing irreparable damage to an industry that all Californians rely on to deliver and support the delivery of their essential goods and services. We were disappointed by CARB's 16-day comment window, on a 113-page draft rule published on April 1st. These proposed rules involve highly technical subjects and the time allowed is not ample to both review the changes from the last draft, nor to prepare constructive comments to address what we believe are significant shortcomings, errors, and misrepresentation of facts in the latest version. We did receive notice from Mr. David Quiros that CARB was granting an unpublished open-ended extension period. And while we feel this extension should have been formal and published, we trust that CARB is sincere, and are taking advantage of the opportunity by submitting the following comments for CARB's consideration and action.

Over the years Starlight's principals have been associated with several highly technical rulemaking processes. Among these were the Escort Rules for San Francisco Bay and the Ports of Los Angeles and

Long Beach. The regulatory bodies involved included the United States Coast Guard and the California Office of Spill Prevention and Response. Private and industry partners in the process included including harbor and bar pilot associations, marine exchanges, shipping companies, harbor safety committees, tug and barge companies and other interested stakeholders. While at times the opinions of the regulators and regulated differed we were all guided by a commitment to get it right and to base our findings on accurate and verifiable data and sound scientific principles. The result was rules that have produced safer waterways, while allowing the commerce they regulate to continue to operate in a safe and efficient manner. The science behind the latest draft of the proposed CHC regulations has deviated from this proven path. We continue to be concerned by CARB's willingness to move forward with the rules without first addressing the known and significant errors in the foundational elements that they are based upon. These inaccuracies include:

- Errors in the vessel population data used by CARB, that drastically overstates the towing vessel population operating in CARB waters. Starlight and AWO have repeatedly demonstrated to CARB staff that the U.S. Coast Guard vessel database, the foundation of all their vessel counts, has no information related to a vessel's utilization or location of operation. Further we have shared with CARB real-time sources of vessel operating data that could provide accurate usage data. Sources that showed:
 - Of the 219 towing vessels CARB used as operating in California, only 73 of those vessels were operated in California.
 - That the 219 vessels did not include vessels registered out of state, that were operating in California.
 - That CARB asserted, based on the false number of 219 towing vessels in their database, there was a 48% under-reporting of towing vessel emissions in California. Accurate real-time data refutes this claim and shows that any errors in reporting are likely insignificant.

It defies logic and scientific rigor that CARB is continuing to promote a regulation based on such an erroneous data set that has created incorrect and invalid conclusions.

- CARB has arbitrarily and capriciously included or exempted classes of vessels. Specifically, the draft CHC rule exempts commercial fishing vessels because of certain operating criteria while not extending similar exemptions ocean-going tugs and barges that meet the exact same criteria. These vessels trade in direct competition with self-propelled cargo and tank ships that are not covered by the CHC rule, putting them at a financial disadvantage.
- The technical solutions offered by the rule are infeasible and overly prescriptive. They pick winners and losers in the commercial marketplace and fail to allow vessel operators to innovate and find creative solutions to achieve emission reduction targets. Starlight supports CARB's goal of reducing emissions in California, but this rule would force operators down a technical path that is untested, unproven, and may not be the only avenue to achieve the desired emissions reductions.

In support of our comments, we have included as Appendix A AWO's Comments submitted to CARB on 4/30/21. Starlight assisted AWO staff in the preparation of their comments and fully supports the observations and statements contained therein.

INACCURATE AND GROSSLY OVERINFLATED VESSEL POPULATION DATA

Starlight directs you to the comments contained in the AWO comment letter in Appendix A. As the U.S. Coast Guard will attest, the database used by CARB to describe the population was designed to track the ownership and regulatory status of a vessel and does not provide any insight or information into where a vessel is operated. CARB staff has acknowledged this fact and yet continues to use the numbers in the database to justify the conclusions of the study and the proposed rules. These are not insignificant errors. The vessel count includes:

- 146 towing vessels that did not operate in CARB waters during the last three years.
- Excludes 69 towing vessels that were registered out of state but did operate in CARB waters.
- Includes 33 vessels that did not have a valid Certificate of Documentation, either having retired it or having it marked as “Not in Operation.” There is no evidence these vessels operated in CARB waters during the last three years.

Using real-time sources from the Marine Exchanges in both San Francisco and Los Angeles Long Beach, based on Automatic Identification System (AIS) and regulatory reporting requirements, we demonstrated the flaws in the vessel counts that CARB was using for towing vessels. Most importantly we clearly showed that there was no justification for CARB to inflate the towing vessel numbers by 48% for under reporting. AWO and Starlight shared all our data with CARB in the spirit of full transparency and would welcome the opportunity to assist CARB in obtaining accurate vessel information. But we are confused and dismayed that while CARB openly acknowledged these errors in the CHC Workshop #4 held on March 16, 2021, they informed the attendees of the workshop that they would not be revising their vessel count numbers in the draft regulation.

To that end Starlight joins with AWO to urge CARB to:

- Develop an accurate vessel population data set using available means of gathering real-time vessel operating information and emission profiles. This should be done for all vessel categories.
- Amend the study utilizing the corrected data set to determine the industry specific impact and need for regulation.
- Redraft the Proposed Regulations to reflect the conclusions of the new study.

Moving forward with regulation without correcting errors in the underlying data set will undermine the legitimacy of the regulatory process.

CARB’S ARBITRARY AND CAPRICIOUS EXEMPTION OF SOME VESSELS VERUS OTHERS

Starlight directs you to the comments from AWO, contained in Appendix A. CARB’s decision to exempt about 1,570 commercial fishing vessels (approximately 40% of the total CHC population) from the rule is arbitrary and capricious. This decision places 100% of the emission reduction burden of the CHC rule on 60% of the vessel population.

CARB’s rationale for excluding these vessels apply to the towing vessels that operate in coastal and international trade. Specifically:

- Small profit margins;
- Demonstrated lack of feasibility for Tier 4 repowers and retrofits;
- Competition with out of State and global markets; and,
- Tendency to conduct most of their operations far from the coast.

Ocean-going tugs and barges, either towed on a wire or rigidly connected through an ATB system, are directly analogous in their operation to commercial fishing vessels and share all four bases that led CARB to exempt commercial fishing vessels. AWO members have offered to confidentially share with CARB financial data that demonstrates the small profit margins in the towing industry. AWO submitted information in April of 2020 showing that “repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.” Similar technical challenges exist for ocean-going tugs, barges, and ATBs. These vessels commonly operate in interstate commerce in competition with self-propelled vessels in out of state and global markets. Additionally, the tugboats and barges operating in these markets are required by law to be U.S.-flagged, -owned, -crewed, and -built. This rule would place U.S.-flagged towing vessels at a competitive disadvantage against self-propelled foreign-flagged vessels that are not covered by CARB’s rule. Finally, AIS and Marine Exchange data reveals that these vessels conduct most of their operations far from the California coast, giving them a similar air emission profile in California as the exempted commercial fishing vessels.

CARB’s decision to exempt 40% of CHC based on the exact conditions that apply to other non-exempt vessels is arbitrary and capricious and should be addressed prior to formal rulemaking.

CARB’S PROPOSAL IS TECHNICALLY INFEASIBLE

In its April 30, 2020 letter, AWO submitted an Engineering Review Summary performed by Jensen Naval Architects on the Marine Engineers of the Cal Maritime Tier 4 Feasibility study with which CARB supports its assertion that the proposed regulations are feasible for CHC operators. The Cal Maritime study evaluated four DPF retrofit scenarios for a single ship assist and escort tug. The Jensen Review Summary also demonstrates the feasibility of DPF retrofit using a comparable large towing vessel. While the Cal Maritime study projects a \$2.81 million per vessel cost, the Jensen study finds a larger cost impact – between \$3.7 and \$4.5 million – and makes some important points about the limitations of the Cal Maritime study:

- This study of one large and spacious ship assists and escort tug is not representative of the diverse towing vessel fleet.
- The Jensen Review Summary notes “the technical challenges of repowering with EPA Tier 4 engines could be significant and cost prohibitive for some ship assist and escort tugs.”
- The Jensen Review notes that size constraints on some tugs could entirely preclude the placement of aftertreatment systems required by CARB.

CARB’s proposal to combine Tier 3 or Tier 4 engines with DPF aftertreatment technology is unproven, unavailable, and technically infeasible. Size and weight constraints make re-powering and retrofit options impossible for many towing vessels, but even if a vessel had the necessary space to accommodate this technology, there is no available DPF aftertreatment product on the market. The absence of commercially available technology has limited the guidance that engine manufacturers can provide about potential paths to compliance. Additionally, the absence of compliant technology makes planning future capital investment impossible. No matter how carefully a CHC operator has planned out

Appendix B - Starlight May 2021 Comments

the service life and maintenance schedule of a given vessel, the impact of this proposed rule with its unknowable compliance price-tag cannot be accounted for.

CARB must acknowledge that there is no available technology that currently meets both the performance standards of the proposed regulation and the propulsion needs of the regulated population of towing vessels. CARB must provide realistic relief for vessels that cannot comply with its rules based on space or feasibility constraints. As the draft rule stands now, Starlight will be forced to spend tens of millions of dollars on unproven and potentially dangerous retrofits on vessels that have are in the process of or have only recently been repowered to meet the last iteration of the CHC regulations. The financial waste caused by this proposal is staggering and raises the question of whether CARB is legally “taking” property from vessel operators by devaluing fully operational equipment that meets federal standards through state regulation.

CARB must consider providing vessel operators a feasible path to reducing stack emissions from CHCs. This path must include less prescriptive means of achieving emission reductions and longer-lasting exemptions for vessels that cannot feasibly retrofit.

Conclusion

Starlight appreciates this opportunity to comment on CARB’s Proposed Concepts for Commercial Harbor Craft in California. It is our desire to continue our long and effective collaborative relationship with the State of California and CARB. However, in its current form this rulemaking represents a failure of collaboration between regulators and the regulated community. Starlight does not understand how CARB can move forward with the rulemaking process without first addressing the glaring errors and misrepresentations that call into question the very legitimacy of the regulation. The erroneous data not only inflates the emissions generated by the towing vessel fleet and in turn the impact the fleet has on the air quality and health of the residents of the regions in which we operate. Starlight stands ready to work with CARB to address the errors in the vessel population data. We support a regulation that will fairly apply to all CHC based on their true area of operation and the impact they have on the air quality. Finally, we want a regulation that supports industry finding feasible solutions to reducing emissions in the harbors of California. Starlight urges CARB to adopt a more collaborative approach in advance of the 45-day formal rulemaking. Thoughtful and honest collaboration will benefit the state’s economic and environmental health. Starlight looks forward to discussing the topics outlined in this letter with the CARB staff.

Sincerely,



Benjamin Ostroff
Manager of Harbor Operations
Starlight Marine Services, LLC.
Company Security Officer

Cc: Charles Costanzo, AWO’s General Counsel and VP – Pacific Region



Comment Log Display

Below is the comment you selected to display. Comment 3125 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Seymour
Last Name: Beek
Email Address: sbeek@earthlink.net
Affiliation: Balboa Island Ferry Inc.

Subject: Commercial Harbor Craft Regulations

Comment:

Please see my attached letter dated November 12, 2021.
Regards,
Seymour Beek
Balboa Island Ferry Inc.

Attachment: www.arb.ca.gov/lists/com-attach/3547-chc2021-WzhcOwZrAjhVnQhn.pdf

Original File Name: California Air Resources Board Proposed Ammendments S Beek.pdf

Date and Time Comment Was Submitted: 2021-11-15 13:58:10

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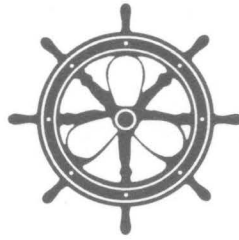
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BALBOA ISLAND FERRY

DIRECTORS:
H. SEYMOUR BEEK
ALLAN BEEK
LINDA BEEK



PHONE: (949) 673-1070
FAX: (949) 673-1639

410 SOUTH BAY FRONT
BALBOA ISLAND, CALIFORNIA 92662

November 12, 2021

Ms. Laine Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Madame Chair:

I am writing to provide comments on the proposed amendments to the Commercial Harbor Craft Regulation by the California Air Resources Board ("CARB"). For over 100 years Balboa Island Ferry has provided service for vehicles, cyclists, and pedestrians between Balboa Island and the Balboa Peninsula in Newport Beach, California. Not only is the ferry a convenient, inexpensive option for those trying to cross the bay, but it is also enjoyed as a source of entertainment, providing individuals a unique vantage point on Newport's beautiful coastal community. The proposed amendments would place an unbearable cost burden on Balboa Island Ferry and would likely result in ending the valuable service we have been providing to the families we have served for over 100 years.

3125.1

Balboa Island Ferry is in a unique position regarding the proposed amendments as it appears to qualify as a "short-run ferry" service. The proposed amendments place extreme restrictions on all commercial harbor craft, well beyond existing U.S. EPA engine standards, as Mr. Roger Carlson, Chair of the Harbor Commission of the City of Redondo Beach, notes in his comment letter.¹ However, the proposed amendments call for even more stringent emissions standards for short-run ferry services, requiring all new, newly acquired, and in-use short-run ferries to be zero emission vehicles ("ZEVs") by December 31, 2025. Based on our review of the ZEV requirements, compliance with the proposed amendments would result in the need to have battery powered electric propulsion in each of Balboa Island Ferry's vessels, which would result in an extremely high cost to Balboa Island Ferry.

¹ Available at: <https://www.arb.ca.gov/lists/com-attach/2910-chc2021-WjZVNgZzWH9VNgh6.pdf>. Balboa Island Ferry incorporates and adopts many of the positions in this comment letter and others referenced in this letter taking issue with the fairness and lack of appropriate technical support for the proposed amendments.

As an initial matter, it is unclear whether CARB has adequately considered the impact of these costs, the lack of any significant corresponding emissions reductions, or the potential increases in emissions associated with discontinuing services such as Balboa Island Ferry's transportation of passengers and vehicles. Understanding the agency's consideration of cost impacts is difficult, due in part to the lack of clarity in CARB's Standardized Regulatory Impact Assessment ("SRIA").

For example, CARB estimated the following Zero-Emission Infrastructure costs for an individual charging facility:

- an upstream utility cost of \$2,096,885,
- a charging station cost of \$2,748,070,
- an installation cost of \$365,817, and
- a vessel-side infrastructure cost of \$751,129.²

Adding those values together, the total estimated infrastructure cost is \$5,961,901. CARB also provides a table with these costs aggregated, to show each total cost for all the new charging facilities that would be required in California.³ Given CARB's estimate of 17 new charging stations throughout the state, the costs in the table should be 17 times the corresponding costs above, but they are not.

Even without clarity as to the exact cost Balboa Island Ferry would face under the new regulations, it is clear that the cost of the proposed amendments on our small business would be debilitating. Balboa Island Ferry has three small ferries with engines of 135 horsepower each. CARB estimates engines would come at cost of \$1,020 per horsepower, totaling \$137,700 for each ferry. According to CARB, labor and installation for the new engines would cost \$2,380 per horsepower if the ferries are able to be retrofitted and repowered and \$3,293 if Balboa Island Ferry's vessels are unable to accommodate the new engines and it must purchase entirely new vessels. Thus, the costs using CARB's assumptions could be anywhere from \$321,300 to \$444,555 for each ferry. The engine and installation estimates would result in a total cost of \$459,000 to \$582,255 for each ferry. Multiplying these figures by 3, the number of ferries Balboa Island Ferry owns, results in total costs ranging from \$1,377,000 to \$1,746,765. Balboa Island Ferry believes these estimates do not reflect the full cost of complying with the proposed amendments and that the actual cost will be closer to \$1 million per vessel, or \$3 million total.

Balboa Island Ferry also does not see any consideration in CARB's materials with respect to battery and electrification safety requirements that are or may be implemented by the U.S. Coast Guard, much less the likely costs associated with such requirements.

Further, Balboa Island Ferry would have to bear the cost of the infrastructure required to support the new ZEVs. As an operator of small ferries on the coast of residential Balboa Island, Balboa Island Ferry not aware of any other business or partner who would share in these costs. Thus, it would potentially have to bear the entire infrastructure cost on its own, which according to CARB could be as much as \$5,961,901 (see above). Even if the actual costs were a fraction of this sort of

² SRIA p. 88.

³ SRIA p. 91.

estimate, it would result in a total cost of compliance leagues beyond the budget of a small, family-owned ferry company.

CARB notes that ZEV implementation costs can be funded by grants but fails to recognize how such a short compliance deadline rules out this possibility. As noted by Dr. John Headding, Chair of the Board of Directors of the Air Pollution Control District of San Luis Obispo County, in his comment letter⁴, most programs set a minimum project life of three years for upgrading to engines that reduce emissions. Therefore, the December 31, 2025 compliance deadline would effectively render Balboa Island Ferry and other short-run ferry services ineligible for grant funding, resulting in significant inequities for short-run ferries compared to other categories of commercial harbor craft. Thus, any requirement that a small, short-run ferry operation like Balboa Island Ferry transition to zero emission vessels must be accompanied by a much longer implementation timeline.

3125.3

Balboa Island Ferry is also considerably different than the other short-run ferries in California. Balboa Island Ferry travels about 900 feet across Newport Bay from Balboa Island to the Balboa Peninsula. Balboa Island Ferry's small engines and short trips result in negligible emissions. Each engine consumes an average of 0.5 gallons of diesel per hour. Thus, if all three vessels operate 365 days per year—which they do not—for 16 hours per day, they would need 8,760 gallons of diesel. Based on CARB's most expensive projected diesel price of \$2.38 (recognizing that current prices are quite a bit higher), that would cost Balboa Island Ferry under \$21,000 per year. This is considerably less than the CARB estimates for fuel cost for an average short-run ferry.⁵ Thus, Balboa Island Ferry contributes much less to short-run ferry emissions than the model ferries CARB used to conduct its projections, which travel much longer distances and use larger engines, and our ferries should not be subject to the same requirements.

3125.4

Lastly, Balboa Island Ferry transports approximately 350,000 motor vehicles and 1.6 million passengers per year across the Newport Bay. Without the ferry, all 350,000 vehicles would have to take the alternative route: a commute of about six miles. Conceivably most of the pedestrian passengers would also have to take this route by personal vehicle, taxi, or rideshare. CARB failed to consider the emissions of these automobiles taking the alternative in any analysis. Further analysis should be undertaken to account for these emissions.

Balboa Island Ferry recognizes the concerns of CARB and supports the improvement of statewide air quality. But there are clear and considerable errors in CARB's analysis, including a lack of consideration regarding certain aspects of short-run ferry operations, rendering its conclusions and plan insufficient. Thus, we object to the proposed amendments and request that CARB reconsider the amendments and/or eliminate the amended provisions requiring short-run ferries to achieve zero emissions by 2025. CARB should take the time to conduct a more careful analysis of the environmental impact and the impact the proposed amendments would have on Balboa Island Ferry and other similarly situated commercial harbor craft companies. In this or any future consideration of the proposed amendments, CARB should re-evaluate the compliance deadlines and extend any such deadlines to allow short-run ferries throughout the state the opportunity to enroll in grant programs and/or implement feasible plans to manage costs. If it does not, the approval of the proposed amendments will be detrimental to Balboa Island Ferry and other short-

3125.5

⁴ Available at: <https://www.arb.ca.gov/lists/com-attach/2012-chc2021-UwxVMF1xUDFXDIMM.pdf>.

⁵ SRIA Table C-21 and C-22.

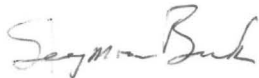
November 12, 2021

Page 4

run ferries throughout the state. Family-owned businesses that have served local communities for decades will be forced to close because of the incredibly burdensome requirements based on flawed analyses.

Please do not move forward with the proposed amendments, or at least remove from the proposed amendments the provisions adding burdens to the short-run ferries. The impacts have not been fully considered and you do not have the appropriate and correct information to properly assess the benefits or impacts. On behalf of the thousands of people who enjoy our ferry services and the numerous businesses on both sides of our bay that benefit from the ferry, please do not impose these requirements that as currently contemplated would put us out of business without any corresponding benefit to the environment.

Sincerely,

A handwritten signature in cursive script that reads "Seymour Beek".

Seymour Beek
President
Balboa Island Ferry, Inc.



Comment Log Display

Below is the comment you selected to display. Comment 3126 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: martin
Last Name: mclaughlin
Email Address: dukerider72@hotmail.com
Affiliation:

Subject: Commercial harbor craft regulations

Comment:

you all cant serious about what your trying to do with the boats ,

I can understand if you implement new standards on new boats but b not old boats , they have the right to keep our world history and are family enjoyment going on (they should be left alone) now for cargo ships you should look at them way more then charter fishing boats .

please get a clue and stop messing up califorina .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 13:57:00

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Below is the comment you selected to display. Comment 3127 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Paul
Last Name: Prekop
Email Address: Paulfromcaesars@outlook.com
Affiliation:

Subject: Sport fishing - whale watching

Comment:

Please leave this industry alone, do not over regulate , let them manage themselves! Thank you th

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:09:42

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Below is the comment you selected to display. Comment 3128 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Carley
Last Name: Cavanaugh
Email Address: Carley.briggs@gmail.com
Affiliation:

Subject: Passenger sport fishing - CARB act

Comment:

My husband owns a passenger fishing vessel in Marin county and with the new regulations we won't be able to stay in business and provide for our family. The existing boats that these fisherman have can not simply adhere to the potential new guidelines and would require the purchase of a brand new boat. That is not possible for so many of the business owners in this industry. Please reconsider - it is our livelihood and what we have worked so hard to build.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:18:02

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First Name: Daniel
Last Name: Herrera
Email Address: danielherrera1156@gmail.com
Affiliation:

Subject: Save sports fishing

Comment:

Save sports fishing! Why do we have to cancel something that doesn't impact the ocean. You should be concentrating on cleaning up all the trash in the ocean .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:29:16

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Below is the comment you selected to display. Comment 3130 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Erica
Last Name: Briggs
Email Address: Esbriggs46@gmail.com
Affiliation:

Subject: CARB ACT

Comment:

I visit California a few times a year due to the beautiful coastline and amazing access via commercial boats. These boats and businesses WILL NOT survive and will be a big hit to tourism in this area. I certainly will rethink my trips. THIS IS A HUGE MISTAKE.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:18:40

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**Below is the comment you selected to display.
Comment 3131 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Nikki
Last Name: Davis
Email Address: hairartistnikkigaona@gmail.com
Affiliation:

Subject: Sports fishing
Comment:
Save sports fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:30:28

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Below is the comment you selected to display. Comment 3132 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Hannigan
Email Address: brian@hannigan.net
Affiliation:

Subject: Commercial Harbor Craft Regulation

Comment:

The requirement proposed would cripple the sport fishing, whale watching and ocean adventures in California.

This would not only cause the boat owners to go out of business due to the high cost of retrofit or entirely new boats but it would also have a direct impact on the economy of all the harbors and marinas that would lose the traffic of these customers.

DO NOT put more regulations on businesses that are having a hard enough time staying in business!

Attachment:

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Date and Time Comment Was Submitted: 2021-11-15 14:33:13

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Below is the comment you selected to display. Comment 3133 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: William
Last Name: Barrett
Email Address: william.barrett@lung.org
Affiliation: American Lung Association in California

Subject: Health and Medical group support for CHC rule

Comment:

Please see the updated letter of support for the CARB adoption and strengthening of the CHC rule amendments.

Attachment: www.arb.ca.gov/lists/com-attach/3555-chc2021-AGgAY1Y2AD9WJAdv.pdf

Original File Name: Health Group_CHC Support_11.15.21.pdf

Date and Time Comment Was Submitted: 2021-11-15 14:31:24

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November 15, 2021

Liane Randolph, Chair
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

Subject: Public Health Support for Commercial Harbor Craft Rule Amendments

Dear Chair Randolph and Members of the Board:

On behalf of the undersigned health and medical organizations and individuals, we are writing to express our support for the strongest possible pollution controls on new and in-use Commercial Harbor Craft (CHC). Pollution from these vessels represent a major source of local and regional health risks and must be addressed as quickly and thoroughly as possible. We write in strong support of the proposed regulation amendments and offer recommendations to increase the health benefits of the final rule, which we view as a critical measure of relief for communities currently bearing the immense heart, lung, cancer, and other health impacts of CHC pollution.

Californians face the most difficult air pollution challenges in the United States. The American Lung Association’s *State of the Air 2021* found that California is home to seven of the ten most ozone-polluted cities in the United States, and six of the ten most particle-polluted cities.¹ Despite decades of progress, Californians face increased risks of unhealthy air, including asthma attacks, strokes, heart attacks, lung cancer and premature death. Low-income communities and communities of color face disproportionate burdens and disparities in health impacts, including portside communities directly impacted by tugboats, ferries, fishing boats and other CHC addressed through CARB’s proposed amendments.

Significance of Commercial Harbor Craft Pollution

Despite their relatively small overall population of approximately 3,100 vessels, the CHC category represents an important source of community health impacts and regional air quality impacts. CHC emissions are a significant source of smog-forming NOx emissions and fine particle pollution that threaten lung and heart health. CHC represent one of the top three cancer

¹ American Lung Association. State of the Air 2021. April 2021. www.lung.org/sota.

risks in seaport communities, and contribute to California communities failing to achieve health-protective air quality standards.² To put the scope of the emissions in context, CARB staff note that [just one sportfishing boat produces the equivalent exhaust as 162 diesel school buses](#). These vessels, along with ferries, tugs, commercial fishing boats and others generate a heavy dose of carcinogenic diesel exhaust in some of the most disadvantaged communities in California. All CHC must be brought up to the most health-protective engine technology standards possible – as soon as possible – so that the lungs of children in disadvantaged communities no longer pay the price of CHC pollution.

Support for Proposed Amendment Framework

CARB's proposal would generate significant health benefits through major reductions in harmful air and climate pollutants. The proposal would amend existing policy to acknowledge technological advancement and require more stringent emission control strategies,³ and broaden the rule to capture emissions from additional vessel types.⁴ We strongly support the expanded scope of existing rules to ensure emission controls apply to a wider range of CHC including certain barges, pilot vessels, commercial passenger "charter" fishing vessels, commercial fishing vessels and other CHC not included in the existing rule. We appreciate that CARB has included reporting responsibilities for CHC facility operators to support data tracking and compliance, as well as preparation of facilities for more zero-emission technologies. The proposal would require more stringent in-use emission controls for vessels, including accelerating the deployment of zero-emission technologies. Specifically, new excursion vessels (e.g., dinner cruise, sight-seeing), which must be zero-emission capable/hybrid by 2025 and new and in-use short-run ferries are required to be zero-emission by 2026. New and in-use diesel-powered vessels would need to meet standards equivalent to the cleanest available certified engine operating with a diesel particle filter.

Benefits of the Proposed Rule

By shifting to zero emission and cleaner engine technologies, and expanding the scope of the rule, the amendments will save lives and billions in public health impacts. The proposed amendments will cut carcinogenic diesel particle pollution from CHC by 89 percent and will cut smog- and particle-forming NOx by more than half by the end of 2038. This will support efforts to attain health-protective air quality standards and significantly improve health. Notably, the proposal would result in an estimated \$5.25 billion in public health benefits between 2023 and 2038, and would avoid:

- 531 premature deaths
- 161 hospital admissions
- 236 emergency room visits

It is important to note that the monetized health costs of the proposed amendments do not factor in the significant reductions in cancer risk, and other health impacts that will result from implementing the amendments to the CHC rule. The cost of compliance with this regulation is approximately one-third of the *monetized* health benefits to be gained.⁵ These *non-monetized*

² California Air Resources Board. Initial Statement of Reasons Proposed Amendments to the Commercial Harbor Craft Regulation. Figure II-1. Seaport Contribution to Near Source Cancer Risk at p. III-3. September 2021. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/chc2021/isor.pdf>

³ CARB at p. III-7.

⁴ CARB at p. III-1.

⁵ CARB at Table IX-8: Annual Direct Costs of the Proposed Amendments are estimated at approximately \$1.8 billion between 2023 and 2038 at page IX-12.

health benefits are substantial and cannot be overlooked. For example, cancer risk due to CHC emissions could be greatly reduced or eliminated for millions of Californians:⁶

- The South Coast Air Basin’s population exposed to a potential cancer risk of 1 chance per million would drop by 10 million residents due to implementing the proposed rule.
 - 5 million residents would maintain this risk due to ongoing emissions from CHC.
- The Bay Area population exposed to a 1 chance per million cancer risk from CHC would drop by five million.
 - 2 million Bay Area residents would still face this level of cancer risk, speaking to the need for ongoing rule strengthening and updates as technologies progress.

Strengthening the Proposal to Improve Health

We believe that the proposal is a critical step toward healthier air, reduced cancer risk and a range of health improvements in communities most disproportionately burdened by toxic CHC emissions. The proposal could be improved to accelerate the health benefits of greater deployment of zero-emission technologies, reduce policy delays following technology advancement and limit compliance flexibilities that extend the life of high-emitting technologies:

- CARB should expand requirements for zero-emission technologies beyond the limited range of vessels included in the proposed amendments to accelerate more zero emission technologies as rapidly across the CHC fleet and in line with Governor Newsom’s Executive Order N-79-20 which set a state goal to “transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.” 3133.1
- CARB should ensure a responsive technology review is in place to further amend the program to accelerate deployment as new zero-emission and other advanced engine technologies come online. This commitment to generating additional emissions reductions should be included as a unique measure in the 2022 State Implementation Plan. 3133.2
- CARB should significantly limit compliance extensions to ensure relief from pollution impacts occur in the near term. As proposed, most CHC may be granted compliance extensions as far out as 2034, with certain vessels (e.g., ferries, charter fishing boats, and excursion vessels) eligible to wait even longer to clean up. 3133.3

We support the proposed amendments because failure to address this major source of carcinogenic pollution in heavily impacted communities is unacceptable. We believe that the policy should be strengthened to accelerate the health benefits and support healthier air for our most impacted residents. Please contact Will Barrett at the American Lung Association with any questions at William.Barrett@lung.org.

Sincerely,

Mark Noah, MD, FACP
American College of Physicians California Chapter Services

Will Barrett, National Senior Director, Advocacy, Clean Air
American Lung Association

⁶ CARB at V.4.

Autumn J. Ogden-Smith, Director, California State Legislation
American Cancer Society, Cancer Action Network

Marc Carrel, President & CEO
BREATHE Southern California

Yvonne Choong, Vice President, Center for Health Policy
California Medical Association

Wayne A. Walls, MBA, RRT-ACCS, RRT-NPS, RCP, President
California Society for Respiratory Care

Vipul V. Jain, MD, MS, President
California Thoracic Society

Linda Rudolph, MD, MPH, Director
**Center for Climate Change and Health
Public Health Institute**

Sylvia Betancourt, Program Manager
Long Beach Alliance for Children with Asthma

Juliet Sims, MPH, Associate Program Director
Vince Leus, Program Coordinator
Prevention Institute

Joel Ervice, Associate Director
Regional Asthma Management and Prevention (RAMP)

Jim Mangia, MPH, President & CEO
St. John's Well Child and Family Center (Los Angeles)

Robert M. Gould, MD, President
San Francisco Bay Physicians for Social Responsibility



Comment Log Display

Below is the comment you selected to display. Comment 3134 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lauren
Last Name: Gularte
Email Address: gularte@watertransit.org
Affiliation:

Subject: Water Emergency Transportation Authority (WETA) Comments on Proposed Amendments
Comment:

Please see attached comment letter from the Water Emergency Transportation Authority (WETA)/ San Francisco Bay Ferry on the Proposed Amendments to the Commercial Harbor Craft Regulations.

Attachment: www.arb.ca.gov/lists/com-attach/3556-chc2021-ViEHZAB1BTdSCwlq.pdf

Original File Name: WETA Comment letter_CARB Proposed CHC Regs_Nov 15 2021.pdf

Date and Time Comment Was Submitted: 2021-11-15 14:42:06

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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November 15, 2021

Liane M. Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted via <https://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Chair Randolph:

Thank you for the continued opportunity to comment on California Air Resources Board's Proposed Amendments to the Commercial Harbor Craft (CHC) Regulations ("Proposed Amendments"). The San Francisco Bay Area Water Emergency Transportation Authority (WETA) has worked closely with your staff over the last year and a half, and we appreciate that the Proposed Amendments address nearly all of WETA's concerns. WETA has two remaining requests for changes to the Proposed Amendments, which are outlined below.

WETA is a regional public transit agency tasked with operating and expanding ferry service on the San Francisco Bay and with coordinating the water transit response to regional emergencies. Under the San Francisco Bay Ferry brand, WETA carries over three million passengers annually utilizing a fleet of 15 high speed passenger-only ferry vessels. San Francisco Bay Ferry currently serves the cities of Alameda, Oakland, Richmond, San Francisco, South San Francisco and Vallejo.

WETA has always been a leader in advancing and embracing clean vessel technology. From the agency's beginning, WETA pushed for the development and implementation of new diesel engine technology that exceeded Environmental Protection Agency's (EPA) standards, proving to the industry that increasingly stringent Federal emissions requirements were achievable. WETA's newest vessels are the first passenger vessels in the country to achieve EPA's Tier 4 emissions standards, reducing an estimated 10 tons of GHG emissions annually.

WETA is committed to operating the cleanest vessels possible and appreciates the opportunity that the Proposed Amendments provides to push our efforts even further. In partnership with CARB, WETA staff has worked throughout the last year to develop an Alternative Control of Emissions (ACE) plan that will shift 50% of our vessel fleet to zero emissions by 2035. This is an exciting endeavor, but as we mention below, implementing this plan will require new funding and significant investment.

WETA has two remaining requests for changes to the September 21, 2021 version of the Proposed Amendments:

1. Regarding subsection (f)(1)(I) on page 94, which states: "Emission reductions included in an ACE may not include reductions that are otherwise required by any local, State, or federal rule, regulation, or statute, or that are achieved or estimated from equipment not located in the region to which the ACE applies. The ACE application must not use equipment acquired by funds or grants that cannot be used to comply with State regulations, laws, or mandates." 3134.1

Requested change: The current language is confusing. The language is unnecessary if the intent is to allow operators to use grant funds, unless those funds are reserved for projects and programs that exceed State regulations, laws or mandates; or are otherwise restricted by the granting agency. Rather than limiting the use of grant funds to implement an operator's ACE plan, WETA suggests that the restrictions on the use of grant funds come directly from the granting agency. WETA respectfully requests CARB to delete this language

and instead rely on the granting agency to set eligibility requirements for the use of grant funds. Alternatively, WETA requests that CARB revise the final sentence as follows: “The ACE application may use equipment acquired by funds or grants only if such grant funds may be used to comply with State regulations, laws, or mandates.”

2. Section (e)(12)(D)(1)(b), in addition to other locations within the Proposed Amendments, states that the compliance date for an engine is based on the model year of the in-use engine that was installed in the in-use vessel as of December 31, 2022.

WETA Comment: WETA is currently in the process of upgrading all four of our Gemini Class vessels with tier 4 engines. One of those vessels is projected to be in the shipyard on December 31, 2022, and will likely not have an engine in it. According to the September 21, 2021 version of the Proposed Amendments, WETA is unsure what engine model year to attribute to a vessel that will not have an engine installed on December 31, 2022. 3134.2

Requested change: WETA respectfully requests CARB to address “in process” engine replacement projects in the sections of the Proposed Amendments that discuss the engine model year being set on December 31, 2022. WETA proposes that the following underlined text be included in Section (e)(12)(D)(1)(b) and other locations where it states that the compliance date for an engine is based on the model year of the in-use engine that was installed in the in-use vessel as of December 31, 2022:

Using Method D1, with the exception of engines complying by subsection (e)(12)(C)(4)b., the compliance date for an engine is based on the model year of the in-use engine that was installed in the in-use vessel as of December 31, 2022. For in-use vessels that are in the process of an engine replacement on December 31, 2022, the compliance date will be based on the model year of the engine that is in the process of being installed in a vessel.

We look forward to your consideration of these two changes in the Final Amendments to the CHC Regulations.

In addition to the two comments above, WETA also would like to remind CARB that it will submit an Alternative Control of Emissions (ACE) Plan immediately upon the effectiveness of the new rule. WETA urges CARB to act promptly in reviewing and approving WETA’s ACE Plan to facilitate swift implementation of these improvements. Many of the vessel refurbishment and replacement projects that are included in WETA’s draft ACE plan can take up to two years to implement once funding has been secured. Expedited approval will help position WETA to begin near-term projects that will bring about near term benefits to our regional and state air quality.

We are grateful for the time and effort your staff has committed to working with WETA over the last year. We hope to continue our partnership with CARB as we move toward implementation of the amended regulations.

Thank you for your consideration. We would be pleased to answer any questions or provide further information.

Sincerely,



Seamus Murphy
Chair

cc: Richard Corey, CARB Executive Officer; David Quiros, Manager, Freight Technology Section
WETA Board of Directors



Comment Log Display

Below is the comment you selected to display. Comment 3135 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Shih
Email Address: cablecarjim@yahoo.com
Affiliation:

Subject: CHC2021

Comment:

I urge CARB to vote no on regulations that rely on technology that is economically unfeasible and has not been tested as safe on passenger harbor crafts. As boats are removed from service, access to the sea will be limited and sportfishing will become too costly. Save recreational fishing access and the fishing industry

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:51:41

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Comment Log Display

Below is the comment you selected to display. Comment 3136 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marcella
Last Name: Tate
Email Address: marcellacareaga@hotmail.com
Affiliation:

Subject: BOAT DIESEL ENGINE REPLACEMENT MANDATE

Comment:

Dear Newsom Administration and CARB,

This is a PLEA to please have EMPATHY for the families that operate the sportfishing and whale watching boats in California by removing the mandate to replace their existing diesel engines. ■ It's my understanding that this will be very costly so they will need to raise tickets prices. ■ The increase in ticket price would not be

3136.1

affordable to families like mine and will put an end to any charity the boat owners so generously give to, like "Meals on Wheels".

My family and I enjoy the peace and tranquility as well as the excitement the ocean brings. ■ As it is, we're only able to afford these trips once or twice a year. ■ We definitely save up for the yearly "Meals on Wheels" charity fishing trip. ■ Not only do we meet wonderful people and make long lasting memories, it's also very gratifying helping those in need like the elderly. ■ The

3136.2

captain of the charity fishing trip is a kind-hearted hard-working man who started out as a deck hand and now owns his boat after many years of saving. ■ The mandate will most definitely have devastating effects on "Rene" and his family, other boat owners, and families like mine.

3136.3

Nothing can replace the look of a child, or an adult, who sees a dolphin, a whale, or a fish jumping out of the water. Or when they get a bite and start reeling in their fish. ■ It's a thrill that everyone should have the opportunity to experience.

3136.4

I BEG you to PLEASE find another way to lower emissions contributing to coastal pollution. ■ I too care very much about all coastal pollution and hope that another solution is found so that boat owners like "Rene" can continue to earn a living doing what they love and can continue to provide for their families. And so that families like mine can still afford to enjoy a fishing or whale watching trip and just for a day leave the chaotic city behind and be able to take a deep breath and enjoy nature at its best.

Respectfully,

Marcella Tate

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:04:37

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Comment Log Display

Below is the comment you selected to display. Comment 3137 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Craig
Last Name: Anderson
Email Address: craiga@westernpulp.com
Affiliation:

Subject: New CARB regulations regarding sportfishing boats

Comment:

I think it is ridiculous to require sportfishing boats to replace their existing functional motors to meet new CARB regulations.

There's a carbon footprint involved with building an entirely new motor and disposing of the old that wouldn't be there if the existing motor were used for its expected lifespan.

Require new equipment to meet CARB regulations, not existing functional equipment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:57:36

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Below is the comment you selected to display. Comment 3138 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Thomas
Last Name: Jacobsen
Email Address: tom.jacobsen@jacobsenpilot.com
Affiliation: Jacobsen Pilot Service, Inc.

Subject: CARB's proposed revisions to the Commercial Harbor Craft Regs
Comment:
Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/3560-chc2021-UjFQNwZ1VmcFXFQ4.pdf

Original File Name: CARB ltr from JPS 11-15-21.pdf

Date and Time Comment Was Submitted: 2021-11-15 15:10:18

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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LONG BEACH, CALIFORNIA 90832-2248

November 15, 2021

Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CARB's Proposed Revisions to the Commercial Harbor Craft Regulations

Dear Madam Chair,

Jacobsen Pilot Service, Inc. has been in business since 1924 and provides the port piloting service for the Port of Long Beach and the Seal Beach Naval Weapons Center. We operate 24/7 and pilot roughly 7,000 ships per year. **I am writing to express our serious concern with the agency's proposed revisions to the commercial harbor craft regulations.**

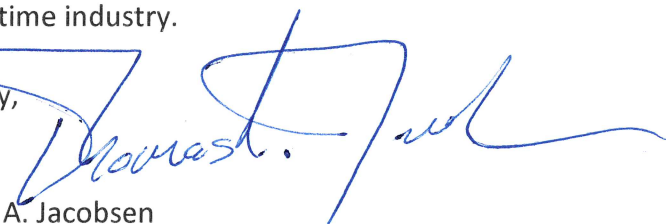
CARB has proposed engine emission regulations that require technology that has not been developed or tested to be reliable and safe at sea. Our three pilot boats deliver pilots to inbound ships, and the transfer process out in the open ocean can be dangerous. It is paramount for us to have reliable and safe engines.

Our company has been proactive in upgrading engines whenever possible to keep the cleanest available engines possible. Our two newest vessels, which are only one and three years old, were specially designed to reduce weight so we could use smaller cleaner engines. These two boats cost over 4 million each and have a service life of 30 years. We took advantage of carbon fiber technology and utilizing water jet drives. These boats reduce fuel consumption by 33% and reduce NOX by 35%, CO by 55%, CO2 by 37%, and PM by almost 100%. Each of our new boats has two Tier 3 engines rated at 800 HP.

Your proposed regulations would phase out our Tier 3 engines in a few years, but unfortunately there is no available engine technology that could replace these engines and fit in our new boats. The current Tier 4 engines would require a much bigger boat, which would be heavier and would require larger engines that burn a lot more fuel. This doesn't any make sense.

Our company supports cleaner engine technology when it is proven to be safe, reliable and practical for the maritime industry.

Sincerely,



Thomas A. Jacobsen
President / CEO



Comment Log Display

Below is the comment you selected to display.
Comment 3139 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Stephanie
Last Name: LaChance
Email Address: stephanie@clubnautique.net
Affiliation: Club Nautique

Subject: Proposed Amendments - Sailboats

Comment:

Hi,

I am a business owner of a sailing and powerboating school in the San Francisco Bay area. It seems that some clarification is needed to the regulations with regards to sailboats. The current rules imply, but do not expressly exempt sailboats from the ruling. The language should really be amended to exclude sailboats as they are propelled primarily by wind making them hybrids under the current language. As the document is currently written a lot of reporting is required to apply for exemptions and extensions which will cause an untold burden on our business as well as CARB given that we would have to hire additional staff to track and submit this paperwork for all of our boats. CARB would need additional staff to also review and approve all of the paperwork, which seems like an unnecessary expense. Please reconsider and exclude sailboats from the proposed regulations.

Thanks,
Stephanie LaChance

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 14:34:24

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Below is the comment you selected to display. Comment 3140 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jason
Last Name: Erwin
Email Address: jason@greenflowermedia.com
Affiliation:

Subject: Stop CARB's biased and racist action now!

Comment:

To whom it may concern,

This is absurd idealistic politics in action. Please stop this nonsense. You talk about social equity and helping the people while simultaneously pulling the rug from under the largest industry serving low income families for food and recreation. Please reevaluate your stance and not not take brash careless action. The fact this would have passed already without community involvement in itself should highlight how far disconnected CARB is with reality.

A concerned citizen,

Jason

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:16:30

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**Below is the comment you selected to display.
Comment 3141 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: michael
Last Name: wall
Email Address: mscottwall9@yahoo.com
Affiliation:

Subject: SAVE OUR BOATS

Comment:

instead of putting thousands of people out of work how about grand
fathering old boats and make new boats comply

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:21:26

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Below is the comment you selected to display. Comment 3142 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Picard
Email Address: Stpla63@yahoo.com
Affiliation:

Subject: Chc2021

Comment:

Please save the fishing boats. This is crap to have to buy new engines for these vessels. You are going to kill the fishing industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:24:57

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

Below is the comment you selected to display. Comment 3143 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Teresa
Last Name: Bui
Email Address: tbui@pacificenvironment.org
Affiliation:

Subject: Letter from County of Los Angeles Board of Supervisor Solis

Comment:

Please see letter from County of Los Angeles Board of Supervisor Hilda Solis attached.

Attachment: www.arb.ca.gov/lists/com-attach/3565-chc2021-BWYHbgNvJW8GZQh6.pdf

Original File Name: Commercial Harbor Regulation - Hilda Solis.pdf

Date and Time Comment Was Submitted: 2021-11-15 15:39:18

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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856 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
Telephone (213) 974-4111 / FAX (213) 613-1739

HILDA L. SOLIS

CHAIR, BOARD OF SUPERVISORS
SUPERVISOR, FIRST DISTRICT

November 15, 2021



California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Commercial Harbor Regulation

Dear California Air Resources Board,

Harbor craft, such as tugboats, ferries, barges and dredges, contribute to a increased health and cancer risks to millions of Californians near the ports and beyond. I am pleased to express my support for strengthening the Commercial Harbor Craft Regulation (“CHC”) for cleaner air. Harbor craft, many of them old and polluting, emit a toxic brew of diesel particulate matter. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I join fellow public officials to end the continued emissions from harbor craft across the state of California. This proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents nearby our harbors and beyond. This rule avoids 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from air quality experts at the California Air Resources Board. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I’m asking you to strengthen the Commercial Harbor Craft rule:

1. Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories.
2. Set all ferries, tugboats, dredges, and barges on an electrification pathway right now and require full electrification by 2035.
3. Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions

3143.1

3143.2

4. Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation 3143.3

Let's keep California on a path towards innovation and clean air. Thank you for your attention, and please feel free to reach out to Aydin Pasebani, Environmental & Special Projects Deputy at AyPasebani@bos.lacounty.gov or at 213-974-4111 if there are any questions.

Sincerely,



HILDA L. SOLIS

Supervisor, First District

Chair, Board of Supervisors



Comment Log Display

**Below is the comment you selected to display.
Comment 3144 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Zachary
Last Name: Werner
Email Address: werner.zach@gmail.com
Affiliation:

Subject: Sport fishing

Comment:

Please don't jeopardize sport fishing and people's livelihoods by retrofitting vessels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:40:17

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Below is the comment you selected to display. Comment 3145 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Teresa
Last Name: Bui
Email Address: tbui@pacificenvironment.org
Affiliation:

Subject: Letter from Port of San Diego Port Commissioner Naranjo

Comment:

Please see letter from Port of San Diego Port Commissioner Naranjo attached.

Attachment: www.arb.ca.gov/lists/com-attach/3567-chc2021-B3dSO1QnByAAWVAz.pdf

Original File Name: Port Commissioner Naranjo CARB Letter RE Harbor Craft Rule 11.15.21.pdf

Date and Time Comment Was Submitted: 2021-11-15 15:41:52

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Sandy Naranjo

PORT COMMISSIONER *for* NATIONAL CITY



<https://linkedin.com/in/sandynaranjo>



<https://fb.com/CommissionerSandy>



<https://linktr.ee/CommissionerSandy>

November 15, 2021

Dear California Air Resources Board:

Harbor craft, such as tugboats, ferries, barges and dredges, contribute to an increased health and cancer risk to millions of Californians near the ports and beyond. I am signing my name to support strengthening the Commercial Harbor Craft Regulation (“CHC”) for cleaner air. Harbor craft, many of them old and polluting, emit a toxic brew of diesel particulate matter. Particulate matter gets into your lungs, weakens your immune system, and causes ground-level ozone, which can reach unhealthy levels on hot days. The technology exists for zero-emissions boats and ships: Just like cars and trucks, boats and ships must transition off fossil fuel.

I join fellow public officials to end the continued emissions from harbor craft across the state of California. This proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents nearby our harbors and beyond. This rule avoids 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from air quality experts at the California Air Resources Board. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I’m asking you to strengthen the Commercial Harbor Craft rule:

1. Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories.
2. Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035.
3. Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions
4. Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation

Let’s keep California on a path towards innovation and clean air.

Sincerely,

Sandy Naranjo
Port Commissioner



Comment Log Display

Below is the comment you selected to display. Comment 3146 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Raquel
Last Name: Sholley
Email Address: raquel.alexis@hotmail.com
Affiliation:

Subject: Save Sportfishing

Comment:

Sportfishing has become a vital source of recreation and a food source for my family and I, and we would hate to see so many small business effected from these law changes. We have needed sportfishing during a time when stress is high and when it is difficult to find fun. Sportfishing has also been a source of positive socializing and engagement with like minded peers and fisherman. Please save sport fishing so that people of all ages and income backgrounds can enjoy it for years to come!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:44:00

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Below is the comment you selected to display. Comment 3147 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ross
Last Name: McDonald
Email Address: rossm@suase.com
Affiliation: Sause Bros.

Subject: Comments on Proposed Amendments to the CHC Regulations

Comment:

We appreciate the opportunity to comment on the Proposed Amendments to the Commercial Harbor Craft Regulation. We are disappointed that CARB has decided to break from years of collaboration with the maritime industry and have completely ignored the comments Sause Bros. and others have submitted. Attached are the Sause Bros. comments.

Attachment: www.arb.ca.gov/lists/com-attach/3569-chc2021-AXJVMIQgAilAY1QL.pdf

Original File Name: Sause Bros CARB Harbor Craft Comments November 15, 2021 .pdf

Date and Time Comment Was Submitted: 2021-11-15 15:43:49

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SAUSE BROS.

3710 N.W. FRONT AVE. • PORTLAND, OREGON 97210
TELEPHONE: (503) 222-1811 • WWW.SAUSE.COM

November 15, 2021

Mr. David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: California Air Resources Board's (CARB) Proposed Regulations for Commercial Harbor Craft in California

Dear Mr. Quiros:

We appreciate the opportunity to comment on the Proposed Amendments to the Commercial Harbor Craft Regulation. We are disappointed that CARB has decided to break from years of collaboration with the maritime industry and have completely ignored the comments Sause Bros. and others have submitted. Sause Bros. has participated in and collaborated with CARB officials and harbor craft reporting regulations since its inception. Sause Bros. has diligently upgraded vessel engines on time, and in many instances ahead of schedule. This success was based on close partnership with CARB. By CARB abandoning this approach, results in an increased risk of creating requirements that do not achieve the desired outcome and potential unintended consequences.

CARB seems to be rejecting input from stakeholders or even ports who have published studies on effective methods of emissions reduction (See: Case Study of the San Pedro Bay Ports' Clean Air Action Plan 2006-2018):

"In the early days of the CAAP's deployment, the SPBP supported end-of-tailpipe technologies (e.g., diesel particulate filters) on existing, in-use diesel engines. These technologies provided immediate emission reductions at relatively low cost, but their benefits could be shortlived, especially if the retrofit equipment were not properly maintained. Over time, the Ports and partners moved toward engine and vehicle replacements with cleaner diesel technologies, which were more expensive investments but also more robust"

Given the time (and opportunity) to actually engage and collaborate with CARB, industry stakeholders and CARB could achieve more sustainable alternatives than what is being implemented in the regulations (including the use of DPF filters).

3147.1

While work shops were held in December 2018 the input that was provide was clearly ignored. CARB chose to hold a workshop to discuss the Draft Proposed Amendments to the Commercial Harbor Craft Regulation on March 16, 2021. The actual Draft Proposed were not released until April 1, 2021. This was completely unacceptable as it provided no time for a thoughtful and thorough review of the proposal allowing for meaningful comments on these extensive regulations. Previously, CARB's projected vessel count increases in the emission inventory did not match the projected increases laid out in the cost benefit analysis. CARB acknowledged the variance between the emission inventory and cost benefit counts, stating that the assumptions in each document now match (as of March 16, 2021). How the corrections were applied, and how this impacts the findings, has not been discussed, therefore no time was given to do a meaningful review to understand the change.

The first time industry was provided with the actual information CARB used to justify this rule was September 21, 2021. Sause Bros. strongly support reducing air emissions for DAC's; however, regulations that come at a high cost warrant scientific data, robust exploration of all options (especially those which are sustainable, and attainable), as well as community and stakeholder involvement and feedback. Less than two months is not enough time to provide meaningful input to these new rules that would help improve them and ensure that they achieved their goal.

Sause Bros. strives to be ahead of the industry standards. That being said, the proposed regulation and deadlines will be impossible to meet. I have below provided our comments and suggestions into sections. Tug Engine Repowers Feasibility and Alternatives, Costs Associated with proposed tug and barge engine repowers, CARB's Proposed Fee Concept, CARB's Vessel Count, and Safety Related Concerns of DPF On Tank Barges.

Tug Engine Repower Feasibility and Alternatives

Sause Bros. owns and operates two types of tugs: ocean-going and harbor/assist tugs. We strongly believe ocean-going vessels should be treated differently than harbor/assist Tugs under the new rules. The Cal Maritime study only examined push tugs and did not consider, examine, or detail how ocean-going tugs could feasibly install DPF units. Before CARB subjects ocean-going tugs to new harbor craft rules and implementation guidelines, Cal Maritime and CARB officials need to study and diagram the engine room of an ocean-going tug. Sause Bros. would be happy to provide an ocean-going tug(s) for CARB and Cal Maritime to study and diagram: Issues outlined below.

1. Push/Assist tugs. Sause Bros. has 4 assist tugs that operate exclusively in SCAQMD's district (Redondo, Cabrillo and Arapaho and Pono). Three of the four Long Beach based assist tugs (Redondo, Cabrillo and Arapaho) could be repowered fairly easily. These three tugs have the engine room space to accommodate Tier 4 engines and DPF's per the Cal Maritime study. Repowering these three tugs is feasible given CARB's proposed timeline. However, the fourth assist tug (Pono) will be highly problematic to repower since it wasn't originally designed to be an assist tug, it is actually an ocean-going tug subject to tonnage requirements with limited engine room space.
2. Ocean-going tugs. Sause Bros. believes ocean-going tugs should be exempt. Ocean-going tugs and barges, spend minimal in California waters spending most of their time far off shore. CARB has arbitrarily chosen to exempt approximately 1,570 commercial fishing vessels based on this same operational characteristic.

3. Tier 4 feasibility study flawed. Sause Bros.' understanding CARB has based the proposed regulations on a Tier 4 feasibility study. Note pp. 95 of the Cal Maritime report stating, "This vessel is used to push a specific barge in inland waters. It is not used for coastal voyages." Sause Bros. ocean-going tugs do not operate on inland waters. Push tugs are vastly different than ocean-going tugs. Push tugs have expansive engine rooms while ocean-going tugs are subject to tonnage requirements with extremely limited engine room space. With the exception of Redondo, Cabrillo and Arapaho the rest of our tugs simply do not have the space to accommodate DPF units. Sause Bros. engineers are currently struggling to fit SCR's into new tug designs. Naval architects and Sause Bros. engineers will be able to detail why DPF's are not feasible for installation on ocean-going tugs. Also, it's highly unlikely we could repower any of our ocean-going tugs as our engine manufacturer, MTU doesn't currently offer a tier 4 option.

3147.2

There is a hindrance with crew and supply boat repowers. Sause Bros. operates 3 crew/ supply vessels (Ford, Hermosa and Ranger) Under CARB's proposed concept, crew boats will not need to be repowered until 2029. No technology currently exists to repower these boats to Tier 4 + DPF standards.

The biggest hurdle the proposed concepts poses for Sause Bros. is the timeline to repower our ocean-going tugs, home ported outside of CA. Even if the engineers and naval architects are able to find a way to fit a DPF unit into these tugs Sause Bros. would be unable to meet the proposed timeline. Under CARB's proposed concept the Chinook, Cochise, Klihyam and Mikiona would all need to have their main engines repowered by 12/31/2024.

It is not easy to replace main engines. It involves months of planning in addition to 3-6 months to repower. One of our vessels is currently having the very smallest of our main engines (12 Cylinder 1800 RPM) removed to be rebuilt. It had to be substantially torn down prior to removal. This requires that Sause Bros. to totally disassemble the factory assembled and bench tested rebuilt engine to then be re-inserted. Without significant deconstruction of the house and vessel we find it cost and time prohibitive to remove and install new equipment only to find that displacement and ancillary equipment on many of the new Tier engines has grown to meet both emission and HP requirements.

3147.3

Costs associated with tug and barge engine repowers-

With regard to modeling and cost analysis Sause Bros. concludes the proposed "tug" costs noted in the Cal Maritime study grossly misrepresents the total costs involved for repowering ocean-going tugs. Conservative figures acutely under estimate the true costs associated with the changes to engines and vessel systems. The lack of suitable replacement vessel equipment with the ability to replace our fleet that meets customers vetting requirements will make taking vessels out of the fleet for retrofit very difficult from both an operations and cost standpoint. Costs vary significantly from vessel to vessel with those requiring significant changes reaching near the cost of a new build figure of 6 million. New tug construction for our ocean-going tugs is almost 3 times the estimated figure at \$16,300,000 (We have built two in the last year so these are very recent and correct figures). Finally, the replacement timeline is extremely aggressive. Sause Bros. recently launched a new tug under CARB's proposed timeline this new tug would be required to undergo major reconstruction to meet even basic Tier 4 requirements in a matter of 7 years after construction which is absolutely unrealistic and unacceptable. This requirement would erode the ability to compete with other transportation options in your area.

3147.4

CARB's Proposed Fee Concept-

We believe any new Harbor Craft rules and regulations need to clarify the difference between PERP and Harbor Craft engines. All of the engines on our barges are currently registered, paid for and inspected

under the PERP program. However, they're also registered, tracked and inspected by Harbor Craft. Numerous Harbor Craft/CARB officials have admitted barge engines aren't portable and shouldn't be subject to PERP regulations. Unfortunately, SCAQMD enforcement officials believe these barge engines should be enrolled in PERP, and subject PERP fees and inspection regulations. Sause Bros. suggests Harbor Craft adopt the PERP fee model. The barge engines, currently enrolled, paid for and inspected should be able to roll over into a Harbor Craft fee structure at the engines next renewal date. Industries with models such as our, should not be subject to **both** Harbor Craft and PERP registration, fee and inspection programs. Further, it is a gross redundancy to re-register and immediately pay a Harbor Craft fee for barge engines currently enrolled and paid for under the PERP program. Harbor Craft could easily use a form similar to PERP's to register and pay for tug engines. Each tug engine would be issued a color coded placard with a Harbor Craft sticker that's valid for 3 years. The PERP model, fee structure and inspection program has proven workable over the years.

3147.5

The per vessel and per main engine proposed fee structure is illogical. A lower fee for a single vessel fleet instead of a multiple vessel fleet just encourages separating out fleets into single vessel operations. Charging more for a low use exemption makes no sense as these engines by definition do not operate frequently in California.

CARB Vessel Count

Fundamental to the proposed regulations is an understanding on behalf of CARB staff that, over one third of subject vessels, as stated in Initial Statement of Reasons, operating in California have not satisfied the reporting requirements of CARB's regulations. This number is arrived at by comparing the number of vessels that report to CARB and vessels that list a California hailing port on their U.S. Coast Guard Certificate of Documentation as of May 2019. This understanding is wrong on several fronts. It does not recognize how hailing port is determined, it includes vessels that are not operating and it does not recognize that many of these vessels have no engines at all. Additionally, while it includes fishing vessels in the count it does not propose in-use requirements for this type of vessel. This misconstruing of the data makes the assumptions on impacts of the emissions from vessels and benefits of the proposed regulations nebulous.

3147.6

While it would be concerning if a significant number of vessels are not meeting the existing CARB reporting requirements, there is no actual evidence that this is actually happening. CARB has had the USCG vessel data since May of 2019 which includes the address for all of these vessels owners that are supposedly not reporting. CARB has done nothing to reach out to the vessel owners to find out why. It is hard to believe CARB is genuine in their concern about under reporting when they have done nothing with the information they currently have to enforce their existing requirements.

Without examples of the purported widespread under reporting the justification for the burdensome Facility Reporting Requirements and Vessel Identifiers and the very justification of the proposal based on Emission Inventory Methodology is all suspect based on the vessel count provided by CARB.

Under U.S. Coast Guard vessel documentation regulations Hailing Port is not closely defined and does not necessarily mean the Port in which the vessel operations. 46 CFR 67.119 Hailing port designation only requires that the owner of a vessel must designate a hailing port to be marked upon the vessel and that the hailing port must be a place in the United States and include the State, territory, or possession in which it is located. Generally, this is the port in which the managing owner of the vessel has their office, or which is nearest to their office; the home port of a vessel. This means the hailing port has more to do with the vessel ownership than where it operates. This is not always consistent and when vessels are

sold the hailing port does not always get updated to reflect this change. Due to the constantly changing operations of vessels, the hailing port is rarely updated just because the vessel starts operating in a different port. Relying on hailing port as a measure provides an inaccurate count of vessel potentially subject to CARB regulations as many of these vessels do not operate in California.

Of the vessels on the U.S. Coast Guard list with a valid COD, 1,069 are Commercial Fishing vessels. These vessels represent nearly 30% of the overall fleet included in the count of vessels that are not reporting to CARB and as vessels that contribute to the overall emission inventory yet they are not being included in the proposed "in-use" requirements. CARB's rationale for excluding Commercial Fishing vessels is based on "the small profit margins in the industry, demonstrated lack of feasibility for Tier 4 repowers and retrofits, competition with out of State and global markets, and tendency to conduct the majority of their operations far from the coast." This is equally applicable to ocean going tug boats and is not justifiable if they represent such a significant part of the overall fleet.

As reported to CARB already, commercial vessels have many unique identifying numbers including the USCG Documentation Number, the International Maritime Organization number, Call Sign Number and Maritime Mobile Service Identify Number. It seems that CARB intends for people on shore to ignore all of these other identifying features and instead look for the 5" high number that was assigned by CARB. This notion reflects how out of touch CARB is with the maritime industry. Instead of creating an entirely new numbering system CARB should develop a methodology that utilizes existing technology and databases of these numbers to create an accurate vessel count. If a unique number needs to be created simply provide the vessel with a certificate it can show to a terminal or inspector as evidence that they are registered.

Safety concerns regarding DPF Installation on Tank Barges -

Sause Bros. has significant concerns on the safety and design perimeters of installing DPF's on oil tank barges. Sause Bros. would like to see CARB more closely examine having DPF's on oil tank barge engines. ABS, USCG, and OCIMF should weigh in on the safety issues prior to rule making.

3147.7

In conclusion, thank you for taking the time to consider our suggestions. Sause Bros. has been working steadily for the last two years to prepare our current class of ocean-going tugs for Tier 4 requirements and expect our next build to meet federal Tier 4 requirements utilizing DEF. Our preferred MFG is utilizing DEF and will not be integrating DPF. In addition, DPF is not a feasible solution for our ocean-going tugs due to limited engine room space and US tonnage requirements. We believe due to the technical inability ocean-going tugs should be exempted from the current proposed requirements for Tier 4+ DPF. That said, we do see the feasibility of meeting these requirements in our harbor/assist tug fleet, though we do not currently know of an engine manufacturer that is factory installing DPF equipment and serious questions about warranty with the addition of aftermarket DPF technology remains in both over and under 600KW engines.

Respectfully,



Ross McDonald

Director Safety, Quality, Environment & Security
Sause Bros.



Comment Log Display

Below is the comment you selected to display. Comment 3148 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alfredo
Last Name: Campos
Email Address: Freddieno_1@hotmail.com
Affiliation: Ingrid Computers

Subject: Please dont ruin sportfishing

Comment:

174 companies will be devastated, please fellow democrat dont do this to the working class you slime haired leftist sellout.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:47:16

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Below is the comment you selected to display. Comment 3149 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Corbin
Last Name: Hames
Email Address: Corbin_hames@yahoo.com
Affiliation:

Subject: New regulations for boating engines

Comment:

The people of California as well as businesses have suffered great losses through this pandemic and creating and enforcing new regulations will take sport fishing and whale watching over the brink. With so few outlets for adults but more importantly our youth, this would be one more positive activity for our young adults to engage in during a time where Many lack positive outlets to keep them from drugs and violence. Please reconsider this proposal which is not only currently unreasonable, but currently impossible with current technology available

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:44:46

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Below is the comment you selected to display. Comment 3150 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Corbin
Last Name: Hames
Email Address: Corbin_hames@yahoo.com
Affiliation:

Subject: New regulations for boating engines

Comment:

The people of California as well as businesses have suffered great losses through this pandemic and creating and enforcing new regulations will take sport fishing and whale watching over the brink. With so few outlets for adults but more importantly our youth, this would be one more positive activity for our young adults to engage in during a time where Many lack positive outlets to keep them from drugs and violence. Please reconsider this proposal which is not only currently unreasonable, but currently impossible with current technology available

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:44:46

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Below is the comment you selected to display. Comment 3151 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: John
Last Name: Lopez
Email Address: johnlopez8801@gmail.com
Affiliation:

Subject: Party boats/ 6 Pack boats

Comment:

I am very familiar with CARB as in my last job had to report compliance for container port terminals. All of us want clean air to breathe. I want to make sure my grandchildren and their grand children have clean air.

Unless the government is going to be fair across the board for any commercial vessel I urge your agency not single out Commercial passenger fishing vessels.

Cargo ships burn bunker oil once they are out of state waters and this foul toxic smokes reach our shores. Commercial fishing vessels currently are exempted from this measure.

The reality is that all California tax payers should bear some of the costs for changing engine requirements. Not just single out fishermen and women that will directly pay higher trip costs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:37:23

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Below is the comment you selected to display. Comment 3152 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Steven
Last Name: Brink
Email Address: steveb@calforests.org
Affiliation: California Forestry Association

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Comments from California Forestry Association attached

Attachment: www.arb.ca.gov/lists/com-attach/3574-chc2021-U2FUY1ZmAGJVYgQw.docx

Original File Name: 211114_comments_on_the CARB amendments_to the Commercial Harbor Craft Rule_FINAL.docx

Date and Time Comment Was Submitted: 2021-11-15 15:49:52

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1215 K Street, Suite 1830
Sacramento, CA 95814
916.444.6592

November 15, 2021

Clerk of the Board
California Air Resources Board
1001 I Street,
Sacramento, California 95814

RE: Proposed Amendments to the Commercial Harbor Craft Rule

Comments submitted electronically to:

To the California Air Resources Board:

These comments are from the California Forestry Association and are only addressing the Commercial Harbor Craft use in Humboldt Bay.

California Forestry Association is a trade association whose membership includes California sawmills, veneer mills, several biomass powerplants, and private industrial forest landowners. Transportation of forest products, including logs and chips is a major component of California's forestry industry.

Information from the Proposed Rule

According to the California Air Resources Board (CARB) as of 2021, there are 229 towing vessels statewide in three subcategories: escort/ship assist tugs, push/tow tugs, and articulated tug barges. There are 2 inventoried towing vessels at Humboldt Bay.

The Air Resources Board (ARB) states the regulation is necessary to reduce emissions of diesel PM and NOx that cause adverse health effects for Californians. The ARB exposure study was done at the Ports of Los

Angeles and Long Beach and found harbor craft to be the third highest source of diesel PM emissions contributing to the cancer risk from port activity.

CARB used Port Emissions Inventory Data from Port of Los Angeles, Port of Long Beach, and Port of Oakland.

CARB has reporting data from the Bay Area Bulk Terminal, Concord Naval Weapons Station, LA Berth 240, Port of Hueneme, Port of Redwood City, Port of Richmond, Port of Sacramento, Port of San Diego, Port of San Francisco, and Port of Stockton.

Note, CARB is not using data from the Port of Humboldt Bay.

Proposed Rule Amendment Requirements

Under the Proposed Amendments, towing vessels operating in Regulated California Waters would be subject to:

- use of Tier 4 engines equipped with diesel particulate filters (DPF).
- if engines are rated below 600 kilowatts (kW) and Tier 4 engines are not available in required power subcategories, Tier 3 engines equipped with DPFs.

Excerpts from Proposed Rule Compliance Exceptions and Extensions

- With full compliance extensions, compliance dates for towing vessels would phase in between **2029 and 2034**.
- Vessels operating under low-hour use thresholds (80 hours annually for a dredge, and 300 hours annually for all other commercial harbor craft) within 24 nautical miles of the coast do not have to repower or retrofit their vessels.

- If compliance requires vessel replacement, towing vessel owners can receive up to six years of compliance extensions or 2034, whichever is earlier, if they can demonstrate financial difficulty.

The Proposed Rule Schedule

The Proposed Amendments are scheduled for initial Board consideration December 9, 2021, final consideration in early 2022, and would take effect beginning in 2023.

Situation at Humboldt Bay

According to the CARB fact sheet, there are 2 towing vessels on the North Coast; there are 6 commercial sportfishing vessels on the North Coast.

Air Quality is in **Attainment** in the Eureka area (Humboldt Bay).

There is no apparent reason to require private owners to make major investments for 6 commercial sportfishing vessels and 2 tugboats. There is also a dredge used annually in Humboldt Bay that may not be able to stay under the low use limit.

There are usually only 5-6 freighters that use the Port at Humboldt Bay annually.

There's no data to indicate that the Port of Humboldt Bay should be administered the same as the Port of Long Beach or Los Angeles or any other major California Port under this proposed Rule.

Recommendation:

Humboldt Bay should be exempt from the Commercial Harbor Craft Rule.



1215 K Street, Suite 1830
Sacramento, CA 95814
916.444.6592

Closing

Thank you for the opportunity to comment. Direct any questions to Steve Brink.

Sincerely,

STEVEN A. BRINK
Vice President – Public Resources
steveb@calforests.org
916-208-2425



Comment Log Display

**Below is the comment you selected to display.
Comment 3153 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Julio
Last Name: Chang
Email Address: Changjulio09@gmail.com
Affiliation:

Subject: Do not harm sport fishing!!!

Comment:

Do not harm sport fishing in California!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:51:58

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Below is the comment you selected to display. Comment 3154 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jerry
Last Name: Chang
Email Address: jerrycch3310@yahoo.com
Affiliation:

Subject: Please stop the travesty

Comment:

Please stop restricting the public's right to access fishable waters. The regulations being proposed and those that have already been enacted are gross failures to accurately protect the environment. Moreover, they fail to address the true problems that we face and neglect the science behind what the fishermen have been saying.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:58:24

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Below is the comment you selected to display. Comment 3155 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brent
Last Name: Perry
Email Address: bperry@shift-cleanenergy.com
Affiliation:

Subject: harbour craft
Comment:
letter is attached

Attachment: www.arb.ca.gov/lists/com-attach/3577-chc2021-UjEAZ1hAjMBWFA8.pdf

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2021-11-15 15:59:33

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7/30/21

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814
Via Electronic submittal
Evan.Kersnar@arb.ca.gov

RE: CARB's Commercial Harbor Craft Rule

Dear Chair Randolph,

We urge CARB to require 100% zero-emissions deadline for all vessel segments of the Commercial Harbor Craft Rule.

Since 2009, PlanB has been leading the way in how battery technology is used on board ships to reduce emissions. We have extensive experience with installing battery powered systems in marine vessels globally.

The electrification for marine vessels has now been considered as a proven technology contributing to a decarbonized sustainable maritime sector. We are witnessing a fast-evolving climate friendly global technological shift that requires more integrated approaches entailing alternative fuels, wind and solar energy, renewable hydrogen, fuel-cell technologies, zero emission dockyards and many more to overcome the evidence based expected ecological catastrophe.

We supply batteries for various types of workboats, ranging from small harbour vessels to larger workboats of various kinds, enabling energy optimization and zero-emissions operations. Some examples of our work includes:

- The Tycho Brahe is a fully electric passenger ferry. It measures 238 meters (780 ft) and weighs 8,414 tonnes. Along with its sister ship, [the electric Aurora](#), it operates on a 4 km ferry route between Helsingborg (Sweden) and Helsingör (Denmark). The massive ships carry 7.4 million passengers and 1.9 million vehicles annually. Completed in 2017
- [Gloppefjord and Eidsfjord fully battery-operated ferries](#), which operate on the Anda-Lote route Nordfjord on the west coast of Norway, mark another milestone in the road towards zero emission in ferry operation in Norway. Total battery capacity onboard each ferry is two 520kWh PlanB batteries with Siemens as the electric integrator. Each ferry has two 500 eKW Scania DI16 90M generators for back-up and emergency operators. Among the ferries unique selling points is that they will only need to stop for nine minutes for battery charging in ports. Completed in 2018.



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- [The Elektra](#) is a 100% Electric Vessel. This double-ended ferry has paved the way for a new type of ship, the hybrid/electric ro-ro. Finnish state-owned ferry operator FinFerries is only the second operator in the world to build such a vessel but remains the first of its kind to recharge its batteries at each end directly from the domestic power grid; Norwegian Ampere was the first however it draws its power from banks of batteries at each terminal. In June 2017, the Elektra began regular operation between Nauvo and Parainen in the Turku archipelago. Designed to be a 24/7 workhorse, it travels this route every 15 minutes during peak hours and once an overovernight. She operates with a 1060kWh battery pack on a 5 minute turn time.
- [The Elfrida electric boat](#), the world's first electrically powered ship for fish farming, is in operation off the coast of Central Norway. The work boat is used to transport feed and equipment, to repair or relocate fish cages, check anchorages, and make inspections. It requires around 50 minutes for its daily trip to the fish hatchery, which lies 12km off the coast. During the normal working day of about eight hours the ship is powered by 100% battery power. System Specifications: The system is made up of 24 6.5kWh Power batteries for a total of 156kWh. Completed in 2016.

We appreciate the hard work that CARB staff have done on the proposal. However, the draft rule as written is short-sighted. The rule does not reduce greenhouse gas emissions and risks creating a stranded asset scenario for harbor craft owners who may pay to retrofit to Tier 3 and 4 engines only to be forced to make a full zero-emission transition in quickly proceeding years later.

The world is undergoing a period of significant change unlike anything in human history. All of us must work together to reduce fossil fuel emissions. **For the marine sector, a strong but achievable standard would be that all harbor craft operating in the state must be zero emission by 2035.** What we need now to drive uptake are strong market accelerating policies, including incentives and funding mechanisms.

We would be happy to discuss our technology further with you. We believe we can support a **fully zero emission solution** that can be implemented before 2035.

Sincerely,

Brent Perry
CEO Shift Clean Energy

cc:
CARB Board members
Secretary Jared Blumenfeld, CalEPA

Comment Log Display

Below is the comment you selected to display. Comment 3156 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Suzanne
Last Name: Hume
Email Address: S@CleanEarth4Kids.org
Affiliation: CleanEarth4Kids.org

Subject: 100% zero-emissions for all harbor craft.

Comment:

CleanEarth4Kids.org is for 100% zero-emissions for all harbor craft.

Ships are one of the worst air polluters in California and toxic exhaust from harbor craft are a major cancer risk for those living near the ports of Los Angeles, Long Beach, San Diego and Oakland. This is about racial, social, climate and environmental justice as disadvantaged communities and communities of color suffer the most from harbor pollution.

3156.1

California must take steps to stop the use of diesel and other fossil fuels. We have the technology to move commercial harbor craft to 100% zero-emission right now.

We ask CARB to strengthen the Commercial Harbor Craft rule:

Require a 100% zero-emissions transition for all harbor craft by 2035, including tugboats and barges

Revisit the rule regularly to maximize emission reductions as new technology and innovations are developed

3156.2

Increase funding for zero-emissions replacements and retrofits

3156.3

A strong zero-emission harbor craft rule is estimated to save \$5.25 billion a year in health costs which is 2.5x more than the cost of implementation. Air pollution is linked to asthma, decreased lung function, heart disease, cancer, neurological issues like alzheimers and parkinsons along with other serious health problems.

Please take strong action to protect our air and stop the use of diesel and other fossil fuels in our ports and harbors.

Thank you.

Sincerely,

Suzanne M. Hume
CleanEarth4Kids.org

Attachment: www.arb.ca.gov/lists/com-attach/3578-chc2021-VjVXMF0uADEGXwFp.pdf

Original File Name: CARB Harbor Craft Comment Nov 15.pdf

Date and Time Comment Was Submitted: 2021-11-15 16:05:20

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Nov 15, 2021

Dear California Air Resource Board,

CleanEarth4Kids.org is for 100% zero-emissions for all harbor craft.

Ships are one of the worst air polluters in California and toxic exhaust from harbor craft are a major cancer risk for those living near the ports of Los Angeles, Long Beach, San Diego and Oakland. This is about racial, social, climate and environmental justice as disadvantaged communities and communities of color suffer the most from harbor pollution.

California must take steps to stop the use of diesel and other fossil fuels. We have the technology to move commercial harbor craft to 100% zero-emission right now.

We ask CARB to strengthen the Commercial Harbor Craft rule:

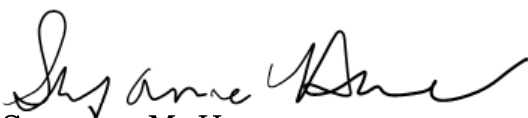
1. Require a 100% zero-emissions transition for all harbor craft by 2035, including tugboats and barges
2. Revisit the rule regularly to maximize emission reductions as new technology and innovations are developed
3. Increase funding for zero-emissions replacements and retrofits

A strong zero-emission harbor craft rule is estimated to save \$5.25 billion a year in health costs which is 2.5x more than the cost of implementation. Air pollution is linked to asthma, decreased lung function, heart disease, cancer, neurological issues like alzheimers and parkinsons along with other serious health problems.

Please take strong action to protect our air and stop the use of diesel and other fossil fuels in our ports and harbors.

Thank you.

Sincerely,



Suzanne M. Hume

S@CleanEarth4Kids.org

(760) 650-2166

CleanEarth4Kids.org

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Below is the comment you selected to display. Comment 3157 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Yang Yang
Last Name: Zhang
Email Address: yyzhang@ucsd.edu
Affiliation:

Subject: Save Sportfishing Industry

Comment:

The sportfishing industry is under dire threat of dissolving if this measure is affirmed. Thousands of hardworking Americans will lose their livelihoods. I was introduced to this hobby by my father and still hold many fond memories of fishing with him dear to my heart. It will be a great miscarriage of justice and equality should these unidirectional regulations and requirements go into effect. The massive polluters are not the sportfishing industry, but other bad actors. I think the air resource board should focus on old junkers in the road, cargo shipping backlog, and clean energy generation during nighttime rather than come after the sportfishing industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:09:50

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First Name: R.A.
Last Name: Carpenter
Email Address: restaite@restaite.net
Affiliation: R.E. Staite Engineering, Inc.

Subject: Public Comments - Proposed Amendments to the Commercial Harbor Craft Regulation
Comment:

Please see the attached comments regarding the Proposed Amendments to the Commercial Harbor Craft Regulations from R.E. Staite Engineering, Inc.

Attachment: www.arb.ca.gov/lists/com-attach/3580-chc2021-AnJSIQBjAD8LZAVm.pdf

Original File Name: Public Comments Commercial Harbor Craft 11-15-21.Final.pdf

Date and Time Comment Was Submitted: 2021-11-15 15:48:51

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R. E. STAITE ENGINEERING INC.

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November 15, 2021

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Attn: Ms. Liane Randolph, Chair, California Air Resources Board

RE: Public Comments

Subject: Proposed Amendments to the Regulation to Reduce Emissions from Diesel Engines on Commercial Harbor Craft Operated within California Waters and 24 Nautical Miles of the California Baseline

Dear Chairperson Randolph:

R.E. Staite Engineering, Inc. (RES) has reviewed the materials included with the Proposed Amendments to the Regulation to Reduce Emissions from Diesel Engines on Commercial Harbor Craft (CHC) Operated within California Waters and 24 Nautical Miles of the California Baseline that the California Air Resources Board (CARB) is considering on November 19, 2021. R.E. Staite Engineering, Inc. is strongly opposed to the Proposed Amendments to the Commercial Harbor Craft (CHC) Regulations. RES requests that the Board deny the CHC Proposed Amendments. Governor Newsom's Executive Order N-79-20 directed CARB and other State agencies to transition off-road vehicles and equipment to 100 percent zero-emission by 2035 where feasible and cost effective. **The CHC Proposed Amendments are not feasible, nor cost effective.**

If the CHC Proposed Amendments (dated September 21, 2021) are not denied, we request that CARB suspend the suspend the rulemaking and address the following items in order to comply with the direction of Executive Order N-79-20:

1. Allow Reasonable Time For Upgrades
2. Provide Flexibility In Grant Application Requirements
3. Implement Incentive Based Compliance (Fleet Averaging / Best Available Control Technology (BACT))
4. Include a Small Business Phasing Plan

R.E. Staite Engineering, Inc. has participated in the review of the amendment process, provided information to CARB staff and has made reasonable suggestions for change. The Proposed Amendments will have a devastating impact on our company; R.E. Staite Engineering, Inc. will likely go out of business. **As a small business, we do not feel heard or understood.** Our suggestions have not been incorporated into the draft proposals, our company data has not been used in a way that we understand, and we have serious concerns about a majority of the data and assumptions used for parts of the analysis. The Proposed Amendments require unrealistic

3158.1

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goals in the timeframe provided. For clarity, we have divided our response into four sections: I. Introduction/Background, II. Concerns, III. Solutions and IV. Conclusions. Appendix A has been provided with more detailed information that is referenced in our letter.

I. INTRODUCTION/BACKGROUND

The review process for the Proposed Amendments was initiated at the beginning of the pandemic in March 2020. Many, if not all of the companies affected by the CHC Proposed Amendments were struggling to keep their doors open and employees working. In companies across the marine sector, all hands were on deck and devoted to keeping crews safe and making adjustments to the workplace. To date, the pandemic is still an issue in California. Business is not “back to normal” yet. The fact that the CARB Board is not meeting in person is just one example of that.

As an industry we have tried diligently to gather information, meet with CARB Staff and elected officials to explain our situation and ultimately try to decide what the potential impact the Proposed Amendment will have on our businesses. The majority of us that are impacted by the regulations are not scientists, economists or health professionals. We are contractors, fishermen and maritime service providers. The majority of us do not have lobbyists or lawyers to spend time on the analysis and data review. Most of us have spent a considerable amount of time just trying to understand what is being proposed and how it affects our fleets, making sure that we are heard and understood, and that regulations can be implemented in a reasonable manner that allow us to both protect the health of Californians and stay in business.

A. OUR COMPANY

R.E. Staite Engineering, Inc. (RES) is a small, family owned, marine construction business that has been in business for over 80 years, since 1938. RES is headquartered in San Diego. Our office, yard and wharf are within the designated SB 535 Disadvantaged Communities and AB 1550 Low-Income Communities of Barrio Logan. RES works in San Diego, and along the west coast, with our fleet homeported in San Diego.

RES is a recognized and respected dredger and heavy marine construction contractor within the industry. Our company has 50 employees or less for the majority of the year. RES specializes in projects for government agencies with an emphasis on dredging and pier/wharf infrastructure construction and repairs. The majority of our work falls under the construction and maintenance of essential infrastructure, which includes public works construction. R.E. Staite is self certified as a small business enterprise in the Federal System for Award Management (SAM) for a variety of NAICS codes. It is important to note that in order to maintain the designation, as a small business dredging contractor, our income must be \$30M or less (over a three year average).

R.E. Staite’s marine equipment includes tug boats, derrick barges, crane barges, flat deck barges with 50 to 450 ton crawler cranes, dump scows, support barges, Flexi-Float barge units and work boats. RES also maintains equipment for land-based construction that includes long reach excavators, cranes, forklifts and other ancillary equipment. It is a diverse spread of equipment that is subject to several CARB programs/regulations including Commercial Harbor Craft (CHC), In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation/DOORS), and the Portable Equipment Registration Program (PERP). All of these programs have different regulations, fees and tracking systems. RES has up-tiered 27 marine engines since the original

CHC regulations were implemented. Most of the engines have been up-tiered at our own expense. The majority of the engines in our fleet are Tier 2, 3 and 4.

As a small business contractor, RES has two current Multiple Award Construction Contracts (MACC) with the Navy, the first contract is the Indefinite Delivery Indefinite Quantity (IDIQ) Multiple Award Construction Contract (MACC) For New Construction, Repair, And Renovation of Waterfront Facilities at Various Government Installations Located In California, Arizona, Nevada, Utah, Colorado, and New Mexico; RES is one of eight marine contractors in this MACC. The second contract is the Waterfront Multiple Award Contract (WF MACC) for Naval Facilities Engineering Command (NAVFAC) Northwest Area of Responsibility; RES is one of eight marine contractors in this MACC. These contracts are multi-award, multi-year contracts for new construction, repair and maintenance of Naval infrastructure. Between the two contracts work can occur along the west coast between the borders of Mexico and Canada and stretch into the interior states. As part of our obligation, we identified equipment that was ready and available. The CHC Proposed Amendments put us in jeopardy of not having equipment available to fulfill our potential contracts.

II. OUR CONCERNS

We are concerned that the CHC Proposed Amendments are not feasible or cost effective in meeting the goals and values established by Executive Order N-79-20. R.E. Staite Engineering, Inc. has identified issues with safety, data validation, health, feasibility, environmental, financial and small business in the supporting documents that have been provided along with the Proposed Regulations. RES has summarized our concerns below and have provided examples of specific issues attached in Appendix A.

- A. **Safety** - It has not been demonstrated to the industry that the new technology is safe in the proposed applications, therefore, **the CHC Proposed Amendments as drafted are not feasible or cost effective.** 3158.2
- B. **Data Validation** -The data provided to justify the Proposed Amendments may be faulty and is not representative of the industry making **the CHC Proposed Amendments as drafted not feasible or cost effective.** 3158.3
- C. **Health** - Without an accurate count of vessels and a solid understanding of how emissions are generated at each port, the impacts on health cannot be quantified, thus, **the CHC Proposed Amendments as drafted are not feasible or cost effective.** 3158.4
- D. **Feasibility**- There is not a “one-size fits all” solution to CHC emission reduction. Because the technology required does not exist and the costs cannot be quantified in a manner that allows companies to plan for the impacts, **the CHC Proposed Amendments as drafted are not feasible or cost effective.** 3158.5
- E. **Environmental** -The conclusion that the environmental impacts could be “Less Than Significant or Potentially Significant and Unavoidable” is not acceptable. There is not enough verifiable information in order to approve the Draft Environmental Analysis (EA). The Draft EA should be denied and as such, **the CHC Proposed Amendments as drafted are not feasible or cost effective.** 3158.6

F. **Financial** -The costs of implementation are impractical without significant assistance in the form of grants and other funding relief in order to meet the timeline goals of the Executive Order N-79-20. For this reason, **the CHC Proposed Amendments as drafted are neither feasible or cost effective.** 3158.7

G. **Small Business** - The impacts on small business are unacceptable. The only way for a small company to survive is to pass the upgrade costs on to future clients. If a small business cannot do that in a reasonable manner they will go out of business. A plan that does not make accommodations for small business is not a working plan for California, and **the CHC Proposed Amendments as drafted are not feasible or cost effective.** 3158.8

For reasons related to safety, data validation, health, feasibility, environmental, financial and small business, the CHC Proposed Amendments should not be implemented as drafted and are NOT FEASIBLE OR COST EFFECTIVE.

III. SOLUTIONS

A. **ADDITIONAL TIME FOR UPGRADES**

Our most pressing concern with the Proposed Amendments is that there is not enough time or funding available and dedicated to have all of our engines up-tiered to Tier 3 or 4 plus a diesel particulate filter (DPF) by the proposed compliance dates. The compliance dates are unattainable and unrealistic for our small business. 3158.9

The marine industry, and R.E. Staite in particular, have made significant good faith investments in upgrading vessels to meet the current CHC regulations. Since the initial CHC regulations were adopted in 2008, the industry has had time to plan for improvements, industry has had technology that was known and available for installation, and industry was told that once the changes were made that we would be in compliance, allowing the industry to amortize the upgraded equipment over a longer period of time. Even with time and technology on our side, it has not been an easy task. We have replaced 27 of our engines, most at our own expense. Our equipment has been repowered with the majority of our engines upgraded to Tier 2 and Tier 3. We have some Tier 4 engines and also some engines that are registered as low use. To comply with the CHC Proposed Amendments means starting over with repowering our fleet. In order to repower our fleet we will need time to:

- Research Equipment Options
- Perform Marine Architecture Studies
- Schedule Vessels for Dry Dock
- Plan for Funding / Obtain Loans
- Apply for Grants
- Plan for Work and Equipment Availability

Repowering a marine engine is not a small task All of the tasks identified above are substantial and will take time to complete before an engine can be repowered and be back in service. Compliance with Executive Order N-79-20 is NOT FEASIBLE AND NOT COST EFFECTIVE.

B. GRANT FLEXIBILITY

The reference materials and Standardized Regulatory Impact Assessment (SRIA) all note that grant funding is available, but based on the criteria for grant eligibility, R.E. Staite may not be able to take advantage of the funding, leaving a large amount that must be self-financed. It should be noted that most grants also require that projects be funded up front by the Owner and then reimbursed when the project has concluded.

3158.10

We appreciate the opportunity for funding to offset some of the costs we will incur. If there is a way to allow CARB Staff more discretion to approve requests for waivers/variances when there is a benefit to the public (improved emissions), it may allow for more projects to be completed in an accelerated fashion without actually changing the grant criteria or programs.

R.E. Staite Engineering, Inc. strongly supports the recommendations suggested by the San Luis Obispo County Air Pollution Control District Board (letter from SLO APCD dated October 5, 2021) in order to promote more meaningful grant opportunities:

“For the vessels with new regulatory replacement schedules where engine replacement is feasible, we have the following regulatory recommendations:

- 1. Add compliance flexibility to the CHC Regulation for coastal areas that are in federal attainment for ambient air quality standards, similar to the flexibilities provided in the CARB “In-use On-road and Off-road” Regulations.*
- 2. Any new replacement compliance dates should be set at least eight years from the effective date of the regulation, and not sooner than December 31, 2030, so air districts can provide meaningful grant funding for vessels with new regulatory schedules;*
- 3. The replacement schedules should factor in time needed for engine manufacturers to complete the development and deployment of additional Tier 4 engines and DPFs, and the certification of these new technologies by CARB, the U.S. Coast Guard, and if necessary, Cal OSHA; and*
- 4. The replacement schedules should allow flexibility for possible delays in Tier 4 and DPF deployment due to delays in production, certification, or industry limitations in repower specialists. “*

In addition to the suggestions above, R.E. Staite would also encourage the ability to “grant stack” – being able to add several funding sources together in order to create a larger funding source for the more costly upgrades in our fleet. As the grant packages stand, it is difficult to piece together enough money to do one engine, let alone a whole fleet.

Based on the number of vessels that have to be repowered or purchased, reducing the matching fees a company would have to contribute would also get more vessels upgraded and in compliance in a faster timeframe. Some grant programs allow Government funding of 100%. Allowing 100% funding for the private industry as an incentive for targeted projects or targeted areas, such as Disadvantaged Communities (DACs) would put the focus on problem areas and assist with swifter implementation.

C. IMPLEMENT INCENTIVE BASED COMPLIANCE (FLEET AVERAGING / BEST AVAILABLE CONTROL TECHNOLOGY (BACT))

The compliance tables in the CHC Proposed Amendments require that engines be replaced based on their model year. This does not give a company any discretion, other than using a low

use waiver, to decide when equipment should be upgraded or taken out of the fleet for improvements. In our case, just based on model years, we will have two of our largest tug boats, the workhorses of our fleet, needing to be dry-docked the same year. Basing upgrades on engine model years does not afford an Owner any control over his assets or his ability to use his owned equipment as an advantage when bidding projects. RES is located within a Disadvantaged Community (DAC), which further penalizes our company by slashing low use hours by half of other vessels in other parts of the state. An incentive-based compliance system would be welcome.

3158.11

D. CARB Off-Road Diesel Program (DOORS)

CARB has another program that has a similar goal of removing the dirtiest engines out of circulation under its Off-Road Diesel program. The Off-Road Diesel program uses a method called fleet averaging and Best Available Control Technology (BACT). The DOORS program (the name of the Off-Road compliance program) allows companies to meet a fleet average each year. If they are not able to do that, they are responsible for meeting a Best Available Control Technology (BACT) target. The average and the target are reduced each year until the goal is met at the end of the compliance period. The fleet averaging/BACT allows a company to strategically phase their replacements so that if you need to keep an older engine running, you can, BUT, but you may have to make other choices about vessel upgrades to offset that choice, such as upgrading another (or several) vessels to Tier 4 technology, or perhaps retiring a vessel so that you meet your average or target each year. BACT credits are awarded for early compliance and those credits can also be used to phase in the other vessels. This program has different target dates for large, medium and small companies, so that the less horsepower a company has, the longer the compliance period, acknowledging that different sized companies have different thresholds for sustainability. The result of using fleet averaging/BACT is the same as using a compliance table, but in a way that allows a company more control over how it is accomplished.

E. SMALL BUSINESS PHASING

The proposed regulations make no concessions for a small business to remain competitive with the larger companies. In fact, the way the compliance is set up, the small businesses will likely be the first to go out of business. As suggested Section III-D above, allowing for a small / medium / large category for business size based on total CHC horsepower along with the fleet averaging / BACT compliance methods would allow for small businesses to upgrade to cleaner technology while still remaining competitive.

IV. CONCLUSION

R.E. Staite Engineering, Inc. has been an engaged partner in the review of the Proposed Amendments to the current CHC regulations. We have provided information about our company, identified our concerns and have proposed reasonable solutions. As an important company in the construction, repair and maintenance of marine infrastructure and waterways, we expect to be heard and our solutions considered. We are a small company trying to survive and evolve with change. We ask that we be treated with consideration and respect and that the Board and Staff engage with us to come to a more workable solution than the one this has been proposed. That includes:

1. Allowing Reasonable Time For Upgrades
2. Providing Flexibility In Grant Application Requirements
3. Implementing Incentive Based Compliance (Fleet Averaging / Best Available Control Technology (BACT))

4. Including a Small Business Phasing Plan

Many representatives in our industry have participated in the review process as well. R.E. Staite Engineering, Inc. fully supports the statements and requests submitted by other companies and representatives of our industry specifically The American Waterways Operators (AWO), the Pacific Merchant Shipping Association (PMSA), the Sportfishing Association of California (SAC), the Truck and Engine Manufacturers Association, the San Diego Port Tenants Association as well as other industry representatives.

If the items identified by our company and others noted above are not considered and implemented, it is more than likely that our small maritime business will not be able to comply with the Proposed Amendments to the CHC regulations and will be forced out of the marine construction industry.

If there is other information that would be helpful to you to further understand our situation and our company, please let us know how we can help. I can be reached at rayc@restaite.net or via phone at 619/233-0178.

Thank you for your consideration.

Sincerely,

R.E. STAITE ENGINEERING, INC.



R.A. Carpenter
President



Kristin Joseph
Estimating/Special Projects

Attachments:
Appendix A – Detailed List of Concerns

APPENDIX A – DETAILED LIST OF CONCERNS

<p>A. Safety It has not been demonstrated to the industry that the new technology is safe used in the proposed applications, therefore, the CHC Proposed Amendments as drafted are not feasible or cost effective.</p>		
<p><i>Is the Proposed Technology Safe?</i></p>	<p>Safety is our #1 concern. Heavy marine construction is inherently dangerous. We have been tracking many of the issues manufacturers have been having with their Tier 4 marine equipment. We understand that there has been some communication with the Coast Guard related to the safety issues of the proposed technology. Before a regulation is approved, it is important that the safety concerns be shared with all stakeholders. Allowing more time for implementation allows more time for safety trials and testing. The middle of the ocean is a dangerous place for a mishap, and anything our company can do to send our crews out with every safety advantage ahead of time is our goal. Allowing more time for safety is a must.</p>	3158.12
<p><i>Opacity Testing</i></p>	<p>We have concerns about the requirements and costs for opacity testing. Our tug boats are specially tuned for performance to provide the power, maneuverability, and braking necessary to operate safely while maneuvering heavy loads, towing equipment or operating in tight quarters. We agree with the American Waterways Operators conclusion that “Tuning the engine to minimize smoke during the transitional phase could compromise engine integrity when the operator needs maximum responsiveness to ensure safe operation.”</p>	3158.13
<p>B. Data Validation The data provided to justify the Proposed Amendments may be faulty and is not representative of the industry, making the CHC Proposed Amendments as drafted not feasible or cost effective.</p>		
<p><i>Number of Vessels</i></p>	<p>The number of CHC vessels has been a point of contention with the maritime industry since the Proposed Amendment was introduced. Appendix H, 2021 Update to the Emission Inventory for Commercial Harbor Craft: Methodology and Results details how CARB Staff determined their numbers, but does not address the numerous questions from the industry about possible discrepancies. The number of vessels is the basis for many of the studies and conclusions, particularly about health and environmental impacts. Until the number of vessels can be verified, the conclusions drawn in the Standardized Regulatory Impact Assessment (SRIA), Draft Environmental Analysis (EA) and the Staff Report: Initial Statement of Reasons (ISOR) regarding health outcomes may not be valid.</p>	3158.14

<p><i>Major Cost Inputs</i></p>	<p>R.E. Staite provided CARB Staff with proprietary data about the costs to upgrade our vessels to Tier 4 + DPF technology. We shared our rough order of magnitude information with the CARB Staff in one letter and an e-mail (October 30, 2020 and December 18, 2020), as well as what we thought an estimated loan would cost us if we had to obtain one for vessel upgrades. This information was incorporated into the Standardized Regulatory Impact Assessment (SRIA), Appendix A, Table II-A: Major Cost Inputs by CHC Category. It should be noted that our data was referenced on 17 pages of the SRIA and along with the California Maritime Academy (CMA) study and the Sause Bros (tug category), as a primary source of data for the major cost input for the following vessel categories: Push/Tow Tug category, the Dredge category, Other Barge category and Workboat category.</p> <p>We clearly stated that since we did not have any cost information or data for DPF, that the numbers were estimated and were rough order of magnitude. None of our notes regarding the numbers being estimates and rough order of magnitude numbers are noted in the document. It is inconceivable that such a small data set was allowed to be representative of these major vessel categories. Reviewing all the categories there appears to be very little industry participation. Since there is not adequate industry data provided in the study, the results are not representative of the true costs of the CHC Proposed Amendments.</p>	<p>3158.15</p>
<p><i>DPF Data</i></p>	<p>We question the numbers and the methods used to arrive at the Major Cost Inputs by Category in the SRIA. The data we provided included an estimate for a marine Tier 4 engine plus DPF. CARB staff deconstructed that estimate and arrived at a separate cost for the engine and a separate cost for the DPF. We communicated that it was highly unlikely that a company that had to upgrade an engine to a Tier 4 + DPF would upgrade the engine, then add the DPF in a separate transaction, but that is what the numbers seem to imply. The regulations should remain as is until there is actual technology and actual costs to attribute to the required changes.</p>	<p>3158.16</p>
<p><i>Replacement Costs</i></p>	<p>For the Push/Tow Tug category, the SRIA suggests that \$440/hp is adequate for replacement costs. For 3301 hp, that would equate to \$1,452,440 for the purchase of a push/tow tug replacement vessel. It would be enough to cover the replacement of a <u>used</u> tug with Tier 1 engines, but not even close to the \$8M - \$10M a new small tug (60' or less) might cost, not to mention the time to build the new tug and the lost revenue waiting for the replacement. We question the results of the analysis in the SRIA as they relate to replacement costs. A larger tug may cost \$15M - \$18M to purchase new. The replacement costs need to be reviewed again with more industry input.</p>	<p>3158.17</p>

<p>C. Health Without an accurate count of vessels and a solid understanding of how emissions are generated at each port, the impacts on health cannot be quantified, thus, the Proposed Amendment as drafted is not feasible or cost effective.</p>		
<p><i>Verification of Vessel Data</i></p>	<p>The verification of the vessel data as mentioned above is critical in estimating health benefits or declines from CHC emissions.</p>	<p>3158.18</p>
<p><i>Comprehensive Emissions/</i></p>	<p>To our knowledge, there is not a comprehensive health study that specifically identifies CHC emissions as the highest source of pollutants that impact health. In San Diego in particular, there are a variety of pollution sources such as the</p>	<p>3158.19</p>

<p><i>Health Study</i></p>	<p>Highway 5 freeway and car and truck traffic that run through the neighborhoods adjacent to the Port that likely contribute to the impact on health in the immediate area in addition to marine vessels. It is recognized that everyone benefits from reduced emissions, but the drastic measures that are being targeted at CHC vessels is not the whole solution to the issue. It has been acknowledged that each port in California is unique and may have other contributing factors to emissions besides CHC. We would like to see a study done that looks at all of the sources of pollution that contribute to health impacts before regulations are changed. We would like a study of each port and the contributing emission sources so that a better picture of CHC emissions can be generated and solutions can be created that are in proportion to the pollution.</p>	<p>3158.19 (cont.)</p>
<p><i>Question Health Benefits</i></p>	<p>Page 5 of the Public Notice reads (underline ours for emphasis): <i>“The Proposed Amendments are expected to improve California residents’ health benefits, especially those in communities located near California’s seaports and marine terminals. Many of these communities are disadvantaged and bear a disproportionate health burden due to their close proximity to emissions from CHC (at dock, and in transit) and other emission sources including trucks, locomotives, and terminal equipment serving the seaports. These improvements in health benefits are anticipated to include reductions of 531 premature deaths reduced, 73 hospital admissions for cardiovascular illness, 88 hospital admissions for respiratory illness and 236 emergency room visits. The total statewide valuation due to avoided health outcomes between 2023 and 2038 totaled \$5.25 billion.”</i></p> <p>We agree that any improvement in someone’s health or preventing a premature death is very important, however, the numbers referenced above are shockingly small for a time span of 15 years that covers the entire state of California. We question the results, are the gains really that small?</p>	<p>3158.20</p>

<p>D. Feasibility There is not a “one-size fits all” solution to CHC emission reduction. Because the technology required does not exist and the costs cannot be quantified in a manner that allows companies to plan for the impacts, the CHC Proposed Amendments as drafted are not feasible or cost effective.</p>		
<p><i>Technology Required in Proposed Amendment Does Not Exist for Tier 4 Marine Applications</i></p>	<p>Is the Proposed Amendment feasible? Much of technology that is being required does not exist. Contractors like certainty in a very uncertain business. We review historical data, track trends and try to base our estimates on what we know to be true. In this case we are guessing about the costs, we are not sure about how the technology will integrate with our vessels and are very uncertain about the safety of the applications. We do not have the opportunity to see how the technology is applied in a real world situation. We can’t ask questions of the installers or colleagues in the industry, because no one else has the technology either. It is not tested or vetted. As of February 2021, there is one possible verified level 3 DPF. Page E-42 of Appendix E, Technical Support Document and Assessment of Marine Emission Control Strategies, Zero-Emission, and Advanced Technologies regarding CARB Verified Level 3 VDECS (DPFs) states the following (underline for emphasis, ours):</p>	<p>3158.21</p>

	<p><i>“As of February 2021, CARB has verified a variety of devices for various sectors including on/off-road, stationary, transportation refrigeration unit (TRU), auxiliary power unit (APU), cargo handling equipment, and marine applications.⁶³ There is one verified device for marine applications, the Rypos ADFP... Success of possible retrofit requirements is contingent upon the technology developers applying for and receiving verification from CARB for their diesel emissions controls strategies (DECS). There are currently three established companies who are interested in submitting their products for CARB verification. The number of options for retrofits should increase as requirements for DPFs are adopted and more products penetrate the market.”</i></p> <p><i>It should be noted that a Tier 4 DPF for marine application is not on the market. In the timeframe proposed for compliance, it would be foolish to retrofit your vessel with a Tier 4 engine and then install a DPF in a separate transaction. The loss of time in installation and the increase in cost would not be justified.</i></p>
<p><i>CMA Study & Compliance Options</i></p>	<p>Page 42 – 44 of Appendix E, Technical Support Document and Assessment of Marine Emission Control Strategies, Zero-Emission, and Advanced Technologies, California Maritime Academy Feasibility Study indicates the following (underline ours for emphasis):</p> <p><i>“CARB commissioned the California State University Maritime Academy (CMA) to evaluate the feasibility of repowering and retrofitting in-use harbor craft with Tier 4...The overall conclusion from the study is that there are a number of feasible compliance options for a broad range of different CHC types evaluated. However, because many vessels have unique designs, no assumptions can be made about the technological feasibility regarding a specific vessel without a thorough analysis of its design to determine what engine and after treatment options are available. In some cases where changes are required to a vessel’s structure, the repower project will require a design review by a naval architect to ensure the modifications will not negatively affect the vessel’s stability or seaworthiness. <u>The technological capability of repowering with engines and aftertreatment to meet the Tier 3 or 4 + DPF emissions performance standard is dependent on many variables and must be thoroughly evaluated on a case-by-case basis for every vessel.</u> Therefore, CARB staff used the study to evaluate the likelihood of a vessel needing to be replaced to meet the proposed emissions performance standard in the cost and economic analyses, and in developing the Proposed Amendments.”</i></p> <p><i>There is not a “one size fits all solution” to upgrading vessels. Owners need time to evaluate options when they are available on the market in order to decide what is the best approach in terms of safety, feasibility and practicality for each company. It has been noted that there are compliance extensions available if the technology is not available within the compliance timeframe.</i></p>

3158.22

	<p>The extensions may keep a fleet in compliance, but they still do not allow adequate time for analysis and installation once the technology is available. Once the technology is available, there is a year for installation once the product comes on the market. That is not enough time to come up with funding or installation arrangements.</p>															
<p><i>Low Use Compliance is Not Feasible for Operators in DAC</i></p>	<p>The CHC Proposed Amendments allow for a low use compliance pathway, however, if a company is within an area of Disadvantaged Communities (DAC) the low-use compliance thresholds would be half of other areas of the State. This puts Owners in these areas at a huge disadvantage in terms of competing for business and being able to take advantage of low use options. It becomes very impractical to maintain a marine vessel every year for only half of the allowable hours of use. A pre-tier 1 engine could be used 40 hours, just barely a week of work. This is definitely not a compliance pathway that is cost effective or practical.</p> <table border="1" data-bbox="451 772 1299 865"> <thead> <tr> <th>Engine Tier</th> <th>Pre-Tier 1</th> <th>Tier 1</th> <th>Tier 2</th> <th>Tier 3 or 4</th> </tr> </thead> <tbody> <tr> <td>DACs (hours/year)</td> <td>40</td> <td>150</td> <td>200</td> <td>350</td> </tr> <tr> <td>All Other Areas (hours/year)</td> <td>80</td> <td>300</td> <td>400</td> <td>700</td> </tr> </tbody> </table>	Engine Tier	Pre-Tier 1	Tier 1	Tier 2	Tier 3 or 4	DACs (hours/year)	40	150	200	350	All Other Areas (hours/year)	80	300	400	700
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3158.23

<p>E. Environmental The conclusion that the environmental impacts could be “Less Than Significant or Potentially Significant and Unavoidable” is not acceptable. There is not enough verifiable information in order to approve the Draft Environmental Analysis (EA). The Draft EA should be denied and as such, the CHC Proposed Amendments as drafted are not feasible or cost effective.</p>	
<p><i>Please Review Section IV. Impact Analysis and Mitigation Measures , Section 3, Air Quality of the Draft Environmental Analysis (EA)</i></p>	<p>A thorough review of Section IV. Impact Analysis and Mitigation Measures , Section 3, Air Quality of the Draft Environmental Analysis needs to be completed. Environmentally this is probably the most important section of the Draft Environmental Assessment and there are statements throughout the document that several modeling options are not available and that in many cases it is not possible to predict improvements regarding air quality. The sentences below are out of context, but are not meant to be misleading, only illustrative of the difficulties of pin-pointing air quality gains or degradations.</p> <p><i>Page D-37: “It is not possible to predict exactly where project related improvements would occur or what each project would involve.”</i></p> <p><i>Page D-38: “The ability for CARB staff to correctly estimate the location, amount, and types of projects which could occur in response to increased vessel repowers and new builds, has been determined to be too speculative for a thorough evaluation.”</i></p> <p><i>Page D-39: “Therefore, modeling emissions associated with the manufacturing and delivery of marine vessels is not possible. For calculating increased emissions associated with vessel repowers and new builds, the industry standard CalEEMod is thus not a viable modeling option.”</i></p>

3158.24

	<p><i>Page D-43 “However, the exact location and magnitude of specific health impacts that could occur as a result of project-level construction-related emissions in specific air basins is infeasible to model with any degree of accuracy with the level of information known about the Proposed Amendments.”</i></p>
<p><i>Are Impacts Less Than Significant Or Potentially Significant And Unavoidable?</i></p>	<p>The following statement repeats throughout the Draft Environmental Analysis (example taken from EA pg D-27):</p> <p><i>“Because the authority to determine project-level impacts and require project-level mitigation lies with local land use and/or permitting agencies for individual projects, CARB finds it legally infeasible to implement and enforce this measure. Moreover, due to the programmatic analysis of this EA, which does not allow project-specific details of potential impacts and associated mitigation, there is inherent uncertainty in the degree of mitigation that lead agencies may ultimately implement to reduce the potentially significant impacts if they approve these potential projects.</i></p> <p><i>Consequently, while impacts could likely be reduced to a less-than-significant level with mitigation measures imposed by the land use and/or permitting agencies acting as lead agencies for these individual projects under CEQA, if and when a project applicant seeks a permit for compliance-response related project, this Draft EA takes the conservative approach in its post-mitigation significance conclusion and discloses, for CEQA compliance purposes, that short-term construction-related and long-term operational impacts to aesthetics associated with the Proposed Amendments would remain potentially significant and unavoidable.”</i></p> <p><i>Are impacts less than significant or potentially significant and unavoidable? While we understand the limits of authority to impose mitigation, the EA should provide more direction in terms of environmental impacts of the Proposed Amendments.</i></p>
<p><i>Selling Vessels Out of State</i></p>	<p>The Page D-13 of the Draft Environmental Analysis states:</p> <p><i>“CARB staff predicts most retired vessels would be sold out of state, not scrapped. Based on preliminary conversations with industry leaders, CARB staff expects many vessels to be sold or moved to other states or countries on the North American West Coast. Larger, more costly, or other specialty vessels could be sold and transferred to regions around the globe.”</i></p> <p><i>Our understanding of the Proposed Amendments are to reduce emissions in order to improve the health of those in impacted polluted areas. By selling vessels out of state, the problem would just be shifted elsewhere. Emissions may be reduced in California, but the impact to global warming would remain. In addition, most areas that have maritime commerce already have vessels.</i></p>

3158.25

3158.26

	A glut of used vessels flooding the out of state market would drive down pricing, leaving owners with a fraction of the value to offset new vessel purchases or repowers in California. As much as we would like to be able to sell our assets somewhere else to offset new vessel costs, this solution seems contrary to the spirit of the regulations.
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F. Financial	
The costs of implementation are impractical without significant assistance in the form of grants and other assistance in order to meet the timeline goals of 2035. For this reason, the CHC Proposed Amendments as drafted are not feasible or cost effective.	

<i>Costs Analysis Inputs Are Not Representative of the Industry</i>	Appendix A of the SRIA, Cost Analysis Inputs and Assumptions for Standardized Regulatory Impact Assessment should be reviewed thoroughly. There are very few industry stakeholders referenced in the analysis. The primary source of information seems to be the California Maritime Academy study for all vessel categories with 1-2 industry contacts (including RES) that have shared company costs, which is hardly representative of the industry as a whole. See Section B Data Verification Above.
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3158.27

<i>R.E. Staite Engineering, Inc. Estimated Costs</i>	R.E. Staite Engineering, Inc. estimated our up-tier costs based on the difference between a Tier 3 engine quote and a Tier 4 engine quote we had received from a vendor as we were preparing a grant for one of our tug boats. A DPF for the marine engines we are looking at is not available, so the DPF cost that we provided to CARB Staff was estimated. Our <u>ESTIMATED, ROUGH ORDER OF MAGNITUDE</u> costs to up-tier all of our engines is approximately \$12 million dollars, assuming we are not purchasing new vessels. Seven of the engines would need to be up-tiered by 2024. The remainder of the engines are spread between 2024 and 2030 with another larger cluster that would need up-tiering in 2028. We are already too late to apply for Carl Moyer funding for the 2024 engines as we need a three-year window between the grant application and when the compliance is mandatory.
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3158.28

<i>Administrative Fees</i>	The administrative and compliance fees are extraordinary. The first year of fees for our company is estimated to be at least \$23,004 and could be as much as \$91,904+. Note that the fees and compliance estimates were derived from the SRIA. Some of the fees such as opacity testing, record keeping and reporting may be more or less depending on the actual amount of time expended or the service provider used. The "Possible Additional Costs" would apply if we request a compliance extension (the amount noted would be for one vessel, the number would increase if we needed additional reports). It is not clear if the \$7500 regulation interpretation costs identified as a possible cost in the SRIA would be charged the first year of implementation. Added together, the total potential cost the first year is \$91,904. It is acknowledged that this number could be much less if we do not request a compliance extension for any of the vessels, but is should also be noted that it is possible this number could be much more if we request extensions for several vessels. These fees and costs could better be put towards upgraded engines and reducing emissions.
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3158.29

	<p>Administrative Fees – First Year</p> <table border="0"> <tr> <td>Annual Fee / Vessel</td> <td>\$486 / vessel</td> </tr> <tr> <td>Annual Fee/ Engine</td> <td>\$396 / engine</td> </tr> <tr> <td>Record Keeping & Reporting</td> <td>\$200 / assumed</td> </tr> <tr> <td>Vessel Labeling (Est Every 5 Years) to replace</td> <td>\$150 / assumed every 5 years</td> </tr> <tr> <td>Opacity Testing / Biennially</td> <td>\$200 / assumed cost, biennially</td> </tr> <tr> <td>Total Cost Based On Engines/Fleet Size</td> <td>\$23,004</td> </tr> </table> <p>Possible Additional Costs</p> <table border="0"> <tr> <td>Regulation Interpretation Costs</td> <td>\$ 7,500*</td> </tr> <tr> <td>Naval Architect Report</td> <td>\$61,000**</td> </tr> <tr> <td>Financial Feasibility Reports (Compliance Extensions)</td> <td>\$ 400**</td> </tr> <tr> <td>Total Estimated</td> <td>\$68,900</td> </tr> </table> <p>Estimated Possible Fees and Compliance Costs – First Year 2023 \$91,904</p> <p><i>*SRIA pg 95 - Staff assumes this would be a one-time cost per fleet occurring in 2023, and represents administrative time needed to understand the regulation during the first year the Proposed Amendments would be in effect. Staff assumed a per-fleet cost of \$7,500 which represents 100 personnel hours with a personnel hour cost of \$75.</i></p> <p><i>**SRIA pg 93 - Staff assumed that the cost of a Naval Architect Report would be approximately \$61,000, and the cost of a Financial Feasibility Report would be \$400.</i></p>	Annual Fee / Vessel	\$486 / vessel	Annual Fee/ Engine	\$396 / engine	Record Keeping & Reporting	\$200 / assumed	Vessel Labeling (Est Every 5 Years) to replace	\$150 / assumed every 5 years	Opacity Testing / Biennially	\$200 / assumed cost, biennially	Total Cost Based On Engines/Fleet Size	\$23,004	Regulation Interpretation Costs	\$ 7,500*	Naval Architect Report	\$61,000**	Financial Feasibility Reports (Compliance Extensions)	\$ 400**	Total Estimated	\$68,900	<p>3158.29 (cont.)</p>
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<p>Questions About Fees and Costs</p>	<p>We have questions about the fees and costs that we will incur.</p> <ul style="list-style-type: none"> • Why are there separate fees per vessel and per engine? Why not a single fee per vessel? • Why is there no cap on the fees per company? • Why is there not a sliding scale for company size? • Why is opacity testing every two years? Why not a baseline test and a final test at the end of the program? • Will there be a \$7500 regulation interpretation fee imposed in 2023? This is a large sum of money and should already be factored into the annual fees for program implementation. • Vessel labeling – why do it? As one of our colleagues noted in previous correspondence, each CHC vessel has a unique identifying number already assigned (COR #, CDF#, IMO). Why add another along with its associated costs? The \$150 fee for the label is not the only cost that would be associated with that fee. Labor would be involved in ordering and affixing the label, likely doubling the cost and time taken to implement the requirement. • Will any of the fees be put towards a more efficient tracking system? Right now reporting is very cumbersome. The DOORS (Off-Road Diesel Program) program has a electronic system that is much easier to use and keep information current and track compliance, we would suggest using the same system. 	<p>3158.30</p>																				

<p><i>Construction and Modification of Vessels Out of State</i></p>	<p>The following statement was made on page D-2 of the Draft EA:</p> <p><i>“Construction and modification of vessels would likely occur both inside and outside of California. As outlined in Section IV.E of Appendix E to the ISOR, CARB staff performed a survey of existing shipyards in California, Oregon, and Washington, which confirmed there is sufficient capacity to repower, retrofit, and build new vessels in response to the Proposed Amendments. The survey identified capacity for 23 percent of repowers and retrofits (82 out of 353 repowers per year), and capacity for 73 percent of new ship builds (72 out of 98 new builds per year) in either Oregon or Washington. Therefore, the majority of new vessel builds are expected to occur outside of California. This may be particularly likely because labor can be cheaper in other states.”</i></p> <p>Why are we not planning for these retrofits and new vessels to occur in California? We thought the idea was to create jobs and strengthen California’s economy. Aside from jobs, the cost to mobilize a vessel to Oregon or Washington is prohibitive. For example, when estimating costs for a tug boat repower in the San Francisco Bay Area, the cost to transit our tug boat between San Diego and Alameda was between \$40,000 - \$50,000. Double that or 4x that for a trip to Oregon or Washington.</p>	<p>3158.31</p>
<p><i>Mitigation Costs Identified in the Draft EA</i></p>	<p>EA Mitigation 3-1</p> <p>The costs of mitigation measures associated with construction projects related to the Proposed Amendments have not been incorporated into the SRIA. While the EA states that CARB does not have the jurisdiction to impose mitigation measures, any mitigation that is approved by a responsible agency will have a financial impact and should be included in the overall costs for the Proposed Amendments.</p>	<p>2158.32</p>

<p>G. Small Business</p> <p>The impacts on small business are unacceptable. The only way for a small company to survive is to pass the upgrade costs on to future clients. If a small business cannot do that in a reasonable manner they will go out of business. A plan that does not make accommodations for small business is not a working plan for California, and the CHC Proposed Amendments as drafted are not feasible or cost effective.</p>		
<p><i>Impacts on Small Business</i></p>	<p>Page IX-6 of the Staff Report: Initial Statement of Reasons (ISOR) states the following as it relates to Small Business:</p> <p><i>Creation or Elimination of Businesses</i></p> <p><i>The Proposed Amendments do not directly result in business creation or elimination. However as discussed in Chapter E of the SRIA, changes in outputs of different sectors might indicate the creation or elimination of businesses in the State.</i></p> <p><i>Based on the modeling of output changes, many sectors, such as shipyards and ship and boat building industry may experience an increase in output which may result in the creation of new businesses.</i></p>	<p>2158.33</p>

	<p><i>Industries that operate CHC would face costs and see net decreases in output growth and employment. Some of these businesses are large and would not be anticipated to face business elimination. However, many are small businesses and may face substantial compliance costs. If these businesses are unable to pass on the costs of the Proposed Amendments to customers or if there is a significant change in demand for services, it is possible that some businesses would be eliminated.</i></p> <p>It would be extremely difficult to pass costs to our clients. We have an estimated \$12M of potential expenses (assuming we have all re-powers, the cost is significantly more if we have to purchase new vessels). If we spread that cost over the projects that we bid, we would likely not be very competitive, reducing our volume of projects each year which translates to reduced profits and income to spend on repowers or new purchases.</p>	<p>3158.33 (cont)</p>
<p><i>Reasonable Alternatives to Lessen the Impact on Small Business</i></p>	<p>Page X-6 of the Staff Report: Initial Statement of Reasons (ISOR) states the following as it relates to Small Business:</p> <p><i>Small Business Alternative</i> <i>The Board has not identified any reasonable alternatives that would lessen adverse impact on small businesses while still achieving necessary emission reductions.</i></p> <p>Small business is a vital part of the California economy. Small businesses are a small percentage of the marine construction sector. R.E. Staite has suggested several reasonable solutions(Section III) that would reduce the impact on small business. Making concessions for small business based on size of fleet, amount of horsepower in fleet or number of employees would improve the potential outcome for some businesses if the Proposed Amendments are approved.</p>	<p>3158.34</p>

Comment Log Display

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First Name: Chauncey
Last Name: Preal
Email Address: prealchaunce@gmail.com
Affiliation: Seajay Sportfishing

Subject: Carb

Comment:

My name is Chauncey preal.Owner/operator of the Seajay.Its a commercial Sportfishing vessel that's operated for years in the channel islands.

I submit this letter in reference to the importance of comercial Sportfishing/watching vessels.

The importance behind these vessel is larger than is being considered.It is a community assistant as well as to many the only piece they recieve as an off time.

For myself it has changed my life,provides for my family and also has changed lives.

I come from a troubled back ground that lead to multiple years of incarceration.In fact over 10 years.Fisging changed my life granting me the opportunity to change lives as well.I have with my troubled experiences donated to troubled areas and have spoke to future kids to influence great things in their future rather than a troubled path.

I have customers that came on my vessel to know what past I came from.The motivation,that I been told that changed their lives because they seen my turn around.All I had no idea or intention to influence but ended up a huge part of what drives me so hard.

My boat is also family friendly doing family trips to show the time I miss working on the boat from them.Its our boat.It provides go for us.Fir our anglers,our friends.

Starting back over 20 years ago to see the old faces.The ones that still fish,the ones that still attempt to when it's so hard for them to be mobile.This business means more that fun to many.It means life.Real smiles,real friends,the time we spend together.The joy we have together.Fighting fish next to one another,trying to figure out how to catch them.

To shut our vessels downs would be more than an injustice.It would be more than possibly putting people on the street.It would take from many watch their true joy is.Those that fish once a week ,once a month,or years it's a life taker/changer.

My name is Chauncey Preal/ Seajay owner. This business, these boats saved my life. From a troubled kid doing troubled stuff on the streets, to incarceration, and working hard to change and buy and run a business. I can speak for myself. If this business wasn't around I don't know where I be. This boat is my life, my families life, and the life of very many.

Please hear our pleas. These Boats are our life. See my Social media. Real smiles, real people. Making memories one day at a time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:50:46

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Comment Log Display

Below is the comment you selected to display. Comment 3160 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Smith
Email Address: Scott.Smith@cityexperiences.com
Affiliation:

Subject: Hornblower Comments on Commercial Harbor Craft Regulation
Comment:
See attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/3583-chc2021-UDgBaFEiWGVXMwVp.pdf

Original File Name: Hornblower.CARB.15Nov2021.signed.pdf

Date and Time Comment Was Submitted: 2021-11-15 16:20:48

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November 15, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: Commercial Harbor Craft Regulation

Dear California Air Resources Board Members and Staff,

Thank you for the opportunity to work together and provide comments on CARB's proposed Commercial Harbor Craft Regulation Amendment. For over three decades, Hornblower has been at the forefront of researching, developing, and implementing emissions-reducing solutions across a full-spectrum of propulsion systems including: hybrid-electric, all-electric, energy efficient conventional engines, biofuels, and state-of-the-art hydrogen solutions. Hornblower understands CARB's goal to adopt maritime emissions-reducing technology, to improve air quality, and to achieve California's ambitious Climate goals. Hornblower appreciates CARB's outreach and the opportunity to be part of the rulemaking process.

As referenced in previous letters, COVID has devastated our industry. While segments of the maritime sector have thrived during COVID, such as ocean-going shipping vessels, other segments, such as harbor craft excursion vessels, have been decimated. The impacts of reduced tourism and stay at home orders have the California passenger/excursion maritime businesses on the verge of sinking. The persisting impacts of pandemic continue to limit business volumes and the jeopardize the financial sustainability of vessel owners and operators. While some industries have been able to bounce back faster, passenger/excursion fleets still suffer from significantly reduced tourism, which, unfortunately, is not expected to rebound for years. Current estimates are that it will take three years, until 2025, to achieve a return to pre-Covid economically sustainable conditions. Hornblower's California losses far exceed those in the other states where we operate. Covid displaced almost 90% of our California revenues in 2020, 65% of revenues in 2021, and is expected to displace 40% or more of revenues in 2022.

3160.1

We appreciate CARB staff working with the industry to develop the proposed Commercial Harbor Craft Regulation Amendment and the recognition of hardships that the excursion craft sector confronts. Specifically, we appreciate the proposed inclusion of the "Force Majeure" provision that provides compliance flexibility for vessels and operators facing unforeseeable event, including pandemics. Thank you also for the proposal for In-use engines rated below 600 kW that meet Tier 3 standards before January 1, 2023 to retrofit with a DPF and meet Tier 3 + DPF standards by the nominal compliance dates.

However, the most significant near-term impact will be the change to the Low Use Exemptions prior the industries, including Hornblower, rebound from the devastating impact of COVID. With sustainable economic conditions not expected until 2025, delaying the implementation of

3160.2



the new Low Use Exemption levels for a period of 24 months would greatly benefit vessel owners and operators without significant impact due to the limited hours of operation.

City Experiences anchored by Hornblower looks forward to continuing to be a leader in demonstrating and commercializing advanced marine technologies and reducing emissions. We look forward to continuing to work with ARB staff to achieve the goals of the Commercial Harbor Craft Regulation Amendment and sustainably providing water-dependent coastal experiences for Californians and tourists from around the world.

Sincerely,

Scott Smith

Senior Vice President of Marine Operations
Hornblower Group



Comment Log Display

Below is the comment you selected to display. Comment 3161 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Anthony
Last Name: Gonzalez
Email Address: tstewartphan@yahoo.com
Affiliation: 22nd st. Landing

Subject: Sportfishing

Comment:

In my opinion being into sportfishing. This would be a tremendous hit to the industry. In the scheme of things sportfishing boat in comparison to all other water vehicles is a very small percentage. And wouldn't really make difference.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 15:55:26

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Comment Log Display

Below is the comment you selected to display. Comment 3162 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Angel
Last Name: Lopez
Email Address: drpd98@gmail.com
Affiliation:

Subject: Regulations

Comment:

To whom it may concern do not impose these regulations. It is not the answer.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:23:17

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Below is the comment you selected to display. Comment 3163 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cameron
Last Name: Enos
Email Address: enoscameron2016@gmail.com
Affiliation:

Subject: My life and families livlyhood depends on passing this bill

Comment:

Please pass this bill governor newsom . My life and mom and sisters life depends on me working . My mom works in the medical field and got put on leave until she got the vaccine since then. My sole income had provided for them and me . It's been next to impossible. I'm homeless but still working. Please do ass this so I can continue work and cover my mom and sister until my mom goes back to work: she works at sharp memorial in San Diego. Her name is Dawn Showalter, Dawn Alexandra Showalter not the late Showalter wife named dawn as well . Please pass this bill or help my mom . If not I'm not sure how to help them . I got kicked out of high school and now this is all I have mr.newsome

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:24:58

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Below is the comment you selected to display. Comment 3164 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ben
Last Name: Hoover
Email Address: Benhoover24@gmail.com
Affiliation:

Subject: Do not pass this legislation it will hurt our fishing industry

Comment:

Please do not pass this legislation that will negatively impact the commercial fishing industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:30:54

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Comment Log Display

Below is the comment you selected to display. Comment 3165 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Greg
Last Name: Bombard
Email Address: gbombard@catalinaexpress.com
Affiliation: Catalina Channel Express, Inc

Subject: CHC 2021 Comments

Comment:

Please see attached letter regarding the Proposed Amendments to the Commercial Harbor Craft Regulation.

Attachment: www.arb.ca.gov/lists/com-attach/3588-chc2021-AmFRNgN2BzUGbFU8.pdf

Original File Name: CatalinaExpress_CommentsOnCHC_111521.pdf

Date and Time Comment Was Submitted: 2021-11-15 16:33:19

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November 15, 2021

Ms. Liane Randolph
1001 I Street
Sacramento, CA 95814
VIA EMAIL: harborcraft@arb.ca.gov

RE: Harbor Craft Emission Draft Regulations

Dear Chair Randolph:

Established in 1981, Catalina Channel Express, Inc (CCE) is a privately owned, non-subsidized company, operating a fleet of eight high-speed passenger ferries. Regulated by the California Public Utilities Commission (CPUC) as a Vessel Common Carrier (VCC-52), CCE provides reliable daily, year-round transportation, from three Southern California mainland ports to Catalina Island.

As a company, CCE is deeply committed to California's fight against climate change, including CARB's efforts to reduce harmful pollutants and emissions. We understand that achieving those goals requires intentional leadership, complex decisions, and sacrifice by multiple stakeholders, and we appreciate CARB's work on Californians' behalf. In recent conversations with CARB staff, we have been encouraged that CCE will be able to work with CARB to get sufficient extensions to achieve CARB's ultimate goals of emission reductions while creating a pathway to a zero-emission future.

CCE is committed to achieving zero-emissions from its vessels as soon as feasible. At least one smaller ferry which is scheduled to operate soon in the Bay area will run on green hydrogen. Rather than impose an infeasible mandate forcing CCE to convert to Tier IV, it makes more sense for CARB to team with CCE to become the testing ground for zero-emissions technology for larger ferries like the ones we operate. Allowing CCE a longer compliance path will avoid the negative consequences of disrupting transportation to and from Catalina Island and, (on the heels of the pandemic,) harming Catalina's tourism economy. Instead, we encourage you to embrace a better and bolder alternative.

3165.1

A Better Alternative

CCE believes that, working with CARB staff and new technologies, we can achieve a better compliance path that will result in some immediate emissions benefits while ultimately resulting in our fleet achieving zero emissions within a decade.

First, CCE will immediately convert to using renewable diesel yielding significant and immediate emissions reductions.

Second, CCE will work with CARB and new technologies to develop the use of green hydrogen, electric, or some combination of the two, to upgrade the CCE fleet in a reasonable time. While these technologies have not yet progressed to the point needed (given the size and speed of Catalina ferries), such technologies are not that far off. Already there are pilot projects for smaller vessels involving electric and green hydrogen technologies. More companies are also now offering green hydrogen for transportation fuels in California. This signals that CARB has an opportunity to show its leadership in developing a zero emission solution for the marine transportation industry by assisting the private sector to develop such technologies.

Third, CCE will work with local shipyards to develop and build zero-emission vessels here in California, creating a new, green shipbuilding industry, more jobs, and economic opportunity for all Californians.

While the prospect of a zero-emissions ferry fleet is on the horizon, so is the harm that would be caused if CARB does not allow sufficient time for CCE to achieve this goal without allowing costly and infeasible Tier IV standards to prevent this “small” company from reaching a much better environmental goal.

CCE is Catalina Island’s Lifeline

CCE plays a vital role in the economic survival of Catalina Islanders. As you know, CCE is a private operator of these ferries, and we are licensed by the CPUC. We call to your attention the 2006 report on ferry transport by the Los Angeles County Metropolitan Transportation Authority (MTA). That report called our ferries a “lifeline service,” noting that, “Sixty-two percent of all respondents and forty-six percent of islanders indicated that they could no longer live/work on the island if the [ferry] service were not available. In addition, ninety-three percent of those indicating that they use the service for work stated that they felt the service was an irreplaceable lifeline, providing the only affordable, regularly scheduled mode of travel between the island and mainland harbors.”

3165.2

Since that report was issued, transportation options have not changed. About 70% of the visitors to Catalina arrive and depart via cross channel ferries. Alternatives to ferry transport, such as helicopters or private charters, are neither practical nor economically feasible for residents, especially workers who commute daily from the mainland to the island to assist in the Island’s only meaningful industry - tourism.

If ferry service is substantially disrupted, it will cause great harm. The same MTA report shows that fifty-four percent of islanders travel by ferry for medical or dental appointments or to conduct personal business, and twenty-six percent of islanders travel for school or work. Our ferries also transport first responders, firefighters and other emergency personnel to the island and provide a reliable means of evacuation of the Island in the event of a significant emergency as occurred during the devastating fires of 2007. The fire threat continues and just last week a fire broke out on the Island but was quickly contained by Los Angeles County Fire.

Regulations will undermine the region's ability to "roar back"

We are also concerned about the financial impact of the regulations on Santa Catalina tourism and the Long Beach and San Pedro hospitality industries. Although California is gradually recovering from the pandemic, recovery is much more prolonged in areas with a hospitality economy and with higher percentages of low-income residents.

3165.3

As a destination that is 100% dependent on tourism, Catalina Island was especially hard hit by the pandemic by reason of State and local laws precluding leisure travel and mandatory spacing of passengers. Small businesses are especially vulnerable to changes that reduce foot traffic. Tourism-spending represents 47.7% of Avalon's 2,629 total jobs. If the regulations are not modified, the decline in ferry passenger volume will be a final nail in the coffin for many businesses in Avalon and will inevitably lead to job losses, business closures and unneeded suffering.

Additionally, many visitors who seek to travel to Catalina stay overnight in Long Beach and San Pedro before their trips to the island. The reduction in ferry availability will further discourage travel and spending by tourists to the greater South Bay region, undermining recovery and causing irreparable, permanent harm to our local economy as well.

Regulations will increase emissions

We are also concerned that the regulations may increase GHG emissions. In existing vessels, the mandated Tier IV engines will reduce the ferry passenger capacity by over 50% and will force CCE to make twice as many trips to simply keep up with current demand. The additional trips will require the use of more fuel which will defeat the very purpose of the regulations.

3165.4

How The Proposed Tier IV Regulations Would Affect CCE Without Extensions

The primary concern with the proposed regulations is that the weight and size of the new engines (Tier IV) will require complete rebuilding of existing vessels while significantly reducing passenger loads. We ask CARB to take the longer view of embracing a zero-emission future and partnering financially with the private sector to convert the Catalina ferry fleet to 100% clean engines in a reasonable time period.

3165.5

CCE operates a fleet of eight ferries. Below is a summary of the vessels in our fleet and when retrofit or replacement requirements would take effect without an extension.

Compliance Date	# Of Vessels Due	Vessel Name
2024	1	Catalina Jet
2025	5	Islander Express, Catalina Express, Cat Express, Super Express, Avalon Express
2026	2	Jet Cat Express & Starship Express

Impacts of Retrofit Path

- CCE consulted a principal with the well-respected marine architectural firm of Incat Crowther Design (designer of three of CCE’s most modern catamarans). According to Incat Crowther Design, it would cost \$7-9+ million to repower and retrofit the CCE vessel, M/V Jet Cat Express, to CARB’s mandated Tier IV level. Similar scale costs would apply to all eight of the vessels in the CCE fleet. 3165.6
- The retrofit would add a significant amount of weight (approximately 15 tons) to the vessel. To keep the vessel within its “structural design limit,” a retro-fitted vessel’s passenger capacity would need to be adjusted down from 390 to 172 passengers – a 218 passenger or 56% reduction. 3165.7
- Post retrofit, each vessel would need to make two round trips to Catalina Island to carry its current USCG certified capacity of passengers.
- The vessel retrofit would burn 100% more fuel on a passenger carried basis, produce more emissions per run and more than double the carbon footprint per passenger carried.
- As a private company, CCE is not eligible for public funds and currently there are no grants or other sources of funding available through programs like the Carl Moyer or Cap and Trade Programs. As a result, the currently contemplated regulations would compel us to build an entirely new fleet of vessels at a cost of approximately \$120 million. 3165.8

Impacts of Replacement Path

The cost to build a new vessel is approximately \$20 million. Under the proposed regulations, CCE would need to build 6-7 vessels by 2032, which at a minimum, would cost a total of \$120 million. Compounding this fiscal challenge is the fact that boat yard availability on the West Coast for both retrofit and new build projects is a great hurdle for us to clear. At present capacity, a change of this magnitude is not achievable and is not commercially financeable over the required 10-year payback period. Nor does it make good policy sense given the proposed regulation is simply a waypoint on the path to zero-emissions. 3165.9
3165.10

Compliance Timeline for Ferries

CCE will need until at least 2029 to have a realistic chance to convert to zero-emission technology and bypass the financially and technically infeasible Tier IV standards. We believe the current regulations may provide that potential path:

3165.11

Tier II, Tier III, and Tier IV engines on ferries (except short run) and tugboats would have compliance dates between 2024 and 2029 to meet the Tier III or Tier IV plus DPF emissions performance standards.

To get sufficient extensions to achieve the 2029 extension, CCE would have to demonstrate a lack of feasibility. As currently defined in the regulations, and discussed in detail below, CCE can demonstrate that moving immediately to Tier IV is not feasible. First, the engines and DPF's will not fit in the hulls of our current fleet of vessels without displacing over 50% of passenger capacity. Pouring every penny into Tier IV would eliminate the ability of CCE to finance zero emission technology such as electric, green hydrogen or hybrid technology that is on the horizon. The regulations' feasibility off-ramp is as follows:

b. Feasibility

The feasibility compliance extension of the Proposed Amendments would provide a renewable two-year extension, for the following circumstances:

- Tier IV engines or DPFs are not available.
- Engines or DPFs will not fit, and a replacement vessel cannot be afforded, limited to six years or to December 31, 2034, except:
 - workboats, which have no limit to the number of extensions; and,
 - ferry, excursion, or CPFVs, which are limited to eight years if they have an initial compliance deadline on or before December 31, 2024.
- Tier IV engines on a vessel have no fitment for a DPF and operate below 2,600 hours/year (or 1,300 hours/year if operating in a DAC).

The proposed regulations provide CCE with a "renewable two-year extension" in circumstances where "engines or DPFs will not fit and a replacement vessel cannot be afforded, limited to six years or December 31, 2034." Given our inability to afford a Tier IV retrofit of our fleet (and the passenger displacement caused by retrofits that are after market and do not fit the vessel properly), we believe CCE should clearly be eligible for these renewable extensions.

CARB staff has recognized the challenge of affordability for ferry operators:

CARB staff anticipates the most common use of the feasibility extension to be for operators that must replace a vessel and cannot afford the cost of a vessel replacement without additional time to secure funding. Under this extension, CARB staff propose no limit to the number of

extensions eligible for dedicated workboats, and up to eight years of extensions for excursion, ferry, and CPFVs that have compliance deadlines on or before December 31, 2024, for the reasons discussed in Chapter II.E. For all other regulated in-use vessel categories, this renewable extension may not be combined to exceed six years or extend past December 31, 2034.

We ask CARB to support the current availability of extensions to the Tier IV mandate for ferries as a bridge to reaching zero emissions engines. CCE looks forward to working with CARB staff on implementing a compliance path with reasonable extensions to continue operating CCE affordably and in an environmentally sensible manner.

Sincerely,



Greg Bombard
President/CEO



Comment Log Display

Below is the comment you selected to display. Comment 3166 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ted
Last Name: Robey Sr
Email Address: catexan@socal.rr.com
Affiliation:

Subject: Save our Sport fishing and Whale Watching

Comment:

I'm a 75 year old senior on Social Security. I have to save up my money so as to be able to go fishing. If the boats are made to comply with the new Air Pollution Law I'll never be able to go fishing again. The fishing boats will have to charge too much for tickets to fish.

Thank You

Ted Robey Sr

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:28:00

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Comment Log Display

Below is the comment you selected to display. Comment 3167 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Keck
Email Address: mrbeltswildride@gmail.com
Affiliation: Concerned citizen

Subject: Terrible flawed amendments

Comment:

This is a terrible idea. By doing this you are literally going to put hard working Californians out of work with these kind of regulations. Do not move forward with this. It will only hurt Californians worse than we already are.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:40:43

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Comment Log Display

Below is the comment you selected to display. Comment 3168 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Lisa
Last Name: Appelgate
Email Address: lappelgate@gmail.com
Affiliation:

Subject: Clean technologies for ships

Comment:

Dear Chair Randolph and Members of the Board,

Ships are one of the worst air polluters in California, and harbor boats are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. California must invest in clean technologies and stop investing in diesel operated harbor boats.

I am specifically submitting this letter in support of funding for UC San Diego's Scripps Institution of Oceanography (Scripps) hydrogen-hybrid coastal research vessel project. This vessel will reduce pollutants and greenhouse gas emissions, while demonstrating the viability of clean, nonpolluting zero-emission shipboard power systems to the maritime industry. The vessel will feature an innovative hybrid propulsion system that will use hydrogen fuel cells to enable true zero-emission operations for 75 percent of the ship's expeditions, supplemented by a conventional diesel-electric power plant when additional range is required offshore.

Given the climate emergency that we are facing, we need bold climate leadership -- and bold transformation of maritime power systems that Scripps is working to demonstrate.

This is a critical time to protect the health of port-side communities, Californian families, and our environment.

Thank you for your attention to this important issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:35:45

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Comment Log Display

Below is the comment you selected to display. Comment 3169 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tim
Last Name: Eckart
Email Address: Timo3701@sbcglobal.net
Affiliation:

Subject: Commercial harbor craft regulations

Comment:

Commercial harbor craft Regulations if changed would put a major hardship on the boat owners and the men and women that work on the regulations that you are proposing Would put these people out of business

The regulations that you are opposing on these vessels are ridiculous and it would affect thousands of people and their livelihood sincerely yours Tim Eckart

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:38:30

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Comment Log Display

Below is the comment you selected to display. Comment 3170 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Max
Last Name: Cohen
Email Address: mcohen@curtinmaritime.com
Affiliation: Curtin Maritime Corp.

Subject: Curtin Maritime CHC Proposal Protest

Comment:

November 15, 2021

Liane M. Randolph
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

SUBJECT: Comments Regarding the Proposed Amendments to the
Commercial
Harbor Craft Regulation

Dear Chair Randolph,

The various Civil Engineering and Transportation firms, operating within California's maritime sector, take immense pride in our aggressive pursuit of fleet innovation, while actively integrating Best Management Practices within our current business operations. Commercial Harbor Craft (CHC) operations are paramount to our industry's ability to dredge channels and maintain ports that are crucial to American trade. Additionally, long haul barge transport operations provide grossly overlooked benefits to the general public by connecting commodities to distant markets, without congesting California's already strained freeway system.

CHC operators understand the importance of taking meaningful steps towards reducing harmful Particulate Matter (PM) and Greenhouse Gas Emissions (GHG) such as SO_x, NO_x, and CO₂ within our areas of operation. In our efforts to meet upcoming CHC regulations, we have dedicated resources towards researching and implementing new technologies within our fleets. However, the newly proposed CHC amendment promulgates an impractical expansion of existing CHC regulations. This amendment will now include engine upgrade

requirements to be met within a timeframe that is simply not feasible for Subchapter M operators. Concerns regarding these additional regulations have arisen based upon valid observations of blatant discrepancies littered throughout the new amendment proposal process. These include, but are not limited to the following:

1) The exclusion of certain commercial fishing vessels from these CHC amendments. This exclusion is based upon factors which are every bit as prevalent for tug and barge operators. If negative financial impacts to industry sectors were being considered during the development of this amendment then surely Subchapter M operators, whose primary functions involve clamshell dredges and barges (assets which will also be impacted), should be considered for exemption as well.

2) Discrepancies, and misrepresentations, of inventory numbers and regional data are also clear. The initial use of the USCG registry to determine CHC vessel numbers was based upon a fundamental misunderstanding of "Hailing Port State". However, it does not end there. The July 7th release of the Standardized Regional Impact Assessment (SRIA) on the proposed amendments to the existing CHC regulation has a rather egregious omission of regional CERP data that should be addressed. The South Coast Air Quality Management District's (SCAQMD) Community Emissions Reduction Plan (CERP) is a locally developed emission reduction strategy, for disadvantaged portside communities, based upon locally generated emissions reporting. The July 7th SIRA explicitly states:

"Emissions generated from CHC are one of the primary areas of concern in a number of portside communities currently developing CERPs due to their substantial toxic and criteria air pollution emissions."

However, according to Chapter 3B within the WCWLB CERP, which represents Wilmington/Carson/West Long Beach, it asserts that, while Diesel Particulate Matter (DPM) was the main contributor of higher air toxic cancer risks within the SCAQMD basin, CHC vessels were not among the top contributors of PM2.5 or VOC. In fact, this document clearly states that overall NOx emissions are expected to increase through 2029 due to "industrial and on-road mobile sources". It also makes note of the fact that the primary contributors of NOx from the "Off-Road" sector remain Ocean Going Vessels (OGV's). While it does assert that Off-Road Sources account for 45% of NOx emissions within the region, nowhere does it make the claim that CHC vessels are a primary contributor. Concluding that the CHC fleet is the primary source of air pollution and higher cancer rates from this CERP is baseless and can only be rationalized by grouping CHC vessels in with Ocean Going Vessels, while at the same time dismissing CARB's own projections of the impact of on road mobile sources.

3) Subchapter M operators are bound by strict vessel stability requirements. If forced to install DPF+SCR aftertreatment systems, this could put many tugboats out of compliance with 46 CFR 170-173. The Cal Maritime Feasibility study points out that, in the case of

ship assist tugs, the added equipment will raise the Vertical Center of Gravity (VCG), thus impacting the vessel's range of stability. The push to implement Tier 4 engines w/ DPF + SCR aftertreatment systems also assumes that tugboat designs are flexible and can accommodate the added equipment without major modifications to the vessel. This is incorrect, and is even stated throughout the Cal Maritime Feasibility Study, which "cherry picked" specific vessels in each CHC class that were most compatible with these new engine upgrades. This study asserts that, while these engine upgrades are technically feasible onboard a very specific vessel, it would require extensive rerouting of exhaust systems and a complete rearrangement of the engine room in order to make space for the aftertreatment equipment such as the DPF tank and SCR silencers. Considering that a tugboat's major components are deeply integrated throughout the vessel, making modifications such as the ones being proposed would be nearly impossible without having to retrofit the entire ship. Additionally, there are concerns regarding the impact of the DPF + SCR aftertreatment systems on the vessel's exhaust system which was not addressed in the Cal Maritime Feasibility Study. These aftertreatment systems choke the flow of exhaust creating a backup of pressure which can lead to engine failure. This highlights a valid safety concern, rather than a fiscal burden. Attempting to rapidly force unavailable, infeasible, and untested technology upon this specific class of vessel will put stability, and ultimately crew safety, in jeopardy.

4) CHC operators are faced with limited options for installing EPA certified marine engines and aftertreatment systems. Currently, there are not enough engine manufacturers producing the necessary ranges of Tier 4 EPA certified engines, or Level 3 DPF aftertreatment systems for marine use. As of today, the new proposal will force every CHC operator, covered under this regulation, to patron a small pool of manufacturers in order to install equipment that meets their specifications. While this will certainly benefit the manufacturer(s), it will ultimately cause extensive delays for CHC operators attempting to comply by getting this equipment installed.

5) The new CHC amendments will ultimately impact tug and barge companies engaging in the Civil and Other Heavy Duty Engineering Sector, on two fronts. These Subchapter M operators are frequently contracted to perform necessary work in the marine space on behalf of construction firms and federal agencies. Necessary channel maintenance projects in California are contracted out by the U.S. Army Corps of Engineers. These projects, especially in California, require the use of clamshell dredges which are also subject to the tenets of the new CHC amendments. For tug operators who own and employ dredge assets this pending regulation will proliferate an additional layer of regulatory action taken against their fleets.

6) There are a limited number of Subchapter M operators capable of handling the volume and scope of marine construction work along California's coast. The consequences of these regulations will not only cause immediate harm to tug companies operating in the maritime construction industry but will have compounding effects on

those construction firms who contract tug and barge operators as well. The subsequent industry impacts of these CHC Amendments will be reflected through higher rates and possible delays of vital marine construction and management projects. Most notably, this will impact channel deepening/widening projects which must occur regularly for our ports to remain open to large container vessels carrying vital cargo. The few Subchapter M operators who will be left to perform this work will have a monopoly on this specific industry sector causing the prices of these large-scale dredging projects to increase. For construction firms that subcontract CHC operators for the use of their tugs and barges, rates will increase as well.

The new amendment seems to be an unjustified expansion of existing CHC regulations that is being slipped under the current AB-617 legislation. The insurmountable financial burden and lost opportunity costs associated with repowering lower tier vessels, within the fleets of small tug and barge operators, puts them at a competitive disadvantage. Furthermore, attempting to spur innovation of cleaner marine technologies by way of harsher regulations will be counterproductive and will ultimately achieve an antithetical result.

For these reasons we ask that CARB:

-Define its methodology for establishing the population of CHCs operating over 300 hours in California waters. It is important that the methodology also accounts for the specific operational usage of these vessels.

-Show direct cause between CHC's and higher cancer rates. It is irresponsible to draw this conclusion without first proving causation for obvious reasons. Placing the burden of guilt upon CHC operators, while openly acknowledging that "Industrial & On Road emission sources will cause NOx levels to increase through 2029", in a region that is heavily industrialized and situated amongst the nations most congested freeway systems seems to be a rush to judgement.

-Enforce compliance dates on a case-by-case basis. CARB's approach to these CHC regulations applies a "one size fits all" solution for various types of vessels across vastly different industry sectors. While the current technology may be feasible for some CHC operators to implement within their fleets at this time, it does not mean that other operators in different industry sectors can automatically do the same. We ask that these compliance dates work in conjunction with a responsible rollout of this technology, where the OEM tests and approves these new engine upgrades for each specific vessel.

-Re-evaluate its approach of regulation over incentivization. If the goal is to substantially lower emissions within heavily impacted, low-income regions then the current incentive structure

must be re-evaluated. Currently, the only applicable public funding for vessel repowers come via the Carl Moyer, DERA, and VW Mitigation Trust programs. The ability of these programs to allocate funds for the purpose of a vessel repower is hindered by relatively low maximum award limits and grant stacking restrictions. These programs are inefficient in allocating sufficient funds for singular marine repower projects, much less multiple projects within the same fleet. As previously mentioned, many of these projects will not be simple repowers, but will involve a complete retrofit of the vessel. If this is the case for multiple ships within a single fleet, then the costs of integrating these new engines will be much higher. This means that the current maximum award limits of these funds will render them almost useless in helping CHC operators meet these new upgrade requirements. Restriction of these funds will be further exacerbated upon the implementation of harsher CHC regulations under AB-617.

Attachment: www.arb.ca.gov/lists/com-attach/3593-chc2021-UjECcVYIU3QDbANt.pdf

Original File Name: CURTIN MARITIME CARB CHC AMENDMENT LETTER.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:03:31

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November 15, 2021

Liane M. Randolph
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

SUBJECT: Comments Regarding the Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Chair Randolph,

The various Civil Engineering and Transportation firms, operating within California's maritime sector, take immense pride in our aggressive pursuit of fleet innovation, while actively integrating Best Management Practices within our current business operations. Commercial Harbor Craft (CHC) operations are paramount to our industry's ability to dredge channels and maintain ports that are crucial to American trade. Additionally, long haul barge transport operations provide grossly overlooked benefits to the general public by connecting commodities to distant markets, without congesting California's already strained freeway system.

CHC operators understand the importance of taking meaningful steps towards reducing harmful Particulate Matter (PM) and Greenhouse Gas Emissions (GHG) such as SOx, NOx, and CO2 within our areas of operation. In our efforts to meet upcoming CHC regulations, we have dedicated resources towards researching and implementing new technologies within our fleets. However, the newly proposed CHC amendment promulgates an impractical expansion of existing CHC regulations. This amendment will now include engine upgrade requirements to be met within a timeframe that is simply not feasible for Subchapter M operators. Concerns regarding these additional regulations have arisen based upon valid observations of blatant discrepancies littered throughout the new amendment proposal process. These include, but are not limited to the following:

1) The exclusion of certain commercial fishing vessels from these CHC amendments. This exclusion is based upon factors which are every bit as prevalent for tug and barge operators. If negative financial impacts to industry sectors were being considered during the development of this amendment then surely Subchapter M operators, whose primary functions involve clamshell dredges and barges (assets which will also be impacted), should be considered for exemption as well.

3170.1

2) Discrepancies, and misrepresentations, of inventory numbers and regional data are also clear. The initial use of the USCG registry to determine CHC vessel numbers was based upon a fundamental misunderstanding of "Hailing Port State". However, it does not end there. The July 7th release of the Standardized Regional Impact Assessment (SRIA) on the proposed amendments to the existing CHC regulation has a rather egregious

3170.2

omission of regional CERP data that should be addressed. The South Coast Air Quality Management District's (SCAQMD) Community Emissions Reduction Plan (CERP) is a locally developed emission reduction strategy, for disadvantaged portside communities, based upon locally generated emissions reporting. The July 7th SIRA explicitly states:

"Emissions generated from CHC are one of the primary areas of concern in a number of portside communities currently developing CERPs due to their substantial toxic and criteria air pollution emissions."

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- 3) Subchapter M operators are bound by strict vessel stability requirements. If forced to install DPF+SCR aftertreatment systems, this could put many tugboats out of compliance with 46 CFR 170-173. The Cal Maritime Feasibility study points out that, in the case of ship assist tugs, the added equipment will raise the Vertical Center of Gravity (VCG), thus impacting the vessel's range of stability. The push to implement Tier 4 engines w/ DPF + SCR aftertreatment systems also assumes that tugboat designs are flexible and can accommodate the added equipment without major modifications to the vessel. This is incorrect, and is even stated throughout the Cal Maritime Feasibility Study, which "cherry picked" specific vessels in each CHC class that were most compatible with these new engine upgrades. This study asserts that, while these engine upgrades are technically feasible onboard a very specific vessel, it would require extensive rerouting of exhaust systems and a complete rearrangement of the engine room in order to make space for the aftertreatment equipment such as the DPF tank and SCR silencers. Considering that a tugboat's major components are deeply integrated throughout the vessel, making modifications such as the ones being proposed would be nearly impossible without having to retrofit the entire ship. Additionally, there are concerns regarding the impact of the DPF + SCR aftertreatment systems on the vessel's exhaust system which was not addressed in the Cal Maritime Feasibility Study. These aftertreatment systems choke the flow of exhaust creating a backup of pressure which can lead to engine failure. This highlights a valid safety concern, rather than a fiscal burden. Attempting to rapidly force unavailable, infeasible, and untested technology upon this specific class of vessel will put stability, and ultimately crew safety, in jeopardy.

4) CHC operators are faced with limited options for installing EPA certified marine engines and aftertreatment systems. Currently, there are not enough engine manufacturers producing the necessary ranges of Tier 4 EPA certified engines, or Level 3 DPF aftertreatment systems for marine use. As of today, the new proposal will force every CHC operator, covered under this regulation, to patron a small pool of manufacturers in order to install equipment that meets their specifications. While this will certainly benefit the manufacturer(s), it will ultimately cause extensive delays for CHC operators attempting to comply by getting this equipment installed.

3170.4

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3170.5

6) There are a limited number of Subchapter M operators capable of handling the volume and scope of marine construction work along California's coast. The consequences of these regulations will not only cause immediate harm to tug companies operating in the maritime construction industry but will have compounding effects on those construction firms who contract tug and barge operators as well. The subsequent industry impacts of these CHC Amendments will be reflected through higher rates and possible delays of vital marine construction and management projects. Most notably, this will impact channel deepening/widening projects which must occur regularly for our ports to remain open to large container vessels carrying vital cargo. The few Subchapter M operators who will be left to perform this work will have a monopoly on this specific industry sector causing the prices of these large-scale dredging projects to increase. For construction firms that subcontract CHC operators for the use of their tugs and barges, rates will increase as well.

3170.6

The new amendment seems to be an unjustified expansion of existing CHC regulations that is being slipped under the current AB-617 legislation. The insurmountable financial burden and lost opportunity costs associated with repowering lower tier vessels, within the fleets of small tug and barge operators, puts them at a competitive disadvantage. Furthermore, attempting to spur innovation of cleaner marine technologies by way of harsher regulations will be counterproductive and will ultimately achieve an antithetical result.

For these reasons we ask that CARB:

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3170.7

-Show direct cause between CHC's and higher cancer rates. It is irresponsible to draw this conclusion without first proving causation for obvious reasons. Placing the burden of guilt upon CHC operators, while openly acknowledging that "Industrial & On Road emission sources will cause NOx levels to increase through 2029", in a region that is heavily industrialized and situated amongst the nations most congested freeway systems seems to be a rush to judgement.

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Sincerely,

Martin Curtin

Martin Curtin
CEO
Curtin Maritime Corp.

R.A. Carpenter

R.A. Carpenter
President
R.E. Staite Engineering, Inc.



Comment Log Display

Below is the comment you selected to display. Comment 3171 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cynthia
Last Name: Pinto-Cabrera
Email Address: cynthia@calcleanair.org
Affiliation: Central Valley Air Quality Coalition

Subject: CVAQ Comments on Commercial Harbor Craft Regulation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/com-attach/3594-chc2021-UTICawFtVGpXNAV3.pdf

Original File Name: Commercial Harbor Craft Reg_CVAQ Comments_Nov 15 2021.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:05:15

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Little Manila RISING



November 15, 2021

Chair Randolph and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically

RE: 21-12-6: Proposed Amendments to the Commercial Harbor Craft Regulation

Chair Randolph and members of the Air Resources Board,

The undersigned submit these comments regarding agenda item 21-12-6: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft Regulation. Due to the cumulative and disproportionate impacts on already overburdened communities living near the Port of Stockton (POS) in San Joaquin County and port communities across California, we urge the California Air Resources Board (CARB) to strengthen the Commercial Harbor Craft rule and expedite the transition to zero emissions for all commercial harbor crafts. Tugboats, also known as towing vessels, are currently the most common vessel type at the Port of Stockton, and are one of the largest emitting categories of commercial harbor craft for fine particulate matter (PM 2.5).¹ It is essential to improve health and quality of life for portside communities that CARB require all harbor crafts, including tugboats, to be zero emissions as expeditiously as possible.

The Port of Stockton is the 4th largest port in California, and is located in census tract 6077000801. According to CalEnviroScreen 4.0, the POS ranks in the 99th percentile for pollution burden, with surrounding census tracts falling between 96th to 100th percentiles. Diesel pollution from sources related to the POS, numerous stationary sources, as well as major transportation corridors such as Interstate 5 and Highway 4 significantly impact surrounding neighborhoods. Idling ships along with the associated railroads, trucking facilities, warehouses and other freight and goods movement infrastructure concentrate deadly diesel particle pollution in these neighborhoods. Chronic exposure is associated with decreased lung function, exacerbated asthma impacts, and increased cancer risks due to the different substances contained within diesel emissions².

¹ California Air Resources Board (CARB). 2021. "CHC Fact Sheet: Tugboats (Towing Vessels)" <https://ww2.arb.ca.gov/resources/fact-sheets/chc-fact-sheet-tugboats-towing-vessels>

² CARB. 2021. "Overview: Diesel Exhaust and Health". <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>

CARB staff has stated that concentrations of diesel particle pollution can reach communities up to an estimated 50-mile radius inland.³ With the proposed expansion of the Port of Stockton, community health impacts will likely worsen from the additional emissions from commercial harbor crafts and other sources. CARB expressed concern regarding the POS expansion and “the Project’s potential public health impacts, the lack of mitigation measures presented in the DEIR, the omission of statutory considerations that address the disproportionate impacts of air pollution on disadvantaged communities, and the absence of information related to public outreach.”⁴

Eliminating emissions from harbor crafts, especially tugboats, will benefit the health and quality of life of people living near the POS. As it stands, CARB’s current draft harbor craft rule misses the opportunity to fully embrace this technology transition and provide much-needed emissions reductions. CARB must maintain its commitment to disadvantaged communities like south Stockton to reduce cumulative impacts by expediting the transition to zero-emissions technologies for commercial harbor crafts. This step is critical for protecting the health of Valley residents living near the Port of Stockton, and for portside communities across the state.

Sincerely,

Dr. Catherine Garoupa White, Executive Director
Central Valley Air Quality Coalition

Matt Holmes, Environmental Justice Director
Little Manilla Rising

Mariah Looney, Campaign Coordinator
Restore the Delta

³ CARB. 2021. “Appendix G: Health Analysis: Proposed Amendments to the Commercial Harbor Craft Regulation”. Figures G-9 and G-10 pp. 44-45,
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2021/chc2021/appg.pdf>

⁴ CARB. CARB. 2020. “Comments on Draft Environmental Impact Report (DEIR) for the Lehigh Southwest Stockton Terminal Project (Project), State Clearinghouse No. 2019100510”.
https://files.ceqanet.opr.ca.gov/256569-3/attachment/eLYMhEkYqLrwbhEu0SGv05nq5wFyPf1_Gdj9FiyDJz8m8e6zlrbsOijLUViGdRjfcG3H7IaUqTu4jWpx0



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Below is the comment you selected to display. Comment 3172 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Tom
Last Name: Connors
Email Address: tjconnors47@gmail.com
Affiliation:

Subject: Keep sportfishing alive

Comment:

We need to keep the Sportfishing industry alive to all.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:08:22

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Comment 3173 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Ed
Last Name: Leland
Email Address: Eleland@lbarealty.com
Affiliation:

Subject: Clerk of the board

Comment:

Let us keep fishing, please be reasonable

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:05:22

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First Name: Rob
Last Name: Southwick
Email Address: info@savefishing.com
Affiliation: Southwick and Associates

Subject: CHC2021 - Economic Analysis of Sportfishing/Whale Watching Boat Regulations
Comment:

As the California Air Resources Board (CARB) is set to consider unprecedented harbor craft engine emission regulations that stand to remove 174 sportfishing and whale watching boats from the sea, the Sportfishing Association of California (SAC) has released economic analysis that undermines CARB's contention that it is economically feasible for boat owners to replace their vessels. The analysis also reveals unintended consequences for the state's economy, fishery and conservation programs and significant declines in fishing participation rates. Hardest hit would be low-income communities.

Attachment: www.arb.ca.gov/lists/com-attach/3597-chc2021-VGVUYwAvUjBSYVd5.pdf

Original File Name: 11.15.21SouthwickCARBAnalysis_Final.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:08:55

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November 15, 2021

Ms. Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CHC2021 – Economic Feasibility of Vessel Replacement for Passenger Sportfishing
and Whale Watching Boats

Dear Ms. Randolph:

Please let me begin by sharing my credentials. Since founding the business in 1990, we have specialized in economic research regarding fishing, hunting and outdoor recreation. We have conducted many hundreds of sportfishing economic studies, including numerous examinations of marine sportfishing issues in California. This background provides us in-depth expertise into the motivations, spending and roadblocks associated with sportfishing participation and their associated jobs, tax revenues and other economic concerns. Based on this experience, the rest of this letter provides my comments and observations regarding CARB's proposed engine emission regulations for commercial passenger harbor crafts, commonly associated with sportfishing, whale watching and scuba diving.

Background:

On September 21, 2001, the California Air Resources Board (CARB) released amendments to the proposed Commercial Harbor Craft Regulations designed to reduce diesel engine emissions. These regulations, if adopted, would require engines and technology that may not fit existing vessels' engine rooms. As a result, and CARB admits, vessel replacement would be likely.

CARB contends that boat replacement is economically feasible, costing approximately \$2.1 million for a new, compliant vessel. To finance these vessels, CARB reports passenger ticket prices would have to increase. CARB does not report how their cost estimates were calculated or if they consulted with vessel owners or builders regarding the costs for new, compliant vessels. CARB acknowledges that even at their projected vessel cost, not every boat owner can afford a new vessel or pass on the full cost increase to their passengers and that some business loss is likely.

Given the lack of data behind CARB's statements, several key questions arise:

1. What are the actual costs to business owners to purchase a new, compliant vessel?
2. Will any price increases required to purchase new vessels impact fishing participation?
3. Will there be any impact on fisheries management and state conservation efforts?
4. Will any communities experience greater burdens than others? and,
5. What is the expected impact to the State economy?

To answer these questions, the Sportfishing Association of California retained Southwick Associates. Following is a summary of our findings.

1. What are the actual costs to business owners to purchase a new, compliant vessel?

To establish whether CARB's expected costs to purchase a new, compliant vessel are correct, a Certified Public Accountant (CPA) with marine industry experience evaluated construction bids for two commercial vessels that were designed to comply with CARB's proposed rules (attached). The Class 1 and Class 2 bids (attached) reflect two of the most common passenger sportfishing vessels found off the California coast, with a Class 1 vessel that can be configured for whale watching, eco-tourism and scuba diving excursions.

CARB's *Standard Regulatory Impact Assessment* (SRIA) economic analysis estimated the average replacement cost for a commercially inspected passenger sportfishing vessel to be \$2.1 million, financed with passenger ticket price increases of \$39.78 (or 27% increase) for a single-day trip and \$37.05 (or 19% increase) for a multi-day trip on a per passenger per day basis. Their economic analysis does not reveal how CARB assessed the \$2.1 million value, whether they sought bids from reputable boat builders and if they applied the projected construction costs to real boat operating budgets. To ensure reliable, defensible data are used to assess the true impacts of the proposed amendments, H&M Landing of San Diego did exactly that.¹

Two construction bids were received by H&M Landing (attached). One was for \$4.6 million to construct a 65 ft one-day vessel (Class 1, suitable for day fishing trips, whale watching and SCUBA excursions) and \$5.7 million for an 80 ft multi-day vessel (Class 2). These costs are magnitudes greater than CARB's estimate of \$2.1 million per vessel. According to the CPA report, based on the operating budgets of current H&M landing boats, to break even, businesses replacing a Class 1 boat would have to increase prices for a one-day fishing trip from \$180 to \$542 (201% increase) and a new Class 2 boat that provides multi-day fishing trips would have to increase its prices from \$200 to \$394 (97% increase). These price increases are significantly higher than the 19% to 27% increases anticipated by CARB.

The CPA's analysis also underscores the financing challenges facing boat owners. The CPA notes that 20% - 40% is a commonly required down payment within the marine industry. Considering existing non-compliant boats will have no resale value in California and the glut of boats to be sold will depress markets outside of California, businesses will find it difficult to sell their current boats and secure down payments on new vessels, thus raising the risk for banks. Banks would have to demand higher down payments and/or higher rates. Without feasible financing, many vessel operators will shut down.

2. Will any price increases required to purchase new vessels impact participation?

It is noteworthy to mention that CARB assumes CPF vessels would maintain their current passenger loads in the face of price increases. Expecting passenger demand to remain unchanged in face of price increases is wrong. At Southwick Associates, we have examined impacts on fishing license sales resulting from price increases for over 40 states. Price increases can include the price of the actual license, fuel prices (boat and auto), the hassles associated with poor weather, and more. The following are examples from these previous analyses:

Oklahoma:

- a. In 2019, a \$1 (or 5%) increase in resident annual fishing licenses would result in a loss of 7,924 anglers and a decline in license sales of 1.2%:

¹ H&M Landing in San Diego operates 30 CPF vessels.

- The statistical models custom built for Oklahoma's license sales show that a 100% increase in price would cause resident participation to decrease over 22%, while a 200% increase would result in a 44% decline in participation.
- b. A \$1 increase in Oklahoma's nonresident annual fishing license would result in a loss of 1,342 visitors, which equates to a 4% decline in sales.
- Further statistical modeling shows that a 100% increase in price would cause non-resident participation to decrease to nearly zero.

Tennessee:

- a. In 2018, a 10% increase in the basic fishing/hunting license² would result in a loss of 6,149 anglers which means a 2% decline in license sales:
- Tennessee's statistical models show that a 100% increase in price would cause resident participation to decrease 20%, while a 200% increase would result in a 40% decline in participation.
- b. A 10% increase in Tennessee's nonresident annual fishing license would result in a loss of 1,482 visitors, which equates to a 4% decline in nonresident license sales.
- Further statistical modeling shows that a 100% increase in price would cause non-resident participation to decrease 37%.

Oregon:

- a. In 2013, a \$1 (or 3%) increase in the price of the resident annual fishing license would result in a loss of 5,711 anglers which means a 2.3% decline in sales:
- The statistical models custom built for Oregon license sales show that a 100% increase in price would cause resident participation to decrease to 74%, while a 200% increase would decrease participation to nearly zero.
- b. A \$1 increase in the \$106.25 annual fishing license would cause a 1.1% sales decline.
- Further statistical modeling shows that a 100% increase in price would cause non-resident annual license sales to decrease to nearly zero.
 - Considering Oregon's annual nonresident fishing license is priced similar to a one-day CPF vessel trip, we tested the effects of CARB's suggested price increases. At these levels, Oregon's annual license sales would fall over 40%.

Results of other states are also available. Across the board, the statistical models show that price has a significant effect on fishing participation. **While small increases might be absorbed, increases of 97% to 201% as required for operators to replace CPF vessels would cause annual passenger volume to decline severely.** Even if CARB's regulatory costs could be passed on with a 19-27% passenger price increase, the proposed regulations could reduce passenger volume by nearly half, per the Oregon data.

Please note that it is possible to measure the effects of price increases on California's license sales. The necessary license data are in possession of the California Department of Fish and Wildlife. CARB's economic analysis (*SRIA*) does not refer to any effort to conduct this basic statistical assessment.

3. Will there be any impact on fisheries management and state conservation efforts?

Fisheries management is largely dependent upon the sale of fishing licenses. Every adult angler aboard a CPF vessel is required to possess a California marine fishing license, generating significant fisheries conservation revenues. The total revenues attributable to CPF vessels are calculated for 2018, which is

² Tennessee does not sell a standard fishing-only license to residents. Users must purchase a combination fishing/hunting license.

the same year examined by the professional CPA financial assessment regarding CARB's potential financial burden on CPF vessel operators:

- The California Department of Fish and Wildlife reports 1,776,844 resident and nonresident fishing licenses were sold in 2018 with revenues of \$59,876,070.³ This equates to \$58.95 per license sold.
- The professional CPA documented the annual revenue for two California CPF vessels. The average annual revenue for both vessels in 2018 was \$457,760.
- The typical fees paid by their customers range from \$60 for 1/2 day trip to \$800 for a 2.5 day trip.⁴ Across all types of trips, the average fee paid per customer is estimated to be \$287.75.⁵
- Dividing the average annual revenue by the average fee per customer yields an average of 1,986 passengers per vessel each year. With 75% of passengers expected to be repeat users, each vessel is estimated to generate 497 license sales annually.
- At an average of \$58.95 per license sold, each vessel represents \$29,298 in annual license revenue to the State of California.
- With 174 CPF vessels operating in California,⁶ and considering the assumptions stated above, the California Department of Fish and Game receives \$5,097,852 annually from license sales to CPF vessel customers which represents 8.5% of its annual sport fishing license receipts.

Another potential ramification to conservation funding relates to a possible reduction in federal funds received by the State for fisheries conservation. This fund, known as the Federal Aid in Sport Fish Restoration fund, allocated \$16.5 million to California in 2018. Funds are received from the wholesale fishing tackle and motorboat fuel sales, then allocated across states based on a formula accounting for each state's number of licensed anglers and water area. The final apportionments vary each year based on the total funds available and the number of licensed anglers across states. In 2018, California received \$10.30 for each licensed angler.⁷ Considering there are 174 active vessels, each generating on average 497 license sales annually, CPF vessels account for roughly 86,478 license buyers who represented \$890,723 in federal fisheries conservation funds in 2018. A reduction in their numbers could directly threaten California's future federal funding allocations.

4. Will any communities experience greater burdens than others?

Basic demographic data are shared first:

- The U.S. Fish and Wildlife Service (USFWS) reports 43 percent of anglers had an average household income under \$75,000, identical to the average U.S. household (43%).⁸
- Likewise, according to the USFWS, 48% of anglers were under the age of 45, while 47% of the U.S. population was under 45 years of age.
- While anglers are under-represented among Hispanics, the Recreational Boating and Fishing Foundation (RBFF) reports Hispanic participation is growing rapidly, with 13% having

³ <https://wildlife.ca.gov/Licensing/Statistics#SportFishingLicenses>

⁴ Personal communications with H&M Landing in San Diego from where 30 CPF vessels operate.

⁵ The proportion of trips across these four categories was obtained via personal communications with H&M Landing in San Diego: ½ day = 45%, full-day = 18%, overnight = 15% and multi-day = 22%.

⁶ Per SAC estimate of USCG commercially inspected vessels, based on CFW data.

⁷ For FY2018, California received \$16,513,733. When divided by California's sale of 1,603,626 licenses as certified by the USFWS, this equals \$10.30 in federal revenue per license sold.

⁸ Angler income obtained from the 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation., U.S. Fish and Wildlife Service, 2018. US median income obtained from <https://www.census.gov/library/publications/2017/demo/p60-259.html>.

participated in fishing in 2020, the highest participation rate yet recorded. Nearly one in 10 Hispanics participated in fishing for the first-time last year. In the past ten years, the number of U.S. Hispanics who went fishing grew 55% from 3.1 million to 4.8 million.⁹

A common misperception is anglers are disproportionately wealthy and will accept higher prices to continue to fish. The Federal statistics shared above show anglers are not wealthy compared to the U.S. population and likely comprise just as many young families as found anywhere else. Considering prices for boats that can safely access the ocean generally start at \$75,000, the only affordable means for many lower-income segments of California's communities to access the ocean are via CPF vessels. **Expecting lower-income communities of California to bear severe price increases and not decrease their use of CPF vessels is certainly not reasonable.**

Please note that data does exist pinpointing where anglers live. License data held by the California Department of Fish and Wildlife contains purchasers' zip codes. These data can be used to generate plot maps showing where anglers live, including the percentage living in lower income neighborhoods. Such assessments have apparently not been conducted, yet should be to better determine the potential burden placed on lower income communities.

5. What is the expected impact to the State economy?

Per page 110 of CARB's economic analysis (SRIA), July 7th, 2021:

"...However, staff cannot rule out the possibility of some business elimination if costs cannot be pass on to the customer or if passing through costs would result in a significant decrease in demand."

Earlier, it was shown that many customers will stop using CPF vessels if prices are increased. **Any assumption that costs can be fully or even partially passed along to customers without decreasing participation is simply wrong. If boat operators were in a position to charge higher prices, just like any business, they already would have. Without a doubt, price increases will harm CPF vessel operators and likewise the local communities that depend on them.**

Decreased participation means decreased spending on CPF vessels, which in turns harms the economy:

- As shown earlier, the average fee paid per customer is estimated at \$287.75 while the average number of paying customers per vessel is 1,986 annually.¹⁰
- With 174 vessels in service, 345,564 passenger trips occur annually.
- With an average of \$287.75 per trip, annual fees paid to access CPF vessels in California is \$99,436,041.
- According to the most recent economic impact data for marine fishing in California¹¹, for each dollar spent by anglers, the following multipliers take effect:
 - .000015 jobs are supported
 - 38 cents in income is generated for California residents
 - \$1.59 in value-added, or contributions to GDP, are provided
 - And according to an additional source, 14 cents in state tax revenues¹²

⁹ 2021 Special Report on Fishing. Recreational Boating and Fishing Foundation (RBFF) and the Outdoor Industries Foundation (OIF).

¹⁰ The proportion of trips across these four categories was obtained via personal communications with H&M Landings of San Diego who operates 30 vessels, plus their website regarding prices.

¹¹ National Marine Fisheries Service. 2021. Fisheries Economics of the United States, 2017. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-219

¹² Southwick Associates. Sportfishing in America: An Economic Force for Conservation. Produced for the American Sportfishing Association (ASA) under a U.S. Fish and Wildlife Service (USFWS) Sport Fish Restoration grant (F12AP00137, VA M-26-R) awarded by the Association of Fish and Wildlife Agencies (AFWA), 2012.

- Therefore, considering anglers annually spend \$99,436,041 to access CPF vessels, the following benefits are created for California's economy:
 - 1,492 jobs
 - \$37,785,696 in income (salaries, wages and small business profits)
 - \$158,103,305 in GDP contributions to California's economy, and
 - \$13,921,046 in lost state tax revenues.

The economic impacts are greater than just the fees paid to CPF vessel operators. Passengers also spend money traveling to and from the marinas, often staying in hotels before or after their trip while also purchasing food at local restaurants along with outdoor clothing and more. According to research based on data from the U.S. Census Bureau, for every dollar anglers spend on guides and CPF vessels, another \$19.77 are spent on other travel items such as lodging, food and more. How much is spent specifically by CPF customers on travel items is not known, but are certainly significant and would add much more to the CPF sector's economic impacts reported above.

California's tourism sector will also be affected. According to the U.S. Department of Commerce, nearly 10% of California's marine anglers are out-of-state residents.¹³ Their exclusion will harm California's tourism industry.

Summary:

CARB clearly does not understand nor did not take time to learn about the affected vessels' operations and business environment, nor understands the demographics, motivations and financial abilities of these vessels' customers. Assuming the customers of the affected vessels, who commonly hail from lower income environments, will simply accept higher prices and not decrease their days of fishing is absurd. If passed as proposed, the amendments will significantly reduce the dollars received by California for oceans and fisheries conservation, impact lower income communities the most, and cost the state economy nearly 1,500 jobs, \$37.8 million in income and over \$13 million in state tax revenues.

In conclusion, we find serious shortcomings in CARB's statements and claims as presented in its economic analysis (SRIA). We offer our insights based on the best data available and our years of experience. We kindly request that the State of California carefully considers these potential impacts before making decisions that can potentially harm businesses, their employees and California residents who want to access the ocean. Thank you.

Sincerely,



Rob Southwick
 President
Rob@SouthwickAssociates.com

¹³ ¹³ National Marine Fisheries Service. 2021. Fisheries Economics of the United States, 2017. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-219

CONSIDINE CONSIDINE
CERTIFIED PUBLIC ACCOUNTANTS

November 10, 2021

Frank Ursitti
H&M Landing
2803 Emerson Street
San Diego, CA 92106

Dear Mr. Ursitti,

As a partner in the attestation group of Considine and Considine for 35 years, I have worked with many marine entertainment-based event businesses and significant marine industry activity. Considine and Considine is a San Diego-based public accounting firm in operation since 1947 with approximately 90 staff.

In response to new engine emission rules proposed by the California Air Resources Board (CARB) that will likely require commercially inspected passenger boats to be replaced in the coming years, H & M Landing sought a cash analysis to determine the financial impact of different scenarios that would result from the purchase of a Class 1 (65 ft) vessel or Class 2 (80 ft) vessel.

This analysis is in response to the CARB statements in the *Standard Regulatory Impact Assessment (SRIA)* and associated cost spreadsheet that replacement vessels are projected to cost an average of \$2.1 million and can be financed with passenger ticket price increases of \$28.03/day (or 19% increase) and \$26.09/multi-day (or 14% increase).

Our firm was retained to answer the following questions for each vessel:

- 1) What would be the impact to cash flow using CARB's suggested ticket price increase percentages?
- 2) What increase in ticket prices would be required for a vessel owner to achieve break-even cash flow (no profit)?

Methodology:

From a reputable ship builder, the client secured bids for commercial passenger vessels that commonly operate off the coast of California, a Class 1 65 ft local/coastal (day trip) vessel and a Class 2 80 ft multi-day vessel. The ship builder believes that the new vessels would meet the requirements of CARB's proposed rule and be able to accommodate the mandated engines and equipment when approved for marine use.

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The cash flow analyses are based on estimated operating expenses provided by client of in-service vessels and existing daily customer rates. There are two vessels under consideration, one a \$4.6 million build cost related to a Class 1 coastal local experience vessel with an expected 15-person capacity; the Class 2 multi-day vessel would be a larger offshore multi day vessel with estimated construction cost of \$5.7 million with an expected 25-person capacity. We used the year 2018 as the base year, a period that proceeded the COVID-19 pandemic that required operations to be suspended, and assumed vessels operated at 100% of capacity on all trips.

The cash analyses are based on constant dollars with no inflation factor built in. Increasing costs are based on statutory rates or market forces. Inflation impact on revenue and expenses are expected to net to near zero and have not been included in the cash analyses to provide a more simple straightforward effective way to demonstrate the cost of acquiring major new fixed asset vessels to cash flow.

Each vessel analysis has two cash flow schedules the first based on a 14% price increase in the year of acquisition for the vessel and a 1% increase in real dollars each year thereafter ending at 10 years. The second analysis demonstrates the pricing levels necessary to break even on cash flow for the acquisition. While breakeven is not an acceptable long-term business model it does provide guidance to the expected pricing increases that would be necessary to reset a fleet with new qualified vessels.

The financing terms on the acquisition of new vessels are expected to be at 6% interest over a 20-year repayment life with a down payment of approximately 10% to be sourced from a potential resell value of existing equipment. These terms are likely optimistic for several reasons. First, the resale value of existing vessels may be difficult given that they will not meet new emission standards and have no resale value, requiring the vessels to be transferred overseas or across the U.S. Second, our experience demonstrates that banks are unlikely to finance 90% of the cost of a new vessel given down payments of 20%-40% are common for these types of vessels. Third, the analysis assigns no cost to the pay-off of a capital note on the existing vessel and it is unlikely that the full resale value of the existing vessel would be fully available for a down payment as it would be the security for the existing note. And lastly, the vessel owners will be required to convert the vessels to zero emission well within the useful life of the capital investment at an unknown but potentially significant cost meaning banks will want the loan to mature over a shorter period or will further reduce the percentage of the vessel that can be financed.

Conclusion

H&M Landing (current vs. future prices)

	Passenger Ticket for Existing Vessel	Passenger Ticket for CARB Compliant Vessel
Class One (Day) 15-passengers	\$180	\$542
Class Two (Multi Day) 25-passengers	\$200	\$394

Class 1 Coastal Vessel (65 feet): As the cash flow analysis demonstrates the \$4.6 million boat acquisition with 10% deposit would produce a **negative** cash position over 10 years of \$ 2,826,304. For this boat to breakeven, passenger prices would have to increase threefold or be increased by 200%.

Class 2 Multi-Day Vessel (80 feet): The cash flow results based on the \$5.7 million purchase with a 10% deposit would produce a \$ 3,047,600 **negative** cash at the end of 10 years and for this boat to breakeven, passenger prices would have to nearly double or be increased by 97%.

The four cash flow analyses attached to this letter demonstrate the trajectory business owners will face given high cost of replacement vessels. Modeling suggests revenue increases to support the cost of new build will be extremely aggressive.

In my experience with marine recreation, the sudden and significant cost increase would both reduce the pool of those that can access the service and the frequency of returning customers. This challenge will be even greater for the most common smaller passenger vessel category (Class 1), notably half to one-day coastal vessels that serve anglers, whale watchers and divers. This would affect the ability to finance a vessel as would the uncertainty regarding future investments necessary to achieve zero emissions. Banks may view any extensions granted by CARB negatively as it would shorten the period of capital recovery and thereby require additional increases in ticket prices to achieve sustainable revenues.

Very truly yours,

Considine & Considine

PHILIP R. SMITH

Certified Public Accountant

PRS/Alli

Charter Boat Analysis

Class 1 (65ft) Vessel (Local/Coastal)

\$360,000 Down Payment, 20-Year Payoff, 6.00%

Cost: \$4,600,000

	2022 Year 1	2023 Year 2	2024 Year 3	2025 Year 4	2026 Year 5	2027 Year 6	2028 Year 7	2029 Year 8	2030 Year 9	2031 Year 10
Revenues										
Existing Day Rate/Person	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180
Rate Increase	1.00	1.14	1.15	1.16	1.17	1.18	1.19	1.20	1.21	1.22
Boat Capacity	10	15	15	15	15	15	15	15	15	15
Days of Operation/Year	116	116	116	116	116	116	116	116	116	116
Revenues	\$ 208,800	\$ 357,048	\$ 360,180	\$ 363,312	\$ 366,444	\$ 369,576	\$ 372,708	\$ 375,840	\$ 378,972	\$ 382,104
Operating Costs										
Fees	\$ 62,640	\$ 107,114	\$ 108,054	\$ 108,994	\$ 109,933	\$ 110,873	\$ 111,812	\$ 112,752	\$ 113,692	\$ 114,631
Utilities	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511
Advertising	\$ 6,264	\$ 10,711	\$ 10,805	\$ 10,899	\$ 10,993	\$ 11,087	\$ 11,181	\$ 11,275	\$ 11,369	\$ 11,463
Labor	\$ 37,979	\$ 39,118	\$ 40,292	\$ 41,501	\$ 42,746	\$ 44,028	\$ 45,349	\$ 46,709	\$ 48,111	\$ 49,554
Maintenance	\$ 25,056	\$ 42,846	\$ 43,222	\$ 43,597	\$ 43,973	\$ 44,349	\$ 44,725	\$ 45,101	\$ 45,477	\$ 45,852
Fuel	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000
Insurance	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000
Total expense	\$ 213,450	\$ 281,301	\$ 283,884	\$ 286,502	\$ 289,156	\$ 291,848	\$ 294,579	\$ 297,348	\$ 300,159	\$ 303,012
Operating Income	\$ (4,650)	\$ 75,747	\$ 76,296	\$ 76,810	\$ 77,288	\$ 77,728	\$ 78,129	\$ 78,492	\$ 78,813	\$ 79,092
% of Gross	-2%	21%	21%	21%	21%	21%	21%	21%	21%	21%
Expenses Resulting from Purchase										
New Vessel Interest	\$ -	\$ 230,638	\$ 244,937	\$ 237,561	\$ 229,730	\$ 221,417	\$ 212,591	\$ 203,220	\$ 193,271	\$ 182,709
New Vessel Property Tax	\$ -	\$ 46,000	\$ 42,167	\$ 38,653	\$ 35,432	\$ 32,479	\$ 29,772	\$ 27,291	\$ 25,017	\$ 22,932
Net Income (Loss)	\$ (4,650)	\$ (200,891)	\$ (210,807)	\$ (199,404)	\$ (187,875)	\$ (176,168)	\$ (164,234)	\$ (152,020)	\$ (139,476)	\$ (126,549)
% of Net	-2%	-56%	-59%	-55%	-51%	-48%	-44%	-40%	-37%	-33%
Cash Beginning	30,000	25,350	(279,046)	(609,437)	(935,800)	(1,258,465)	(1,577,736)	(1,893,899)	(2,207,219)	(2,517,944)
Net Income	(4,650)	(200,891)	(210,807)	(199,404)	(187,875)	(176,168)	(164,234)	(152,020)	(139,476)	(126,549)
Loan Payoff	-	(103,505)	(119,584)	(126,959)	(134,790)	(143,103)	(151,930)	(161,300)	(171,249)	(181,811)
Capital Reserves	-	-	-	-	-	-	-	-	-	-
Net Sale Proceeds	-	360,000	-	-	-	-	-	-	-	-
Down Payment	-	(360,000)	-	-	-	-	-	-	-	-
Ending Cash	25,350	(279,046)	(609,437)	(935,800)	(1,258,465)	(1,577,736)	(1,893,899)	(2,207,219)	(2,517,944)	(2,826,304)

Charter Boat Analysis

Class 2 (80ft) Vessel (Full Day Islands/Offshore)

\$500,000 Down Payment, 20 Year Payoff, 6.00%

Cost: \$5,700,000

Revenues

	2022 Year 1	2023 Year 2	2024 Year 3	2025 Year 4	2026 Year 5	2027 Year 6	2028 Year 7	2029 Year 8	2030 Year 9	2031 Year 10
Existing Day Rate/Person	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200
Rate Increase	1.00	1.14	1.15	1.16	1.17	1.18	1.19	1.20	1.21	1.22
Boat Capacity	25	25	25	25	25	25	25	25	25	25
Days of Operation/Year	162	162	162	162	162	162	162	162	162	162
Revenues	\$ 810,000	\$ 923,400	\$ 931,500	\$ 939,600	\$ 947,700	\$ 955,800	\$ 963,900	\$ 972,000	\$ 980,100	\$ 988,200

Operating Costs

Fees	\$ 243,000	\$ 277,020	\$ 279,450	\$ 281,880	\$ 284,310	\$ 286,740	\$ 289,170	\$ 291,600	\$ 294,030	\$ 296,460
Utilities	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500
Advertising	\$ 24,300	\$ 27,702	\$ 27,945	\$ 28,188	\$ 28,431	\$ 28,674	\$ 28,917	\$ 29,160	\$ 29,403	\$ 29,646
Labor	\$ 117,938	\$ 121,476	\$ 125,120	\$ 128,874	\$ 132,740	\$ 136,722	\$ 140,824	\$ 145,049	\$ 149,400	\$ 153,882
Maintenance	\$ 97,200	\$ 110,808	\$ 111,780	\$ 112,752	\$ 113,724	\$ 114,696	\$ 115,668	\$ 116,640	\$ 117,612	\$ 118,584
Fuel	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906
Insurance	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000
Total expense	\$ 739,844	\$ 794,412	\$ 801,701	\$ 809,100	\$ 816,611	\$ 824,238	\$ 831,985	\$ 839,855	\$ 847,851	\$ 855,978
Operating Income	\$ 70,156	\$ 128,988	\$ 129,799	\$ 130,500	\$ 131,089	\$ 131,562	\$ 131,915	\$ 132,145	\$ 132,249	\$ 132,222
% of Gross	9%	14%	14%	14%	14%	14%	14%	14%	13%	13%

Expenses Resulting from Purchase

New Vessel Interest	-	282,858	300,394	291,348	281,745	271,549	260,724	249,232	237,031	224,077
New Vessel Property Tax	-	57,000	52,250	47,500	42,750	38,000	33,250	28,500	23,750	19,000
Net Income (Loss)	70,156	(210,870)	(222,845)	(208,348)	(193,406)	(177,988)	(162,060)	(145,587)	(128,532)	(110,855)
% of Net	9%	-23%	-24%	-22%	-20%	-19%	-17%	-15%	-13%	-11%
Cash Beginning	30,000	100,156	(237,655)	(607,159)	(971,212)	(1,329,927)	(1,683,418)	(2,031,806)	(2,375,214)	(2,713,769)
Net Income	70,156	(210,870)	(222,845)	(208,348)	(193,406)	(177,988)	(162,060)	(145,587)	(128,532)	(110,855)
Loan Payoff	-	(126,940)	(146,659)	(155,705)	(165,308)	(175,504)	(186,329)	(197,821)	(210,022)	(222,976)
Capital Reserves	-	-	-	-	-	-	-	-	-	-
Net Sale Proceeds	-	500,000.00	-	-	-	-	-	-	-	-
Down Payment	-	(500,000.00)	-	-	-	-	-	-	-	-
Ending Cash	\$ 100,156	\$ (237,655)	\$ (607,159)	\$ (971,212)	\$ (1,329,927)	\$ (1,683,418)	\$ (2,031,806)	\$ (2,375,214)	\$ (2,713,769)	\$ (3,047,600)



SOCAL Charter Vessel Specification

Proposed concept is to provide a diesel electric drive charter fishing/sightseeing vessel. The diesel electric design was chosen to “futureproof” the vessel to allow for upgrades to power system as new and more reliable technology becomes available. Electrical power is generated via multiple diesel generators, the decision was made to not use battery storage system due to the current inefficiency in energy storage.

Vessel to be designed and built to all class requirement (Sub-Chapter T, ABS etc)

100 Design & Structure

General

Length overall,	65'
Beam overall	22'
Crew	3 person
Passengers maximum	40 person
Fuel capacity, useable	2500 US gal.
Fresh water capacity	750 US gal.

Hull materials

- Option #1 Steel
- Option #2 Fiberglass
- Option #3 Aluminum

House design

- Material same as hull
- Interior dining/seating area
- Galley for food preparation and concessions sales
- ADA compliant
 - Head
 - Doorway
 - Seating area
- Crew member berth and head w/ shower



SOCAL Charter Vessel Specification

200 Propulsion Systems

Propulsion to be provide by twin electrically powered azimuth pod type motors. This propulsion system combines steering along with propulsion making the vessel highly maneuverable and controllable. Electrical power is provide by multiple generators, operating together as power is required and shutting down during low power consumption operations(in/out port, trolling or “idling”)

Azimuth Thruster

- SCHOTTEL SRE
- EcoPeller 150 L-Drive
- 1200 mm Fixed Pitch Propeller
- Offshore duty rating
 - 3000 to 5500 annual thruster operating hours
- Freshwater cooled motor



Azimuth steering

- Electrical
- Steering time 10 seconds for 180°

Generators

- Three Northern Lights 300kw w/ SCR, DPF & wet exhaust
- Multiple generators to be started & paralleled as electrical demands increase
 - Utilize generator power efficiently to reduce, fuel consumption, noise and engine wear

300 Electrical Systems

Vessel is equipped with multiple electrical systems of AC & DC power. Electrical control cabinets are used to properly protect components and personnel. All systems to be grounded at one single point as required.

- Schneider frequency converters for control of propulsion motors
- Generator control systems
- Led lighting throughout vessel
- Generators individual start battery bank
- House emergency power battery bank
- Shore power connection 50 amp minimum



SOCAL Charter Vessel Specification

400 Command & Control Systems

Full suite of Furuno Navnet electronics system along with communication radios and satellite phone.
Schottel drive controls

Electronics

- Furuno radar radome
- Furuno radar open array
- Furuno Navnet system
- Dual GPS chart plotters
- Satellite phone
- Dual VHF
- Sideband radio
- Wesmar HD860 Color side-scanning sonar
- Fathometer
- Loud hailer
- PA system

Alarm system

- Bilge high water
- Fire
- Propulsion motors
- Generator monitoring



SOCAL Charter Vessel Specification

500 Auxiliary Systems

Auxiliary system components are selected for longevity and where possible duplicated between system to reduce spare requirements

- HVAC
 - TECHNICOLD CHILLED WATER MARINE AIR CONDITIONING
 - 90,000 btu
 - Multi zone system
 - Bridge
 - Galley
 - Mess deck
- RSW
 - Integrated Marine Systems 5 ton system
 - Electric drive
- Bait tanks
 - FWD
 - 300 gallon / 20 Scoop
 - AFT
 - 750 gallon / 50 scoop
 - Fish hold/rsw supplied
 - 1000 gallon/66 scoop
- Fish Hold
 - Multiple storage tanks
 - Size and configurations TBD
- Washdown pumps FWD & AFT
- Potable water
 - 750 gallon tank
 - Pressure pump
 - Hot water heater
- Waste system
 - 400 gal black water
 - 400 gal grey water
 - Deck pump out connection
- Bilge System
 - Individual bilge pumps located in all water tight compartments



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting

All decking, paneling, cabinetry, and seating for passengers made of materials selected for ease of cleaning and durability

Galley & Concessions equipment

- Under counter top load Beverage cooler
 - 25 cases of bottles
- Refrigerator
- Flat top grill
- Vent hood
- Warming pan
- Coffee maker

Seating area

- ADA compliant doorway
- Easy clean booth type seating
 - ADA compliant section
- USB charging ports
- (2) 42 " flat screen TV's w/ dvd player
 - Optional satellite TV

Passenger heads

- Two individual heads
- ADA compliant
 - Doorway
 - Grab bar
 - Toilet height
- Easy clean with deck drain
- Raw water toilet

Insulation

- Passenger and pilot house areas to be thermally insulated
- Engine room to be acoustically insulated



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting (CONT)

Crew Stateroom & head

- Separate from the guest areas
- Sleeping bunk
- Full head w/shower

Railing

- Continuous railing with movable sections as required for boarding
- Height TBD

Paint/gelcoat

- Paint
 - If vessel is steel or aluminum
- Gelcoat
 - If vessel is fiberglass

Decks

- All walkways and decks shall be covered in Nonskid

Windows

- All windows to be direct bonded frameless windows

Budgetary estimate

The budgetary Estimates for this vessel

- Diesel electric propulsion is \$4,600,000
- Conventional power package (diesel w/ shafts & props) \$4,200,000



SOCAL Charter Vessel Specification

Proposed concept is to provide a diesel electric drive charter fishing/sightseeing vessel. The diesel electric design was chosen to “futureproof” the vessel to allow for upgrades to power system as new and more reliable technology becomes available. Electrical power is generated via multiple diesel generators, the decision was made to not use battery storage system due to the current inefficiency in energy storage.

Vessel to be designed and built to all class requirement (Sub-Chapter T, ABS etc)

100 Design & Structure

General

Length overall,	80'
Beam overall	25
Crew	3 person
Passengers maximum	40 person
Fuel capacity, useable	3000 US gal.
Fresh water capacity	1000 US gal.

Hull materials

- Option #1 Steel
- Option #2 Fiberglass
- Option #3 Aluminum

House design

- Material same as hull
- Interior dinning/seating area
- Galley for food preparation and concessions sales
- ADA compliant
 - Head
 - Doorway
 - Seating area
- Crew member berth and head w/ shower
- 21 persons berthing spaces



SOCAL Charter Vessel Specification

200 Propulsion Systems

Propulsion to be provide by twin electrically powered azimuth pod type motors. This propulsion system combines steering along with propulsion making the vessel highly maneuverable and controllable. Electrical power is provide by multiple generators, operating together as power is required and shutting down during low power consumption operations(in/out port, trolling or “idling”)

Azimuth Thruster

- SCHOTTEL SRE
- EcoPeller 150 L-Drive
- 1200 mm Fixed Pitch Propeller
- Offshore duty rating
 - 3000 to 5500 annual thruster operating hours
- Freshwater cooled motor



Azimuth steering

- Electrical
- Steering time 10 seconds for 180°

Generators

- Three Northern Lights 300kw w/ SCR, DPF & wet exhaust
- Multiple generators to be started & paralleled as electrical demands increase
 - Utilize generator power efficiently to reduce, fuel consumption, noise and engine wear

300 Electrical Systems

Vessel is equipped with multiple electrical systems of AC & DC power. Electrical control cabinets are used to properly protect components and personnel. All systems to be grounded at one single point as required.

- Schneider frequency converters for control of propulsion motors
- Generator control systems
- Led lighting throughout vessel
- Generators individual start battery bank
- House emergency power battery bank
- Shore power connection 50 amp minimum



SOCAL Charter Vessel Specification

400 Command & Control Systems

Full suite of Furuno Navnet electronics system along with communication radios and satellite phone.
Schottel drive controls

Electronics

- Furuno radar radome
- Furuno radar open array
- Furuno Navnet system
- Dual GPS chart plotters
- Satellite phone
- Dual VHF
- Sideband radio
- Wesmar HD860 Color side-scanning sonar
- Fathometer
- Loud hailer
- PA system

Alarm system

- Bilge high water
- Fire
- Propulsion motors
- Generator monitoring



SOCAL Charter Vessel Specification

500 Auxiliary Systems

Auxiliary system components are selected for longevity and where possible duplicated between system to reduce spare requirements

- HVAC
 - TECHNICOLD CHILLED WATER MARINE AIR CONDITIONING
 - 90,000 btu
 - Multi zone system
 - Bridge
 - Galley
 - Mess deck
- RSW
 - Integrated Marine Systems 10 ton system
 - Electric drive
- Bait tanks
 - FWD
 - 500 gallon / 33 Scoop
 - AFT
 - 1500 gallon / 100 scoop
 - Fish hold/rsw supplied
 - 2,500 gallon/167 scoop
- Fish Hold
 - Multiple storage tanks
 - Size and configurations TBD
- Washdown pumps FWD & AFT
- Potable water
 - 1000 gallon tank
 - Pressure pump
 - Hot water heater
- Waste system
 - 500 gal black water
 - 500 gal grey water
 - Deck pump out connection
 - Macerator pump and overboard connection
- Bilge System
 - Individual bilge pumps located in all water tight compartments



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting

All decking, paneling, cabinetry, and seating for passengers made of materials selected for ease of cleaning and durability

Galley & Concessions equipment

- Under counter top load Beverage cooler
 - 25 cases of bottles
- Refrigerator
- Flat top grill
- Vent hood
- Warming pan
- Coffee maker

Seating area

- ADA compliant doorway
- Easy clean booth type seating
 - ADA compliant section
- USB charging ports
- (2) 42 " flat screen TV's w/ dvd player
 - Optional satellite TV

Passenger heads

- Two individual heads
- ADA compliant
 - Dooway
 - Grab bar
 - Toilet height
- Easy clean with deck drain
- Raw water toilet

Insulation

- Passenger and pilot house areas to be thermally insulated
- Engine room to be acoustically insulated



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting (CONT)

Crew Stateroom & head

- Separate from the guest areas
- Sleeping bunk
- Full head w/shower

Passenger Berthing spaces

- Bunks for 21 passengers
- Emergency egress hatches & fire barriers as required

Railing

- Continuous railing with movable sections as required for boarding
- Height TBD

Paint/gelcoat

- Paint
 - If vessel is steel or aluminum
- Gelcoat
 - If vessel is fiberglass

Decks

- All walkways and decks shall be covered in Nonskid

Windows

- All windows to be direct bonded frameless windows

Budgetary estimate

The budgetary Estimates for this vessel

- Diesel electric propulsion is \$5,700,000
- Conventional power package (diesel w/ shafts & props) \$5,200,000

Comment Log Display

Below is the comment you selected to display. Comment 3175 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jay
Last Name: Ocampo
Email Address: Jmocampous@yahoo.com
Affiliation:

Subject: A right to eat.

Comment:

When I get on sportboats it is my intention to fish in order to bring home catch for myself and family. It has also been a way of life, the act of fishing. Without sportboats where I spend about 50 percent of my fishing time I would not be able to enjoy catching the grade of fish that is possible local to where I live. I would need to go out of state to Oregon or towards Baja Mexico to enjoy similar catch.

3175.1

Sadly, it seems that the CARB restrictions are not allowing for feasible measures or reasonable time lines for many sportboats operations to come into compliance without drastically putting the owners at huge financial risk with the new measures in place. This would mean many, nearly 90 percent of sport boat operations would go out of business in CA causing loss of many jobs and the domino effect of the other industries tied to sport fishing industry to decline.

3175.2

While I am nature and earth lover, I really feel additional assistance to keeping sport boats in business while also keeping up with greater emissions standards is necessary for well being of the planet. Therefore, are there better ways to preserve sport boats staying in business while also improving emissions standards? If the current carb emissions will result in the closure of many sport boat operations then I think the measures need to be reassessed.

Please help sportboats improve emissions standards while also staying in business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 16:55:58

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Comment Log Display

Below is the comment you selected to display. Comment 3176 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Clark
Last Name: Chase
Email Address: clarkchase60@yahoo.com
Affiliation: None except I fish off these vessels

Subject: If these vessels are eliminated I will not have access to my fish quota and will not have
Comment:

They are the safe and secure way of obtaining our fish limit ... do not take this away from me ... I need fish in my diet... and they have a special ability to do that... please let us use Berkeley sport fishing for the rest of my life... thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:08:40

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Comment Log Display

**Below is the comment you selected to display.
Comment 3177 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dan
Last Name: Nutt
Email Address: dan.nutt@kirbycorp.com
Affiliation: Kirby Offshore Marine, LLC

Subject: Comments to CHC Rulemaking
Comment:
Please see the attached letter.

Attachment: www.arb.ca.gov/lists/com-attach/3600-chc2021-UDtTOIE9A30DZgJq.pdf

Original File Name: KOM-CHC_RULEMAKING COMMENTS_111521_final.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:25:51

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Kirby Offshore Marine, LLC

55 Waugh Drive, Ste. 1000
Houston, TX 77007
713-435-1000
fax 713-435-1464

Submitted via <https://www.arb.ca.gov/lispub/comm/bclist.php>

November 15, 2021

Clerk's Office
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Subject: Proposed Regulations for California Commercial Harbor Craft

Please accept this letter submitted with regard to the CARB CHC Regulations proposed September 21, 2021. Kirby is a member of the American Waterways Operators and we defer to their correspondence for greater detail of the issues the tug and barge industry is facing with this proposed rulemaking.

Kirby Offshore Marine operates towing vessels and barges in interstate commerce on the West Coast of the U.S., Hawaii, and Alaska. The California market is served by vessels which must also remain profitable in service outside of California. Kirby supports common-sense initiatives to improve the environment and protect the health of the public. But we believe that, based on the information presented in the AWO's comments, the emission impacts of towing vessels and barges, including ATB's, have been miscalculated and their effects on public health overstated in the CARB Statement of Reasons for the new rules.

Kirby has made significant investments in new vessels that are qualified to work in California markets under the existing CHC rules, and these investments will be negatively impacted by these proposed rules. Certain equipment that meets the current CHC regulations, will be disqualified from operation in California before the useful lifespans of the existing engines are realized. Decisions were made regarding capital investments, based on the current CHC regulation, and now these investments will likely not meet their expected service life due to the arbitrary nature of the proposed rules. The previous regulation very clearly stated that investments to upgrade pre-Tier 1 and Tier 1 engines on in-use vessels or deploy new equipment with Tier 2 and Tier 3 engines would be the only investment needed for the remaining life of these vessels. The fact that CARB has exempted the largest inventory of engines in the State from these regulations (commercial fishing vessels) and shifted the burden of improving overall CHC emissions onto the remaining vessels, is an arbitrary action which undermines the stated purpose of the regulations, and further harms the ability of the maritime industry to serve the people of California.

We ask the Air Resources Board to stay the implementation of these new rules until any future actions can be applied fairly and the economic impacts apportioned appropriately among all engine operators in the universe of vessels regulated under the CHC rules.

Sincerely,

Dan Nutt
Director, Regulatory Affairs



Comment Log Display

Below is the comment you selected to display. Comment 3178 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Beck
Email Address: beckmike223@yahoo.com
Affiliation:

Subject: Save sport fishing

Comment:

Sport fishing needs to be saved. It's a lifestyle that has been apart of many souther California families. This industry supplies many jobs for local fisherman and has been a back bone of the fishing industry. Allow these hardworking individuals and families to remain fishing and allowing us patrons the ability to make memories and enjoy a passed time that we cherish.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:23:59

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**Below is the comment you selected to display.
Comment 3179 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jacob
Last Name: Stanley
Email Address: jdstanman@gmail.com
Affiliation:

Subject: No

Comment:

Don't do it you'd be putting so many charter vessels out of
business

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:36:39

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Comment Log Display

Below is the comment you selected to display. Comment 3180 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rick
Last Name: Scott
Email Address: fishntuna@aol.com
Affiliation: Sport boat captain

Subject: CHC2021

Comment:

As a sport boat operator this would be detrimental to my livelihood and many others in the fishing industry. Not to mention the economics that this industry creates. What is being asked of us is not feasible to install on our vessels without creating a safety hazard to the crew and passengers. Every aspect of our vessels are regulated by the United States Coast Guard which you have been negligent in the process of your actions. If you had done the proper research you would have concluded that the equipment required to meet your standards is not manufactured to work effectively at the low RPMs and low loads on our engines at the normal operations of our engines. This regulation would put the entire Sportfishing industry out of business. If that is your goal I ask that you consider a buyout plan that would include a payment of a minimum of 5 year gross income of every vessel that cannot comply due to in affective equipment you are requiring to meet your standards. If not please consider a tier3 engine sufficient to meet your goal.

3180.1

3180.2

3180.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:11:39

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Comment Log Display

Below is the comment you selected to display. Comment 3181 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ralph
Last Name: Martinez
Email Address: Kmarti4life@gmail.com
Affiliation:

Subject: Sport fishing boats

Comment:

To whom it may concern,

Being a native Southern Californian spending time on the ocean was a huge part of my upbringing. Through high school and college I spent most of my time fishing. I can honestly say this kept me and many other from finding trouble elsewhere. Placing such high demand on the sport fishing fleet will greatly reduce the opportunity for these kids. Please consider the youth that use the sport fishing boats and ocean to engage in positive outdoor activity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:29:35

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Comment Log Display

**Below is the comment you selected to display.
Comment 3182 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Michael
Last Name: Mendiburu
Email Address: Micheal_mendiburu@yahoo.com
Affiliation:

Subject: Dont sink sportfishing!
Comment:
Dont sink sportfishing!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:45:41

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Comment Log Display

**Below is the comment you selected to display.
Comment 3183 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: ROBERT
Last Name: NOLL
Email Address: RDNOLL@YAHOO.COM
Affiliation:

Subject: PROPOSED AMENDMENTS

Comment:

COMMERCIAL HARBOR CRAFT REGULATION, NOT ONLY GOING TO HURT FISHERMEN
IT'S ALSO GOING TO BE A BIG HIT TO FUNDING FOR DEPARTMENT OF FISH
AND WILDLIFE

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:35:26

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Comment Log Display

Below is the comment you selected to display. Comment 3184 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Melynda
Last Name: Dodds
Email Address: melynda.dodds@gmail.com
Affiliation:

Subject: Unsafe

Comment:

The proposed requirements are unsafe. Please consider the safety of boaters

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:51:31

If you have any questions or comments please contact [Clerk of the Board](#) at (916) 322-5594.

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Comment Log Display

Below is the comment you selected to display. Comment 3185 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Madeline
Last Name: Rose
Email Address: mrose@pacificenvironment.org
Affiliation: Pacific Environment

Subject: Environmental and EJ groups Letter in Support of Strong Harbor Craft Rule

Comment:

Please see the attached letter on behalf of environmental and environmental justice organizations in strong support to approve the Commercial Harbor Craft Regulation, with strengthening amendments.

We urge CARB to make its harbor craft rule as close as possible to requiring absolute zero emissions as soon as that is feasible. Californians, the nation and the world are facing interrelated existential public health, racial justice, and climate crises. The technology to create zero emission harbor craft is well on its way to achieving 100% zero-emissions by 2035 and it would be a mistake for California's Air and Climate regulator to endorse a continuation of diesel-powered vessels during the decade of urgent climate and clean air action.

Attachment: www.arb.ca.gov/lists/com-attach/3608-chc2021-WzVTMIY4AAwHYANt.pdf

Original File Name: NGO and EJ Letter in Support of a Strong Commercial Harbor Craft Regulation.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:44:23

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**[Union of
Concerned Scientists**

**Friends of
the Earth**



**SAN PEDRO PENINSULA
HOMEOWNERS' COALITION**

**BREATHE
SOUTHERN CALIFORNIA**



Little Manila RISING



MOVE LA



**CALIFORNIA
ENVIRONMENTAL
VOTERS**
FORMERLY CLCV



**COALITION FOR
CLEAN AIR**

November 1, 2021

Chair Randolph and Members of the Board
California Air Resources Board
1001 I Street,
Sacramento, California 95814
Via Electronic submittal

**Re: Approve the Commercial Harbor Craft Regulation, with Strengthening
Amendments**

Dear Chair Randolph and Members of the Board:

The undersigned organizations are writing to submit comments on California Air Resources Board (“CARB”) Proposed Regulation Order for the Commercial Harbor Craft Regulation (“CHC”). We appreciate the work that CARB staff have done on the proposal, including taking

into consideration comments that many of the undersigned organizations submitted to CARB in February and April of this year.

First and foremost, we urge CARB to stand firm in rejecting any efforts by industry to weaken the rule from its current draft. As written, CARB's amended CHC rule will yield significant public health benefits for Californians, especially those living in low-income communities of color. As you know, commercial harbor craft are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and Oakland. The proposed rule will protect thousands of Californians from asthma, cancer and other health risks and will save 500 Californians from premature death. The proposed rule mitigates negative health outcomes valued at over \$5.25 billion — 2.5 times more in savings than what it will cost companies to implement changes.

3185.1

In total, this landmark rule will reduce diesel particulate matter (PM) emissions from CHC in California by 89% and smog-forming nitrous oxide (NOx) emissions by. In so doing, the proposed rule lowers CHC-related cancer risk (>1 in a million) for nearly 15 million California residents in the areas evaluated (South Coast and Bay Area regions), reduced from 22 million under the current regulation to 7 million.

CARB must not walk back from these lifesaving amendments. The South Coast region is not on track to achieving the health-based air quality standards required under the US Clean Air Act, and the health and economic consequences of non-attainment are huge. Every sector that emits as much as this one does must play a part in reaching clean air, and no industry can be exempted from needed pollution reductions without putting additional stress on residents' health and additional burdens on other industries.

Secondly, we acknowledge that the proposed CHC rule will include a first-in-the-nation zero-emission mandate for the maritime sector, moving almost 200 vessels to 100% zero-emission this decade. In so doing, CARB will be helping catalyze zero-emission vessel innovation within the maritime sector and advance the land-side clean fuels and clean energy transition California ports desperately need to accelerate.

To these ends, we are particularly supportive of the following in the latest rule as proposed:

1. **Expanded Vessel Categories:** The additional CHC vessel categories to in-use requirements make sense, fit the definition of a harbor craft, and would help achieve additional emission reductions.
2. **Zero-emission requirements on the two segments:** We appreciate the zero-emission requirement for short run ferries traveling 3 nautical miles and a zero-emission "capable" emphasis for excursion vessels. These two areas are ripe for going to zero-emission.
3. **Methane performance standard:** We appreciate the revision to the methane performance standard to the rule of 1.0 g/bhp-hr.

However, we still believe the rule misses the opportunity to embrace electrification solutions for the commercial harbor craft sector and remain deeply concerned that the rule as written generates almost no material greenhouse gas reductions. In the face of climate emergency, we believe that the draft CHC rule remains insufficient and that significantly more harbor craft segments must be pushed off of fossil fuel propulsion to 100% zero-emissions by 2035.

We therefore urge CARB to go further to set an even stronger, zero-emission rule:

I. Require a 100% zero-emission transition for more harbor craft segments by 2035, notably all ferries, tugboats, dredges and barges, which are allowed to stay on diesel under the proposal as written:

The proposed regulation is still not sufficiently ambitious and misses greenhouse gas emissions reduction potential by requiring zero-emissions for only two segments. This risks creating a stranded asset scenario for harbor craft owners who may pay to retrofit to Tier 3/4 engines, only to be forced to make a full zero-emission transition in quickly proceeding years later. The proposed regulation also risks putting CARB out of compliance with [E.O. N-79-20](#).

Technology exists to transition all harbor craft to zero-emissions segments. Just like cars and trucks, boats and ships must transition off of fossil fuel propulsion. The time is now to electrify everything. No industry should get a free pass at the price of our frontline communities and the environment.

There are currently over 300 zero-emission ships powered by batteries in operation in the world, with another 194 on order. California's first zero-emission hydrogen fuel cell passenger ferry is already on the water in the San Francisco Bay in August. Construction has commenced on the world's first fully [electric fast ferry](#), ameliorating any concern that a zero-emission ferry commute would slow Californians down. California's [first fully electric, American-made tugboat](#) is in production, designed and owned by U.S.-based Crowley Marine, and will be at the Port of San Diego in early 2023. Meanwhile, [Duffy Electric Harbor Excursion vessel](#) is the world's leader in the electric boat industry since 1970 is based in Newport, CA.

Zero-emission targets for more segments would also bring a wide range of benefits:

- **A stronger zero-emission harbor craft rule will create jobs in California:** As the state looks toward economic recovery after the fallout of COVID-19, continued and expanded investment in developing zero emission technologies and infrastructure in the maritime sector provides unique opportunities to create reliable, in-state jobs while also achieving our climate goals. For instance, establishing shore power in just one Long Beach terminal — Pier C — created 60 union jobs. In addition, zero-emission shipping is expected to create 316,700 jobs nationally over 10 years according to a 2021 UC Berkeley Goldman School of Public Policy report.
- **A stronger zero-emission harbor craft rule will save lives and advance environmental justice.** As stated above, harbor craft are one of the top three cancer risks for Californians living near the ports of Los Angeles, Long Beach, San Diego and

Oakland. The draft rule will protect thousands of Californians from asthma, cancer and other health risks and will save 500 Californians from premature death. An even stronger rule will help save even more lives.

- **A stronger zero-emission harbor craft rule will save Californians billions of dollars.** As stated above, the avoided negative health outcomes are valued at over \$5.25 billion — 2.5 times more in savings than what it will cost companies to implement changes. A stronger rule will generate even more savings.

We have heard concerns from industry stakeholders on the costs to achieving ZE in these categories. While there may be initial investment costs, that cost can be passed on to the consumer but not to a degree that would impact efficiency. For example, Denmark-based Maersk, the world’s largest shipping company, has committed to net-zero emissions from its ocean shipping by 2050 and estimates that decarbonizing shipping would add only 6 cents to a pair of \$100 running shoes. Operators will also see increased efficiencies and fuel savings. For example, the Sandpiper dredge was converted from diesel to electric-powered. Besides producing far less pollution, the rebuilt Sandpiper is so efficient, it can dredge the harbor in less than half the time of the previous owner.

- **A strong zero-emission harbor craft rule creates business certainty:** In addition, harbor craft manufacturers and equipment developers need regulatory certainty in order to drive continued investment from the private sector in ZE technology.

II. Include technology reopener in rule language to revisit zero emission options as the commercial market matures

3185.3

With technology changing so rapidly, we recommend that CARB provide the ability to reopen the rule as the commercial market matures. We are attaching with our comment letter the Getting to Zero Coalition’s “Mapping of Zero Emission Pilots and Demonstration Projects” report.

III. Include a State Implementation Plan commitment to revise this rule as technology matures to achieve additional reductions.

The final rule should include an official, time-bound, aggressive commitment on when the next iteration of this rule will be considered and adopted.

In conclusion, we urge CARB to make its CHC rule as close as possible to requiring absolute zero emissions as soon as that is feasible. Californians, the nation and the world are facing interrelated existential public health, racial justice, and climate crises. The technology to create zero emission harbor craft is well on its way to achieving 100% zero-emissions by 2035 and it would be a mistake for California’s Air and Climate regulator to endorse a continuation of diesel-powered vessels during the decade of urgent climate and clean air action.

Sincerely,

Madeline Rose
Climate Campaign Director
Pacific Environment

Bill Magavern
Policy Director
Coalition for Clean Air

Regina Hsu
Associate Attorney
Earthjustice

Taylor Thomas
Co-Executive Director
**East Yard Communities for
Environmental Justice**

Fern Uennatornwarangoon
Air Quality Policy Manager
Environmental Defense Fund

John Kaltenstein
Deputy Director
Friends of the Earth

Matt Holmes
Community Engagement Specialist
Little Manila Rising

Peter M. Warren
**San Pedro & Peninsula Homeowners
Coalition**

David Wooley
Executive Director
Environmental Center
Goldman School of Public Policy
University of California, Berkeley

Dan Hubbell
Shipping Emissions Campaign Manager
Ocean Conservancy

Yassi Kavezade
Senior Campaign Representative,
My Generation, **Sierra Club California**

Sam Wilson
Senior Vehicles Analyst
Union of Concerned Scientists

Eli Lipmen
Deputy Director
Move LA

Marc Carrel
President & CEO
Breathe Southern California

Danny Serrano, AICP
Campaign Director,
Environmental Health Coalition |

Durwood Zaelke
Daniel Taillant, Climate Justice Policy
Advisor
**Institute for Governance and Sustainable
Development**

Ameen Khan
Regulatory Affairs Advocate
California Environmental Voters

Ellie Cohen
CEO
The Climate Center



Comment Log Display

Below is the comment you selected to display. Comment 3186 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Timothy
Last Name: Winn
Email Address: timwnn@yahoo.com
Affiliation:

Subject: i.e. exhaust filters.....

Comment:

this is such a powerless source of defense, alot of the bay area fleet is whats brought fresh fish and crab to my dinner table for many years as well as many others.if you shut these boats down i hope you will never sleep good the rest of your life because these guys who rely on this as financial support to feed they're family's and pay bills will have to start a new career beyond the middle of most of there lifes.that being said i hope you really think about the decision before you take action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:52:21

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**Below is the comment you selected to display.
Comment 3187 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Robert
Last Name: Mercier
Email Address: Robertmercier61@yahoo.com
Affiliation:

Subject: Save the fishing fleet

Comment:

To damage the fleet with unnecessary regulations damages family and individual livelihood. Boat owners captains and crew are very aware of climate change pollution and other hazards to nature. Putting a large financial burden on the fishing business will put many out of business. Do not make this a political decision .If it's not broken don't fix it. Robert Mercier

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:44:19

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Below is the comment you selected to display. Comment 3188 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: LeVon
Last Name: Garland
Email Address: gmangroovin2@gmail.com
Affiliation:

Subject: Chc 2021

Comment:

I am an avid saltwater sportfisherman who goes fishing as much as time and budget will allow and derive great enjoyment from this activity I've been doing since I was 14 years old(I'm 62 now).I've spent a good amount of money buying fishing tackle licenses,bait, apparel , Eyewear etc.and I believe the businesses and people who run them will be negatively affected if this bill goes thru as written.Many of the operators will not be able to afford the changes and prices will rise greatly among those who can.Do we really want to make the business environment more difficult than it already has been for almost 2 years? Do you want them to fail? Please don't pass this legislation.It will make the livlyhood of many difficult if not impossible and put the cost of participation out of the reach of many.Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:32:52

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**Below is the comment you selected to display.
Comment 3189 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Elias
Last Name: Van Sickle
Email Address: elias@switchmaritime.com
Affiliation:

Subject: Proposed CHC Regulations Comment Letter

Comment:

Letter attached. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/3612-chc2021-WikGd101UHcFYFQ8.pdf

Original File Name: SWITCH Letter to CARB_2021 11 15.pdf

Date and Time Comment Was Submitted: 2021-11-15 17:48:42

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SWITCH

MARITIME

November 15, 2021

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814
Via Electronic submittal
Evan.Kersnar@arb.ca.gov

RE: CARB's Commercial Harbor Craft Rule

Dear Chair Randolph,

SWITCH Maritime commends CARB for proposing legislation to reduce emissions and particulate matter from commercial harbor craft, making strides towards realizing a cleaner, healthier future in California. Informed by significant experience in working to commercialize zero-carbon, electric vessel(s) powered by hydrogen fuel cells and batteries, SWITCH believes zero-emissions vessels will be both technologically and economically viable for commercial harbor craft operators to adopt well before 2035. Accordingly, SWITCH writes to urge CARB to strengthen the proposed CHC regulation to move more rapidly toward full fleet decarbonization, achieving 100% zero-emissions across all CHC vessel types by 2035.

3189.1

Supported by a CARB grant, SWITCH Maritime is nearing completion and commercialization of the *Sea Change*, a 70-foot, 75-passenger aluminum catamaran ferry powered by hydrogen fuel cell and battery. The *Sea Change* features 10 hydrogen storage tanks that store 246 kgs of compressed hydrogen gas at a pressure of 250 bar. This provides enough energy for the *Sea Change* to operate continuously for ~300 nautical miles at a cruising speed of approximately 15 knots (max speed 20 knots). When the *Sea Change* is idling or traveling at low speeds, excess electricity generated by the fuel cells is stored in the 100 kWh battery system onboard. When higher speeds are required, this energy is then discharged from the battery to boost the power to the electric propulsion system. Now undergoing system commissioning and sea trials at the shipyard in Bellingham, WA, the *Sea Change* is slated to start operations in the San Francisco Bay Area in Q1 of 2022.

The technology employed in the *Sea Change* is modular and scalable and can be applied to all vessel types and sizes. With zero-carbon powertrain technology costs rapidly declining, SWITCH believes price / performance parity will be achieved in the next 5-7 years with conventional diesel alternatives and even sooner once grants and incentives are considered. Further, the *Sea Change* project will establish the regulatory frameworks with the U.S. Coast Guard, both for vessel design as well as fueling, that can be leveraged for future zero-carbon vessel projects. Given this technology and regulatory backdrop, achieving zero-carbon CHC by 2035 is feasible and CARB can help send an important market signal and help realize this energy transition by advancing more stringent emissions regulations.

- Given the climate emergency that we are facing, we need bold climate leadership. SWITCH is asking CARB to strengthen the Commercial Harbor Craft rule in the following specific ways: 3189.1 (cont.)
1. Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories.
 2. Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035.
 3. Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 3189.2
 4. Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation 3189.3

Finally, SWITCH would be more than happy to support policy efforts by offering an industry and technology perspective, should that be valuable to CARB.

Sincerely,

Pace Ralli
SWITCH Maritime, CEO



cc:
CARB Board members
Secretary Jared Blumenfeld, CalEPA



Comment Log Display

**Below is the comment you selected to display.
Comment 3190 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: john
Last Name: prendergast
Email Address: fishinbeavis@gmail.com
Affiliation:

Subject: fishing boats
Comment:
dont do it

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:58:37

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Below is the comment you selected to display. Comment 3191 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ernie
Last Name: Reinke
Email Address: epreinke59@gmail.com
Affiliation:

Subject: Please don't make ocean fishing unaffordable!
Comment:

To Governor Newsome, The California Air Resources Board and everyone else involved with this proposal,

I am a member of the Sportfishing community and as a fisherman and as a local. This letter is to express my concerns about the pending emissions regulations being proposed for Sport fishing Boats in California. There are many reasons this proposed legislation is flawed:

- 1.) One of the biggest flaws is the fact that the proponents of this legislation have not given adequate consideration to the overall economic impact this legislation will cause to the Sportfishing industry and the overall loss of tax revenue to the state of California. The California recreational Sport Fishing industry generates over 5.6 billion dollars annually and is responsible for the livelihood of thousands of people and their families. The proposed legislation would be devastating to not only the fishing industry but to the lives of many.
- 2.) The proposed technology for the Diesel Particulate Filter (DPF) does not exist and due to non existence, has not been approved by the U.S. Coast Guard.
- 3.) The proposed technology has not been tested and has not been proven to be safe for use at sea. This could lead to putting human lives in danger.
- 4.) The California State University Maritime Academy has concluded that the suggested standards for existing engines does not exist. In the alternative, treatment equipment (modifications) alone will significantly impact a vessel's stability.

5.) Over 80% of the existing Sport Fishing fleet is constructed of wood, fiberglass and combinations of said materials. Boats built of these materials would not be safe to operate if they could be retrofitted with proposed emissions devices. The result of the newly proposed emissions devices would require boats currently being used, to be replaced with boats made of steel hulls. This requirement would force most sport fleet operators out of business as the cost of this would be untenable.

Please apply common sense and logic to this proposal and end this madness before the wellbeing of those within the the Sportfishing industry and so many businesses associated with the Sport Fishing industry are bankrupted and forced out of business. Please realize the loss to the entire state if this incompetent proposal is to go forward.

Sincerely

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:58:24

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Below is the comment you selected to display. Comment 3192 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Christian
Last Name: Sekas
Email Address: Christian@sekassportfishing.com
Affiliation:

Subject: Effects of regulation on my livelihood

Comment:

The proposed regulations for passenger vessels will put me out of business. I operate a fiberglass passenger fishing vessel which cannot accommodate a "tier 4" diesel. As a person coming from a family of uneducated, economically disadvantaged person this business is the greatest accomplishment in my family, and it is horrifying to think CARBS regulations will strip that away. The requirements put forth are without question are unattainable for the vast majority of small passenger fishing vessels and should be changed. My business will be gone and the businesses I rely on to operate will be negatively effected as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:00:20

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Below is the comment you selected to display. Comment 3193 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alexander
Last Name: Andriatis
Email Address: aandriat@ucsd.edu
Affiliation: UC San Diego

Subject: Letter of Support for Proposed Amendments from UC San Diego Students

Comment:

Dear Chair Randolph and Members of the California Air Resources Board,

As students studying the ocean and the many ways in which our society benefits from it, we are acutely aware of the negative impacts of polluting ships. We personally spend time collecting air and water samples up and down the California coast, studying the ecology of harbors and estuaries, and measuring the effects of sea level rise in coastal communities. During our research, we breathe the pollutants emitted by diesel ship engines that is a leading cause of cancer among portside communities. We measure the oils and toxic chemicals in our coastal waters resulting from a continued reliance on petroleum fuels. We see the flooding already occurring in low-lying communities and model the severe economic and social impacts that continued carbon dioxide emissions and climate change will have on Californians in the coming decades.

We are submitting this letter of support for the proposed amendments to the Commercial Harbor Craft Regulation, and to advocate for a greater emphasis on supporting the infrastructure necessary to transition to fully zero-emission harbor craft and shoreside operations. Commercially-available technology already exists to build and operate zero-emission commercial harbor craft. Electricity from batteries or hydrogen fuel cells combined with electric propulsion systems can meet the operational requirements for all types of commercial littoral and harbor vessels. Scripps Institution of Oceanography continues to lead by example through its hydrogen-hybrid coastal research vessel project and goal of building clean, non-polluting shipboard power systems.

Currently, a major factor inhibiting the adoption of these technologies is the lack of shoreside infrastructure that would support the charging and fueling of these vessels. To maximize the

co-benefits of particulate emissions reductions and greenhouse gas emission reductions, the source of electricity for batteries and hydrogen for fuel cells will need to be derived from renewable energy sources. Requiring the development of charging and fueling infrastructure and subsidizing the costs of green hydrogen and renewable electricity will greatly increase the adoption of zero-emission vessel technologies.

California has historically been a national leader in addressing issues related to health, environmental pollution, and climate change. We are calling on the California Air Resources Board to continue being bold climate leaders. Accelerating the transition to zero-emission ships will improve air quality and health in coastal communities, reduce the impact of shipping on climate change, and bring the state of California closer to meeting its carbon reduction goals.

Thank you for your consideration of this important issue.

Students for Electrified and Sustainable Ships at Scripps Institution of Oceanography

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:16:01

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First Name: Tucker
Last Name: McCombs
Email Address: tuckermccombs@gmail.com
Affiliation: Boat Owner/Operator & Landing Owner

Subject: CHC2021

Comment:

Hello,

Attached please find my letter regarding CHC2021.

Thank you,

Tucker McCombs
Owner of Outrider Sportfishing, Inc. (Sportfishing boats) and
Ventura Habrbor Sportfishing, LLC (Sportfishing Landing)

Attachment: www.arb.ca.gov/lists/com-attach/3618-chc2021-AGNXMFEiVWQAWQJu.docx

Original File Name: CARB Letter - Outrider Sportfising+Ventura Harbor Sportfishing .docx

Date and Time Comment Was Submitted: 2021-11-15 18:17:17

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OUTRIDER SPORTFISHING, INC.
ENDEAVOR, ISLAND SPIRIT AND
CALIFORNIAN SPORTFISHING BOATS

WWW.VENTURASPORTFISHING.COM
(805) 676-3474
1500 ANCHORS WAY DR.
VENTURA, CA 93001

Ms. Liane Randolph, Chair

California Air Resource Board, c/o chc2021, 1001 I Street, Sacramento, CA 95814

My name is Tucker McCombs, and I am president of Outrider Sportfishing and Ventura Harbor Sportfishing LLC. I own and operate 3 CPFV's out of both Ventura Harbor and Mission Bay, along with the sportfishing landing that 2 other CPFV's run their businesses out of. I have spent most of my life working on CPFV's and completely rely on these vessels to support my family. Between the two businesses I employ 17 full time employees and 4 seasonal part time employees that fully rely on the operation of the CPFV's to make a living and support their family as well.

All three of the CPFV's that I own are powered with tier 3 engines and agree that as an industry we need to do everything that we can to have the least amount of emissions possible within reason. My observation is that because of the Carl Moyer program the CPFV fleet has done just that.

Two of my vessels are pre 1960 and of plank over frame construction, the other was built in 1972 of fiberglass over plywood. The reason for me purchasing these vessels was not because I enjoy vintage boats but because the price of new construction is completely out of the question for myself and almost all of my colleagues. When in the process of buying my first CPFV in 2016, I investigated commissioning a vessel of new construction from Little Hoquiam Shipyard. At the time before the present sever cost of material increase and inflation the quote was \$1,900,000.00. With the financial growth of my business since that time it still would not be feasible or possible for my business to sustain a purchase of that size. As it stands, I would have to repower my current vessels with tier 4 engines. This would just not be possible with the type CPFV's that I own with the present technology available.

One of the biggest problems for myself along with many others in this industry is that we still owe a substantial amount of money from the loans we used to acquire the vessels and equipment we use to make our living. Even if my business could afford to have a new CPFV built what would I do with my current vessels? The value of these vessels is usually based on their annual gross because of their "for purpose construction". Long story short the current proposal would force my two businesses to shut down and myself looking for a new industry to work in. I have spent my entire life getting to where I am at and this proposal would take all of that away. Thank you for your consideration.

Sincerely,

Tucker McCombs



Comment Log Display

**Below is the comment you selected to display.
Comment 3195 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Greg
Last Name: Hurner
Email Address: greg@carpentersievers.com
Affiliation: SAC & GGFA

Subject: CHC2021

Comment:

For your consideration.

Attachment: www.arb.ca.gov/lists/com-attach/3619-chc2021-VCdSNQdIWFQHYABu.pdf

Original File Name: SAC and GGFA CARB Rule Comment Letter FINAL Draft 11.15.21 compressed.pdf

Date and Time Comment Was Submitted: 2021-11-15 18:19:41

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November 15, 2021

Clerks' Office
California Air Resources Board
1001 I Street Sacramento, California 95814
<https://www.arb.ca.gov/lispub/comm/bclist.php>

SUBJECT: CHC2021: Official Comments Regarding the Amended Commercial Harbor Craft Regulation on Behalf of California's Commercial Passenger Fishing Vessel Owners and Operators

To Whom It May Concern:

This letter is presented by both the Sportfishing Association of California (SAC) and the Golden Gate Fisherman's Association (GGFA), whose combined efforts represent Commercial Passenger Fishing Vessels (CPFV's), both inspected and uninspected, throughout the State of California. The intent of this letter is to:

- Provide some background and knowledge of California's CPFV's operations (both landside and water related), legal licensing requirements and industry challenges;
- Identify the general issues with the proposed amendments to the Commercial Harbor Craft (CHC) regulation, as it relates to California's CPFV's;
- Provide specific comments on the proposed rule, including on the technical and financial analyses;
- List informational and data requests for which the California Air Resources Board (CARB) did not provide answers in its rulemaking materials, but which are critical to the understanding of the rule impacts; and
- Propose modifications to the current amendments to the CHC as well as an alternative to the rule provisions for CPFVs.

EXECUTIVE SUMMARY - QUESTIONS AND ANSWERS PERTAINING TO COMMERCIAL PASSENGER SPORTFISHING VESSELS

Because a comprehensive economic and social justice study was not completed and accurate costs for vessel replacements were not obtained, the proposed rule and associated work product is based on faulty assumptions and fails to evaluate the economic impacts to the inspected CPFV fleet, impacts to equitable and affordable access to our oceans, ocean education, reduced reach of programs offered for Title 1 schools, at-risk individuals, veterans, and other groups served by non-profits and to state conservation funding. As detailed in this letter and supporting documents, the rule will lead to the gentrification of ocean access where only those of significant means can afford to access the vessels that may remain after implementation of the rule.

3195.1

CPFVs are unique among harbor craft proposed for regulation under the rule and similar to Commercial Fishing in nearly all respects, including that they are family-operated small businesses. CARB has developed regulations that, if adopted, will destroy a lifetime of savings by devaluing vessels and businesses. The simple release of such an onerous proposed regulation has already affected potential sales of vessels from operators who had intended to sell their most valuable asset in order to retire.

3195.2

It is evident by our interaction with CARB, and how the proposed rule was developed, that CARB has little understanding of maritime operations, the economics of ocean-dependent businesses, and our customers. The inherent bias is displayed by CARB shrugging off the report they commissioned from the Cal Maritime Academy that raised the same fitment and safety issues between Commercial Fishing Vessels and CPFVs, then dismissively stating in the media that CPFVs can just raise ticket prices to buy new boats. Consequently, the proposed rule stands to make the sportfishing and whale watching industry obsolete, denying millions of Californians access to offshore fishing and marine life.

3195.3

More specifically, CARB estimates that replacement CPFVs will cost approximately an average of \$2.1 million but provides no supporting information to establish how they came up with the estimate. In stark contrast to CARB's estimate, a landing obtained estimates from a reputable ship builder. Those estimates show that new boats constructed to comply with CARB's rules would cost \$4.6 million (Class 1) and \$5.7 million (Class 2). So, in contrast to CARB's estimated ticket price increases of 27% for single day trips or 19% for multiday trips, a Certified Public Account determined ticket prices would need to increase 201% or 97%, respectively, to simply breakeven with no profit. And these scenarios require that a vessel owner not lose a single customer due to price increases that would be double or triple current levels.

3195.4

CARB conducted no analysis on the profile of anglers or those that go out to observe marine life, and somehow also neglected how cost increases would impact participation. We can assume from CARB's media statements and lack of analysis that they believe every participant is the equivalent of a bottomless-pocketed millionaire and that price has no impact because participants could afford their own boat anyway. In reality, as noted in the Southwick Associates Report, the USFWS found that 43% of anglers make less than \$75,000 per year, the same as the general population. The Recreational Boating and Fishing Foundation found that Hispanics are the fastest growing segment among anglers with a 55% increase in the last 10-years. This means those accessing the ocean through CPFVs are likely to be reflective of California's population and income levels generally.

3195.5

Southwick Associates has examined price increases on anglers in over 40 states. They tested CARB's suggested price increases on data available from Oregon for a similarly priced license. The results show that even at CARB's artificially lower increases in ticket prices, participation would fall over 40%. Southwick Associates notes that California angler data is readily available to CARB to conduct a full analysis. The report also provides insight into loss of ocean access on lower income communities and the jobs, income, state taxes and conservation funding that will be reduced, areas which were also not properly analyzed by CARB.

3195.5
(cont.)

However, CARB has designed the rule to place even greater economic burdens on CPFVs. Vessel owners would still be required to continue to upgrade their existing vessels, without the use of or with limited grant funding, while waiting for marine diesels and equipment that would meet the rule to be certified so new vessels can be built. While the industry has used grant funds to upgrade the majority of the fleet to Tier 2 engines, those will need to be replaced per the rule. If we assume 25% of the fleet will have upgraded to Tier 3 by the time the implementation of the rule in 2023, the industry will still need to spend over \$45 million to upgrade existing vessels.

3195.6

CARB also would require submission of paperwork every two-years for a possibility of potentially granting extensions of vessel replacement to a maximum of 6 or 8 years depending on implementation dates. CARB indicates the first year of documentation preparation will average over \$61,000 per vessel to request an extension or over \$10 million combined for the fleet. If the cost of updating the paperwork every two years is 20% of the original cost, this would require over \$2 million of additional paperwork costs for the hope of each subsequent two-year extension with no guarantee the extension will be granted. All of these costs, in addition to a reasonable profit, would require additional ticket price increases to the doubling or tripling necessary to fund the new vessel.

This means that to meet the criteria in the proposed rule, the 174 inspected vessel owners would need to spend over \$900 million to maintain and then replace the existing fleet, far higher than estimated by CARB. However, there is no conceivable way boat owners can finance the construction of new vessels under CARB's regulatory regime, nor have any customers remaining on which to pass the costs. Boat owners will be run out of business within a few short years from now.

And because the incomes of ocean access participants – particularly in angling – reflect the income profile of the public generally, cost increases will have a noticeably graver impact on lower income populations in California that are disproportionately ethnic minorities. Given the most significant increases in anglers during the COVID pandemic were minorities and women, these groups would likely be the first to experience reductions in ocean access due to affordability.

3195.7

The fleet also actively participates with creating ocean access opportunities for Title 1 school children, at-risk youth, veterans, the physically or mentally challenged, and others that otherwise would not be able to participate. Partners include schools, elected officials, nonprofit organizations, maritime museums, and ethnic organizations. As an example, Fish for Life has served over 175,000 youth along the southern coast of California by providing marine education and subsequent trips, which are often the children's' first experience on the ocean.

Although SB 617 requires CARB to consider nonmonetary factors such as fairness and social equity, CARB has made no effort to consider the impacts of the proposed rule in this regard. Equitable access to our oceans and the reach of the programs that promote social justice and opportunity will be devastated by the economic barriers the proposed rule creates. This is a substantial and critical failure on behalf of CARB.

While there are many flaws in the proposed rule and supporting documentation by CARB, including life, health and safety concerns noted by the Cal Maritime Academy and vessel owners, CARB makes egregious errors in its air modeling and lack of transparency. As of the submission of this letter, CARB still has not been able to provide full and accessible documentation on their modeling or data for analysis by vessel owners. 3195.8

Further, CARB has not been responsive to input from vessel owners to improve the data CARB is using to justify the health benefits of the rule. For example, CARB has ignored the request to use the logbook data that captures the operational location of each vessel and is electronically logged daily by the captains under threat of criminal penalty. Instead, CARB uses a less accurate method to make assumptions about a few vessels and inaccurately extrapolates that profile to the fleet statewide. This leads CARB to assume vessels operate 83% of the time in regulated waters. However, using logbook data, a vessel owner determined they operated in regulated waters an average of only 16.28% of the time over a five-year period. This is also not a one boat outlier as over 50% of the inspected CPFV operate out of the same area in a similar manner. 3195.9

To attempt to conceal this fatal error, CARB suggests that uninspected six-pack (6 passengers or fewer) boats should be combined with inspected CPFVs for looking at the emissions, impacts, and benefits from the rule. Certainly, there are more six-pack boats than inspected CPFVs, but most are not subject to the rule as they have gasoline engines. In fact, there are roughly 40 six-packs that operate full-time, and it is believed that most of those are gasoline engines. The balance of diesel six-packs would likely meet the low use thresholds; however, their emissions are still included in the CPFV category and skewing the data.

By combining vessels that operate differently, utilizing fatally flawed modeling, ignoring constructive input, and not providing transparent access to data, CARB is purposely overstating emissions contributions from inspected CPFVs to obfuscate that the proposed rule is not based on adequate information, and is not cost effective or technologically feasible. In addition, the rule creates significant barriers to social equity for ocean access. Because of these and other flaws, CARB cannot determine that the proposed rule creates a positive cost-benefit and that there are no reasonable alternatives. Especially, when using accurate operational data would demonstrate that nearly all CPFVs operate distant from CalEnviroScreen identified environmental justice communities

Analysis of the data CARB did provide (see Exhibit 1), even putting aside intrinsic overstatement, reveals it projects these rules will contribute daily emission reductions from CPFVs that will be less than a single ton of nitrogen oxide (NOx) emissions per day and will do so by requiring engines that do not yet exist and are technologically infeasible for these boats, yet will be economically fatal to an entire industry that caters to broadly diverse socioeconomic groups and that supports access by those in disadvantaged communities to sustainable fishing and enjoyment of the state's natural ocean resources. Meanwhile the Rules ignore the transport shipping fleet, so called "ocean going vessels," with roughly 150x more emissions than CPFVs currently contribute, even while they continue to clog our Ports and pollute our communities with excess emissions *due solely to congestion* in the South Coast basin alone in amounts equivalent to the entire state-wide contribution of CHCs and nearly 10x that of CPFVs. 3195.11

The Legislature demands CARB's actions be prudent and balanced, through implementation of programs that are "practicable" (HSC §39650(k)) as well as "cost-effective, and technologically feasible" (HSC §43013(a)). CARB's proposed regulations fail that standard.

3195.12

Tellingly, CARB's engine regulations have invited bipartisan opposition from State Legislators and a coalition of over 60 local, state and national organizations representing small business, tourism, marina/harbors, local agencies, retail, non-profits, boating and sportfishing. In addition, over 21,000 anglers signed a petition pleading with Governor Newsom to Save Our Boats.

The Board should reject the staff proposal and recombine Commercial Passenger Fishing Vessels with the compliance pathway identified in the rule for Commercial Fishing Vessels. This is the only approach that recognizes the lean economics of the industry, provides continuing access to grant funds to make further emissions reductions feasible, recognizes life, health and safety of passengers and crew, and does not impose undue economic barriers to equitable ocean access.

3195.13

Table of Contents

I. BACKGROUND	6
II. GENERAL ISSUES WITH PROPOSED AMENDMENTS TO THE CHC	7
A. The Proposed CHC Regulations Disproportionately Target and Jeopardize Small, Family-Owned Businesses by Ignoring their Operational Characteristics Outside California and U.S. Territorial Waters	7
1. 225 Six-Pack Charters Powered with Gasoline Motors, Which Are Not Subject to The Proposed CHC Regulation	7
2. The CHC “Low Use” Exemption Threshold is Insufficient to Accommodate Transit Time to and from Port for Vessels Operating Almost Exclusively in International Waters.....	7
3. The CHC Regulations are Based on Erroneous Passenger Load Data by Including Part-Time Six-Pack Charter Operations.....	7
4. The Supporting Materials Relied Upon for the CHC Fail to Account Adequately for Unrelated Emissions Impacts in Heavy Sea-Going Traffic Waterways.....	8
5. The Proposed Rule-Making Fails to Differentiate its Data for the Multi-Function Operations of Some CPFV Vessels.....	8
6. The Proposed Regulations Unreasonably Ignore the Operational Characteristics and Difference in Coastal and (Far) Offshore Operations	8
B. CARB’s Economic Assumptions Regarding CPFV Operations are Fundamentally Flawed Leading to Unrealistic Conclusions that Mask the True Consequences to Their Businesses and the Opportunities of the Public to Access California’s Ocean Resources	9
C. The Opportunities for Vessel Owners to Access Funding Assistance to Meet the Economic Consequences of a Regulatory Scheme Whose Benefit is Disproportionately Imposed on a Relatively Tiny Number of Businesses Are Not Realistically Viable	10
D. CARB Dismissively Glosses Over the Conclusions of a California Maritime Academy Study It Commissioned Which Concluded the Requisite Engines are not Available for the Targeted Vessels and Would Create Severe Financial and Safety Challenges	12
E. Though the CPFV Fleet Supports and Has Pursued Rational Emissions Reduction Efforts, the Universal Concerns of the Industry Regarding These Particular Rules at this Particular Time Have Been Largely Ignored	13
F. CARB has Intentionally Engaged in Propaganda to Mislead the Public, Elected Officials and Stakeholders about the Contributions of Emissions from CPFVs and Suggested Dire Consequences for Scenarios Never Contemplated or up for Consideration by the Board.....	14
G. CARB Has Not Made the Necessary Information Available to Adequately Review the Alleged Emission and Health Impacts/Benefits from the Rule.....	15

III. TECHNICAL AND FINANCIAL ISSUES	17
A. Technical Analysis	17
1. By Improperly Combining Inspected Vessels with Six-Pack Charter Operations, including those with gas-powered engines, CARB has Misleadingly Conflated and Skewed the Data, While Refusing to Conduct or Provide More Meaningful and Insightful Information	17
2. By Using Combined Data and Analysis, CARB Has Prevented an Adequate and Accurate Assessment of CPFV Contributions to Emissions and Health Impacts	18
3. By Excluding Commercial Fishing Vessels, Which Have Eerily Similar Operational Characteristics, CARB Has Arbitrarily Targeted Commercial Passenger Fishing Vessels, Reducing the Benefits of the Rule While Capriciously Imposing Technologically Unavailable Burdens on a Very Small Segment of Vessels	19
4. CARB’s Reliance on the Two-Highest Polluted Communities for Detailed Modeling, Without Similarly Modeling the Communities Where Most of the CPFV’s Operate, Creates Unsupported or False Correlative Assumptions.	19
5. CARB Actively Ignored Available Vessel Logbook Information to Gather True Operational Data but Instead Relied on Incomplete and Insufficiently Representative AIS Data for Its Modeling and Risk Analysis.	20
6. CARB Admittedly Relied on Survey Data It Acknowledged was Flawed from Which it Made Unjustified Assumptions to Support its Position	20
7. CARB Failed to Account for Differences in Land-Based versus Maritime-Based Operations and Ignored Identified Safety Concerns Attendant to DPF Use While at Sea.	21
B. Financial Analysis	22
1. CARB Acknowledges the CHC Rules will Require Full Replacement for Many Vessels, But Vastly Understates Likely Replacement Costs	22
2. CARB Overstates the Resale Value of CPFV Vessels Forced Out of Operation by the Proposed CHC Rules	22
3. CARB’s Assumptions Understate the Fare Increases Required for Vessel Cost Recapture.....	22
4. The CHC Regulations Will Unfairly Create a Competitive Market Advantage for Gasoline-Powered CPFVs.....	23
5. CARB Failed to Assess the Market Impact of Competition from Mexico if CPFVs are Forced out of Business or Required to Absorb Anti-Competitive Regulatory Costs	23
6. The CHC Rules Fail to Account for the Near-Term Double Jeopardy Impact of California’s Announced Conversion to Zero Emissions by 2035 or 2045	23
7. The Cost Impact of Requiring Vessels to be Retired and Replaced will Lead to Many or Most of the CPFV Small Family Businesses to Close	23
8. The Value of Available “Time Extensions” are Overstated and Misleading	24

9. CARB Has Insufficiently Analyzed or Accounted for the Drastic Economic Impact on the Businesses and Communities that Support the CPFV Fleet	25
10. CARB Has Not Assessed and the Proposed CHC Regulations do not address the Likely Adverse Impact to Ocean Access for Marginalized Individuals and Groups.....	25
11. CARB Has Not Accessed the Impact on Harbors, Marinas and Landings.....	26
IV. UNANSWERED QUESTIONS.....	26
A. CARB’s Public Communications and Stakeholder Outreach has been Inadequate	26
B. CARB’s Consultation with and Consideration of the Impact on Vessel Owners has not been Sufficient or Transparent.....	27
C. CARB’s Economic Analysis (SRIA) is Incomplete	27
D. The Time Extensions Available Under the Regulation are Insufficiently Defined and Could Prove Illusory as a Hedge Against Technological Unavailability and Economic Infeasibility.....	29
E. Fairness Mitigates Against Imposing the strict CHC regulations while the Economy is Still Emerging from a Generational Pandemic	29
F. It is Not Appropriate to Push Forward Regulations Which Require Installation of Unavailable Technology While Serious Questions About Safety and Feasibility Remain Unanswered.	30
G. It is Not Appropriate to Impose Regulations Requiring Costly Diesel Engine Upgrades Without Addressing the Relationship to and Context of Contemplated Zero Emissions Standards and a Reasonable Time Frame to Achieve a Capital Return on Upgrade Investments.....	30
H. CARB’s Analysis Ignores the Deleterious Impact on Coastal/Disadvantaged Communities that Rely on CPFV Vessels for Employment and Otherwise Unattainable Access to the Ocean and Its Resources Which Has Spurred Concerns and Broad Support for the CPFV Fleet Throughout the State	31
I. It is Illogical and Arbitrary to Separate CFVs from and Give them Far Less Onerous Treatment over the Smaller Similarly Situated CPFV Fleet.....	32
J. The CHC Rules are predicated on Health Benefits that are Disproportionately Isolated to Communities Where the Impact from CPFV Operations Are Minimal; Conversely the Impact of the Regulations Disproportionately Burdens CPFV Operations Where the Projected Benefits are Fractionally Attenuated.....	33
V. RECOMMENDATIONS	34
A. The Following General Considerations Should Guide Review of the Proposed Rule.....	34
B. SAC/GGFA’s Specific Proposal to CARB for the Contemplated CHC Rule	35

I. BACKGROUND

Of the 577 licensed CPFV's in the State of California, there are approximately 174 U.S. Coast Guard (USCG) inspected CPFV's (seven or more passengers) and 403 uninspected CPFV's (six or less passengers; six-pack). The majority of the inspected vessels and several of the uninspected are members of either SAC or GGFA. Of the 403 six-packs, 178 have diesel engines, while 225 are gasoline powered six-packs that are exempt from the rule.

3195.14

CARB plans to regulate 352 vessels with this rule, including the 174 inspected CPFV and approximately 178 diesel-powered six-pack boats. However, since there is a low use exemption and only about 40 six-packs operate full-time and over half of those are believed to have gasoline powered engines, **the rule is effectively targeted at the 174 full-time CPFVs.** Full-time is defined as 50 or more days at sea as reported to California Department of Fish and Wildlife (CDFW). This means that the proposed rule would impose its most stringent and economically devastating requirements on the narrow segment of inspected CPFVs.

From a fisheries standpoint, both uninspected and inspected vessels are licensed by the CDFW as CPFV. From a tax perspective, the State of California implements the same sales and tax exemption structure for BOTH commercial fishing vessels and CPFV's. Both Commercial Fishing Vessels and CPFV's receive the same foundational commercial fishing permit, and many CPFVs will conduct commercial fishing activities from time to time. All water-related issues are both inherited and solved in cohesion among our industry, with Commercial Fishing Vessel owners working side by side with CPFV owners since the boats and the issues affecting them are similar.

From all perspectives, our operations are in many key respects indistinguishable from the commercial fishing operations. The fundamental difference being our industry caters to recreational passengers, including many from out of state, who contribute to state and local economies. In addition, CPFVs allow ocean access for fishing for individuals that do not have the means to own or access to their own boats. Put differently, our operational load consists of passengers (which varies greatly depending on the boat, time of the week and year, and fluctuations in weather and fishing conditions), and commercial fishing vessels operational load consists principally of their "catch". As noted above, many owners actually engage in BOTH commercial fishing and commercial passenger fishing from their vessels at various times of the year, making these operations even more indistinguishable. Lastly, we note that the original CHC Regulation did not differentiate within the commercial fishing industry, as both commercial fishing vessels and commercial passenger fishing vessels were classified as "Fishing Vessel" (definition below) and regulated the same.

"Fishing Vessel" means a self-propelled vessel that is either: (A) a commercial vessel dedicated to the search for, and collection of, fish for the purpose of sale at market or directly to a purchaser(s), or (B) a charter vessel used for hire by the general public and dedicated to the search for and collection of, fish for the purpose of general consumption.

This was then and remains now, exactly correct. The artificial differentiation between (A) and (B) currently being proposed by CARB for the revised CHC regulation is new but should not have been changed for the purpose of this rulemaking.

II. GENERAL ISSUES WITH PROPOSED AMENDMENTS TO THE CHC

A. The Proposed CHC Regulations Disproportionately Target and Jeopardize Small, Family-Owned Businesses by Ignoring their Operational Characteristics Outside California and U.S. Territorial Waters

The ownership demographics of our vessels uniformly reflect small, family-owned businesses. Throughout the state, the CPFV fleet is comprised of two distinct groups: coastal day boats and offshore (overnight and longer) boats that typically operate the majority of their time outside of California and even outside U.S. territorial seas and contiguous zone waters, including outside of the 24-mile threshold in the rule. Most owners are indebted under capital loans on their vessels. With few exceptions, the inspected coastal day boat group has Tier 2 or Tier 3 engines. The offshore inspected vessels have most engines at Tier 2 or Tier 3.

There are currently 577 CPFV licenses issued in California to both inspected and uninspected vessels. Approximately 40% of the inspected CPFV's are federally licensed by the National Oceanic and Atmospheric Administration (NOAA) as "Commercial Highly Migratory Species Fishing Vessels." This group primarily fishes for tuna in international waters. Of these 577 vessels, 403 are "uninspected" vessels for which we believe the CARB assumptions substantially over-estimate usage by not adequately accounting for certain important variables and unknowns, including:

1. 225 Six-Pack Charters Powered with Gasoline Motors, Which Are Not Subject to The Proposed CHC Regulation

Approximately 225 of these vessels are smaller six-pack charters with outboard gasoline motors, NOT diesel. Since these gasoline-powered vessels are not regulated by this rule, they will have a competitive advantage over the regulated diesel vessels.

3195.15

2. The CHC "Low Use" Exemption Threshold is Insufficient to Accommodate Transit Time to and from Port for Vessels Operating Almost Exclusively in International Waters

A concern of many of the offshore vessel operators is that the low use hours modeling in state waters is inadequate for them to simply transit directly from a California port to international waters. Yet 95%+ of their operating time is in international waters, outside of the 24-mile radius, and thus should not be regulated by this rule. This is just one of many examples where CARB's lack of analyzing subcategories with CPFVs is overstating the emissions and impacts from the entire category.

3. The CHC Regulations are Based on Erroneous Passenger Load Data by Including Part-Time Six-Pack Charter Operations

The six-pack charters typically operate only a couple days a week in season and frequently, if not usually, take more limited loads (i.e., 2-3 passengers at a time), and only a small number operate what would be considered full-time. These vessels are colloquially, but not pejoratively, called "Weekend Warriors" in our industry. Because of these and other major differences, it does not make reasonable sense to combine the inspected vessels and the six-pack boats in the same category or to put six-pack diesel owners at a disadvantage to their gasoline-powered competitors. Instead, all six-packs vessels should be considered under a recreational vessel rule that will be developed in the future.

4. The Supporting Materials Relied Upon for the CHC Fail to Account Adequately for Unrelated Emissions Impacts in Heavy Sea-Going Traffic Waterways

The analysis presented in the CARB supporting materials does not differentiate or properly account for the impact of disparate operations in heavy traffic waterways, but instead lumps in other marine operations in the largest ports and some of the busiest waterways in the world, including those in the South Coast Air Basin (SCAB) and the Bay Area Air Basin (BAAB). CalEnviroScreen 3.0 demonstrates that several marinas and harbors where CPFVs have a significant number of vessels are not located within highly impacted pollution zones, which conversely are overwhelmingly affected by emissions from operations outside the proposed rule. CARB's own health benefit analysis suggests only 7% of the health benefits from the proposed rule will occur in San Diego County where 50% of the inspected fleet is located.

3195.15
(cont.)

5. The Proposed Rule-Making Fails to Differentiate its Data for the Multi-Function Operations of Some CPFV Vessels

Some owners of CPFV's conduct commercial fishing, excursions, diving services and workboat/educational type operations. CARB has made no effort to differentiate these multi-function boats.

6. The Proposed Regulations Unreasonably Ignore the Operational Characteristics and Difference in Coastal and (Far) Offshore Operations

There are two primary operational classifications of vessel in the fleets, coastal and offshore.

From Pt. Conception south, the "offshore fleet" operates outside of state waters and in many cases outside U.S. territorial and contiguous waters. We have many overnight and long-range vessels that spend the vast majority of their running time in transit to, trolling in or drifting on fishing grounds dozens if not hundreds of miles away. These boats travel long distances from port (often in foreign waters and to distant offshore banks).

3195.16

The second group is the "coastal fleet" with fishing activities, which involve drifting, anchor fishing, and slow trolling with fully engaged propulsion generally activated mostly for traveling to and from port in what are typically 1/2- and 3/4-day fishing trips. They operate in California waters; however, they spend most of their time either anchored without engines running or trolling at low speeds/low engine loads. We do not believe that CARB's analysis has adequately accounted for either classification of vessels.

B. CARB's Economic Assumptions Regarding CPFV Operations are Fundamentally Flawed Leading to Unrealistic Conclusions that Mask the True Consequences to Their Businesses and the Opportunities of the Public to Access California's Ocean Resources

Economically, the profit margins for CPFV owners are slim, making it difficult to repower without outside funding. This is a driving reason why many of our operators diversify operations. The Carl Moyer Program (CMP) is not accessible to all owners. There are also industry fees that were not included in CARB's Standardized Regulatory Impact Assessment (SRIA). For example, in San Diego, the Port or City receive 5%, the landing that provides the piers collects 10-15%, the live bait companies receive 15%, all of which are paid by the vessel owner before receiving a "net" check from the landing accountant for passenger fare revenue. After the 35% fee collection is deducted, an owner still must make their boat loan, payroll, fuel, maintenance, insurance and advertising payments. This is a low-profit business for small businesses in the best of times.

3195.17

In addition, other assumptions underlying CARB's SRIA are not borne out by experience, particularly as it relates to number of passengers and types of operations. Passenger capacities in the certificate of inspection are not the same as operational passenger capacity. Most of the vessels operate well below capacity, particularly outside certain peak times. This is true for local trips, where external conditions can drive down customer demand, and for long-range trips where trip-duration and customer experience drive reduced-capacity operations.

We realize CARB has made some attenuation to account for less than 100% operational capacity, but in reality, the true operational passenger loads and gross revenue streams are much lower than what CARB assumes. In addition, the net revenue streams after operational costs, including some overlooked, as discussed above, must also fund existing capital costs, repairs and maintenance before it can be added to cover additional costs. Moreover, days of operation outside of California, such as for vessels on multiday trips far from California shores, significantly diminish the assumed emissions impact of our fleet.

The CARB assumption of hundreds of thousands of customers on uninspected six-pack vessels vastly overstates actual passenger loads for purposes of projecting potential cost recapture through increased customer charges. For accuracy, passenger load assumptions must be tied to days underway and actual passenger load data as some may have very few days actually underway and nearly all will have many fewer actual days underway and passengers than the estimates assume.

Our Associations do not believe the cost impacts and physical feasibility (discussed more below) of implementing Tier 4 and diesel particulate filter (DPF) systems have been fully evaluated. This includes lack of evaluation as it relates to the actual cost of equipment install or vessel replacements as well as the impact on vessel capacity or the percentage increase recoupment cost that would have to be (or feasibly could be) passed down to passengers in order to "build new".

Critically, we must contemplate what price point will cause members of the public to forgo planning a fishing trip, and the collateral economic impact that has on surrounding businesses, because it is simply too costly. This variable is difficult to pinpoint, but we have received legitimate and powerful expressions of concern that the stability of the fishing tourism industry and its spending characteristics for ocean fishing activities have not been adequately considered. To characterize passenger cost increases as a viable mechanism to pay for engine repowers would require a much broader and more comprehensive study of the industry's revenue streams than what CARB

has done. To that end, the Associations have provided its own analysis of the economic impacts of this proposed rule, as detailed below. 3195.17 (cont.)

A final salient and important fact to consider is that this fleet provides access to the ocean for a lower economic and diverse tier of our state’s citizens—people who cannot afford their own fishing vessel. Price is an inflection point that determines who can participate in ocean activities. Presently, the fleet serves many people from underserved communities, many of whom count on fishing to provide food for the family table. Care must be taken to consider the impact on these folks before blithely adopting measures that adds substantial cost burdens to their access, particularly for the many disadvantaged communities for which CPFVs provide their only direct access to the ocean and its public resources. 3195.18

C. The Opportunities for Vessel Owners to Access Funding Assistance to Meet the Economic Consequences of a Regulatory Scheme Whose Benefit is Disproportionately Imposed on a Relatively Tiny Number of Businesses Are Not Realistically Viable

There are residual concerns with the funding opportunities that CARB identifies as potential avenues for financial assistance and relief of the cost impact of the contemplated regulations. For many fishing vessels, funds are completely unavailable or extremely limited. There are inconsistent management practices among local Air Pollution Control Districts (APCD) under the CMP. Although there are established CMP guidelines, the local APCDs have the discretion to reduce project lives making it more difficult for some projects to compete, lower the cost effectiveness cap, prioritize industries and recipients, limit the number of engines one owner can apply for, prioritize projects located in impacted/ environmental justice zones, maximize or limit contract terms, among others. Here are some examples of how this discretion currently affects the CPFV owners: 3195.19

Within the South Coast Air Quality Management District (SCAQMD), all CMP projects are prioritized for emission reductions that occur in Senate Bill (SB) 535 and SB 1550 disadvantaged and low-income communities. For the past three years, including the funding cycle that recently concluded in August 2020 (CMP fiscal funding cycles 20-22), the SCAQMD has prioritized projects located in these areas. This has resulted in automatic denial of both commercial fishing and CPFV applications located outside of these identified zones, to include, Santa Monica, Redondo Beach, and Marina Del Rey. We have seen similar funding denials in San Diego. The very notion that these projects do not qualify because their emissions do not directly affect the local population, as determined by the local APCD, is inconsistent with the CARB CHC assumptions, which erroneously point to the commercial passenger fishing industry as heavy polluters.

For example, within the San Diego Harbor, most of the inspected CPFV's are located adjoining Point Loma harbor entrance, which is outside of the identified disadvantaged community area near the Port of San Diego. According to the CALEnviroScreen (attached), which identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution, there are very few fishing vessels that are within these impacted areas. In fiscal funding cycle, Year 20, the SCAQMD Board made a motion to only fund specific industries and eliminated all marine projects from eligibility screening.

Funding opportunities vary from agency to agency, and funding distribution is based on population size and pollution severity. The SCAQMD region and Bay Area Air Quality Management District (BAAQMD) receive millions of dollars each year to reduce pollution in their large geographical regions. In contrast, the San Diego Air Pollution Control District (SDAPCD) receives \$750,000 per year, the North Coast AQMD (NCUAQMD) receives approximately \$250,000 per year, and the Santa Barbara County APCD (SBCAPCD) had a maximum of \$1.6 million this year (a non-exhaustive list).

All of the agencies, who receive CMP funds, prioritize projects based on proximity to disadvantaged communities. Many of these smaller agencies are not able to cover the full 80% that the CMP allows for or may even cap the project award funds at a specific amount. For example, the NCUAQMD has (at times) capped projects at 65%, while the SBCAPCD will limit funds to a maximum of \$150,000. For most inspected vessels carrying more than seven passengers, \$150,000 will only cover the purchase of one engine and possibly none of its associated installation cost. The other propulsion engine must be covered by the owner. Funding for CPFV's is inequitable throughout the state, with several limitations.

Some Districts rank projects, and funding is competitive, and some Districts offer first come first serve funding opportunities. This limits funding opportunities where marine vessels are competing against industries that are the first to have more modern engines and equipment available due to U.S. Environmental Protection Agency (EPA) emission standards and approval processes.

The locations of operations allowed for vessel owners vary from one agency to another. For the BAAQMD and SCAQMD, 75% of a vessel's operations must occur inside their identified waters. By contrast, the SBAPCD requires 100% operation within a multi coastal county region - Santa Barbara, San Luis Obispo, and/or Ventura counties. This eliminates funding opportunities to those who operate outside these parameters.

As previewed above, some agencies will fund projects at the maximum eligible project life at 16 years, while other agencies will cap the project lives at 3, 7 or 10 years. When projects are calculated at shorter project lives, it is difficult for marine projects to compete, as off-road and on-road engines that achieve greater emissions reductions are approved more quickly than marine engines. In addition, marine projects are extremely costly in comparison to other categories, which is another limitation to the CPFV competitiveness when evaluated on the cost vs benefit of associated emissions reductions.

The current proposed replacement schedule in the CHC rule does not allow for three years of surplus emission reductions, in order to qualify for CMP. Most vessel owners can only complete repower work in winter (off-season). This requires careful planning and puts pressure on engine lead times and facility availability. In addition, currently CMP funds do not cover vessel replacement, which will be the majority of the costs for CPFVs under the CHC. Finally, with this rule, there will be thousands of vessels seeking CMP and other grant funding resulting in even greater competition for limited funds.

D. CARB Dismissively Glosses Over the Conclusions of a California Maritime Academy Study It Commissioned Which Concluded the Requisite Engines are not Available for the Targeted Vessels and Would Create Severe Financial and Safety Challenges

We remain concerned about the feasibility of the proposed regulations requiring Tier 4 engines and DPFs. The Cal Maritime Study, performed on behalf CARB and the CHC rulemaking, raised several concerns including the negative impact to the average "sportfishing vessel" due to the unavailability of certified Tier 4 engines and DPFs, the inevitable loss of passenger carrying capacity and consequential vessel instability. Our information suggests existing manufactured Tier 4 engines and DPFs would not be compatible with most of our vessels (wood and fiberglass) and the size of our industry is not sufficient for original equipment manufacturers (OEMs) to deploy the research and development and other resources necessary to try to design Tier 4 engines/DPFs compatible for these vessels (see Engine Manufacturers Association letters to CARB dated October 19, 2020 and April 16, 2021).

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Moreover, based on the study findings, Cal Maritime suggests that accommodating a Tier 4 engine creates a severe financial impact for CPFV business owners due to a forced reduction of passenger capacity. Additionally, as explored more below, the safety and stability of vessels would be compromised. CARB used Cal Maritime safety and financial impact rationale to justify their decision to only require commercial fishing boats to meet Tier 2 engine standards, including extended time periods for compliance. It is inexplicable that while CPFVs exhibit the exact same characteristics, CARB seeks to impose a completely different (and substantially more onerous) set of standards for our vessels. Per CARB's analysis, the limited requirements for Commercial Fishing Vessels are based on the following:

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- *Unique offshore operations.* This is probably truer for CPFVs, where more operations are far offshore. Commercial fishing has many operations that are near-shore.
- *Industry economic considerations compared to other vessel categories.* CPFVs face the same economic issues as the commercial fishing vessels do, and profit margins per boat may even be lower.
- *Due to larger population (38 percent of fleet), emissions reductions are still needed.* SAC/GGFA would commit to similar controls as proposed for commercial fishing vessels, and inspected CPFVs represent a much smaller percentage of the CHC fleet standing at 174 vessels compared to 1,199 for commercial fishing.
- *Draft proposal would require Tier 2 or newer engine, phasing in between 2030 and 2032.* SAC/GGFA would commit to these same requirements and believe that those with access to CMP grants are already compliant.
- *Later compliance schedule than other regulated in-use vessels to allow operators to maximize funding opportunities.* CPFVs would like the same time ability to maximize grant and other funding.

With our previous input, CARB appears to have realized that vessels replacement will be necessary for CPFVs and now the rule is focused on the replacement of CPFVs with new boats, specially designed to accommodate Tier 4 engines/DPFs. This actually increases the cost of compliance and makes the financial impact argument even stronger that this rule will have substantial cost impacts, which will drastically affect the CPFV industry, associated coastal businesses and equitable access to our oceans.

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E. Though the CPFV Fleet Supports and Has Pursued Rational Emissions Reduction Efforts, the Universal Concerns of the Industry Regarding These Particular Rules at this Particular Time Have Been Largely Ignored

We have received nearly unanimous concerns that, economically, very few, if any, companies could afford to replace their boats and engines and meet their existing boat payment obligations. In their collective experience, the relationship between passenger cost and demand makes recoupment through fare increases an untenable model to fund a near-term transition to the proposed regulations. Decreased passenger loads due to the Covid-19 pandemic have further compromised their economic models. While we expect the current health crisis to pass, we do not know when or what might come next. However, historical and recent experiences with increased fares exacerbate the fleet's consternation that passenger fare increases alone will not be a viable solution to continued CPFV operations. A common theme expressed was that if this rule goes into effect, the result would be most CPFVs would be out of business within three to six years. Since CPFV ownership is dominated by small businesses, this effect would be even more devastating. If the industry survives, it would likely be taken over by large corporate interests.

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The fleet mechanic and engine manufacturers are concerned with Tier 4 engine and DPF fire issues as well as engine inoperability during periods of DPF cleaning. CPFV's troll at slow speeds and the DPF would potentially plug up creating a mechanical failure situation when at sea with passengers. In light of the Conception fire incident and the use of boats by passengers, the USCG is carefully monitoring any changes to these vessels pursuant to Subchapter T of the Code of Federal Regulations.

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While the goal to reduce emissions in the State of California is laudable, it is being accomplished efficiently and with substantial success as proscribed in the rules for Commercial Fishing Vessels such that differentiation of the CPFVs, particularly in light of the drastic economic consequences, physical configuration and safety barriers, is untenable and not supportable.

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SAC conducted a survey, which indicated most of the inspected vessels that presently operate on the coast have repowered to Tier 2 or 3 engines through grant-funded projects. Based on the owners' comments, it is unlikely that they will be able afford to replace their vessels and repower again to Tier 4 and/or DPF without access to funding. It is recommended that CPFVs continue to be classified with Commercial Fishing Vessels so they can then afford to upgrade to Tier 3 engines as funding programs are available.

It is commonly believed offshore vessels that transit state waters in route to international or foreign waters should not be part of the CHC Rule. These vessels are easy to identify as they are permitted by NOAA as Highly Migratory Species vessels. Those operations generate valuable tax revenue and economic impact to the region and state that could be lost if subjected to the proposed regulations. They operate on the high seas and have minimal impact on the states air resources transiting to the harbors and due to the West-Northwest wind that prevails on approach to, primarily, San Diego. These vessels should be exempted from the rule or a sufficient low use exemption that reflects their operational days and necessary transit times.

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F. CARB has Intentionally Engaged in Propaganda to Mislead the Public, Elected Officials and Stakeholders about the Contributions of Emissions from CPFVs and Suggested Dire Consequences for Scenarios Never Contemplated or up for Consideration by the Board

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After announcing to the press that a single CPFV contributes the same emissions as 162 school buses, the industry had SCS Engineers (SCS) evaluate the claim. It was conveyed to CARB staff in a Zoom call that it was a disingenuous claim at best. CARB staff responded to the criticism by creating a fact sheet with the claim for its website and for distribution.

For the comparison to school buses, CARB staff used a bus equipped with a modern Tier 4 engine with DPF operating at low speed. For the CPFV, CARB staff used the maximum certified emissions allowed for a Tier 2 engine and multiplied it by two. Beyond the apples to oranges comparison that ignores there are not approved Tier 4 engines with or without DPF for CPFVs, CARB intentionally misleads with the example by artificially lowering emissions from the bus and ignoring the operational profile of a CPFV and assigning maximum possible emissions. In addition, the example is used to create an emotional response and fully ignores the risk profile to receptors of school buses operating months of the year around children where CPFVs operate in harbors and spend much of their time in unregulated waters. CARB lashing out in this manner can only be seen as an attempt to try to discredit the legitimate issues of social justice and equitable ocean access that the proposed rule raises with vessel owners working with Title 1 schools, at-risk youth, veterans, and other non-profits to provide ocean education and access.

Specifically, SCS found the CARB comparison disingenuous for the following reasons:

- CARB is comparing a modern school bus with Tier 4 engine and DPF filter operating at 20 MPH to the maximum emissions allowed on a CPFV with two Tier 2 engines per vessel, which is common for CPFVs.
- Bus engines are smaller with less horsepower than the engines used on inspected CPFVs, so it is not an apples-to-apples comparison on engine capacity.
- Tier 4 engines are readily available for buses; they do not currently exist for CPFVs.
- CPFVs do not operate at maximum capacity; they troll for fish at low rotations per minute (RPMs) and sometimes even anchor or drift offshore on a single engine.
- CARB's assertion implies that all 352 CPFVs are operating with these emissions (as previously mentioned they are including six passenger boats to inflate the emissions from the CPFV category). This disregards the fact that many CPFVs already have Tier 3 engines, and even without the rule, all boats will eventually convert to Tier 3 and even Tier 4 in the future. CARB's comparison assumes that CPFV emissions would not improve without this rule, which is not true.
- These CPFVs are also not operating at or near a school, with children present, and not operating extensively near shore. Therefore, CARB is misleading on the health risk impacts from school buses versus CPFVs. An equivalent amount of emissions from a school bus will have a more direct and significant risk impact on human receptors, especially children, compared to boat emitted at sea.
- School bus upgrades have come at 100% taxpayer funded expense – is CARB offering to buy every owner a new boat? No, they are creating a mandate to take away or limit grant funds for upgrading existing vessels and buying new vessels.

Given that the Chair was appointed largely to ensure CARB policies advance social justice and equity, does the CARB Board and executive staff support such blatant and disingenuous propaganda to discredit these legitimate issues raised by stakeholders?

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Does the Newsom Administration support using taxes and fees used to support state created and promoted propaganda against small business owners advocating for their survival and the survival of programs they support?

Should the Legislature conduct oversight of programs engaged in this behavior or impose rules to prevent this type of conduct?

Does CARB have any policies in place to prevent this type of conduct from occurring?

CARB staff further made assertions that unregulated CPFVs would become the largest percentage of PM if unregulated. However, no CPFV owners have asked to be exempted from the regulation. In fact, CPFV owners have argued strenuously to be included in the regulation with commercial fishing vessels, as they have been historically, to reflect the similarity between the vessels, safety considerations, and economics of the industries. CARB staff obfuscate the true size of the CPFV fleet and emissions (covered elsewhere in this letter) and appear to ignore that the majority of inspected CPFVs are already Tier 2 or Tier 3. However, because CARB has not provided usable and transparent data in this instance, the industry is unable to even analyze the assertions made. On its face, it is hard to understand how 1,199 vessels under the proposed rule would reduce PM emissions by roughly 80% and end up with half of the PM emissions as 174 vessels. Regardless CPFVs are asking to be regulated with Commercial Fishing so emissions would be expected to fall at a similar rate.

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Using CARB's own data (Figure VI-6 from the staff report), diesel particulate matter (DPM) emissions from commercial fishing vessels would decrease from approximately 40 tons per year (tpy) in the 2023 baseline year to less than 10 tpy after compliance with the rule in 2038 (an approximately >75% reduction). If included with commercial fishing under the CHC rule, CPFV emissions would be expected to see a similar >75% reduction from approximately 20 tpy to less than 5 tpy in 2038. At <5 tpy, CPFV would absolutely NOT emit greater than 50% of the DPM emissions compared to the rest of the CHC fleet as CARB has suggested. Yet again CARB has prepared a completely unrealistic and outlandish analysis to try to prove a point instead of engaging in an honest dialogue on the proposed rule.

CARB staff later developed similar "fact sheets" for other vessel classes.

G. CARB Has Not Made the Necessary Information Available to Adequately Review the Alleged Emission and Health Impacts/Benefits from the Rule

SAC and its consultants have been trying to obtain detailed emission, air dispersion modeling, risk assessment, health benefit, and cost information for CPFVs for months, dating back to as early as May 2021. CARB has provided limited, piecemeal information, and kept putting us off, suggesting the material would be available when the rule package came out. To begin with, this is too late. CARB should have supplied this information to affected industries well ahead of the rulemaking so that there would be time for review and correction of the information by those that know the regulated sources the best. However, even when the draft rule came out on September 21, 2021, this information was not complete. CARB has continued to provide piecemeal information since September 21, 2021, including the latest submittal on October 27, 2021, which

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is five weeks after the draft rule and only two and half weeks before comments were due. Nevertheless, even this information is not complete.

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For example, CARB supplies emissions information or links to it on October 27, 2021. When SAC tried to obtain the information, we followed CARB's instructions and downloaded several zipped files with a "7z" extension. To extract the files, we had to install special software as Windows or MAC were not able to extract. Once we got the files, the main one is a large (57 MB) database file that has an "Rdata" extension. We have been struggling to open this file to review the data. We tried to download several open-source programs to do so, but to no avail. Even our IT departments could not figure it out, and were, of course, leery of multiple open-source programs having to be downloaded just to open one file. There are some expensive software packages that may be useful, but we hesitate in spending the money not knowing if they will even work. Moreover, once opened, it is unclear how easy it will be to work with this file, query the data, and get what we want since no one here has ever used this software before.

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As another example, SAC enlisted a toxicologist to review information on health risks and projected benefits from the rule. Access to these data were provided on October 22, 2021, and this was also incomplete. The toxicologist has the following questions and additional data needs that would need to be fulfilled before an adequate review could be done.

- Multiple values of the concentration-response (CR) function coefficient (β) are available in the source CARB cited (e.g., Bell et al. (2008) for cardiovascular and respiratory hospitalizations). For example, Bell presents four coefficients for cardiovascular hospitalizations and four coefficients for respiratory hospitalization. These four different coefficients correspond to each of four different regions (Northeast, Northwest, Southeast and Southwest). Bell et al. also provides seasonal and nationwide values, as well as 0-day and 2-day lag model coefficients. Please specify exactly which value(s) CARB used in the log-linear model(s) for cardiovascular and respiratory hospitalizations or whether an average or pooled value was used.
- Please specify the exact values of the CR function coefficient CARB used (or derived) from Ito et al. (2007) and Krewski et al. (2009).
- The Ito et al. (2007) study is based on data from New York City. Did CARB consider the potential effect of regional differences in using the Ito coefficient for California? Population characteristics and the relationship between air pollutants and health impacts are likely to differ geographically, especially when there are large differences in weather/meteorological conditions between the locations.
- The incidence per ton (IPT) factor approach assumes that all of the health outcomes of interest (e.g., premature deaths, cardiovascular/respiratory hospitalizations, emergency room visits) are due to air emissions. There does not appear to be any attempt to correct the IPT factor for incidents unlikely to be related to air emissions. Thus, this approach is likely to overestimate the number of incidents and correspondingly, the benefits accruing from a reduction in emissions. Please provide the IPT factors CARB used and exactly how they were calculated; we were not able to ascertain these values.

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- The papers cite by CARB (Krewski and Bell) for the effect coefficients (the slope of the CR function for the effects of premature mortality, etc.) actually contain many if not dozens of coefficients so CARB needs to specify exactly which coefficients they used from these papers. As far as the Ito paper is concerned, the coefficient value is not actually shown in the paper so it is not clear how CARB obtained that value from Ito.

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Information as important as this to a major rulemaking should be much easier to access and available much earlier in the rulemaking process. CARB should provide the data in the most easily readable and universal programs possible. There should be more detailed data tables in your staff report, or attached to it, that have every emissions modeling, risk, and health benefit data point for each year, vessel category, and air basin as well as all of the input variables used in the calculations and their sources.

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Transparency should be the order of the day, and the format and timeline in which you have supplied data is far from transparent. It feels as if CARB is making access to these data as difficult as possible as well as providing data so late in the process that there is not adequate time to do the necessary review.

And while CARB staff agreed to discuss the limited issue of why they combined uninspected six-packs and inspected CPFVs on October 28, 2021, which we accepted the next day, CARB informed us they would propose dates and times on November 3, 2021, but no further communication has been received.

III. TECHNICAL AND FINANCIAL ISSUES

A. Technical Analysis

1. **By Improperly Combining Inspected Vessels with Six-Pack Charter Operations, including those with gas-powered engines, CARB has Misleadingly Conflated and Skewed the Data, While Refusing to Conduct or Provide More Meaningful and Insightful Information**

The combination of inspected vessels with six-pack boats skews emission numbers and risk impacts from inspected vessels such that we cannot see the separate contribution of each vessel category. Beyond the fact that both offer fishing opportunities to the public, there are very few other similarities between inspected vessels and the six-pack boats. Further, since these boats are prevalent in different locations across the state at different population sizes/percentages, their inclusion in the data set also skews the contribution of inspected vessels in each air basin falsely makes it appear that there are more inspected vessels in the major health impact zones (South Coast and Bay Area). In addition, since all but a few of the diesel-powered six-pack boats, which are regulated by this rule, are part-time vessels, it does not make sense to regulate them at all under the rule.

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SAC specifically requested data separately for inspected vessels and six-pack boats. It really is key to have all of this data separately as without it, stakeholders cannot adequately assess the emission/risk/health benefit contribution from the inspected vessels and whether the stringent regulation of those boats is reasonable in light of their separate and unique impacts. SAC's data requests in this regard are detailed below:

- SAC asked for separate emission numbers for inspected and six-pack vessels. CARB indicated that these data were not separated. We believe CARB should have the data to do these calculations separately, and that the calculations should be straightforward for them to complete. 3195.30 (cont.)
- SAC asked for separate risk reduction numbers for inspected and six-pack vessels. CARB indicated these data were not separated. We believe CARB should have the data to do these calculations separately. Once CARB completed the separate emission numbers above, this task would be easy to complete. 3195.31
- SAC asked for separate health benefits numbers for inspected and six-pack vessels. CARB indicated that these data were not separated. We believe that CARB should have the data to do these calculations separately once they completed the separate calculations for emissions and risk reductions.
- SAC asked for a separate air modeling, risk calculations, and health benefits analysis for inspected and six-pack vessels as part of the detailed analysis completed in the BAAB and SCAB. CARB indicated that this analysis was not completed separately for each vessel category, which we believe is a major flaw in the analysis. It is critical to know which vessel types are contributing the most to these risks/health benefits.
- SAC asked for separate cost numbers for inspected and six-pack vessels. CARB said these data were not separated. We believe that CARB should have the data to do these calculations separately. This is very important since the capital and operating costs for these boats vary substantially. 3195.32

Much of the data and analysis that was furnished by CARB arrived late, weeks after the public notice and comment period commenced, and was presented in cumbersome and, in several instances, wholly inaccessible format, preventing meaningful analysis. The industry and the public deserve complete transparency and data before such disruptive standards are adopted. 3195.33

2. By Using Combined Data and Analysis, CARB Has Prevented an Adequate and Accurate Assessment of CPFV Contributions to Emissions and Health Impacts

Some of CARB's analyses conflate the overall projected risk impacts and health care benefits of ALL CHC and not specifically the 174 inspected CPFVs. Sportfishing and whale watching boats typically represent a very small portion (approximately 10%) of the CHC found in most marinas and harbors. Further, CPFVs are not present in significant numbers within large ports that serve international vessels where CARB's projected health benefits are greatest (e.g., Los Angeles and the San Francisco Bay Areas). As already highlighted above, approximately 50% of the full-time USCG inspected CPFV's operate from San Diego County; however, only approximately 7% of the expected health benefits per CARB's numbers occur in San Diego County. This strongly suggests that stringently regulated inspected CPFVs will not deliver the substantial health benefits invoked to justify this rule. 3195.34

SAC made the following data requests relative to this issue:

- SAC asked for separate risk reduction numbers individually for all CHC vessel types. CARB indicated these data were not calculated, which makes it impossible to compare and contrast the risk contribution of each vessel type.
- SAC asked for separate health benefits numbers individually for all CHC vessel types. CARB indicated that these were not evaluated, which makes it impossible to compare the relative contributions of each vessels category to the alleged health benefits under the rule.
- SAC asked for separate air modeling, risk calculations, and health benefits for each CHC vessel type for the detailed analysis in the BAAB and SCAB Basins. CARB said that this analysis was not completed separately by vessel, which prevents us from demonstrating that inspected CPFVs are minor contributors to risks/health benefits in these key locations, compared to other CHC.

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3. By Excluding Commercial Fishing Vessels, Which Have Eerily Similar Operational Characteristics, CARB Has Arbitrarily Targeted Commercial Passenger Fishing Vessels, Reducing the Benefits of the Rule While Capriciously Imposing Technologically Unavailable Burdens on a Very Small Segment of Vessels

If CARB were truly concerned about health risks in the port communities, it would not have excluded commercial fishing vessels from the most stringent level of regulation in the proposed rule. CARB has exempted 1,199 commercial fishing vessels from complying with the most stringent, risk-reducing portion of the regulations while requiring 174 inspected CPFVs to comply. CARB did not even analyze what the additional health benefits would have been if the commercial fishing vessels were fully regulated under the rule, which is a glaring omission from the rulemaking materials. By excluding a large number of vessels from the requirement for Tier 4 engines and DPFs, CARB is placing the burden of stringent emission reductions on the remaining vessels in the CHC fleet, including CPFV vessels for which the standards remain technologically unavailable, operationally infeasible and economically and financially unviable. CARB's justifications for exclusion of commercial fishing boats also apply to the inspected CPFVs, and both vessel types are very similar in many aspects except that CPFVs carry passengers. As such, both vessel categories should have been treated similarly under the rule under the compliance path afforded Commercial Fishing Vessels to allow continued access to grant funding for CPFVs as well and an appropriate timeline.

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4. CARB's Reliance on the Two-Highest Polluted Communities for Detailed Modeling, Without Similarly Modeling the Communities Where Most of the CPFV's Operate, Creates Unsupported or False Correlative Assumptions.

The selection of only SCAB and BAAB for detailed modeling and risk analysis does not accurately represent the inspected CPFVs where 50% are in San Diego. In addition, the CPFV fleets in these two locations are different from those in San Diego because they spend more time in near shore fishing. The San Diego inspected CPFVs spend the majority of their engine operating time outside of the 24-mile radius. CARB should have completed detailed modeling and risk analyses for each Air Basin as well as separate detailed analyses for each of the vessel categories at each port location, so that stakeholders and the public could see the relative contributions of each

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vessel type in each location, including port and Air Basin. If this would have been done, then more informed decisions could have been made as to which vessels in which locations should be regulated and at which stringency level.

5. CARB Actively Ignored Available Vessel Logbook Information to Gather True Operational Data but Instead Relied on Incomplete and Insufficiently Representative AIS Data for Its Modeling and Risk Analysis.

When making the calculations for their inventory and health analysis, CARB used incorrect assumptions relative to CPFVs. According to CARB, they used AIS (Automatic Identification System) data to calculate what portion of vessel activity was occurring within 24 miles of the California coast. However, AIS is not required on vessels of less than 65 feet, unless they are operating in a Vessel Traffic Service (VTS) area. A majority of the CPFV fleet is less than 65 feet, and the two VTS areas in California are directly offshore of the Golden Gate and Los Angeles/Long Beach harbors, thus AIS is not required for the majority of the CPFV fleet. The CPFV fleets of San Francisco Bay Area and South Coast tend to spend more time fishing inshore than significant other portions of the CPFV fleet, such as in San Diego.

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Because of this, any use of AIS data to show area of operation will bias the data towards a more inshore area of operation than actually occurs as a whole for the CPFV fleet. A more accurate method of determining area of operations of the CPFV fleet would be to use logbook data from the CDFW as we have repeatedly indicated to CARB. All CPFVs must submit daily logs of times and location they spent fishing. CARB should have used this information, rather than AIS data, for its modeling and risk analysis of CPFVs.

Much of the CPFV fleet from San Diego spends the majority of their time in the Mexican EEZ where AIS is not required on vessels of less than 150 tons, thus the AIS data is not usable. Most of the CPFV fleet that has AIS has only class B transponders, which are lower powered and less likely to be accurately received by shore stations. Relying on Marine Cadastre (Vessel Traffic information) for accurate locations of the CPFV fleet will not yield accurate results.

6. CARB Admittedly Relied on Survey Data It Acknowledged was Flawed from Which it Made Unjustified Assumptions to Support its Position

CARB staff also used a second method in determining area of operation of CPFVs. This method consisted of a survey that was required by operators of commercial vessels in California. Unfortunately, the public outreach for this effort was not very robust, and this resulted in an incomplete data set. Many of the boat owners did not fill out the survey or did not understand the questions being asked or how the data would be used. For example, when filling out reports, some owners were not clear that ONLY hours and fuel burned in California regulated waters were to be reported. Since there had been new requirements for hour meters that could not be shutoff, the owners (incorrectly) assumed that we were being asked for total hours of operation annually. CARB staff acknowledges this issue in Appendix H of the Staff Report, where they nevertheless decide to assume that ALL hours reported are from regulated waters. By not correcting this issue, the data are significantly biased towards showing higher emissions in regulated waters than there actually are.

Once again, CDFW logs are legal documents that show positions and time spent operating in certain geographical areas. One analysis of vessel logbook data, contemporaneously furnished as required to the CDFW, by the owner of a fairly typical overnight vessel (conducting trips of 1-3 days duration) calculated over a five-year period that 16.28% of the vessel's operational time

was spent in regulated waters, contrasted against the 83% of time assumed by CARB staff using faulty AIS and survey data for operational time conducted in regulated waters. Critically, operators are required to carefully track their areas and times of operation and to submit the logbook to CDFW, a California governmental agency, but in making operational assumptions, CARB, also a California governmental agency, consciously chose to ignore regulatorily required *actual* data in favor of inaccurate and deficient *surrogate* data, even though CARB recognizes and acknowledges the data was not reliable as a proxy. This owner's analysis can and should have been replicated by CARB in developing its rulemaking. By not using these data, CARB staff are not using the best available science in the assumptions for their analysis and likely overstated emissions by 5 times for 50% of the fleet.

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7. CARB Failed to Account for Differences in Land-Based versus Maritime-Based Operations and Ignored Identified Safety Concerns Attendant to DPF Use While at Sea

CARB wants the marine engines on CHC equipped with DPFs, the same technology appearing on trucks and off-road equipment that is causing extensive downtime for truckers and farmers. In order for a DPF to not become plugged, it must run at high RPMs, in stark contrast to CPFVs boats that typically troll for fish at low RPMs. Under low RPMs blockage is quite common, creating significant heat and severe backpressure on engines, sometime taking hours to clear the blockage and restart stalled engines. A stalled truck is very different from a stalled boat, adrift at sea, with numerous human passengers at risk. A stalled boat coming into port would have a risk of running aground or crashing into the dock, which would result in damage to the vessel and potential injuries to crew and passengers. CARB has received an October 28, 2021, letter from the California Association of Harbor Masters and Port Captain expressing this same concern.

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Under the best-case scenario, boats could be adrift for hours as crews try to recover engine systems. More likely, at sea rescues would become common due to engine failure. In a worst-case scenario, engines fires, which have occurred on truck engines using DPFs, could occur putting passenger and crew at severe risk.

In a surprising and glaring omission, CARB did not consult with the USCG, that regulates the safety of passenger vessels, until after the proposed rule was drafted. Due to the seriousness of this issue, CARB should have done a detailed analysis of the health and safety risks for the use of Tier 4 engines with DPFs on passenger vessels, which operate far out to sea, away from first responder services.

B. Financial Analysis

1. CARB Acknowledges the CHC Rules will Require Full Replacement for Many Vessels, But Vastly Understates Likely Replacement Costs

By CARB's analysis, an average inspected vessel with two 400 horsepower (HP) engines would cost approximately \$2.2 million to purchase new (including Tier 4 engines and DPF). Our Associations had previously recommended CARB contact a reputable shipyard to obtain a true cost estimate for building new vessels, but clearly CARB did not. A SAC member solicited such reliable projections from a reputable shipbuilder confirming its belief that the real cost is \$4.6 million to \$5.7 million depending on the class of the vessel. Replacement cost is another instance where the data is highly skewed by the combination of inspected and six-pack boats. Cost averaging across a more limited number of inspected vessels and a higher number of six-pack boats creates misleading, unreliable and ultimately uninformative data. Because the costs of these classes of vessels are so disparate, a separate analysis should have been performed for both inspected and six-pack boats. Finally, CARB links all of their vessel replacement costs to the HP of the engines; this again is an inaccurate way to assess such costs as it fails to capture the wide variety of costs related to the building of a new boat that are not related to and certainly not linearly correlated with HP. CARB's inaccurate assessment of new vessel costs is a huge discrepancy that calls into question the entire financial analysis of the rule impacts on CPFVs.

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2. CARB Overstates the Resale Value of CPFV Vessels Forced Out of Operation by the Proposed CHC Rules

CARB's costs overstate the resale value of vessels forced out of service and does not account for the payback of existing loans on boats. CARB's cost analysis assume that an existing vessel would have a resale value of \$465/HP. For the two 400-HP engine examples noted above, that would be \$372,000 for resale value. SAC's informed belief is this value dramatically overstates the resale value for inspected CPFVs, which are specially constructed for fishing in California waters. Most vessels are likely to have minimal to zero value except for scrap materials in California. Even outside of California, these boats would have little value due to the retrofits that would be needed to fish in other locations, whether in other states or other countries. Worse, and finally, if there were no resale value out of state or country, then the owners would have to pay additional costs for destruction or pay for it to be moored. Further, any resale or scrap value likely would simply be applied to reduce the debt on existing boat loans and be unavailable to offset vessel replacement costs. Again, this is a huge discrepancy that calls into question the entire financial analysis of the rule impacts on CPFVs

3. CARB's Assumptions Understate the Fare Increases Required for Vessel Cost Recapture

The ticket price increase analysis by CARB indicates that inspected vessels would need to increase ticket values by less than \$40/per person per day to pay for the cost of the rule. CARB's analysis significantly underestimates this cost. Independent cashflow analysis by a certified public accountant with experience in the maritime industry determined that ticket price increases of \$194 to \$362 per person per day for multi-day and day trips, respectively, would be required to accommodate the capital cost of a new vessel with a breakeven cash flow (no profit). This would be a 97% to 200% increase over existing rates, which is a value that is not attainable or sustainable in the market. In addition, since the size, passenger capacity, and ticket prices of individual CPFVs and their trips vary so much, any projection of increases in ticket price should be valued as a percent increase rather than fixed values.

4. **The CHC Regulations Will Unfairly Create a Competitive Market Advantage for Gasoline-Powered CPFVs**

The exclusion of gasoline-powered six-pack boats from regulation gives them a competitive advantage in the market. CARB did not evaluate the impact to the diesel-powered boats viability given that gasoline-powered boats are not regulated under the proposed rule and will not be spending millions of dollars for compliance. Because few diesel-powered six-packs operate full-time, they should be removed from the regulation and considered under the recreational boating regulation that will be developed in the future.

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(cont.)

5. **CARB Failed to Assess the Market Impact of Competition from Mexico if CPFVs are Forced out of Business or Required to Absorb Anti-Competitive Regulatory Costs**

CARB did not assess the competition of Mexican-based sportfishing on the San Diego area sportfishing operations where 50% of the inspected vessel fleet is located. If CPFV businesses are forced out of business due to the costs of the rule and/or of if they cannot provide competitive pricing, this would significantly increase competition from the Mexican sportfishing industry. Similarly, vessels on the North Coast may be impacted from vessels operating in Oregon or even Washington.

6. **The CHC Rules Fail to Account for the Near-Term Double Jeopardy Impact of California's Announced Conversion to Zero Emissions by 2035 or 2045**

The Newsom Administration has set a goal of the state becoming carbon neutral by 2045 and in a July 7, 2021, letter to the chair of CARB, the Governor asked CARB to examine if it was feasible to achieve this goal even sooner, by 2035. This would likely require all vessels to operate with electric motors supported by batteries or hydrogen. Boat owners question the merits of being required to build larger steel boats powered with new fossil fuel engines over the next two to eight years, or by 2034 at the latest, if they will be mandated under the Governor's proposal to replace their engines or boats once again once zero emission technology becomes feasible. This could create a worst-case scenario where CPFV owners will be required to scrap newly purchased boats and engines and replace their vessels and engines again for the second time in less than 20 years, far below the useful life of the vessels. If this is the ultimate goal for CARB, then the proposed rule is not the correct path forward. Instead, the CHC industry and the State of California should be focusing its resources into research and development for zero emission CHC boats.

7. **The Cost Impact of Requiring Vessels to be Retired and Replaced will Lead to Many or Most of the CPFV Small Family Businesses to Close**

Since over 80 percent of California sportfishing and whale watching boats are constructed of wood or fiberglass, CARB has indicated (see below) that the majority of inspected CPFVs will have to be replaced rather than upgraded or repowered. In fact, CARB notes in their economic analysis that they believe only one of the CPFV fleet can likely be retrofitted; all 173 of the other inspected vessels would need to be replaced. Should the regulations become effective January 2023 as proposed, CPFV owners will have to assess whether they can afford a new steel vessel with Tier 4 engines and DPFs, when this may be required based on the rule deadlines and the various extensions in the rule, and if the owners cannot afford it, when to go out of business.

*"We, through this process, discussed the findings of the feasibility report from the California Maritime Academy and for some sectors are estimating that for vessels operating above the low use threshold that **vessel replacement will be likely, especially***

the categories with wood or fiberglass vessels that can't be as easily reconfigured. - Public Workshop for the Proposed Amendments to the Commercial Harbor Craft Regulations, March 16, 2021

3195.39
(cont.)

Small businesses that have been here for decades would go out of business. CARB appears to agree as stated in their documentation

...(CARB) staff cannot rule out the possibility of some business elimination if costs cannot be passed onto the customer or if passing through costs would result in significant decrease in demand. - CARB, Standardized Regulatory Impact Assessment, July 7, 2021

CARB's analysis of the impact of this fact is severely lacking, as it does not:

- Estimate how many businesses will go out of business, including small businesses.
- Assess the impact of the business closing on jobs.
- Assess the impact of business closing on the economy of the ports and coastal communities, including taxes, fees, etc. CARB received an October 26, 2021, letter from various business coalitions, which expressed these same sentiments about the drastic effects this rule would have on these communities.
- Assess the impact of business closing on tourism.
- Assess the impact of business closing on fees paid to federal and state agencies who license and regulate these boats. This would include fees that fund the CDFW's conservation programs, which rely on these fees.
- Assess the impact of business closing on recreational fishing participation rates, and fishing license revenue that fund fishery and conservations programs administered by the California Department of Fish and Wildlife.

8. The Value of Available "Time Extensions" are Overstated and Misleading

Under the proposed rule, CARB has stated that vessels must be removed from service at the conclusion of any approved extensions. The proposed rule would allow the Executive Officer at CARB to grant up to 6 or 8 years of extension for financial reasons; however, at the end of this period, the vessel would need to be taken out of service if it cannot be retrofitted, which again is highly unlikely for CPFVs. These extensions are available in two-year increments up to a maximum of 6 or 8 years, depending on compliance date, and CARB has to approve the extensions each time based on information submitted by the boat owner.

3195.41

CARB believes that the additional two-year extension (from 6 to 8 years) that has been offered for a limited number of vessels will solve the economic impact issues under the rule by allowing more time for owners to finance the replacement of their boats. In reality, this change will have no material impact on boat owners. It just delays the inevitable for many, if not most, boat owners who will have to spend millions of dollars on replacement vessels when engine rooms cannot be structurally or safely be modified for larger engines and equipment. Moreover, boat owners should not presume that they could claim every two years that it is impossible to comply for economic or technical reasons. As drafted, the standards for two-year extensions are complex and are designed to evolve as new technology comes onto the market. Every two years from as early as 2023 to 2034 or whenever the 6- or 8-year extensions run out, whichever comes first, CARB will make a discretionary determination whether they believe an existing boat can comply or has to

be replaced and whether they agree that you meet the financial impact/affordability criteria. That is, there is no guarantee extensions will actually be granted, and CARB has yet to even publish the criteria it will use to assess these extension requests.

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(cont.)

Additionally, CARB indicates that it will cost each vessel owner more than \$61,000 to simply prepare the required documentation to apply for the first two-year extension. Because CARB has presented no criteria, it is unknown how much of this would be a re-occurring cost. And in the meantime, the vessel owner is required to upgrade their existing vessel to Tier 3, likely without the assistance of the CMP, and then scrap or sell that vessel at the conclusion of the granted extension period(s). As noted previously, CPFVs are low margin businesses that have been using grant funds to reduce emissions. Limiting the grant funds and placing a substantial cost burden on vessel owners to simply apply for an extension is not workable. In addition, the vessel owner would need to start constructing the new vessel during this time and making progress payments.

Given the uncertainty of securing extensions, the lead time to construct new vessels and the significant and overlapping economic barriers, CARB has created a false assertion of a path for compliance that will require boat owners to not only retire their boats, but to leave the industry all together.

9. CARB Has Insufficiently Analyzed or Accounted for the Drastic Economic Impact on the Businesses and Communities that Support the CPFV Fleet

Innumerable ancillary businesses are intertwined with and depend on the CPFV Fleet's Operations. These include obvious businesses such as the Landings, where the CPFV's are berthed, bait and tackle shops, fish processing facilities and parking concessions. These also include local restaurants, gift shops, and hotels as the CPFV Fleet caters to many out of town and out of state customers who bring tourist dollars to the surrounding local communities. These also include state and local governmental agencies that depend on the revenues, license fees and taxes generated from CPFV Fleet and its ancillary businesses. CARB has not performed a meaningful economic analysis to assess the actual consequences of the proposed regulations.

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10. CARB Has Not Assessed and the Proposed CHC Regulations do not address the Likely Adverse Impact to Ocean Access for Marginalized Individuals and Groups

The CPFV fleet provides a service to underserved communities, people of color, lower economic communities and a general diverse public by providing affordable ocean access. They also work with schools and non-profits to facilitate ocean access and learning about the marine environment. The raising of ticket prices, which will be necessary to comply with the rule, would be so substantial that these various underserved communities would not be able to afford to take their family aboard the CPFVs (or such vessels would be put out of business, effectively eliminating access), and it would limit school and non-profit opportunities for ocean access.

3195.43

In this age of ensuring equitable ocean access to all communities within the state, the result of the removal of CPFV vessels from service and/or the raising of the prices substantially would limit access to many, with the disadvantaged communities and those who fish for sustenance suffering the largest impact. CARB makes no effort to assess the impact of the elimination of ocean access on marginalized communities, school children, non-profits, research operations, and people of color. The California DFW has information on the ethnic composition of anglers using CPFVs based on license sales; this information should have been used by CARB to analyze this issue. This is a major social justice issue that CARB has not considered or included in its analysis.

11. CARB Has Not Accessed the Impact on Harbors, Marinas and Landings

Many facilities have restrictions or limitations on the size of vessels docked. As the proposed rule will require larger metal vessels to accommodate larger engines and equipment, CARB has not accessed the construction costs associated with modifying or building larger slips or whether there is a sufficient inventory of available slips if businesses are forced to relocate. CARB has not incorporated these potential costs into operational costs for vessel owners or further impacts to passenger fees.

3195.44

IV. UNANSWERED QUESTIONS

CARB's effort, analysis and transparency for this proposed rule is lacking in every area, which makes it impossible to adequately assess the contributions of CPFVs to emissions in regulated waters and evaluate the economic and social justice benefits of alternative methods to reduce emissions. CARB leaves so many unanswered questions that are critical in understanding the effects of the proposed rule that the existing proposal is at best arbitrary, based on preconceived notions of the staff and not supported by actual data. We have discussed many of these concepts above and with CARB directly, which as noted were ignored or dismissed in preparation of the proposed rule. In addition to the issues identified above, below we list many of the concerns with the lack of effort and the proposed rule in question format so that the breadth of CARB's omissions is painfully obvious.

3195.45

A. CARB's Public Communications and Stakeholder Outreach has been Inadequate

Have the regulations proposed by CARB been implemented anywhere else in the United States? If not, why not?

Before mandating the regulations and untested technology on one of the largest fishing fleets in the country, would CARB consider financing the construction of a proto-type passenger sportfishing vessel to determine construction and operating costs, and potential threats to the safety of passengers and crew? If not, why wouldn't this be a prudent first step to developing emission regulations that are economically feasible and safe?

CARB's overall rule outreach and public notice has been inadequate. Did CARB reach out to the Golden Gate Fishermen's Association (GGFA), an organization that represents Northern California commercial passenger boat owners?

Did CARB convene a meeting with boat owners to determine if their application of Tier 4 engines and technology could safely and economically apply to passenger boats and fishing practices?

Has CARB notified all CPFV owners that their boats may be removed from service?

Why did CARB not accept offers to host in-person workshops from the associations representing CPFV owners?

As recommended by the associations, when CARB released its amended CHC regulations Sept. 21, 2021, did CARB send a letter to every boat owner requesting public comment and notifying them of the hearing (every engine is registered with CARB and commercial fishing licenses are filed with the California DFW)? If not, why not?

By CARB's own admission, sportfishing and whale watching boats constructed of wood and fiberglass will likely have to be removed from service. Has CARB communicated this to every boat owner? (Over 80% of boats are constructed of wood and fiberglass, and no determination has been made that existing metal boats can comply.)

3195.45
(cont.)

B. CARB's Consultation with and Consideration of the Impact on Vessel Owners has not been Sufficient or Transparent

Did CARB consult with boat manufacturers on replacement costs? If yes, who and how many?

Since the technology has not been developed for passenger boats yet, how does CARB know the true capital and operational cost of Tier 4 engines, DPFs and other add-ons necessary to accommodate this equipment, and the cost of new custom boats to house untested equipment?

CARB believes that increasing passenger ticket prices can cover the cost of new boats and has calculated a ticket price increase that will be needed. Has CARB completed a market analysis to see if that ticket price could be supported? If so, will this information be released publicly?

For CARB to conclude that increasing prices was a viable option they would have had to had access to (many) boat owners' business records. Did they?

CARB's economic analysis concluded that if boat owners could not pass on higher passenger ticket prices to customers, some boat owners could go out of business. What is CARB's estimate of the number of businesses that will go out of business and the impacts that will occur due to these business closings? Where is this analysis?

In CARB's analysis, what was the price point or how much of an increase would anglers and families accept before choosing to do something else with their recreational dollars?

Did CARB consult with the California Department of Fish and Wildlife (CDFW) to determine what impact fewer passenger boats or higher prices would have on fishing participation rates, both today and in the future? What impact would declining fishing license sales and revenue have on fishery and conservations programs administered by CDFW and boater safety programs with the Department of Boating and Waterways?

C. CARB's Economic Analysis (SRIA) is Incomplete

If CARB underestimated the cost of new boats and the ability to increase prices, what was CARB's analysis on the impact to small businesses?

3195.46

How did CARB assess the impact of business closings on jobs?

How did CARB assess the impact of business closing on the economy of the ports and port communities, including taxes, fees, etc. and where is that analysis?

How did CARB assess the impact of business closing on tourism and if so, which tourism organizations were publicly noticed and consulted?

Governor Gavin Newsom has made restoring the half of 1.2 million hospitality and tourism jobs lost during the COVID-19 pandemic an economic priority. Has CARB consulted with the

Governor's economic advisors to determine the potential job loss associated with fewer commercial passenger boats in service?

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(cont.)

How did CARB assess the impact of businesses closing on fees paid to federal and state agencies who license and regulate these boats?

Did CARB contact any passengers that commonly use these boats, especially those from disadvantaged communities, to confirm that they could afford these increases in ticket prices? Where is the information regarding that exercise? If such efforts were not undertaken, why not?

How has CARB in its analysis accounted for the fact that most boat owners have existing loans on their boats that would have to be paid off regardless of if the boat has no or limited resale value?

How does CARB differentiate its consideration of new regulations for cargo ships and other large harbor crafts owned by large corporations and publicly traded companies contrasted against passenger fishing boats operated by small family businesses?

What concerns are considered by CARB when implementing regulations that disproportionately impact small business owners?

Carl Moyer Funds can only be used for engines and not vessel replacement. Given the boat owners are being asked to purchase highly advanced vessels with costly equipment and technology, should Carl Moyer Funds be expanded to include vessel replacement?

CARB has suggested CPFV owners could still use grant funding to offset costs. Did CARB provide a detailed analysis of how this would work, when the owners could use these funds, how this would work with the time extensions in the rule, whether vessels might still have to be replaced after grant funding was used for engine repowers, and whether there was enough money available?

CARB acknowledges that if a boat is no longer compliant, it will have no resale value in California. How confident is CARB that a boat owner can finance a new boat without the ability to sell their existing boat at market value (their businesses most valuable asset)?

Did CARB consultant with any boat lenders to determine what barriers boat owners could experience as they try to finance a new boat? If not, why not?

Existing boats may have little value in other states/countries, especially if the market is flooded with new vessels. Is there market demand for 174 used passenger boats? If so, in what states and countries did CARB determine a sufficient market is available?

What has CARB done to ensure sufficient grants and funding opportunities are available to these relatively small number of family-owned businesses?

What has CARB proposed to support the ancillary businesses that depend on CPFV operations, so they are not put out of business in the name of exceedingly modest theoretical (and hypothetical) public health gains?

D. The Time Extensions Available Under the Regulation are Insufficiently Defined and Could Prove Illusory as a Hedge Against Technological Unavailability and Economic Infeasibility

3195.47

In CARB's (Sept. 21, 2021) amended draft regulations, it expanded the possibility of moving the compliance deadline, from three 2-year extensions to four 2-year extensions for some vessels. Given the uncertainty surrounding technological development, the significant economic impact of purchasing new vessels, impacts to ticket prices and decreased ridership, it matters whether a boat owner could actually benefit from any extension.

Under certain scenarios a vessel owner would have to replace their existing vessel within 6-months. How did CARB determine that a new vessel could be financed, constructed, and deployed within this time frame?

Why did CARB not define the extension criteria to allow a reasonable assessment or forward-looking projection by a vessel owner?

What is CARB going to consider in reviewing the financial statements of a boat owner in considering whether to grant an extension?

What is the amount of profit that CARB believes is appropriate for a boat owner? What criteria will be used?

How will "affordability" be defined?

What assumptions has CARB made about ticket price demand elasticity? How high does CARB believe ticket prices can be raised before demand and participation suffer?

Will CARB deny an extension if a boat owner does not raise ticket prices to what CARB believes would be an appropriate level?

What recourse and protection will owners have if depressed demand at increased prices precludes owners from recouping upgrade investment costs?

How did CARB determine that vessel owners can financially afford to upgrade their existing vessels without grant funds (\$350,000 - \$400,000) and spend over \$61,000 to prepare paperwork for the hopes of a two-year extension and finance new boat construction over a similar timeframe?

For vessels that would not have to be replaced within 6-months, how did CARB determine that with no more than two-years notice that new vessels can be financed, constructed and deployed?

E. Fairness Mitigates Against Imposing the strict CHC regulations while the Economy is Still Emerging from a Generational Pandemic

3195.48

Is it fair to impose these costly regulations before boat owners can recover their losses from the COVID-19 pandemic shutdowns? Some boat owners are heavily leveraged from their businesses being shut down during the pandemic. A boat owner could find themselves in the position of paying bank notes on two boats, even though only one is generating revenue.

F. It is Not Appropriate to Push Forward Regulations Which Require Installation of Unavailable Technology While Serious Questions About Safety and Feasibility Remain Unanswered.

3195.49

The CHC rules as drafted will require installation and use of DPFs, which are commonly found on tractor trailers and farm equipment. Have DPFs been used on passenger boats before? Are they safe for passenger harbor crafts? Have they been tested on passenger fishing boats and whale watching boats that typically operate at low RPMs? If so, where, and when, and for how long? Please provide the research.

It is not uncommon in the trucking industry for DPFs to become clogged, requiring the trucks to leave the road and “regenerate” the DPF. The circumstances would differ vastly for a vessel miles from shore or in a narrow harbor. What evaluation has CARB made of safety considerations involved if a DPF becomes clogged, stops working and needs to be regenerated while at sea? Boat owners are concerned that DPFs could stall engines at sea and in the worst case, catch fire. Has CARB evaluated these concerns? <https://www.nbcbayarea.com/news/local/bay-legal-truckers-sue-ca-again-claiming-air-filter-puts-public-safety-at-risk/36208/>

Has CARB conducted any research into the safety of DPFs at sea? Please share the information.

Have safety concerns associated with the use of DPFs been raised before? If so, please share the circumstances.

Has CARB evaluated the risk of stalled engines, especially if vessels are near shore and entering/exiting harbors, and most notably during high winds and seas?

Has CARB provided the Cal Maritime report to the USCG and solicited its input? (The Cal Maritime report says that the technology does not exist for sportfishing and commercial fishing boats and if it did, it would be unsafe).

If the USCG determines that DPFs are not safe at sea, will CARB revise the regulations and, if so, how?

Should CARB be permitted to develop and impose regulations that are economically and technologically infeasible, requiring technology that is unavailable, not tested for the prescribed use, or proven as safe or practical for CPFVs?

G. It is Not Appropriate to Impose Regulations Requiring Costly Diesel Engine Upgrades Without Addressing the Relationship to and Context of Contemplated Zero Emissions Standards and a Reasonable Time Frame to Achieve a Capital Return on Upgrade Investments

If a boat owner can finance a new boat, what is the likelihood that their new boat will have to be replaced by 2035 or 2045 when the Governor’s Climate Change policies (carbon neutral if feasible) takes effect? How will that accommodate an ability of owners now to know they can recoup their investment in upgraded technology that could become functionally obsolete in less than 15 years?

3195.50

What is the basis for CARB’s belief that fossil-fuel burning engines can be replaced with electric engines fueled by batteries or hydrogen to achieve equivalent performance with less environmental damage?

3195.51

Has CARB conducted any research that electric motors will not invite stability or safety issues, and whether the technology can sufficiently support fishing practices, including multi-day long distance trips?

3195.52

<https://www.marinelink.com/news/hybrid-tour-boat-catches-fire-norway-485995>

For those that replace their boats, how confident is CARB that the larger steel boats will be appropriate for conversion to a hybrid or zero emission system? Wouldn't vessels constructed of lighter materials be more appropriate for battery or hydrogen-based propulsion systems?

H. CARB's Analysis Ignores the Deleterious Impact on Coastal/Disadvantaged Communities that Rely on CPFV Vessels for Employment and Otherwise Unattainable Access to the Ocean and Its Resources Which Has Spurred Concerns and Broad Support for the CPFV Fleet Throughout the State

CARB's economic analysis acknowledges that the regulations could put some boat owners out of business, but what reverberative impact will boats going out of business have on coastal economies that depend on sportfishing and whale watching for visitor spending? For example, coastal Los Angeles, Orange and San Diego Counties have some of the largest sportfishing and whale watching fleets in the State and, together with myriad ancillary and support businesses, serve patrons from throughout the state and across the country.

3195.53

The California Travel Association and over 20 coastal chambers of commerce and tourism authorities are concerned about the economic impacts on communities that depend on boats to generate visitor spending. See www.savefishing.com/coalition

In CARB's analysis, what were the concluded impacts to the small ports and communities along the central and northern coasts if boats go out of business?

Did CARB evaluate the impact of many boats and businesses going out of service on government fees and the funding of various environmental programs on which those fees are used?

Members of the State Legislature wrote CARB stating, "Commercial Passenger Fishing Vessels (CPFV), also known as charter fishing vessels, are a critical part of coastal economies and community recovery. These businesses are the primary means by which the public, including disadvantaged communities, who do not themselves own a boat, nonetheless have access to the living marine resources of our state through fishing and whale watching. CPFV operators collaborate in research and marine education. Federal, state, and university researchers (including students) utilize, often at no cost, access to CPFV to conduct research on the health of marine waters and fisheries. In addition, vessel owners work with schools and nonprofits (including Title 1 schools, disadvantaged youth, and veterans) to provide education and access to many that would not be able to access our marine environment any other way."

3195.54

While the Legislature has prioritized the health and wellbeing of Californians by directing CARB to take prudent action to reduce airborne toxins within our state, the Legislature also demanded the actions be prudent and balanced, through implementation of programs that are 'practicable' (HSC §39650(k)) as well as 'cost-effective, and technologically feasible' (HSC §43013(a))." How has CARB satisfied that directive?

3195.40

Given that most Californians do not have the luxury of owning a recreational boat, does CARB agree it has a responsibility to consider potential negative monetary and non-monetary impacts of its regulations on non-profits, educational programs, and disadvantaged and lower income communities?

3195.40
(cont.)

Does CARB believe the proposed regulation are practical, cost effective and technologically feasible if the outcome is significant economic damage, loss of jobs and limiting access to offshore fishing and marine life observation?

I. It is Illogical and Arbitrary to Separate CFVs from and Give them Far Less Onerous Treatment over the Smaller Similarly Situated CPFV Fleet

There are 1,199 commercial fishing boats and only 174 commercially inspected sportfishing/whale watching boats; why are boats that have identical engines held to different emission standards?

3195.55

Cal Maritime Academy raised nearly identical issues regarding technological availability and safety for CFV and CPFV, why was this CARB commissioned report ignored as it applies to CPFVs in preparation of the rule?

Many CPFV also conduct commercial fishing operations, what is the application of the rule to vessels that conduct both types of operations?

What analysis was conducted on CFV and CPFV to understand the economics of each industry?

Historically, CARB commercial and passenger boats were in the same vessel category, regulated in the same manner. The proposed regulations would remove passenger boats. Was this decision political? Who made this decision? What analysis was done to support the decision?

We have been told that the offshore nature of commercial fishing operations contributed to the differentiation but many if not the majority of those operations occur near shore targeting lobster, crab, squid, and bait fish, among other things. Near-shore operations may well constitute a larger percentage of commercial fishing than CPFV operations.

Why will commercial fishing boats continue to have access to Carl Moyer funding (State grants) that help subsidized the cost of repowering to lower emission engines and passenger sportfishing/whale watching boats will be denied or have more restricted access once the regulations are adopted?

Given that passenger boats represent only 10% of all harbor crafts, why not return them to the same vessel category as commercial fishing boats?

Commercial fishing vessels and CPFVs were categorized together and treated equivalently in the last CHC regulations 10 years ago. Why was commercial fishing separated from CPFV before the first iteration of the current rulemaking was even announced and published? Has CARB made available to the public all communications and discussions regarding what led to that differentiation? If not, please provide.

J. The CHC Rules are predicated on Health Benefits that are Disproportionately Isolated to Communities Where the Impact from CPFV Operations Are Minimal; Conversely the Impact of the Regulations Disproportionately Burdens CPFV Operations Where the Projected Benefits are Fractionally Attenuated

3195.56

Has CARB assessed the fact that 50% of the inspected CPFVs are located in San Diego County, but that CARB's own analysis suggests only 7% of the health benefits occur in San Diego County. The rule therefore creates a disproportionate impact on this vessel category compared to its contributions, especially the limited contributions in environmental justice communities.

Has CARB completed a detailed air modeling and risk assessment in San Diego County where the majority of the CPFVs reside and operate? If not, why not?

Why did CARB ignore requests to use accurate logbook data that is available for every vessel?

Given a boat owner has established that his vessel's operating times in regulated waters are overstated by 5 times by CARB's model and his data will be reflective of 50% of the fleet, does CARB plan to revisit requests to use logbook data that accurately reflect where vessels operate?

V. RECOMMENDATIONS

A. The Following General Considerations Should Guide Review of the Proposed Rule

We appreciate your consideration of these concerns. Our members, as identified are small business owners, but they also are residents and citizens of these vibrant communities, which will be impacted by any proposed regulations. While sharing the common goal of a cleaner environment, they seek to do so thoughtfully, mindful of the myriad considerations, and challenges, both economic and technical to be overcome as well as the effects of those decisions on our customers and the social access programs that we support. To that end, we have developed a set of recommendations that we believe harmonize CARB's goals and the realities faced by the CPFV, coastal communities, and those that depend on the industry for affordable access to the oceans we all love. On behalf of CPFV's throughout the state of California, SAC and GGFA recommend the following modifications to the current CHC amendment.

- That inspected CPFVs continue to be considered "Fishing Vessels" and receive the same compliance deadlines as the Commercial Fishing Vessels (CFVs), with Tier 2 serving as final compliance – which staff purposely drafted in a manner to continue to allow CFV's continued access to grant funds. Tier 0 and Tier 1 engines will follow the proposed replacement and low usage exemption requirements. This will result in a logical, consistent path for commercial fishing vessels and CPFVs to reduce their emissions while still being able to overcome the financial hardship of repowers to Tier 3. Grant money would be available to all vessels regardless of operational area and is the appropriate path to finance the repowers vs. putting a boat out of business. Many CPFVs are already Tier 3 and over 26 are scheduled for Tier 3 repowers just in the South Coast in the next two-years (if applications are approved). The repower boatyard serving L.A. and Long Beach areas indicate that 100% of the 15 CPFVs in that area have already converted to Tier 3. 3195.57
- That diesel-powered six-pack boats be left out of this rule. Most of these boats are part-time operations with smaller engines and limited use. Their inclusion puts them at a serious financial disadvantage compared to their gasoline-powered counterparts. We believe there are roughly 20 diesel powered boats that operate full-time. 3195.58
- That Opacity testing requirements be eliminated. These requirements are cumbersome, and a majority of our operators will not have the capacity or resources to complete this task. 3195.59
- That Fee Schedules be removed from the rule as the sector is financially challenged and will be for many years due to the pandemic. 3195.60
- That CARB initiate a thorough outreach campaign for all California Fishing Vessels. SAC and GGFA have offered several recommendations on how this can be completed more effectively. 3195.61

B. SAC/GGFA's Specific Proposal to CARB for the Contemplated CHC Rule

Beyond the general recommendations above, SAC/GGFA also recommend the following specific implementation measures:

CARB contract with the Cal Maritime Academy to establish an advisory committee to receive input on vessel design and operation for the various operational needs off the California Coast. CARB fund the Cal Maritime Academy to use the input of the Advisory Committee to design, build and deploy a minimum of four test vessels of different configurations to operate out of California ports for a minimum of seven years. The Cal Maritime Academy would contract with existing vessel owners to operate the test vessels, and CARB would cover all costs not covered by ticket prices, including any liability arising from the failure of the test vessel. 3195.62

The CPFV fleet has already accomplished significant emission reductions through the use of the CMP where it is available. The recommendations in this letter to remove the barriers to the use of the CMP and to provide full access to the maximum grants for the entire fleet would result in additional emission reductions. Additionally, following the previous recommendations for developing fleet data would allow CARB to put forth an accurate and transparent characterization of the contributions from the CPFV fleet, which is currently lacking. 3195.63
3195.64

We look forward to CARB fulfilling our requests for appropriate outreach so that all individuals potentially impacted by the proposed rule can be heard. Once again, we would extend the offer to host an in-person workshop for CARB to discuss the content of this letter in the coastal communities of interest. 3195.65

Please do not hesitate to contact us if we can be of service or answer questions.



Ken Franke
President
Sportfishing Association of California



Rick Powers
President
Golden Gate Fishermen's Association

Attachments:

Southwick and Associates
Considine & Considine, CPAs
FAQs

NOTE: The following chart is drawn from CARB’s own published data which demonstrably overstates emissions from CPFV.

NOx Current (tons per day)	2010 inventory	2020 inventory	% of total statewide emissions	as fraction	2035 projection
State-wide total: all sources	2321	1421			1139
All ocean-going vessels	204	225	15.83%	0.158339	
Recreational boats	19	15	1.06%	0.010556	
Vessels Excluded from CHC regs*		240	16.89%	0.168895	
All CHC state-wide (2023 baseline)	67	16	1.13%	0.011260	
CPFV state-wide (2023 baseline)	11	1.5	0.11%	0.001056	
Congestion excess: South Coast Port (CARB Sept 2021 Estimate) --7.5 vessels; 7 is everything else (trucks, cranes, etc)		14.5	1.02%	0.010204	
CHC South Coast Basin (2023 baseline)		4.5	0.32%	0.003167	

*cargo ships plus recreational boats

Projected CHC Rule Emission Reductions (after 2038--15 yrs) -Projected baseline 2035 state-wide emissions = 1139 tons/day	1139 tons/day	Net reduction by 2038	% of proj. emissions	emission reduction as fraction	% CHC reductions
All CA CHC (1.1 of 8.3 ton reduction would occur without rule)		8.3	0.73%	0.00729	
CHC South Coast (proj. reduction without rule not ascertained)		2.4	0.21%	0.00211	28.92%
CPFV Statewide (proj. reduction without rule not ascertained)		0.83	0.07%	0.00073	10.00%
CPFV South Coast (proj. reduction without rule not ascertained)		0.25	0.02%	0.00022	3.01%

EXHIBIT 1



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IDENTIFICATION OF COMMON FISH



GUIDE TO COMMON GROUND FISH SPECIES (of Central and Southern California)

Anglers are responsible for knowing current fishing regulations, which can change frequently. Check the state website for up-to-date information.

Black Rockfish** [Image of Black Rockfish] [Description text]	Blue Rockfish** [Image of Blue Rockfish] [Description text]	Gopher Rockfish** [Image of Gopher Rockfish] [Description text]	Black & Yellow Rockfish** [Image of Black & Yellow Rockfish] [Description text]
Brown Rockfish** [Image of Brown Rockfish] [Description text]	Yellowtail Rockfish** [Image of Yellowtail Rockfish] [Description text]	Olive Rockfish** [Image of Olive Rockfish] [Description text]	Copper Rockfish** [Image of Copper Rockfish] [Description text]
Treefish** [Image of Treefish] [Description text]	Grass Rockfish** [Image of Grass Rockfish] [Description text]	Kelp Rockfish** [Image of Kelp Rockfish] [Description text]	Baby Rockfish** [Image of Baby Rockfish] [Description text]
Spiny Rockfish** [Image of Spiny Rockfish] [Description text]	Striped Rockfish** [Image of Striped Rockfish] [Description text]		





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Adventure Camp Outdoor Adv

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Summer Camp



Fisherman's Landing Tackle

FLORIDA REC CO
SUMMER

SPARTAN



November 15, 2021

Ms. Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CHC2021 – Economic Feasibility of Vessel Replacement for Passenger Sportfishing
and Whale Watching Boats

Dear Ms. Randolph:

Please let me begin by sharing my credentials. Since founding the business in 1990, we have specialized in economic research regarding fishing, hunting and outdoor recreation. We have conducted many hundreds of sportfishing economic studies, including numerous examinations of marine sportfishing issues in California. This background provides us in-depth expertise into the motivations, spending and roadblocks associated with sportfishing participation and their associated jobs, tax revenues and other economic concerns. Based on this experience, the rest of this letter provides my comments and observations regarding CARB's proposed engine emission regulations for commercial passenger harbor crafts, commonly associated with sportfishing, whale watching and scuba diving.

Background:

On September 21, 2001, the California Air Resources Board (CARB) released amendments to the proposed Commercial Harbor Craft Regulations designed to reduce diesel engine emissions. These regulations, if adopted, would require engines and technology that may not fit existing vessels' engine rooms. As a result, and CARB admits, vessel replacement would be likely.

CARB contends that boat replacement is economically feasible, costing approximately \$2.1 million for a new, compliant vessel. To finance these vessels, CARB reports passenger ticket prices would have to increase. CARB does not report how their cost estimates were calculated or if they consulted with vessel owners or builders regarding the costs for new, compliant vessels. CARB acknowledges that even at their projected vessel cost, not every boat owner can afford a new vessel or pass on the full cost increase to their passengers and that some business loss is likely.

Given the lack of data behind CARB's statements, several key questions arise:

1. What are the actual costs to business owners to purchase a new, compliant vessel?
2. Will any price increases required to purchase new vessels impact fishing participation?
3. Will there be any impact on fisheries management and state conservation efforts?
4. Will any communities experience greater burdens than others? and,
5. What is the expected impact to the State economy?

To answer these questions, the Sportfishing Association of California retained Southwick Associates. Following is a summary of our findings.

1. What are the actual costs to business owners to purchase a new, compliant vessel?

To establish whether CARB's expected costs to purchase a new, compliant vessel are correct, a Certified Public Accountant (CPA) with marine industry experience evaluated construction bids for two commercial vessels that were designed to comply with CARB's proposed rules (attached). The Class 1 and Class 2 bids (attached) reflect two of the most common passenger sportfishing vessels found off the California coast, with a Class 1 vessel that can be configured for whale watching, eco-tourism and scuba diving excursions.

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CARB's *Standard Regulatory Impact Assessment* (SRIA) economic analysis estimated the average replacement cost for a commercially inspected passenger sportfishing vessel to be \$2.1 million, financed with passenger ticket price increases of \$39.78 (or 27% increase) for a single-day trip and \$37.05 (or 19% increase) for a multi-day trip on a per passenger per day basis. Their economic analysis does not reveal how CARB assessed the \$2.1 million value, whether they sought bids from reputable boat builders and if they applied the projected construction costs to real boat operating budgets. To ensure reliable, defensible data are used to assess the true impacts of the proposed amendments, H&M Landing of San Diego did exactly that.¹

Two construction bids were received by H&M Landing (attached). One was for \$4.6 million to construct a 65 ft one-day vessel (Class 1, suitable for day fishing trips, whale watching and SCUBA excursions) and \$5.7 million for an 80 ft multi-day vessel (Class 2). These costs are magnitudes greater than CARB's estimate of \$2.1 million per vessel. According to the CPA report, based on the operating budgets of current H&M landing boats, to break even, businesses replacing a Class 1 boat would have to increase prices for a one-day fishing trip from \$180 to \$542 (201% increase) and a new Class 2 boat that provides multi-day fishing trips would have to increase its prices from \$200 to \$394 (97% increase). These price increases are significantly higher than the 19% to 27% increases anticipated by CARB.

The CPA's analysis also underscores the financing challenges facing boat owners. The CPA notes that 20% - 40% is a commonly required down payment within the marine industry. Considering existing non-compliant boats will have no resale value in California and the glut of boats to be sold will depress markets outside of California, businesses will find it difficult to sell their current boats and secure down payments on new vessels, thus raising the risk for banks. Banks would have to demand higher down payments and/or higher rates. Without feasible financing, many vessel operators will shut down.

2. Will any price increases required to purchase new vessels impact participation?

It is noteworthy to mention that CARB assumes CPF vessels would maintain their current passenger loads in the face of price increases. Expecting passenger demand to remain unchanged in face of price increases is wrong. At Southwick Associates, we have examined impacts on fishing license sales resulting from price increases for over 40 states. Price increases can include the price of the actual license, fuel prices (boat and auto), the hassles associated with poor weather, and more. The following are examples from these previous analyses:

Oklahoma:

- a. In 2019, a \$1 (or 5%) increase in resident annual fishing licenses would result in a loss of 7,924 anglers and a decline in license sales of 1.2%:

¹ H&M Landing in San Diego operates 30 CPF vessels.

- The statistical models custom built for Oklahoma's license sales show that a 100% increase in price would cause resident participation to decrease over 22%, while a 200% increase would result in a 44% decline in participation.

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(cont.)

b. A \$1 increase in Oklahoma's nonresident annual fishing license would result in a loss of 1,342 visitors, which equates to a 4% decline in sales.

- Further statistical modeling shows that a 100% increase in price would cause non-resident participation to decrease to nearly zero.

Tennessee:

a. In 2018, a 10% increase in the basic fishing/hunting license² would result in a loss of 6,149 anglers which means a 2% decline in license sales:

- Tennessee's statistical models show that a 100% increase in price would cause resident participation to decrease 20%, while a 200% increase would result in a 40% decline in participation.

b. A 10% increase in Tennessee's nonresident annual fishing license would result in a loss of 1,482 visitors, which equates to a 4% decline in nonresident license sales.

- Further statistical modeling shows that a 100% increase in price would cause non-resident participation to decrease 37%.

Oregon:

a. In 2013, a \$1 (or 3%) increase in the price of the resident annual fishing license would result in a loss of 5,711 anglers which means a 2.3% decline in sales:

- The statistical models custom built for Oregon license sales show that a 100% increase in price would cause resident participation to decrease to 74%, while a 200% increase would decrease participation to nearly zero.

b. A \$1 increase in the \$106.25 annual fishing license would cause a 1.1% sales decline.

- Further statistical modeling shows that a 100% increase in price would cause non-resident annual license sales to decrease to nearly zero.
- Considering Oregon's annual nonresident fishing license is priced similar to a one-day CPF vessel trip, we tested the effects of CARB's suggested price increases. At these levels, Oregon's annual license sales would fall over 40%.

Results of other states are also available. Across the board, the statistical models show that price has a significant effect on fishing participation. **While small increases might be absorbed, increases of 97% to 201% as required for operators to replace CPF vessels would cause annual passenger volume to decline severely.** Even if CARB's regulatory costs could be passed on with a 19-27% passenger price increase, the proposed regulations could reduce passenger volume by nearly half, per the Oregon data.

Please note that it is possible to measure the effects of price increases on California's license sales. The necessary license data are in possession of the California Department of Fish and Wildlife. CARB's economic analysis (SRIA) does not refer to any effort to conduct this basic statistical assessment.

3. **Will there be any impact on fisheries management and state conservation efforts?**

Fisheries management is largely dependent upon the sale of fishing licenses. Every adult angler aboard a CPF vessel is required to possess a California marine fishing license, generating significant fisheries conservation revenues. The total revenues attributable to CPF vessels are calculated for 2018, which is

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² Tennessee does not sell a standard fishing-only license to residents. Users must purchase a combination fishing/hunting license.

the same year examined by the professional CPA financial assessment regarding CARB's potential financial burden on CPF vessel operators:

- The California Department of Fish and Wildlife reports 1,776,844 resident and nonresident fishing licenses were sold in 2018 with revenues of \$59,876,070.³ This equates to \$58.95 per license sold.
- The professional CPA documented the annual revenue for two California CPF vessels. The average annual revenue for both vessels in 2018 was \$457,760.
- The typical fees paid by their customers range from \$60 for 1/2 day trip to \$800 for a 2.5 day trip.⁴ Across all types of trips, the average fee paid per customer is estimated to be \$287.75.⁵
- Dividing the average annual revenue by the average fee per customer yields an average of 1,986 passengers per vessel each year. With 75% of passengers expected to be repeat users, each vessel is estimated to generate 497 license sales annually.
- At an average of \$58.95 per license sold, each vessel represents \$29,298 in annual license revenue to the State of California.
- With 174 CPF vessels operating in California,⁶ and considering the assumptions stated above, the California Department of Fish and Game receives \$5,097,852 annually from license sales to CPF vessel customers which represents 8.5% of its annual sport fishing license receipts.

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(cont.)

Another potential ramification to conservation funding relates to a possible reduction in federal funds received by the State for fisheries conservation. This fund, known as the Federal Aid in Sport Fish Restoration fund, allocated \$16.5 million to California in 2018. Funds are received from the wholesale fishing tackle and motorboat fuel sales, then allocated across states based on a formula accounting for each state's number of licensed anglers and water area. The final apportionments vary each year based on the total funds available and the number of licensed anglers across states. In 2018, California received \$10.30 for each licensed angler.⁷ Considering there are 174 active vessels, each generating on average 497 license sales annually, CPF vessels account for roughly 86,478 license buyers who represented \$890,723 in federal fisheries conservation funds in 2018. A reduction in their numbers could directly threaten California's future federal funding allocations.

4. Will any communities experience greater burdens than others?

Basic demographic data are shared first:

- The U.S. Fish and Wildlife Service (USFWS) reports 43 percent of anglers had an average household income under \$75,000, identical to the average U.S. household (43%).⁸
- Likewise, according to the USFWS, 48% of anglers were under the age of 45, while 47% of the U.S. population was under 45 years of age.
- While anglers are under-represented among Hispanics, the Recreational Boating and Fishing Foundation (RBFF) reports Hispanic participation is growing rapidly, with 13% having

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³ <https://wildlife.ca.gov/Licensing/Statistics#SportFishingLicenses>

⁴ Personal communications with H&M Landing in San Diego from where 30 CPF vessels operate.

⁵ The proportion of trips across these four categories was obtained via personal communications with H&M Landing in San Diego: ½ day = 45%, full-day = 18%, overnight = 15% and multi-day = 22%.

⁶ Per SAC estimate of USCG commercially inspected vessels, based on CFW data.

⁷ For FY2018, California received \$16,513,733. When divided by California's sale of 1,603,626 licenses as certified by the USFWS, this equals \$10.30 in federal revenue per license sold.

⁸ Angler income obtained from the 2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation., U.S. Fish and Wildlife Service, 2018. US median income obtained from <https://www.census.gov/library/publications/2017/demo/p60-259.html>.

participated in fishing in 2020, the highest participation rate yet recorded. Nearly one in 10 Hispanics participated in fishing for the first-time last year. In the past ten years, the number of U.S. Hispanics who went fishing grew 55% from 3.1 million to 4.8 million.⁹

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(cont.)

A common misperception is anglers are disproportionately wealthy and will accept higher prices to continue to fish. The Federal statistics shared above show anglers are not wealthy compared to the U.S. population and likely comprise just as many young families as found anywhere else. Considering prices for boats that can safely access the ocean generally start at \$75,000, the only affordable means for many lower-income segments of California's communities to access the ocean are via CPF vessels.

Expecting lower-income communities of California to bear severe price increases and not decrease their use of CPF vessels is certainly not reasonable.

Please note that data does exist pinpointing where anglers live. License data held by the California Department of Fish and Wildlife contains purchasers' zip codes. These data can be used to generate plot maps showing where anglers live, including the percentage living in lower income neighborhoods. Such assessments have apparently not been conducted, yet should be to better determine the potential burden placed on lower income communities.

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5. **What is the expected impact to the State economy?**

Per page 110 of CARB's economic analysis (SRIA), July 7th, 2021:

"...However, staff cannot rule out the possibility of some business elimination if costs cannot be passed on to the customer or if passing through costs would result in a significant decrease in demand."

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Earlier, it was shown that many customers will stop using CPF vessels if prices are increased. **Any assumption that costs can be fully or even partially passed along to customers without decreasing participation is simply wrong. If boat operators were in a position to charge higher prices, just like any business, they already would have. Without a doubt, price increases will harm CPF vessel operators and likewise the local communities that depend on them.**

Decreased participation means decreased spending on CPF vessels, which in turns harms the economy:

- As shown earlier, the average fee paid per customer is estimated at \$287.75 while the average number of paying customers per vessel is 1,986 annually.¹⁰
- With 174 vessels in service, 345,564 passenger trips occur annually.
- With an average of \$287.75 per trip, annual fees paid to access CPF vessels in California is \$99,436,041.
- According to the most recent economic impact data for marine fishing in California¹¹, for each dollar spent by anglers, the following multipliers take effect:
 - .000015 jobs are supported
 - 38 cents in income is generated for California residents
 - \$1.59 in value-added, or contributions to GDP, are provided
 - And according to an additional source, 14 cents in state tax revenues¹²

⁹ 2021 Special Report on Fishing. Recreational Boating and Fishing Foundation (RBFF) and the Outdoor Industries Foundation (OIF).

¹⁰ The proportion of trips across these four categories was obtained via personal communications with H&M Landings of San Diego who operates 30 vessels, plus their website regarding prices.

¹¹ National Marine Fisheries Service. 2021. Fisheries Economics of the United States, 2017. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-219

¹² Southwick Associates. Sportfishing in America: An Economic Force for Conservation. Produced for the American Sportfishing Association (ASA) under a U.S. Fish and Wildlife Service (USFWS) Sport Fish Restoration grant (F12AP00137, VA M-26-R) awarded by the Association of Fish and Wildlife Agencies (AFWA), 2012.

- Therefore, considering anglers annually spend \$99,436,041 to access CPF vessels, the following benefits are created for California’s economy:
 - 1,492 jobs 3195.70
 - \$37,785,696 in income (salaries, wages and small business profits) (cont.)
 - \$158,103,305 in GDP contributions to California’s economy, and
 - \$13,921,046 in lost state tax revenues.

The economic impacts are greater than just the fees paid to CPF vessel operators. Passengers also spend money traveling to and from the marinas, often staying in hotels before or after their trip while also purchasing food at local restaurants along with outdoor clothing and more. According to research based on data from the U.S. Census Bureau, for every dollar anglers spend on guides and CPF vessels, another \$19.77 are spent on other travel items such as lodging, food and more. How much is spent specifically by CPF customers on travel items is not known, but are certainly significant and would add much more to the CPF sector’s economic impacts reported above.

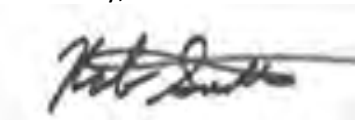
California’s tourism sector will also be affected. According to the U.S. Department of Commerce, nearly 10% of California's marine anglers are out-of-state residents.¹³ Their exclusion will harm California's tourism industry.

Summary:

CARB clearly does not understand nor did not take time to learn about the affected vessels’ operations and business environment, nor understands the demographics, motivations and financial abilities of these vessels’ customers. Assuming the customers of the affected vessels, who commonly hail from lower income environments, will simply accept higher prices and not decrease their days of fishing is absurd. If passed as proposed, the amendments will significantly reduce the dollars received by California for oceans and fisheries conservation, impact lower income communities the most, and cost the state economy nearly 1,500 jobs, \$37.8 million in income and over \$13 million in state tax revenues.

In conclusion, we find serious shortcomings in CARB’s statements and claims as presented in its economic analysis (SRIA). We offer our insights based on the best data available and our years of experience. We kindly request that the State of California carefully considers these potential impacts before making decisions that can potentially harm businesses, their employees and California residents who want to access the ocean. Thank you.

Sincerely,



Rob Southwick
 President
Rob@SouthwickAssociates.com

¹³ ¹³ National Marine Fisheries Service. 2021. Fisheries Economics of the United States, 2017. U.S. Dept. of Commerce, NOAA Tech. Memo. NMFS-F/SPO-219

CONSIDINE CONSIDINE
CERTIFIED PUBLIC ACCOUNTANTS

November 10, 2021

Frank Ursitti
H&M Landing
2803 Emerson Street
San Diego, CA 92106

Dear Mr. Ursitti,

As a partner in the attestation group of Considine and Considine for 35 years, I have worked with many marine entertainment-based event businesses and significant marine industry activity. Considine and Considine is a San Diego-based public accounting firm in operation since 1947 with approximately 90 staff.

In response to new engine emission rules proposed by the California Air Resources Board (CARB) that will likely require commercially inspected passenger boats to be replaced in the coming years, H & M Landing sought a cash analysis to determine the financial impact of different scenarios that would result from the purchase of a Class 1 (65 ft) vessel or Class 2 (80 ft) vessel.

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This analysis is in response to the CARB statements in the *Standard Regulatory Impact Assessment (SRIA)* and associated cost spreadsheet that replacement vessels are projected to cost an average of \$2.1 million and can be financed with passenger ticket price increases of \$28.03/day (or 19% increase) and \$26.09/multi-day (or 14% increase).

Our firm was retained to answer the following questions for each vessel:

- 1) What would be the impact to cash flow using CARB's suggested ticket price increase percentages?
- 2) What increase in ticket prices would be required for a vessel owner to achieve break-even cash flow (no profit)?

Methodology:

From a reputable ship builder, the client secured bids for commercial passenger vessels that commonly operate off the coast of California, a Class 1 65 ft local/coastal (day trip) vessel and a Class 2 80 ft multi-day vessel. The ship builder believes that the new vessels would meet the requirements of CARB's proposed rule and be able to accommodate the mandated engines and equipment when approved for marine use.

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The cash flow analyses are based on estimated operating expenses provided by client of in-service vessels and existing daily customer rates. There are two vessels under consideration, one a \$4.6 million build cost related to a Class 1 coastal local experience vessel with an expected 15-person capacity; the Class 2 multi-day vessel would be a larger offshore multi day vessel with estimated construction cost of \$5.7 million with an expected 25-person capacity. We used the year 2018 as the base year, a period that proceeded the COVID-19 pandemic that required operations to be suspended, and assumed vessels operated at 100% of capacity on all trips.

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The cash analyses are based on constant dollars with no inflation factor built in. Increasing costs are based on statutory rates or market forces. Inflation impact on revenue and expenses are expected to net to near zero and have not been included in the cash analyses to provide a more simple straightforward effective way to demonstrate the cost of acquiring major new fixed asset vessels to cash flow.

Each vessel analysis has two cash flow schedules the first based on a 14% price increase in the year of acquisition for the vessel and a 1% increase in real dollars each year thereafter ending at 10 years. The second analysis demonstrates the pricing levels necessary to break even on cash flow for the acquisition. While breakeven is not an acceptable long-term business model it does provide guidance to the expected pricing increases that would be necessary to reset a fleet with new qualified vessels.

The financing terms on the acquisition of new vessels are expected to be at 6% interest over a 20-year repayment life with a down payment of approximately 10% to be sourced from a potential resell value of existing equipment. These terms are likely optimistic for several reasons. First, the resale value of existing vessels may be difficult given that they will not meet new emission standards and have no resale value, requiring the vessels to be transferred overseas or across the U.S. Second, our experience demonstrates that banks are unlikely to finance 90% of the cost of a new vessel given down payments of 20%-40% are common for these types of vessels. Third, the analysis assigns no cost to the pay-off of a capital note on the existing vessel and it is unlikely that the full resale value of the existing vessel would be fully available for a down payment as it would be the security for the existing note. And lastly, the vessel owners will be required to convert the vessels to zero emission well within the useful life of the capital investment at an unknown but potentially significant cost meaning banks will want the loan to mature over a shorter period or will further reduce the percentage of the vessel that can be financed.

Conclusion

H&M Landing (current vs. future prices)

	Passenger Ticket for Existing Vessel	Passenger Ticket for CARB Compliant Vessel
Class One (Day) 15-passengers	\$180	\$542
Class Two (Multi Day) 25-passengers	\$200	\$394

Class 1 Coastal Vessel (65 feet): As the cash flow analysis demonstrates the \$4.6 million boat acquisition with 10% deposit would produce a **negative** cash position over 10 years of \$ 2,826,304. For this boat to breakeven, passenger prices would have to increase threefold or be increased by 200%.

Class 2 Multi-Day Vessel (80 feet): The cash flow results based on the \$5.7 million purchase with a 10% deposit would produce a \$ 3,047,600 **negative** cash at the end of 10 years and for this boat to breakeven, passenger prices would have to nearly double or be increased by 97%.

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(cont.)

The four cash flow analyses attached to this letter demonstrate the trajectory business owners will face given high cost of replacement vessels. Modeling suggests revenue increases to support the cost of new build will be extremely aggressive.

In my experience with marine recreation, the sudden and significant cost increase would both reduce the pool of those that can access the service and the frequency of returning customers. This challenge will be even greater for the most common smaller passenger vessel category (Class 1), notably half to one-day coastal vessels that serve anglers, whale watchers and divers. This would affect the ability to finance a vessel as would the uncertainty regarding future investments necessary to achieve zero emissions. Banks may view any extensions granted by CARB negatively as it would shorten the period of capital recovery and thereby require additional increases in ticket prices to achieve sustainable revenues.

Very truly yours,

Considine & Considine

PHILIP R. SMITH

Certified Public Accountant

PRS/Alli

Charter Boat Analysis

Class 1 (65ft) Vessel (Local/Coastal)

\$360,000 Down Payment, 20-Year Payoff, 6.00%

Cost: \$4,600,000

Revenues

	2022 Year 1	2023 Year 2	2024 Year 3	2025 Year 4	2026 Year 5	2027 Year 6	2028 Year 7	2029 Year 8	2030 Year 9	2031 Year 10
Existing Day Rate/Person	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180	\$ 180
Rate Increase	1.00	1.14	1.15	1.16	1.17	1.18	1.19	1.20	1.21	1.22
Boat Capacity	10	15	15	15	15	15	15	15	15	15
Days of Operation/Year	116	116	116	116	116	116	116	116	116	116
Revenues	\$ 208,800	\$ 357,048	\$ 360,180	\$ 363,312	\$ 366,444	\$ 369,576	\$ 372,708	\$ 375,840	\$ 378,972	\$ 382,104

Operating Costs

Fees	\$ 62,640	\$ 107,114	\$ 108,054	\$ 108,994	\$ 109,933	\$ 110,873	\$ 111,812	\$ 112,752	\$ 113,692	\$ 114,631
Utilities	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511	\$ 511
Advertising	\$ 6,264	\$ 10,711	\$ 10,805	\$ 10,899	\$ 10,993	\$ 11,087	\$ 11,181	\$ 11,275	\$ 11,369	\$ 11,463
Labor	\$ 37,979	\$ 39,118	\$ 40,292	\$ 41,501	\$ 42,746	\$ 44,028	\$ 45,349	\$ 46,709	\$ 48,111	\$ 49,554
Maintenance	\$ 25,056	\$ 42,846	\$ 43,222	\$ 43,597	\$ 43,973	\$ 44,349	\$ 44,725	\$ 45,101	\$ 45,477	\$ 45,852
Fuel	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000	\$ 73,000
Insurance	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000	\$ 8,000
Total expense	\$ 213,450	\$ 281,301	\$ 283,884	\$ 286,502	\$ 289,156	\$ 291,848	\$ 294,579	\$ 297,348	\$ 300,159	\$ 303,012

Operating income

% of Gross

Operating income	\$ (4,650)	\$ 75,747	\$ 76,296	\$ 76,810	\$ 77,288	\$ 77,728	\$ 78,129	\$ 78,492	\$ 78,813	\$ 79,092
% of Gross	-2%	21%	21%	21%	21%	21%	21%	21%	21%	21%

Expenses Resulting from Purchase

New Vessel Interest	\$ -	\$ 230,638	\$ 244,937	\$ 237,561	\$ 229,730	\$ 221,417	\$ 212,591	\$ 203,220	\$ 193,271	\$ 182,709
New Vessel Property Tax	\$ -	\$ 46,000	\$ 42,167	\$ 38,653	\$ 35,432	\$ 32,479	\$ 29,772	\$ 27,291	\$ 25,017	\$ 22,932
Net Income (Loss)	\$ (4,650)	\$ (200,891)	\$ (210,807)	\$ (199,404)	\$ (187,875)	\$ (176,168)	\$ (164,234)	\$ (152,020)	\$ (139,476)	\$ (126,549)
% of Net	-2%	-56%	-59%	-55%	-51%	-48%	-44%	-40%	-37%	-33%

Cash Beginning

Net Income

Loan Payoff

Capital Reserves

Net Sale Proceeds

Down Payment

Ending Cash

Cash Beginning	30,000	25,350	(279,046)	(609,437)	(935,800)	(1,258,465)	(1,577,736)	(1,893,899)	(2,207,219)	(2,517,944)
Net Income	(4,650)	(200,891)	(210,807)	(199,404)	(187,875)	(176,168)	(164,234)	(152,020)	(139,476)	(126,549)
Loan Payoff	-	(103,505)	(119,584)	(126,959)	(134,790)	(143,103)	(151,930)	(161,300)	(171,249)	(181,811)
Capital Reserves	-	-	-	-	-	-	-	-	-	-
Net Sale Proceeds	-	360,000	-	-	-	-	-	-	-	-
Down Payment	-	(360,000)	-	-	-	-	-	-	-	-
Ending Cash	25,350	(279,046)	(609,437)	(935,800)	(1,258,465)	(1,577,736)	(1,893,899)	(2,207,219)	(2,517,944)	(2,826,304)

Charter Boat Analysis

Class 2 (80ft) Vessel (Full Day Islands/Offshore)

\$500,000 Down Payment, 20 Year Payoff, 6.00%

Cost: \$5,700,000

Revenues

	2022 Year 1	2023 Year 2	2024 Year 3	2025 Year 4	2026 Year 5	2027 Year 6	2028 Year 7	2029 Year 8	2030 Year 9	2031 Year 10
Existing Day Rate/Person	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200	\$ 200
Rate Increase	1.00	1.14	1.15	1.16	1.17	1.18	1.19	1.20	1.21	1.22
Boat Capacity	25	25	25	25	25	25	25	25	25	25
Days of Operation/Year	162	162	162	162	162	162	162	162	162	162
Revenues	\$ 810,000	\$ 923,400	\$ 931,500	\$ 939,600	\$ 947,700	\$ 955,800	\$ 963,900	\$ 972,000	\$ 980,100	\$ 988,200

Operating Costs

Fees	\$ 243,000	\$ 277,020	\$ 279,450	\$ 281,880	\$ 284,310	\$ 286,740	\$ 289,170	\$ 291,600	\$ 294,030	\$ 296,460
Utilities	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500
Advertising	\$ 24,300	\$ 27,702	\$ 27,945	\$ 28,188	\$ 28,431	\$ 28,674	\$ 28,917	\$ 29,160	\$ 29,403	\$ 29,646
Labor	\$ 117,938	\$ 121,476	\$ 125,120	\$ 128,874	\$ 132,740	\$ 136,722	\$ 140,824	\$ 145,049	\$ 149,400	\$ 153,882
Maintenance	\$ 97,200	\$ 110,808	\$ 111,780	\$ 112,752	\$ 113,724	\$ 114,696	\$ 115,668	\$ 116,640	\$ 117,612	\$ 118,584
Fuel	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906	\$ 228,906
Insurance	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000	\$ 26,000
Total expense	\$ 739,844	\$ 794,412	\$ 801,701	\$ 809,100	\$ 816,611	\$ 824,238	\$ 831,985	\$ 839,855	\$ 847,851	\$ 855,978

Operating Income	\$ 70,156	\$ 128,988	\$ 129,799	\$ 130,500	\$ 131,089	\$ 131,562	\$ 131,915	\$ 132,145	\$ 132,249	\$ 132,222
% of Gross	9%	14%	14%	14%	14%	14%	14%	14%	13%	13%

Expenses Resulting from Purchase

New Vessel Interest	-	282,858	300,394	291,348	281,745	271,549	260,724	249,232	237,031	224,077
New Vessel Property Tax	-	57,000	52,250	47,500	42,750	38,000	33,250	28,500	23,750	19,000
Net Income (Loss)	70,156	(210,870)	(222,845)	(208,348)	(193,406)	(177,988)	(162,060)	(145,587)	(128,532)	(110,855)
% of Net	9%	-23%	-24%	-22%	-20%	-19%	-17%	-15%	-13%	-11%

Cash Beginning	30,000	100,156	(237,655)	(607,159)	(971,212)	(1,329,927)	(1,683,418)	(2,031,806)	(2,375,214)	(2,713,769)
Net Income	70,156	(210,870)	(222,845)	(208,348)	(193,406)	(177,988)	(162,060)	(145,587)	(128,532)	(110,855)
Loan Payoff	-	(126,940)	(146,659)	(155,705)	(165,308)	(175,504)	(186,329)	(197,821)	(210,022)	(222,976)
Capital Reserves	-	-	-	-	-	-	-	-	-	-
Net Sale Proceeds	-	500,000.00	-	-	-	-	-	-	-	-
Down Payment	-	(500,000.00)	-	-	-	-	-	-	-	-
Ending Cash	\$ 100,156	\$ (237,655)	\$ (607,159)	\$ (971,212)	\$ (1,329,927)	\$ (1,683,418)	\$ (2,031,806)	\$ (2,375,214)	\$ (2,713,769)	\$ (3,047,600)



SOCAL Charter Vessel Specification

Proposed concept is to provide a diesel electric drive charter fishing/sightseeing vessel. The diesel electric design was chosen to “futureproof” the vessel to allow for upgrades to power system as new and more reliable technology becomes available. Electrical power is generated via multiple diesel generators, the decision was made to not use battery storage system due to the current inefficiency in energy storage.

Vessel to be designed and built to all class requirement (Sub-Chapter T, ABS etc)

100 Design & Structure

General

Length overall,	65'
Beam overall	22'
Crew	3 person
Passengers maximum	40 person
Fuel capacity, useable	2500 US gal.
Fresh water capacity	750 US gal.

Hull materials

- Option #1 Steel
- Option #2 Fiberglass
- Option #3 Aluminum

House design

- Material same as hull
- Interior dinning/seating area
- Galley for food preparation and concessions sales
- ADA compliant
 - Head
 - Doorway
 - Seating area
- Crew member berth and head w/ shower



SOCAL Charter Vessel Specification

200 Propulsion Systems

Propulsion to be provide by twin electrically powered azimuth pod type motors. This propulsion system combines steering along with propulsion making the vessel highly maneuverable and controllable. Electrical power is provide by multiple generators, operating together as power is required and shutting down during low power consumption operations(in/out port, trolling or “idling”)

Azimuth Thruster

- SCHOTTEL SRE
- EcoPeller 150 L-Drive
- 1200 mm Fixed Pitch Propeller
- Offshore duty rating
 - 3000 to 5500 annual thruster operating hours
- Freshwater cooled motor



Azimuth steering

- Electrical
- Steering time 10 seconds for 180°

Generators

- Three Northern Lights 300kw w/ SCR, DPF & wet exhaust
- Multiple generators to be started & paralleled as electrical demands increase
 - Utilize generator power efficiently to reduce, fuel consumption, noise and engine wear

300 Electrical Systems

Vessel is equipped with multiple electrical systems of AC & DC power. Electrical control cabinets are used to properly protect components and personnel. All systems to be grounded at one single point as required.

- Schneider frequency converters for control of propulsion motors
- Generator control systems
- Led lighting throughout vessel
- Generators individual start battery bank
- House emergency power battery bank
- Shore power connection 50 amp minimum



SOCAL Charter Vessel Specification

400 Command & Control Systems

Full suite of Furuno Navnet electronics system along with communication radios and satellite phone.
Schottel drive controls

Electronics

- Furuno radar radome
- Furuno radar open array
- Furuno Navnet system
- Dual GPS chart plotters
- Satellite phone
- Dual VHF
- Sideband radio
- Wesmar HD860 Color side-scanning sonar
- Fathometer
- Loud hailer
- PA system

Alarm system

- Bilge high water
- Fire
- Propulsion motors
- Generator monitoring



SOCAL Charter Vessel Specification

500 Auxiliary Systems

Auxiliary system components are selected for longevity and where possible duplicated between system to reduce spare requirements

- HVAC
 - TECHNICOLD CHILLED WATER MARINE AIR CONDITIONING
 - 90,000 btu
 - Multi zone system
 - Bridge
 - Galley
 - Mess deck
- RSW
 - Integrated Marine Systems 5 ton system
 - Electric drive
- Bait tanks
 - FWD
 - 300 gallon / 20 Scoop
 - AFT
 - 750 gallon / 50 scoop
 - Fish hold/rsw supplied
 - 1000 gallon/66 scoop
- Fish Hold
 - Multiple storage tanks
 - Size and configurations TBD
- Washdown pumps FWD & AFT
- Potable water
 - 750 gallon tank
 - Pressure pump
 - Hot water heater
- Waste system
 - 400 gal black water
 - 400 gal grey water
 - Deck pump out connection
- Bilge System
 - Individual bilge pumps located in all water tight compartments



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting

All decking, paneling, cabinetry, and seating for passengers made of materials selected for ease of cleaning and durability

Galley & Concessions equipment

- Under counter top load Beverage cooler
 - 25 cases of bottles
- Refrigerator
- Flat top grill
- Vent hood
- Warming pan
- Coffee maker

Seating area

- ADA compliant doorway
- Easy clean booth type seating
 - ADA compliant section
- USB charging ports
- (2) 42 " flat screen TV's w/ dvd player
 - Optional satellite TV

Passenger heads

- Two individual heads
- ADA compliant
 - Doorway
 - Grab bar
 - Toilet height
- Easy clean with deck drain
- Raw water toilet

Insulation

- Passenger and pilot house areas to be thermally insulated
- Engine room to be acoustically insulated



SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting (CONT)

Crew Stateroom & head

- Separate from the guest areas
- Sleeping bunk
- Full head w/shower

Railing

- Continuous railing with movable sections as required for boarding
- Height TBD

Paint/gelcoat

- Paint
 - If vessel is steel or aluminum
- Gelcoat
 - If vessel is fiberglass

Decks

- All walkways and decks shall be covered in Nonskid

Windows

- All windows to be direct bonded frameless windows

Budgetary estimate

The budgetary Estimates for this vessel

- Diesel electric propulsion is \$4,600,000
- Conventional power package (diesel w/ shafts & props) \$4,200,000



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House design

- Material same as hull
- Interior dinning/seating area
- Galley for food preparation and concessions sales
- ADA compliant
 - Head
 - Doorway
 - Seating area
- Crew member berth and head w/ shower
- 21 persons berthing spaces



SOCAL Charter Vessel Specification

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- Wesmar HD860 Color side-scanning sonar
- Fathometer
- Loud hailer
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 - Multi zone system
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- RSW
 - Integrated Marine Systems 10 ton system
 - Electric drive
- Bait tanks
 - FWD
 - 500 gallon / 33 Scoop
 - AFT
 - 1500 gallon / 100 scoop
 - Fish hold/rsw supplied
 - 2,500 gallon/167 scoop
- Fish Hold
 - Multiple storage tanks
 - Size and configurations TBD
- Washdown pumps FWD & AFT
- Potable water
 - 1000 gallon tank
 - Pressure pump
 - Hot water heater
- Waste system
 - 500 gal black water
 - 500 gal grey water
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 - Macerator pump and overboard connection
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 - Individual bilge pumps located in all water tight compartments



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SOCAL Charter Vessel Specification

600 Interior/Exterior Outfitting (CONT)

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- Sleeping bunk
- Full head w/shower

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- Bunks for 21 passengers
- Emergency egress hatches & fire barriers as required

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- Continuous railing with movable sections as required for boarding
- Height TBD

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FAQ – Harbor Craft Rule and Commercial Passenger Vessel Impact

BACKGROUND

What is the CARB Harbor Craft rule?

There are several types of harbor craft in California, including crew and supply boats, fishing vessels, ferries, excursion vessels, tugboats, barges, dredges, and other vessel types. The Commercial Harbor Craft (CHC) Regulation was adopted in 2007 to reduce emissions of diesel particulate matter (PM), oxides of nitrogen (NOx), and Reactive Organic Gases (ROG) from diesel engines used on CHC operated in Regulated California Waters (within 24 nautical miles of the California coast). The rule was then amended in 2010 and will be fully implemented by the end of 2022. CARB is currently developing additional amendments to the CHC regulation. The proposed amendments would require Tier 4 engine technology and advanced retrofit emission control devices in CHC applications as well as other operational control strategies for reducing emissions.

How does the proposed rule affect commercial passenger fishing vessels?

In the past, the CARB fishing vessel sector included both commercial (boats that sell their fish to the public for food) and commercial passenger fishing vessels (CPFV) (boats that carry passengers who catch their own fish for food) as a single category. Both vessel types are licensed as commercial fishing vessels by the California Department of Fish and Wildlife. This new rule would separate these similar vessel types into two separate categories and require much stricter emissions guidelines for CPFV's. There are 1,199 commercial fishing vessels according to CARB in contrast to approximately 174 inspected CPFVs (352 total including six passenger boats).

How Many CPFV Vessels are Affected?

The inspected CPFV fleet numbers are approximately 174 vessels. Sportfishing boats can be found in many marinas from San Diego to the Oregon border. Per CARB, about 352 vessels are in the CPFV sector statewide. This includes uninspected 6 passenger boats with diesel engines, which may be affected by the proposed rule but not in the same way as CPFV. Six passenger boats with gasoline engines are not subject to the requirements in the proposed rule.

What is the recommendation of the CPFV community?

The ask of the CPFV community is to remain in the commercial fishing vessel sector, which has been given more time and less economically harmful and technically infeasible requirements under the proposed rule. This would result in the following factually defined and shared guidelines (quoted from CARB presentation, March 16, 2021), which apply to both commercial fishing and CPFVs:

“Requirements for Commercial Fishing Vessels • Unique offshore operations and industry economic considerations compared to other vessel categories • Due to larger population (38 percent of fleet), emissions reductions are still needed • Draft proposal would require Tier 2 or newer engine, phasing in between 2030 and 2032 • Later compliance schedule than other regulated in-use vessels to allow operators to maximize funding opportunities.”

INDUSTRY’S RECORD OF ENVIRONMENTAL COMPLIANCE

Do CPFV’s currently participate in emissions reductions programs?

Yes, for over a decade the fleet has participated extensively in the Carl Moyer grant program (and others) to replace older, less efficient engines, with newer emissions reducing engines. The high cost of repowering a vessel would have made it impossible for these small businesses to replace the older machinery without financing assistance through grant programs. It has been a huge success.

Will the CPFV fleet be able to continue to use grant programs like Carl Moyer once they are under this rule?

While commercial fishing vessels would still have access to the funds, charter sportfishing boats would not since the proposed rule would require these engines/controls to be installed for CPFVs. Carl Moyer grants cannot be obtained when engine or control system upgrades are required by a federal, state, or local regulation. Furthermore, Carl Moyer grants are presently not allowed for vessel replacements, which far outweighs the cost of the engines, and with the proposed regulation, nearly every CPFV will have to be replaced because they cannot be modified to accommodate the new engines and DPFs. CARB has indicated that boats may still have access to some grant funding for early compliance, but they have not clearly defined how that would work, how CPFVs could benefit from it, how that would jibe with the availability of Tier 4 engine or DPFs, and how it might affect the use of the available extensions under the rule. Also, funding is not a guarantee under Carl Moyer, so even if possible, CPFVs could get denied for funding or get a very small grant.

What other emissions reductions efforts has the fleet made?

Not only has the CPFV fleet been repowering as newer engines become available using grant programs, but they have also voluntarily connected to shore electrical power when in port for more than a short period of time.

MANDATED TECHNOLOGY DOES NOT EXIST OR PROVEN SAFE AT SEA

Can CPFV’s comply with installing Tier 4 engines?

The Cal Maritime report, commissioned by CARB, found that Tier 4 engines do not exist for commercial fishing or CPFVs. The lack of Tier 4 engines was confirmed by the engine manufacturers in a comment letter to CARB. If available, Tier 4 engines would also require the installation of diesel particulate filters (DPF) and/or diesel engine fluid (DEF) systems. This would require massive exhaust equipment to be installed, as well as DEF tanks. CARB has admitted that all fiberglass and wood CPFVs would have to be replaced since they could not be retrofitted with this equipment. CARB has suggested that time extensions are available due to the lack of availability or feasibility, but these extensions will not be indefinite as Tier 4 engines with DPFs for marine application are likely to be certified in the future.

When this happens, the extension would end per the time table in the rule, and every CPFV would have to be taken out of service by 2034 at the latest because they won't be able to accommodate the size of the engine and DPF equipment.

Is there an alternative to compliance in the absence of Tier 4 engines?

While the fleet is upgrading to cleaner engines and will continue to do so, CARB has proposed an alternative under special circumstances of Tier 3 engines plus a DPF for certain engine sizes that are in use for CPFVs. However, since this option still includes a DPF, vessel replacement would still be required as the existing vessels cannot accommodate new equipment that is large and bulky. Also, it is possible that the rule could require some boats to repower with the Tier 3 on existing vessels, but still be required to replace the vessels later when Tier 4's and DPFs become available and extensions run out.

Will boat owners have to change out engines twice over a 10-year period?

The Newsom Administration has set a goal of the state becoming carbon neutral by 2045 and in a July 7th letter to the chair of CARB, the Governor asked CARB to achieve this goal even sooner, by 2035. This would likely require all vessels to operate with electric motors supported by batteries or hydrogen. Boat owners question the merits of being required to build larger steel boats powered with new fossil fuel engines over the next two to six years if they will be mandated under the governor's proposal to replace their engines or boats once again once zero emission technology becomes feasible. This could create a worst-case scenario where CPFV owners will be required to scrap newly purchased boats and engines and replace their vessels and engines again for the second time.

Is the use of DPF and DEF systems feasible?

Operationally, financially, and structurally the alternative is not achievable on existing boats. Operationally it presents serious mechanical issues.

Operationally – CPFV's troll at slow speeds and the DPF would potentially plug up creating a mechanical failure situation when at sea with passengers. At best, the boat would be adrift until it could be repaired and restarted.

- **Financially** - The Tier 3 or 4 plus DPF/DEF would require reconstruction of the hulls. According to Cal Maritime, this will result in vessel instability (see below) and require up to a 42% reduction in passengers. As such, CARB has agreed that vessel replacement will be required for all wood and fiberglass CPFVs. CARB has suggested that the owners could simply increase ticket prices to pay for the vessel replacement. However, the increase in ticket prices to cover the cost of reconstruction would make tickets unaffordable for a large proportion of current customers impacting equitable ocean access opportunities, which would also affect the boat revenue due to loss of passengers. The elimination or limitation of grant fund eligibility exacerbates the financial impact that this will have on CPFV owners.
- **Structurally** – The Cal Maritime report expressed concern of vessel stability and heat from the engines and DPF systems which could start fires if a retrofit was attempted. The added weight of this equipment would require up to a 42% reduction in passenger carrying capacity to be safe. From a design standpoint, the existing fleet has been carefully vetted through a comprehensive process of United States Coast Guard approval prior to carrying passengers. The report raises

the same serious doubts for CPFV as it does for commercial fishing vessels as to if the structural redesign necessary to comply with this rule is technically achievable. Thus, CPFVs are only left with the extremely expensive option of vessel replacement, which will likely put many boat owners out of business.

Are there unresolved safety concerns?

There are unresolved safety concerns beyond removing and rebuilding the hulls. CARB wants the engines equipped with DPFs, the same technology appearing on trucks and off-road equipment that is causing extensive downtime for truckers and farmers. In order of a DPF to not become plugged, it must run at high rotations per minute (rpms), in stark contrast to fishing boats that typically troll for fish at low rpms. Blockage is quite common, creating significant heat and severe back pressure on engines, sometime taking hours to clear the blockage and restart engines. Under the best-case scenario boats could be adrift for hours as crews try to recover engine systems. More likely, at sea rescues would become common due to engine failure. At worst, the DPFs have been known to start fires in truck engines, which would result in a disaster at sea for crew and passengers if this happened on a CPFV. In a surprising omission, CARB did not develop the regulations in consultation with the U.S. Coast Guard that regulates the safety of passenger vessels.

ECONOMICALLY AND STRUCTURALLY UNFEASIBLE

If a vessel is not able to be modified or if the finances are such that it is unable to be financed, what will occur?

Under the proposed rule, CARB has stated that vessels must be removed from service at the conclusion of any approved extensions. The proposed rule would allow the Executive Officer at CARB to grant up to 8-years of extension for financial reasons (6 years for most boats); however, at the end of this period, the vessel would need to be taken out of service if it can't be retrofitted, which again is highly unlikely for CPFVs.

Has CARB concluded that wood and fiberglass vessels will have to be replaced?

Since over 80 percent of California sportfishing and whale watching boats are constructed of wood or fiberglass, this is a critical question. According to CARB's assessment, the answer is yes. Should the regulations become effective January 2023, boat owners will have to assess whether they can afford a steel vessel and if not, when to go out of business.

*"We, through this process, discussed the findings of the feasibility report from the California Maritime Academy and for some sectors are estimating that for vessels operating above the low use threshold that **vessel replacement will be likely, especially the categories with wood or fiberglass vessels** that can't be as easily reconfigured." - Public Workshop for the Proposed Amendments to the Commercial Harbor Craft Regulations, March 16, 2021*

CARB notes in their economic analysis that they believe only one of the CPFV fleet can be retrofitted, all 173 of the other vessels would need to be replaced.

On September 21st, CARB amended its proposed regulations. How does CARB's decision to extend three two-year extensions to four impact boat owners?

This change will have no material impact on boat owners. It just delays the inevitable for many, if not most, boat owners who will have to spend millions of dollars on replacement vessels when engine rooms cannot be structural or safely be modified for larger engines and equipment. Moreover, boat owners should not presume that they can claim every two years that it is impossible to comply for economic or technical reasons. As drafted, the standards for two-year extensions are complex and are designed to evolve as new technology comes onto the market. Every two years from as early as 2023 to 2034, CARB will make a determination whether they believe your existing boat can comply or have to be replaced.

Has CARB recommended how to pay to repower or replace the vessels?

Under the proposed rule, CARB would significantly reduce access to grants for CPFV while continuing to allow grants for commercial fishing vessels. CARB has recommended CPFV ticket prices be raised to cover this cost of repowering, modifying or replacing the vessels.

San Diego public television station KPBS asked CARB a similar question and reported August 9, 2021, that: If the regulations are adopted later this year, boat owners will have up to 9 years to make the change. CARB suggests that during that time, sportfishing businesses raise their prices in order to start saving money for a boat loan. ([Article](#))

Will increased ticket prices impact ocean access?

In most cases, yes. The CPFV fleet provides a service to lower economic communities and general diverse public et al. They also work with schools and non-profits to facilitate ocean access and learning about the marine environment. The raising of ticket prices necessary to comply with the rule would have to be so substantial that people would not be able to afford to take their family aboard and it would limit school and non-profit opportunities. In this age of ensuring equitable ocean access to all communities within the state, the result of removal of these vessels from service and the raising of the prices substantially would limit access to many. Companies that have been here for decades would go out of business. CARB appears to agree.

“(CARB) staff cannot rule out the possibility of some business elimination if costs cannot be passed onto the customer or if passing through costs would result in significant decrease in demand.” - CARB, Standardized Regulatory Impact Assessment, July 7, 2021

CARB states the regulations are intended to reduce healthcare risks. Is CARB overstating the projected risks directly associated with sportfishing boats?

Some of CARB’s press statements conflate the overall projected health care benefits of ALL proposed harbor crafts and not specifically the 174 estimated passenger fishing vessels. Sportfishing and whale watching boats typically represent a very small portion (approx. 10%) of the harbor crafts found in most marinas and harbors. Further, CPFVs are not present in significant numbers within large ports that serve international vessels where CARB’s projected health benefits are greatest (e.g., Los Angeles and the San Francisco Bay Areas). For example, approximately 50% of the full-time USCG inspected CPFV’s operate from San Diego County; however, only approximately 7% of the expected health benefits occur in San Diego, which suggests that stringently regulated CPFVs will not have substantial health benefits with this

rule. Moreover, if such vessels pose such significant health care risks CARB would not have exempted 1,199 commercial fishing vessels from complying with the most stringent, risk-reducing portion of the regulations since their fleet has the highest emissions of all of the CHC.

CARB has tried to argue that one CPFV has the same emissions as 160 school buses. Is this true?

Regarding the school bus comparison, CARB is being disingenuous, bordering on propaganda, in making this comparison, with the sole goal of trying to make CPVFs look bad. This is because:

- They are comparing a modern school bus with DPF filter operating at 20 MPH to the maximum emissions allowed on a CPFV with two Tier 2 engines per vessel.
- Bus engines are smaller with less horsepower than the engines used on inspected CPFVs, so it is not an apples to apples comparison on engine capacity.
- Tier 4 engines are readily available for buses; they do not currently exist for CPFVs.
- CPFVs do not operate at maximum capacity; they troll for fish at low RPMs and sometimes even anchor or drift offshore on a single engine.
- CARB's assertion implies that all 352 vessels are operating with these emissions (as previously mentioned they are including six passenger boats to inflate the emissions from the CPFV category). This disregards the fact that many CPFVs already have Tier 3 engines, and even without the rule, all boats will eventually convert to Tier 3 and even Tier 4 in the future.
- These vessels are also not operating at or near a school, with children present, and not operating extensively near shore. Therefore, CARB is misleading on the health risk impacts from school buses versus CPVFs. An equivalent amount of emissions from a school bus will have a more direct and significant risk impact on human receptors, especially children, compared to boat emitted at sea.
- The use of a school bus is simply to create an emotional response to try to counteract our legitimate profiling of the work the fleet does with taking at risk kids, Title 1 schools, veterans organizations and others out to experience the ocean – where otherwise we they would not be able to enjoy the ocean.
- School bus upgrades have come at 100% taxpayer funded expense – is CARB offering to buy every owner a new boat? No, they are creating a mandate to take away or limit grant funds for upgrading existing vessels and buying new vessels.

REGULATORY TIMELINE AND MORE

When will CARB take action?

This past April the regulations were released in draft form. In October, **CARB will accept public comments through November 15th (new date) and consider adoption at the November 19, 2021 Board Meeting.** If the Board approves the draft regulations, they will go into effect January 1, 2023.

Where can I find additional information, fact sheets and related news?

Proposed regulations can be found at <https://ww2.arb.ca.gov/rulemaking/2021/chc2021>

Visit the project website at www.savefishing.com for fact sheets, media coverage and a list of business and trade organizations supporting the sportfishing community.

Sportfishing Association of California
5060 N. Harbor Drive, #165, San Diego, CA 92106
www.savefishing.com



Comment Log Display

Below is the comment you selected to display. Comment 3196 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rebecca
Last Name: Baskins
Email Address: rbaskins@kscsacramento.com
Affiliation: CA Advanced Biofuels Alliance

Subject: CABA.NBB Comment Letter

Comment:

Attached is CABA/NBB's comment letter on the Harbor Craft Regulation.

Attachment: www.arb.ca.gov/lists/com-attach/3620-chc2021-VjUHYNgAjBReVA+.pdf

Original File Name: CABA.NBB Comments on Harbor Craft 11.15.21.pdf

Date and Time Comment Was Submitted: 2021-11-15 18:17:26

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November 15, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: CABA and NBB Comment Letter – Harbor Craft Regulation

The California Advanced Biofuels Alliance (CABA) and the National Biodiesel Board (NBB) appreciate the opportunity to comment on the Harbor Craft Regulation. While we applaud amending the regulation to include renewable fuels, we believe other drop-in fuel replacements, such as renewable diesel and biodiesel blends, should be an available alternative in the regulation.

CABA is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues since 2006. The NBB is the U.S. trade association representing the entire biodiesel and renewable diesel value chain, including producers, feedstock suppliers and fuel distributors. As a drop-in fuel replacement for petroleum diesel, biodiesel and renewable diesel can help California achieve its carbon neutrality goals.

While both fuels provide significant benefits on their own, blending the fuels together maximizes both the environmental and economic profiles of biodiesel and renewable diesel.

A California Air Resources Board (CARB) approved fuel¹, renewable diesel and biodiesel blends comprised of up to 20% biodiesel and 80% renewable diesel (R80/B20) will reduce emissions, perform higher and provide supply and cost benefits to California communities.

Compared to petroleum diesel, R80/B20 can not only reduce nitrogen oxides (NOx) by 10%, but also reduces total hydrocarbons (THC) by more than 20%, particulate matter (PM) by more than 40% and carbon monoxide (CO) by more than 25%.² The full suite of benefits provided by R80/B20 blends only enhances the emissions reductions renewable diesel and biodiesel can provide alone. As CARB is aware, PM has significant adverse impacts on human health, disproportionately so in disadvantaged/ environmental communities (DACs). Because biodiesel reduces PM substantially more than renewable diesel³, an important goal for the CHC regulation should be to maximize the amount of biodiesel used by commercial harbor craft while balancing the need for reducing other pollutants, such as NOx. This is especially critical for maximizing the regulation's health benefits to local DACs, many of which are sited

¹ https://ww2.arb.ca.gov/sites/default/files/2021-07/ADF_Regulation_5-3-21.pdf

² https://www.regi.com/docs/default-source/products/reg-18043_ultra_clean_diesel_fact_sheet_updated_2.pdf?sfvrsn=bcba8d1a_2

³ See Executive Summary, CARB Final Report, "Biodiesel Characterization and NOx Mitigation Study," Oct. 2011, https://www.arb.ca.gov/fuels/diesel/altdiesel/20111013_carb%20final%20biodiesel%20report.pdf.



near California ports or are otherwise subjected to emissions from coastal operations of harbor craft. A R80/B20 blend achieves this optimal balance of GHG, PM and NOx reductions while reducing costs for fleet operators.

Because renewable diesel offers increased cetane and biodiesel offers increased lubricity, blends of renewable diesel and biodiesel can increase engine life with better self-ignition and smoother-running engines.

While emissions benefits and engine performance are significant on their own, supply and price are at the forefront of consumer concerns. As the supply of renewable diesel is growing, biodiesel is currently available to help ease any supply concerns. Blending biodiesel into renewable diesel will also decrease the cost of renewable diesel alone, easing consumer concerns of availability and cost.⁴

There is no single solution to help California achieve its ambitious goals. Allowing blend alternatives (e.g. R80/B20), as well as R100 in the Harbor Craft Regulation, will help California achieve emission benefits immediately while the state pursues its decarbonization efforts, enhance local air quality in disadvantaged and EJ communities near ports and waterways, and ease any potential cost and supply concerns. We ask that such blends be incorporated into the amendments through a 15-day rulemaking public process. This will also provide an opportunity to clarify and correct the technical basis for this rulemaking; it appears that the proposed amendments excluding the use of biodiesel are premised on inaccurate information regarding biodiesel, and we would be happy to work with CARB staff to correct the rulemaking record.⁵

We thank CARB staff for their work on this important matter and look forward to collaborating with you. Please feel free to contact us if any questions should arise.

Sincerely,

A handwritten signature in black ink, appearing to read "Trent Trawick".

Trent Trawick
Chair
California Advanced Biofuels Alliance

A handwritten signature in blue ink, appearing to read "Floyd Vergara".

Floyd Vergara
Director of State Governmental Affairs
National Biodiesel Board

⁴ <https://afdc.energy.gov/fuels/prices.html>

⁵ See e.g., Appendix E of the Staff Report (at E-53), citing the 15-year old National Renewable Energy Laboratory's "Biodiesel Handling and Use Guide (Third Edition, 2006)," as a key basis for contamination, usage, storage and other issues raised in the Staff Report. The Third Edition has long been superseded by the Fifth Edition (2016) of that guide. Indeed, CARB's own 2015 Biodiesel Multimedia Evaluation found significant GHG, air quality, and environmental benefits and no significant adverse impacts from the use of biodiesel, including impacts to air and water quality. See <https://ww3.arb.ca.gov/fuels/multimedia/meetings/revisebiodieselstaffreport.pdf> at 16.



Comment Log Display

Below is the comment you selected to display. Comment 3197 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Brian
Last Name: Collier
Email Address: bspmarine@gmail.com
Affiliation:

Subject: Safety concerns over proposed regulations

Comment:

Dear CARB,

I would like to address the inherent safety implications of your proposed regulations. It has come to my attention that the addition of DPF systems to diesel engines is proving problematic in their current off-road applications. The need for regeneration of the filter requires conditions that charter boats can't always safely offer. The result of not performing a filter regeneration is an intentional loss of power, or in this case, propulsion. In many circumstances, this can prove to be very dangerous and possibly deadly, especially for vessels laden with passengers or in rough weather, or both. It sounds like a great idea to be able to filter particulates from the emissions, but it seems the technology is just still too dangerous for lower engine speed applications at this point.

Another concern about the additional DPFs in USCG certified passenger carrying vessels is whether or not the USCG will even allow these systems under the current CFRs. Has the USCG had the opportunity to examine the proposed requirements? Ultimately, they are the entity that oversees the safety, construction and modifications to these vessels. Without their input on the feasibility of these systems, how can the rule making process proceed?

I believe we would all like these vessels to have the cleanest emissions as possible, but the determination of what's possible has to start with safety.

Thank you for your consideration,
Brian Collier
SF FISHING INC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 17:33:36

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Comment Log Display

Below is the comment you selected to display. Comment 3198 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Don
Last Name: Miller
Email Address: Don.miller@nordson.com
Affiliation:

Subject: Harbor Craft Regulation

Comment:

This proposed regulation if passed will have a negative economic impact on many smaller individually owned sportfishing operations that have recently suffered from higher fuel costs and lower revenues due to COVID. Not the right plan at not the right time !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:14:56

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Below is the comment you selected to display. Comment 3199 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Travis
Last Name: Litzinger
Email Address: Tlitzinger82@gmail.com
Affiliation:

Subject: Ca

Comment:

No way you can take this away from people who have been relying on this as their main income for so many years allowing people like myself to enjoy a charter once in awhile with my dad.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:31:03

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Comment Log Display

Below is the comment you selected to display. Comment 3200 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jared
Last Name: Pablo
Email Address: jaredpablo@icloud.com
Affiliation:

Subject: Sportfishing/Whalewatching

Comment:

Will not have access to annual whalewatching or sportfishing for my family.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:35:09

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Below is the comment you selected to display. Comment 3201 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Trevor
Last Name: Wasson
Email Address: trevwasson@gmail.com
Affiliation:

Subject: Do not pass this Vessel Carbs bill

Comment:

This is unfair and will destroy San Diego's economy. Schedule 4 diesels are a fire hazard and unproven on the ocean !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:36:27

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Below is the comment you selected to display. Comment 3202 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jordan
Last Name: McCormack
Email Address: jord_storm17@hotmail.com
Affiliation: Captain.

Subject: Totally agree.

Comment:

100 percent. Pieces of plastic should never be allowed at sea.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:39:46

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**Below is the comment you selected to display.
Comment 3203 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Joshua
Last Name: Crist-Shelton
Email Address: josh19cs19@gmail.com
Affiliation:

Subject: passenger fishing vessels

Comment:

Please repeal this ridiculous bill, me and my family have made endless memories aboard the boats you're trying to get rid of. Think of small buisness and tax paying people who buy fishing gear and fishing trips

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:39:40

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**Below is the comment you selected to display.
Comment 3204 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: David
Last Name: Zuniga
Email Address: davidzuniga1017@gmail.com
Affiliation:

Subject: Harbor craft Regulation

Comment:

Support your local fishermen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:39:02

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Comment Log Display

Below is the comment you selected to display. Comment 3205 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jill
Last Name: Oliver
Email Address: fairies1126@hotmail.com
Affiliation: Davey Jones newport

Subject: Fishing

Comment:

Putting these mandates on our local fishing will crush our outdoor sportfishing activities. Fishing should not be just for the fish. This company in Newport does a great job with prices and kids activities. They have amazing crews that work with them. Making them buy new boats before their engines need replacing is basically asking u to rebuy a brand new car before you need to and being forced too. Well without a car you can walk or uber... you cant uber fishing... they are our uber lyft. Dont destroy our sportfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:37:19

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Comment Log Display

Below is the comment you selected to display. Comment 3206 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ryan
Last Name: Grisso
Email Address: ryangrisso@gmail.com
Affiliation:

Subject: Opposition to the Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Board of Directors,

I am writing to express my opposition to the proposed amendments to the Commercial Harbor Craft Regulation.

Sincerely,
Ryan Grisso

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:38:23

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Below is the comment you selected to display. Comment 3207 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Luke
Last Name: Gallagher
Email Address: blueycat2@gmail.com
Affiliation: Fisherman

Subject: CARB and Sportfishing Vessels

Comment:

Hello my name is Luke Gallagher and I am 15 years old. I live in Mission Viejo California and I live to fish, spearfish, and spend time on the water. I fish mainly in Dana Point and Newport Beach and my favorite boat to fish on is the Western Pride out of Davey's Locker Sportfishing and Whale watching. Fishing, especially Sportfishing on charter boats is something very special to me. I have made countless friends and learned many things. The Sportfishing culture of California is centered around sportboats and they play a key role in the development of a young man or woman like myself. Fishing keeps us out of trouble and we have so much fun out on the water. If the regulations on these engines go into play landings will either have to get new boats or modify their wood hull vessels which cannot incorporate these engines. The result of this would be going out of business or exponentially increasing ticket prices, limiting the opportunity for many people to spend time on the water. These boats play a huge role in the tourism economy and many native Californians enjoys fishing on these vessels. The Sportfishing fleet is a such a small minority compared to the rest of the vessels operating in the state of California. It is not fair to target these types of vessels and force them to make these unlikely modifications. I ask to reconsider these requirements for Sportfishing vessels because it may lead to the end of an era which would be a cultural and economic disaster.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:41:06

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Comment Log Display

Below is the comment you selected to display. Comment 3208 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Carlisle
Email Address: jncarlisle@verizon.net
Affiliation:

Subject: No on new regulations for passenger fishing vessels

Comment:

Proposed new regulations for passenger fishing vessels are misguided.

Tier 4 diesels are unproven at seas, a fire hazard, and fiberglass and wood vessels can not accommodate due to their extremely high operation temperatures, rendering most passenger fishing vessels useless. Most of these businesses are family owned and the rule changes will decimate this industry.

3208.1

3208.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 18:58:42

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Comment Log Display

**Below is the comment you selected to display.
Comment 3209 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Israel
Last Name: Zelasko
Email Address: 22zelaskoij@gmail.com
Affiliation:

Subject: Notice of Public Hearing to Consider Proposed Amendments to the Commercial Harbor Craft
Re

Comment:

Please don't do this many peoples lives will be negatively affected

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:00:38

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Comment Log Display

Below is the comment you selected to display. Comment 3210 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Gonzalez
Email Address: mike_gonzalez_72@yahoo.com
Affiliation:

Subject: Save our fishing

Comment:

Please save our fishing. It keeps youth occupied, gives second chances to at risk populations. We are not the loud but we are the strong. We shall prevail.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:08:09

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Comment Log Display

Below is the comment you selected to display. Comment 3211 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Laura
Last Name: Avila
Email Address: laura.mercedes89@gmail.com
Affiliation:

Subject: Work with both industries for practical solutions

Comment:

As the daughter of a sport fisherman, I and my family urge CARB to hold off on this until more practical solutions can be determined. Work together with sport fishing leaders and engineers to craft a suitable replacement that will not cause an entire industry to die.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:10:13

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Below is the comment you selected to display. Comment 3212 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Carter
Last Name: Warwick
Email Address: carter_warwick@yahoo.com
Affiliation:

Subject: Save sportfishing

Comment:

I'm all for making steps towards limiting air pollution, but the costs outweigh the benefits here. Do not place new emissions laws in place for sportfishing boats. I'd like to be able to afford to sportfish without taking out a second mortgage

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:16:01

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Comment Log Display

Below is the comment you selected to display. Comment 3213 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jose
Last Name: Villa
Email Address: Jvilla.aeg@gmail.com
Affiliation:

Subject: This fake bill

Comment:

There's corporate interest that have convinced officials not to go after real environmental polluters. Like the dangers of offshore drilling, oil fields and even cattle ranches that make more pollution than a handful of charter boats. The licensing that's need to go fishing and to operate includes oversight. We the people contributed to the sustainability of a good fishery. Automotive pollution by far causes more harm. motor vehicles, industrial emissions, and consumer products Account for most of the pollution. These vessel should be grandfathered in with a ttl clause at the worst.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:11:01

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Comment Log Display

Below is the comment you selected to display. Comment 3214 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jose
Last Name: Rocha
Email Address: Jcrocha17@yahoo.com
Affiliation: California Angler

Subject: Sport fishing.

Comment:

Sport fishing is not only a sport but is a livelihood for many. It's not only a skilled hobby but provides people with a resource that has existed for many decades. It's a shame that these emission laws would harm many vessels and the sustainable impact it has on California's oceans. We should look elsewhere for the effects of carb emissions and not blame a handful of people who are trying to provide an amazing service to any California resident.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:17:48

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Comment Log Display

Below is the comment you selected to display. Comment 3215 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Thompson
Email Address: Mthompson6422@gmail.com
Affiliation:

Subject: Sport fishing and whale watching

Comment:

To whom it may concern. I understand emissions are important to protect our natural resources. But to force these standards on the boats is unfair and unethical. This is not just smoke coming out of a tail pipe this is a long standing tradition. This the way some people put food on the table. Instead of thinking of a small boat start thinking of the million acre Wildland fire that blacks out the sky's. Wild fires are preventable. This is a very short term fix to a very long term problem. This issue will not go away in a year so why are you taking away recreational fishing and whale watching. People need to be able to see what they protect or they will no longer care about it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:09:52

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Comment Log Display

**Below is the comment you selected to display.
Comment 3216 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Josh
Last Name: Torres
Email Address: joshtorres75@yahoo.com
Affiliation:

Subject: Save our boats
Comment:
save our boats

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:28:06

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Below is the comment you selected to display. Comment 3217 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: James
Last Name: Porter
Email Address: porter67@gmail.com
Affiliation:

Subject: New Regulations

Comment:

This will ruin the sport fishing industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:28:26

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Comment Log Display

Below is the comment you selected to display. Comment 3218 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Leela
Last Name: Rao
Email Address: leela.rao@polb.com
Affiliation: San Pedro Bay Ports

Subject: Comments on Proposed Commercial Harbor Craft Regulation

Comment:

Please see the attached comments by the San Pedro Bay Ports on the proposed regulatory language and need for additional funding to support the Commercial Harbor Craft Regulation.

Attachment: www.arb.ca.gov/lists/com-attach/3642-chc2021-VmQBNwMwWDoKPVVk.pdf

Original File Name: 20211115_Joint Ports Ltr CARB CHC Draft Reg_FINAL.pdf

Date and Time Comment Was Submitted: 2021-11-15 19:43:00

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SAN PEDRO BAY PORTS CLEAN AIR ACTION PLAN

November 15, 2021

Mr. David Quiros, Manager
Freight Technology Section
California Air Resources Board

SUBJECT: PORT OF LOS ANGELES AND PORT OF LONG BEACH COMMENTS ON THE CALIFORNIA AIR RESOURCES BOARD'S PROPOSED AMENDMENTS TO THE COMMERCIAL HARBOR CRAFT REGULATION RELEASED ON SEPTEMBER 21, 2021

Dear Mr. Quiros,

The Port of Los Angeles and Port of Long Beach (Ports) appreciate this opportunity to provide comments on the California Air Resources Board (CARB) Proposed Amendments to the Commercial Harbor Craft (CHC) Regulation released on September 21, 2021. CARB staff has worked diligently on this regulation for over two years. We thank you for the continued communication between CARB and Port staff throughout the CHC Regulation rulemaking process.

As stated in previous comment letters, the Ports are landlord ports that lease out the land to our tenants/facility operators. The facility operators wholly control their operations. With these distinctions between facility owner/operator in mind, the Ports offer the comments below on the recently released CHC regulatory language and supporting remarks.

Facility Infrastructure

We appreciate the changes that have been made to section (i).1, specifically, the removal of facility owners bearing responsibility for facility operators to obtain the necessary permits for zero emission infrastructure. However, the Ports continue to assert that the facility operator be solely responsible for initiating any infrastructure improvements since the Ports do not control their operations. The Ports already have leases with the facility operators that require them to apply for land improvements including infrastructure,¹ as previously discussed with CARB staff. For the

3218.1

¹ Port of Long Beach HDP, <https://thehelm.polb.com/download/170/reference-materials/2525/guide-for-harbor-development-permits-hdp-brochure-071118.pdf>;

Port of Los Angeles APP, <https://permits.portoflosangeles.org/application-type>



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THE GREEN PORT

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562.283.7100



Port of **LOS ANGELES**
THE PORT
OF LOS ANGELES
Port of Los Angeles | Environmental Management
425 S. Palos Verdes Street | San Pedro, CA 90731
310.732.3675

The San Pedro Bay Ports Clean Air Action Plan was developed with the participation and cooperation of the staff of the US Environmental Protection Agency, California Air Resources Board and the South Coast Air Quality Management District.

Port of Long Beach (POLB), tenants are allowed to install infrastructure after they successfully complete the required Harbor Development Permit (HDP) process. The Port of Los Angeles (POLA) has a similar Application for Port Permit (APP). The Ports provide the permit, ensuring environmental regulations/requirements are followed, that all necessary Port departments are aware, and that inspections occur, as required. Thus, the responsibility of deploying infrastructure should fall on the facility operator, as the Ports will still be involved in the infrastructure process and provide the approval for such work through their respective permit processes.

Under section (i).1, the regulatory language continues to place the responsibility on both facility owners and operators to jointly install infrastructure < 99 kW. The Ports still believe that joint responsibility will cause confusion regarding who will be responsible for purchasing, constructing, and maintaining the infrastructure; who will own the infrastructure; and who would face potential enforcement action from CARB if noncompliant. The Ports do not control CHC operations, so would not know the necessary power requirements. As stated earlier, this section conflicts with the Ports' currently established procedures and contractual obligations for any tenant improvement.

Facility Compliance, Recordkeeping, and Reporting Requirements

The Ports are encouraged by the removal of the requirement for facility owners/operators to check vessel compliance and reducing the burden of reporting on a quarterly basis to an annual basis. We greatly appreciate that the annual reporting deadline has been set to July 1st to avoid reporting at the beginning of the year when multiple agencies prepare and submit end of the previous year reports.

Section (j).2 needs further clarification as it only states "facilities" and does not differentiate if the reference is to the facility owner or facility operators that are required to report on land side infrastructure. The Ports encourage CARB staff to change this reporting requirement to be only for the facility operators, and that any obligation regarding infrastructure should not be jointly or solely delegated to the facility owners, as it conflicts with our existing leases.

Funding and Compliance Schedules

Many of the vessels that will need to meet new engine emissions requirement will not be able to repower their engines due to lack of space or structural integrity constraints. This will force vessel owners to have to replace their vessels. The Ports again would like to stress the high cost of replacing harbor craft. A new harbor craft vessel can cost in the tens of millions of dollars, well above many funding thresholds of existing grant funding opportunities. For this reason, new vessel builds will be cost prohibitive, and compliance with the regulation infeasible. There are too many vessels operating within California regulated waters than can possibly be funded through existing grant programs. Thus, the Port encourages CARB to create dedicated CHC grant programs and provide additional funding allocations for CHC. We also request that CARB delay compliance schedules to allow operators to take advantage of funding opportunities, as grant dollars cannot pay for compliance. Some compliance deadlines begin in the next few years, and there is very limited time for operators to secure funding and deploy compliant CHC.

3218.2

3218.3

The Ports still believe additional time allowances should be given for recently purchased CHC, as harbor craft purchases are major long-term investments that take years to build. As currently written, the regulation would result in stranded assets. As an example, the Ports have newer harbor craft, less than 10 years old that were designed for an approximate 40 to 50-year lifespan. As there is no room to perform Tier 3 or 4 retrofits with diesel particulate filters (DPF) and exhaust gas

3218.4

scrubbers, CHCs with many decades of useful life still available would have to be turned over, making the recent large investment mostly futile.

While there are currently feasibility extensions, these extensions are two-year increments with a maximum of up to six years. This is still not nearly enough time to justify the investment. The as-built lifespans of all vessels should be seriously considered for compliance schedules. Each extension requires extensive research and an analysis from a marine architect. If CARB requires a new analysis from a marine architect for every extension request, as soon as one extension request is provided to CARB, the marine architect would have to start another analysis. Two-year extensions are far too short. CARB should set the extension to 6-year extensions. This reduces the burden for CARB staff to be reviewing multiple extension requests for the same vessels that have the same information and for vessel operators in preparing extension requests.

The Ports look forward to continued collaboration with CARB on our shared clean air goals and endeavors. The Ports are available to discuss with CARB staff any of these proposed comments to the CHC Regulation. Please feel free to contact Port staff, Amber Coluso at acoluso@portla.org (POLA) and/or Leela Rao at leela.rao@polb.com (POLB), with any questions or concerns regarding this letter.

Sincerely,



CHRISTOPHER CANNON
Director of Environmental Management
Port of Los Angeles



MATTHEW ARMS
Director of Environmental Planning
Port of Long Beach



Comment Log Display

Below is the comment you selected to display. Comment 3219 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Austin
Last Name: Gomez
Email Address: Austingomezphotography@gmail.com
Affiliation:

Subject: New regulations

Comment:

Going to put a lot of good people out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:41:00

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Below is the comment you selected to display. Comment 3220 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Dalton
Last Name: Payton
Email Address: ddpayton116@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

There are many California residents that can not afford to own a private boating vessel in order to experience the great fishery Southern California has to offer. Most of us in this category have grown up fishing what are referred to as the "sport boats," which are located at just about harbor along the coast. These types of vessels typically carry an average of 20-40 passengers, allowing those who can't afford their own boats an opportunity to enjoy the ocean with like minded individuals. This tradition of fishing has been passed down for many generations and if taken away, will surely end the access of many Southern Californian anglers to this great fishery. This includes myself, so on behalf of the entire Southern California anglers, we ask that there be some kind of compromise that can be reached that will still allow us to participate in our tradition.

Thank you,

Dalton Payton

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:44:36

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**Below is the comment you selected to display.
Comment 3221 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Justin
Last Name: Ramirez
Email Address: ramirez.ju97@gmail.com
Affiliation: Fisherman

Subject: Fishing

Comment:

No need to implement new regulations on engines when the engines in use are of current technology and are efficient and economical.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:53:34

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Comment Log Display

Below is the comment you selected to display. Comment 3222 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Daniel
Last Name: Razo
Email Address: danielrazoal@gmail.com
Affiliation:

Subject: Keep the Opportunity Alive for All

Comment:

Please keep the regulations reasonable so that these operations can continue to provide opportunities for everyone to enjoy the ocean. Many people can not afford to buy a boat and hoping on a charter boat is the only way they can get to experience our natural ocean resources. Many of them grow to appreciate and want to protect our ocean and it's resources because they had an opportunity to get out on the ocean. Most of us want clean air, water ect., please allow the technology and prices of the equipment become economical before inforing mandates.

3222.1

There's a whole ocean full of cargo ships, cruise ships and other large craft that run off bunker fuel that contributes much higher to poor air quality and pollution than charter boats. Please consider this before you place mandates on a much smaller class of vessels that operate under much smaller most often family run companies.

3222.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:45:02

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Comment Log Display

Below is the comment you selected to display. Comment 3223 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Charles
Last Name: Ullman
Email Address: Ctullman@gmail.com
Affiliation: Marina sailing charters and yacht broker

Subject: Unnecessary regulation

Comment:

Please do not continue to regulate these hard working charter businesses out of existence. Maintained vessels are safe and have minimal environmental impact, the only think it would do is place a burden on small businesses and owner operator charters that are vital to our state. Do not further this amendment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:08:11

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Below is the comment you selected to display. Comment 3224 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Merlin
Last Name: Kolb
Email Address: Info@ReelMagicSportFishingCharters.com
Affiliation: Reel Magic Sport Fishing & Charters

Subject: Lay Off of the Low Hanging Fruit!! Protect Access to the Sea!!

Comment:

To whom it may concern.

My boat F/V REEL MAGIC, operating out Bodega Bay, will never accommodate a Tier 4 engine. ■ It is a fiberglass, and the motors if they were available would not fit below the deck. 3224.1

If you continue your plight to harvest the low hanging fruit regarding marine emissions here in California, you will put me out of business. ■ 3224.2

You will also eliminate my vessel as a portal to the Sea for the non boat owning public. 3224.3

There will be more of a "Carbon Expenditure" to replace my vessel and destroy and dispose of it than the emissions difference between my current engines and a new Tier 4 engine. 3224.4

Your whole proposal will result is net carbon debt, rather than any sort of emissions reduction.

Why don't you go after gross polluters like the vessels who make up the Cargo Fleet. ■ Do they have too strong of a legal defense team for you to challenge? 3224.5

The cows in California Pollute a larger volume of CO2 than the CPFV fleet.

If you vote to approve this, you will be decimating hundreds of small businesses and families including mine. ■ 3224.6

Your yes vote will also be killing the CPFV fleet and the services that we provide to the California Sportsman, who's access to the natural resources of the State are protected by the California Constitution. 3224.7

I urge you to swallow a pill of perspective and common sense and target something that will really make a difference.

Submitted Respectfully.

Captain
Merlin R. Kolb
F/v REEL MAGIC
REEL MAGIC Sport Fishing
Bodega Bay.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 19:47:12

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Comment Log Display

Below is the comment you selected to display. Comment 3225 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Cole
Last Name: Taylor
Email Address: Coletaylor42@hotmail.com
Affiliation:

Subject: Save Fishing

Comment:

I own a boat in Dana Point. This is dream that I have had since I was a kid. I have fished my whole life. The states over regulation and implementation of restrictions will kill the fishing industry here in California. It will also kill my dream of continuing to own a boat for sport fishing. You will put hardworking people out of a job and out on the streets for no reason. STOP YOUR OVERREACH.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:13:19

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**Below is the comment you selected to display.
Comment 3226 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Victor
Last Name: Espinosa
Email Address: V.espinosa@ymail.com
Affiliation:

Subject: Do not pass this ! You will end sportfishing
Comment:
I fish on boats year round

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:33:33

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**Below is the comment you selected to display.
Comment 3227 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jason
Last Name: Beltran
Email Address: Jason1458@gmail.com
Affiliation:

Subject: CARB
Comment:
Save sport fishing!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:33:58

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Below is the comment you selected to display. Comment 3228 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jack
Last Name: Glant
Email Address: Maxdogg7@aol.com
Affiliation:

Subject: Harbor craft regulation

Comment:

I believe this regulation will hurt sport fishing drastically. Ruin economy for sport fishing for years to come.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:36:39

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Comment Log Display

Below is the comment you selected to display. Comment 3229 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Birdsall
Email Address: scott.birdsall@sbcglobal.net
Affiliation: sport fisherman

Subject: Over restrictive requirement for fishing and whale watching boats

Comment:

Hello,

I am asking the board to reconsider the overreaching, highly restrictive, requirements being imposed on the fisherman and families. This is not necessary, and to expensive a requirement. You will be putting many fisherman and whale watching boats out of buisness.

Please reconsider this amendment and vote no.

Thank you

Scott Birdsall
fisherman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:37:25

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Below is the comment you selected to display. Comment 3230 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Alyssa
Last Name: Morrisroe
Email Address: alyssa_morrisroe@yahoo.com
Affiliation:

Subject: Please save whale watching and sportfishing in CA!

Comment:

This is to strongly object to the mandates affecting sport fishing and whale watching boats requiring engine modifications that will put family run businesses into bankruptcy and cost jobs. I am a female angler, and see more and more women on boats over the last few years. Please don't put an end to an important and vibrant part of California recreation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:49:04

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Comment Log Display

Below is the comment you selected to display. Comment 3231 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jennifer
Last Name: Majdi
Email Address: jenn.majdi@gmail.com
Affiliation:

Subject: CHC2021

Comment:

To whom this concerns,

I've always been Daddy's little girl. I come from a lineage of fishermen. My dad introduced me to fishing when I was about 4 or 5. We would go to the local lake to fish trout. I can still hear the sizzle of the fish frying in the pan from our catch that day. My dad loved the outdoors as did the rest of his family. My dad always loved sharing the outdoors with me.

Fast forward to my 19-year-old self. Still in love with fishing, my uncle Mike (dad's oldest brother) took me on my first ocean trip....a day and a half trip for albacore in the early 2000's. I was hooked. I was connected to the ocean from that point on. He never had kids. But he was a master fisherman and was committed to teaching me everything he could on that trip and I know he was proud that I was there. I was like a daughter to him.

That was the only trip I ever got to go on with Uncle Mike. He got diagnosed with brain cancer not long after that trip. I would help watch over him while he was at the hospital and we would talk about all the trips we would take once he recovered. Unfortunately he never did. After he passed away, I made it my mission to keep learning the craft of sport fishing.

My dad's younger brother Tommy, another master fisherman, took me out occasionally when I was in college. I couldn't afford to go on trips, but would try when my work and college schedule would allow, and when I'd get the invite to fill a spot on his charters.

Then I took a hiatus from the ocean because I had kids. Just after my first son was born, I went on what I didn't know at the time, would be the only ocean trip and last fishing trip I'd go on with my dad. A couple years later he was diagnosed with prostate

cancer.

As the kids got older, while my dad was in remission from that cancer, I started going out onto the ocean again more regularly. I would frequently drive from Northern California to Southern California easily 6 or more times each summer to fish tuna and other sport fish.

It was my mission to master the family craft. My first trip back on the water after several years of hiatus, I landed a 35# yellowtail and got published in Western Outdoor News for it. My dad was super proud. His cancer came back though. This time he was diagnosed with stage 4 pancreatic cancer. He would never live to see my personal best. The next year I was published for landing a 303# bluefin.

You see, this fishing industry is important to me. The people that work in this industry are important to me. The regulatory modifications that are being suggested for boats are insanely ridiculous. Yes we want to take care of the planet, but at what expense? There needs to be a balance.

Many boats are unable to make these modifications because they are insanely too costly. This would not only affect the income/jobs of boat owners, but also the jobs of all the crewmen, all the employees that work at the landing, and the fish processors, their families..... this affects thousands upon thousands of people that need these jobs to survive. For some, it is the only craft and skill they know.

3231.1

From a fisherwoman's standpoint, this industry connects me with a legacy that I am trying to leave behind. A craft that I am continuously trying to master so that I can pass that down to future generations. Being in the minority as a female out on the ocean, I am trying to kill the stereotype that there ARE strong women that can hang with the men and fight just as hard if not harder. I want to open the door for girls in the world to let them know that there ARE women that are massively skilled, knowledgeable, and independent anglers.

3231.2

And lastly, I am a teacher. I am a middle school teacher that has taught science and math to students for over 7 years. My goal is to educate students on sustainability and how important and fascinating our oceans are. I have brought certain fish into my classroom and have seen eyes light up with amazement as they get to see, touch, explore, and learn about the anatomy, environment, and importance of being a responsible angler.

My dad and Uncle Mike may have had their lives cut short by cancer, but please do not let these regulations stop me and others from educating, helping others, and carrying on a legacy of fishing that I can pass down to future generations. Please do not force boats to make ridiculous costly modifications that will jeopardize the industry due to the inability to comply. There are more important things in this world that matter greatly.

On Instagram @fishingwithjenn

-Jenn Majdi

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:54:10

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First Name: Rex
Last Name: Bruntsch
Email Address: rcbruntsch@gmail.com
Affiliation:

Subject: Save sportfishing

Comment:

Dear CARB, please save sportfishing and whale watching by not allowing this harbor craft measure to move forward. Our communities need the continued support and economic benefits of tourism from these activities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:52:55

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First Name: Tanner
Last Name: Cummings
Email Address: Drblondie83@gmail.com
Affiliation:

Subject: Sportfishing engines

Comment:

Mandating such engines will put almost all the sportfishig fleet out of business, and the engines are unproven at sea l, aswell as many of the vessels not being able to accommodate such engines. This mandate would be a huge blow to the fishing industry in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 20:55:59

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First Name: Katherine
Last Name: Morrisroe
Email Address: katmorrisroe9@gmail.com
Affiliation:

Subject: Sport Fishing

Comment:

I'm writing to express my objection to the currently exposed air standards because of their impact on the sport fishing industry.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:11:03

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Below is the comment you selected to display. Comment 3235 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Scott
Last Name: Hedderich
Email Address: scott.hedderich@regi.com
Affiliation: Renewable Energy Group - Ames, IA

Subject: CHC2021

Comment:

please see our comments sent directly to the clerk of the Board due to uploading technical issues

Attachment: www.arb.ca.gov/lists/com-attach/3660-chc2021-ebW8pKvg0r7JlqGR.zip

Original File Name: CHC2021.zip

Date and Time Comment Was Submitted: 2021-11-15 21:18:19

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November 15, 2021

Clerks' Office, California Air Resources Board
1001 I Street
Sacramento, California 95814

Electronic Submission via <https://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to Commercial Harbor Craft Regulation (CHC2021)

Dear Clerk of the Board:

Renewable Energy Group, Inc. (REG) appreciates the opportunity to comment on the proposed amendments to the Commercial Harbor Craft (CHC) regulation.

REG is helping to leading the energy industry's transition to sustainability by converting renewable resources into high-quality, cleaner fuels. REG is an international producer of cleaner fuels and one of North America's largest producers of advanced biodiesel (BD) and renewable diesel (RD). REG solutions are alternatives for petroleum diesel and produce significantly lower carbon emissions. REG utilizes an integrated procurement, distribution, and logistics network to operate 12 biorefineries in the U.S. and Europe. In 2020, REG produced 519 million gallons of cleaner fuel, delivering 4.2 million metric tons of carbon reduction. In California alone, REG has provided over 750 million gallons of biodiesel and renewable diesel to the state over the last decade (nearly 150 million gallons alone in 2020). REG is meeting the growing global demand for lower-carbon fuels and leading the way to a more sustainable future.

As members of the National Biodiesel Board (NBB) and the California Advanced Biofuels Alliance (CABA), we wish to align ourselves with the comments they have submitted. Below are areas that we wish to highlight and emphasize for your consideration.

Unsupported Restriction of Biodiesel/Renewable Diesel Blends

- Amend 93118.5(e)7A to allow RD/BD blends with up to 20% BD to qualify under the rule

The CHC rule as it is structured is set to limit CHC fuel use to R99 or R100 as defined by ASTM D975 to be used as fuel in CHC. We have asked staff to amend this provision to include up to 80/20 RD/BD blends as allowed in ADF appendix 1 sub article 2(a)(1)B approved ADF formulations, and to reflect the additional data submitted by REG to the agency under the ADF and approved and issued in the form of executive orders (Executive Order G-714-ADF02,

3235.1

Executive Order G-714-ADF06, and Executive Order G-714-ADF09). In fact, we are somewhat confused as to why CARB’s own regulation and supporting data weren’t included by reference within this rulemaking. The REG data is further expanded upon in Appendix A. 3235.1 (cont.)

From our understanding, the R99 recommendation is to ensure that the renewable fuel used produces the most emission reductions possible. In practice, however, we believe this presents a number of challenges which we have highlighted below:

- The CHC regulation is intended to reduce all transportation emissions (The CHC ISOR (page I-2) references HSC § 43108(a) directs CARB to achieve “the maximum degree of emission reduction possible.”), but the use of R99/R100 is focused entirely on NOx reduction and represents an incomplete picture of all engine emissions. Page 3 of the Public Hearing notice states: 32325.2

Communities located near California’s seaport complexes bear a disproportionate health burden due to their proximity to the emissions generated from freight activity associated with the seaports, including CHC operating in and around seaports and harbors. *The DPM emitted by CHC continues to impact nearby communities*, [emphasis added] including communities located in regions of the State that are in nonattainment with national ambient air quality standards (NAAQS) for ozone and PM2.5. *DPM is a toxic air contaminant that can substantially increase the risk of developing cancer and other health problems such as increased respiratory illnesses, risk of heart disease, and premature death* [emphasis added]. DPM emissions from CHC engines are projected to become even more significant due to the continued operation of CHC while emissions from other mobile sources are decreasing due to more stringent regulations and cleaner technologies.

- Blends of biodiesel with renewable diesel has the ability to achieve a greater degree of emission reduction than neat renewable diesel. While blends of RD and BD could have slightly higher engine-out NOx emissions than neat RD (both blends and neat RD represent NOx reductions compared to CARB diesel), they produce lower emissions of particulate matter and hydrocarbons which can have greater adverse health effects than NOx, not to mention their potential to enable greater greenhouse gas (GHG) reductions than neat RD. 3235.3

- This rule making is intended to focus on overall air quality in disadvantaged communities surrounding ports and harbors, not solely NOx. Staff have chosen, by disallowing RD/BD blends, to forgo additional reductions in other criteria pollutants and GHGs in favor of potential reductions in RD NOx emissions over the NOx reductions in 80/20 3235.4

- blends. Restricting the use of biodiesel may reduce marginal amounts of engine-out NO_x but, most definitely will result in an increase in other engine emissions, including DPM from neat RD combustion. These engine emissions are environmental pollutants and present real health risks to local communities. 3235.4 (cont.)
- Emissions from R100 in a legacy (pre tier 3 engine) engine may see a NO_x decrease of roughly 4% over the NO_x reductions (compared to CARB diesel) from R80/B20 blends, however, there would be an increase in DPM of up to 12% compared to R80/B20. This trade off does not meet the stated goals of the rulemaking. 3235.5
 - While modern Tier 3 CHC engines currently include NO_x mitigation aftertreatment they do not have DPM mitigation. This means if the data CARB used to make its ADF determinations on blends was in any way in error [it is not], any potential NO_x increases from allowing up to 20% BD inclusion would still be mitigated with modern CHC engines while the more substantial DPM reduction benefits from BD blending would be prohibited allowing higher levels of DPM to still present in at-risk communities. 3235.6
 - ASTM D975 alone is an insufficient standard for determining whether R99/R100 is truly suitable for this class of engines. The technical specifications are not comprehensive and can miss some crucial fuel performance characteristics, which is why some engine manufacturers, including Wabtec, and some fuel system component manufacturers, including Bosch, are currently limiting RD inclusion recommendations to 30 – 50%. 3235.7
 - The use of R99/R100 may cause performance issues in the CHC engines where it will be used. For example, RD is an extremely non-polar fuel with different solvency and elastomer interactions than traditional diesel which may cause additives to separate out (particularly when fuel is contacted with water) and has been proven to cause legacy elastomers to shrink (see Figure B1 and references in Appendix B), which has been observed to contribute to problems such as fuel injector seal leakage. RD also has an extremely high Cetane Number which can cause combustion and timing issues in both lower speed and legacy engines. These and other effects have been observed in engine testing for certain locomotive engines which are very similar to the larger CHC engines under consideration. Including BD in RD can mitigate all of the undesirable attributes of neat RD that have been identified so far.(See Table B1 in Appendix B) 3235.8
 - The CHC rule as proposed is disharmonious with the current fuel allowed under ASTM D975. ASTM D975 allows for the inclusion of up to 5% biodiesel in the finished diesel fuel. Requiring neat RD only would prohibit a substantial amount of D975 diesel, including D975 RD which now often contains 5% BD, which is certain to create supply chain issues for the many smaller businesses that operate CHCs and do not have access to 3235.9

specialty fuel supplies. In short, D975 fuel, whether petroleum or RD, may contain up to 5% BD, which means this proposed rule creates an eventual requirement for a fuel that does not align fully to D975¹.

- RD is currently in limited supply, in spite of the fact that nearly all RD consumed in the U.S. is used in California, and is projected to be fully subscribed for the foreseeable future. Allowing up to 20% BD inclusion increases the effective volumetric availability of RD by 20%, which can only relieve upward price pressure that will impact smaller businesses more acutely than larger operations. 3235.10
- Lastly, the rulemaking contains changes to the Alternative Control of Emissions (ACE) section. Under the ACE, “an applicant would be able to comply by receiving approval from the Executive Officer (EO) to pursue an alternative that includes, but is not limited to, any combination of engine modifications, exhaust treatment control, engine repowers, *use of alternative fuels* [emphasis added] or additives, fleet averaging, or any other measures that, when implemented, will sufficiently reduce emissions equivalent to the emissions performance standards identified in the Proposed Amendments. Since blends of 80% renewable diesel and 20% biodiesel have already received full approval under the provisions of the Alternative Diesel Fuel regulation. We fully expect the EO’s orders to be extended to Harbor Craft. Admittedly, we wonder why staff would propose this step instead of simply referencing the emission data and work done under the ADF by allowing RD/BD blends of up to 80/20 to qualify under the rule. Accordingly we ask that this change be made in any 15 day change authorized by the Board 3235.11

Unsupported Comments about Biodiesel

3235.12

- Edit Appendix E to remove the biodiesel section

First, we wish to state that we are disappointed at the tenor and tone taken towards biodiesel within Appendix E section V(A) Biodiesel (page E52 – E54). CARB has required renewable diesel in a past rulemaking without disparaging biodiesel in the process (e.g. Innovative Clean Transit 2018²). We simply do not understand why CARB chose to misrepresent a fuel that is

¹ Interestingly, CARB staff seems to acknowledged awareness of this fact by allowing a vessel owner or operator to use R100 or R99 once the [fueling] contractual issues no longer exist, or by December 31, 2025, whichever occurs sooner.

² <https://ww2.arb.ca.gov/rulemaking/2018/innovative-clean-transit-2018>

approved for in-state usage, has seen over 1.4 billion gallons come to California since 2011³, and has delivered over 12.3M credits of carbon reduction to the LCFS program - which is 14.3% of all the credits generated for that program.

Many, if not all, of the claims made about biodiesel are simply wrong and/or based upon antiquated studies dating from 2006-2012 that are no longer relevant nor accurate in light of new data. We find it curious that these outdated reports have reemerged in current proceedings as they simply have no present day basis for relevance. Appendix E, in particular, is rife with misleading and unsupported claims about biodiesel which we request be struck from the record.

Like biodiesel, renewable diesel is also an invaluable renewable fuel (albeit much less widely used than biodiesel and with substantially less “real world” experience), but it is not what Appendix E claims it is. It is without irony that we point out the concerns raised about biodiesel also apply to renewable diesel (see Table B1 provided in support of these comments)

3235.12
(cont.)

It is particularly confusing given how much data CARB has already accumulated on biodiesel and renewable diesel as a result of the Alternative Diesel Fuel (ADF) regulation. One particularly problematic example, from the ISOR is as follows: “biodiesel, which is a methyl ester compound that should not be used in high quantities with retrofit aftertreatment.” We have found no evidence to support the claim in Appendix E that biodiesel cannot be used in high quantities due to aftertreatment concerns.

CARB’s own findings in the 2015 ISOR for the ADF determined “Engines that meet the latest emission standards through the use of Selective Catalytic Reduction (SCR) have been shown to have no significant difference in NOx emissions based on the fuel used⁴.” It should be pointed out the study included testing B100 against CARB ULSD on an NTDE.

In terms of real world experience, the city of Ames, Iowa ran its snowplows with EPA Tier IV engines on B100 this past winter⁵ and its Tier IV work trucks on blends above B50 for the past nine months. Furthermore, we have received feedback from fuel users that R99 can cause engine performance issues in older diesel equipment, but those same users have indicated that an RD/BD blend eliminated those issues due to the superiority of biodiesel’s elastomer interactions

³ <https://ww3.arb.ca.gov/fuels/lcfs/lrtqsummaries.htm>

⁴

https://www.arb.ca.gov/fuels/diesel/altdiesel/biodieseldurabilityreport2010_08_11.pdf?_ga=2.65803882.597300459.1636986053-1402025998.1635196007

⁵ <https://www.regi.com/blogs/blog-details/resource-library/2020/03/30/getting-aggressive-with-sustainability>



compared to neat renewable diesel⁶. **Again, we ask that the section on biodiesel be deleted from Appendix E.**

3235.12 (cont.)

Thank you for your consideration of our comments. Please feel free to contact us with any questions or comments.

Sincerely,

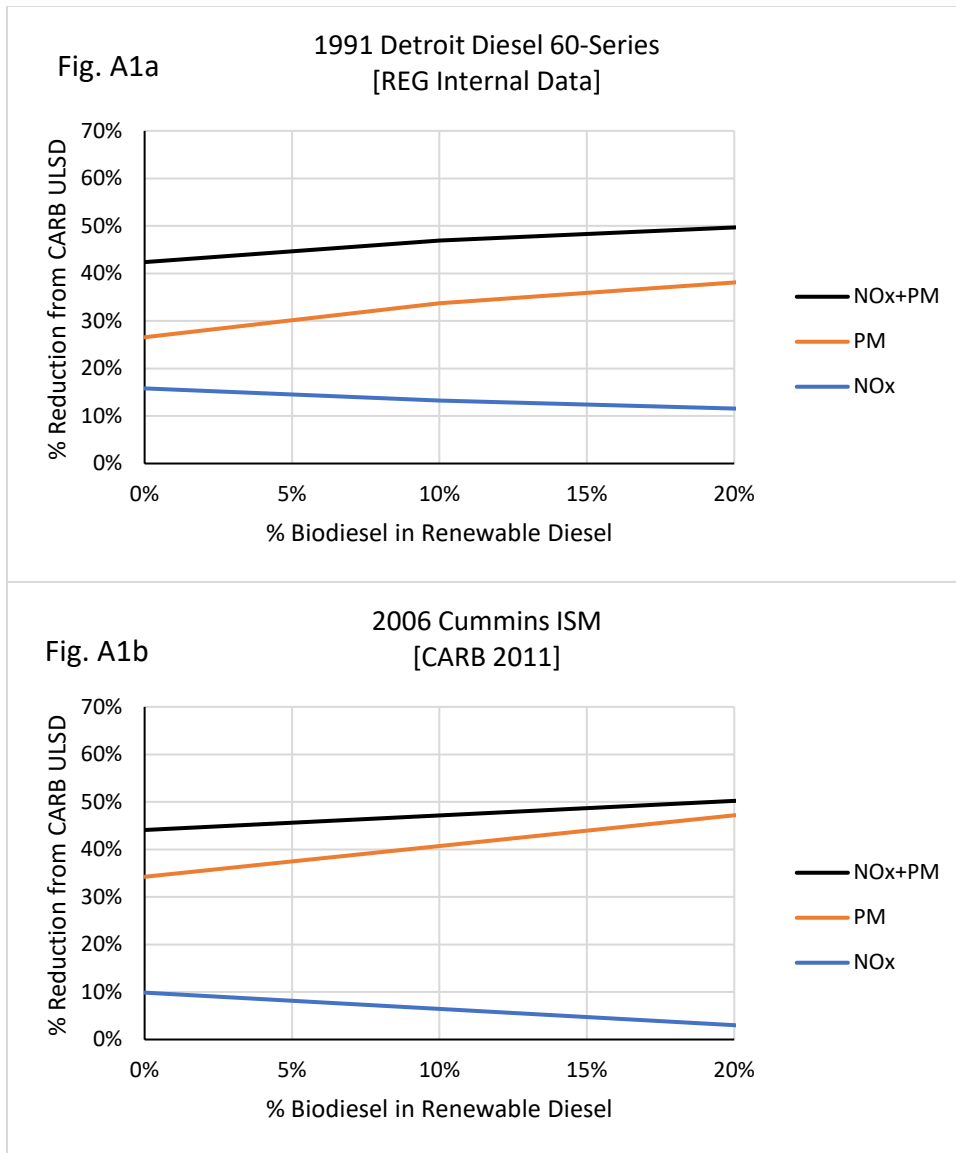
Scott Hedderich
Executive Director, Corporate Affairs

David Slade, Ph.D
Chief Technologist

Martin Haverly, Ph.D.
Sr. Manager, Innovation and Process Development

⁶ https://www.regi.com/docs/default-source/products/reg-18043_ultra_clean_diesel_fact_sheet_updated_2.pdf?sfvrsn=bcba8d1a_2

Appendix A. Emissions Information



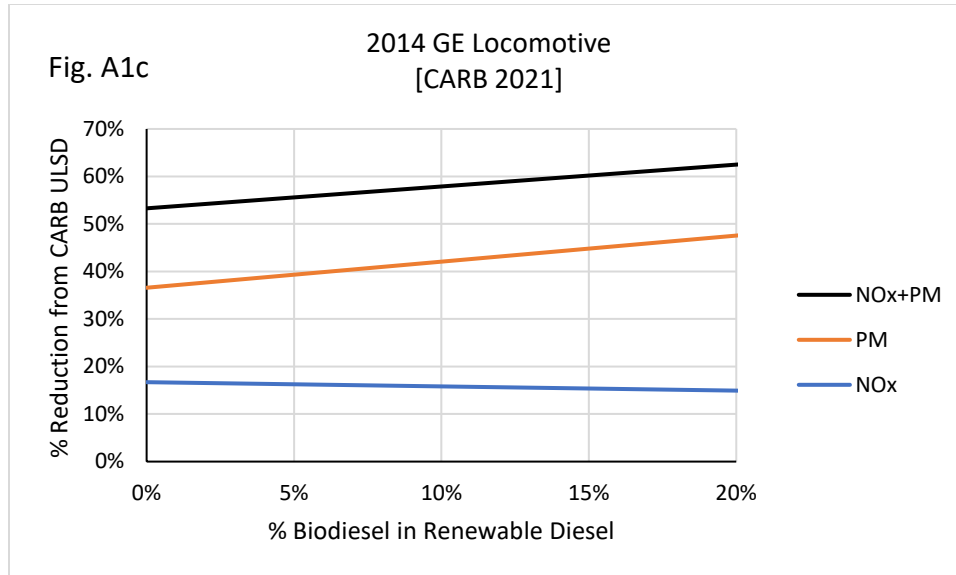


Figure A1. Plots showing the linear reductions in both NOx and PM emissions for BD/RD blends up to 20 vol% biodiesel from three different engine platforms. A) REG data was generated using a 1991 Detroit Diesel 60-series engine [1]. B) CARB 2011 data was generated using a 2006 Cummins ISM engine on the FTP cycle [2]. the CARB 2010 B20/R80 data represents soy-based biodiesel only and the B100 data represents an average of soy-based and animal fat-based biodiesel results. C) The CARB 2021 data was generated using a 2014 GE Locomotive engine [3].

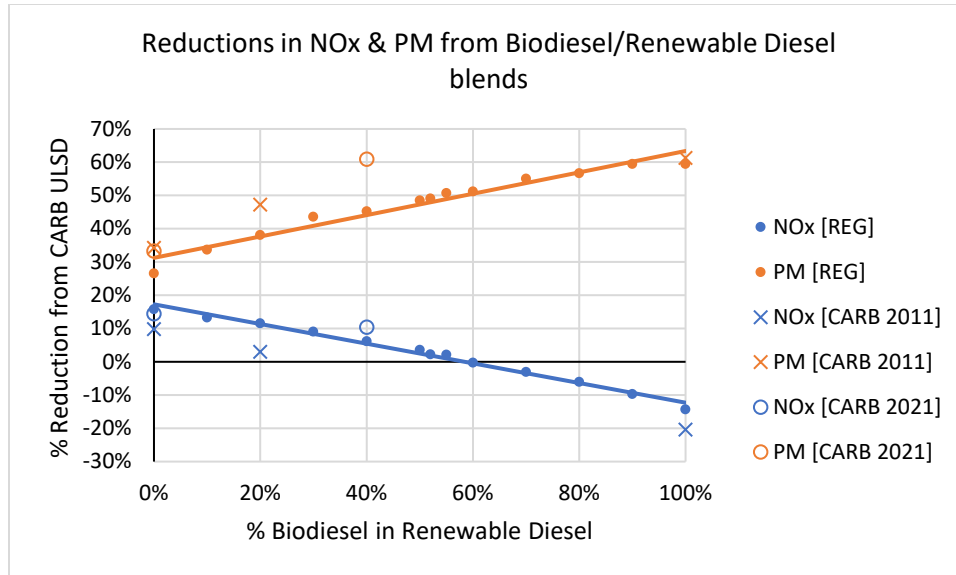


Figure A2. Demonstration of consistently linear reductions in NOx and PM emissions across full range of biodiesel and renewable diesel blends from the three separate data sets shown in Figure A1.

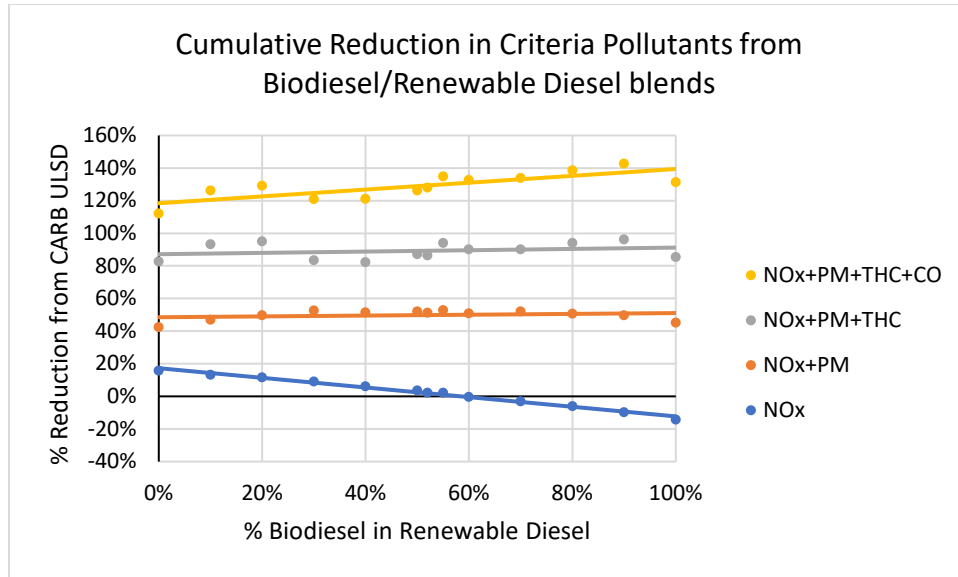


Figure A3. Cumulative increase in NOx, PM, THC, and CO emissions benefits across full range of biodiesel and renewable diesel blends from the three separate data sets shown in Figure A1 [1].

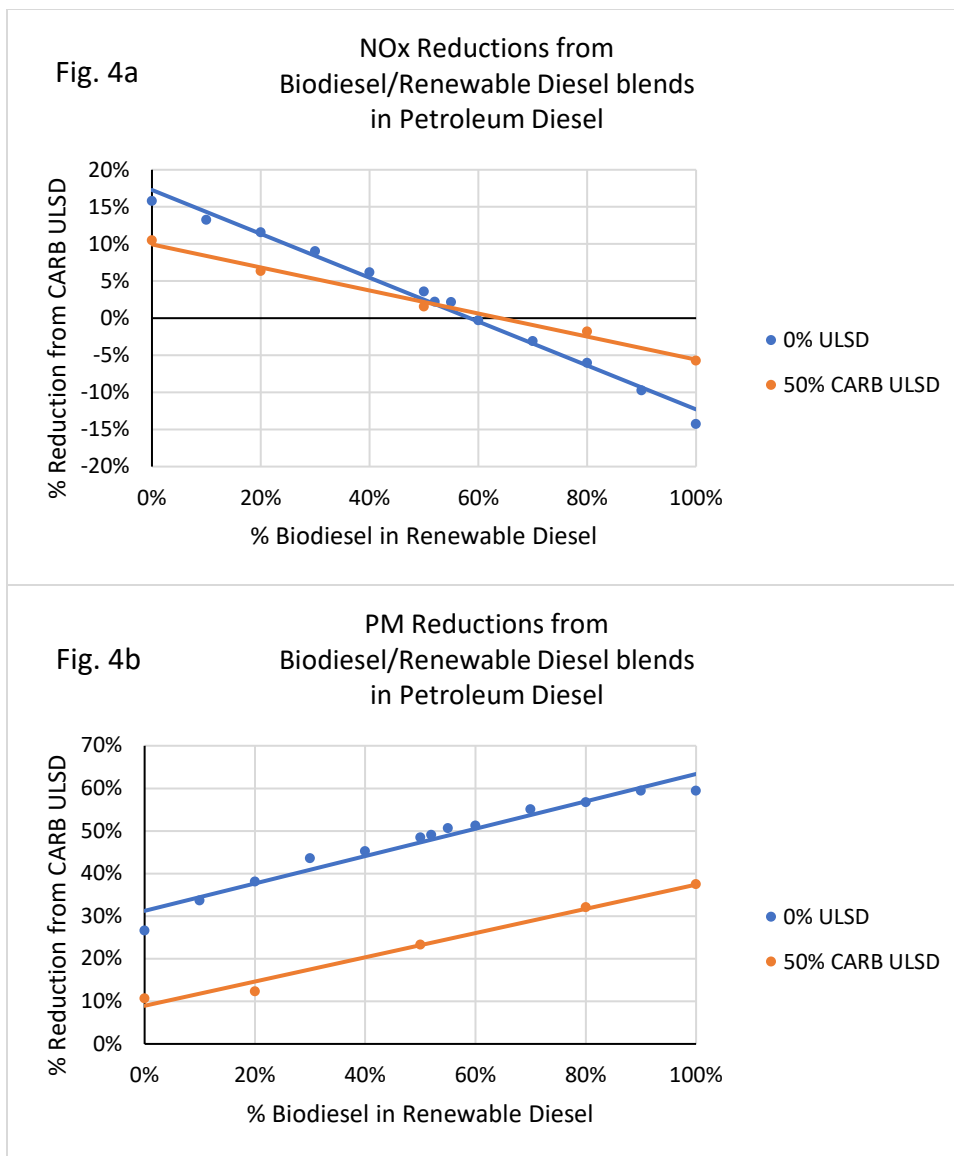


Figure A4. Demonstration of consistently linear reductions in (a) NOx and (b) PM emissions for biodiesel and renewable diesel blends when blended with petroleum diesel. Data was generated by REG using a 1991 Detroit Diesel 60-series engine [1].

Appendix B: Operational Information

Table B1. Applicability of concerns raised in Staff Report: Initial Statement of Reasons, Appendix E with respect to both biodiesel and renewable diesel.

Concern raised in Appendix E	Biodiesel?	Renewable Diesel?
“not chemically similar to...petroleum diesel”	Yes (BD is methyl esters)	Yes (RD lacks cyclics & aromatics, causing substantial differences)
“different physical properties...compared to PD”	Yes (higher density, surface tension, and bulk modulus than PD)	Yes (lower density, surface tension, and bulk modulus than PD)
Elastomer compatibility issues in “older engine fuel systems” compared to PD	Yes (potential for increased elastomer swell in older engines compared to PD)	Yes (potential for elastomer shrinkage in older engines compared to PD)
Concerns about the potential for increased free water and microbial growth in storage tanks compared to PD	No (As noted, BD holds more water in solution, thus reducing the potential for free water which is required for microbial growth)	Yes (RD increases the likelihood of free water which is required for microbial growth)
Concerns about cold weather operation compared to PD	Yes (BD cloud point is typically higher than PD cloud point)	Yes (RD cloud point can be similar to PD’s but can also be much higher. RD freezes differently than PD: freezes solid and at temperatures well above its cloud point)
Concerns about engine manufacturer support for B6 – B20 (R99 is comparison fuel)	No for B6 – B20 Billions of gallons of B6 – B20 have been successfully used since the 2006 reference that is cited for this was written	Yes for R99 Some engine and component manufacturers still limit RD content to R30 – R50. Pipelines still limited to R5.

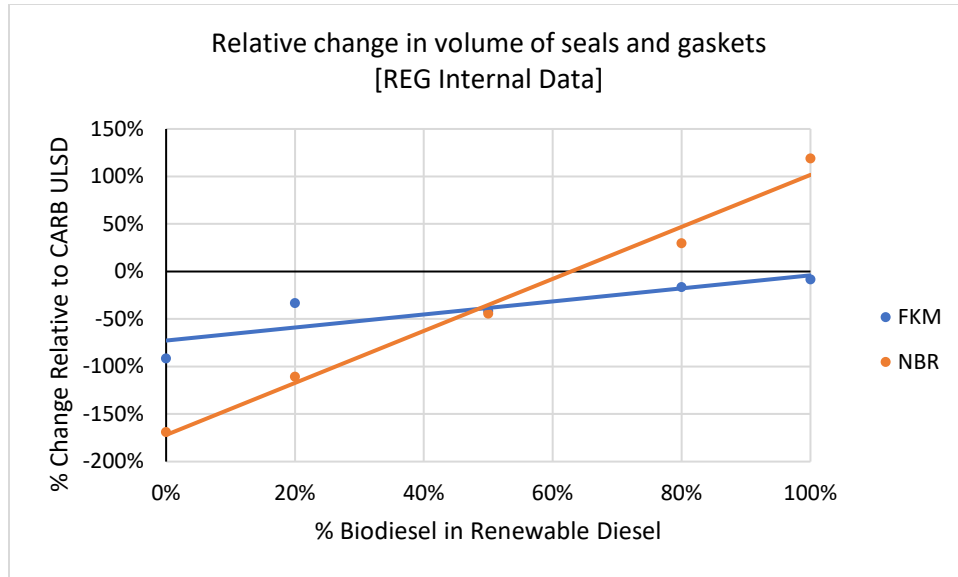


Figure B1. Change in volume of elastomer seals and gaskets for blends of biodiesel and renewable diesel for two common elastomers: fluorine rubber (FKM, also known as Viton) and Nitrile Butadiene Rubber (NBR) [1]. Negative values indicate shrinkage and positive values indicate swell.

It is also important to note that B20 blends have repeatedly been shown to be compatible with elastomers commonly used in fueling systems [4, 5, 6, 7, 8, 9, 10, 11, 12, 13]. Furthermore, a 2010 report written by CARB staff demonstrated that blends up to B20 blends have been used extensively in the state of California, without issue [14].



Appendix A & B References:

[1] REG internal data.

[2] Durbin et. al., (2011). CARB assessment of the emissions from the use of biodiesel as a motor vehicle fuel in California “biodiesel characterization and NOx mitigation study.” CARB Final Report.

[3] Stoos, C. (2021). Renewable diesel fuel effects on exhaust emissions from a Tier 3 GE ES44C4 locomotive. SwRI Final Report.

[4] Alves, S., Mello, V., & Medeiros, J. (2013). Palm and soybean biodiesel compatibility with fuel system elastomers. Tribology International.

[5] Frame, E., & McCormick, R. (2005). Elastomer compatibility testing of renewable diesel fuels. National Renewable Energy Laboratory Technical Report.

[6] Haseeb, A., Fazal, M., Jahirul, M., & Masjuki, H. (2011). Compatibility of automotive materials in biodiesel: A review. Fuel.

[7] Haseeb, A., Jun, T., Fazal, M., & Masjuki, H. (2011). Degradation of physical properties of different elastomers upon exposure. Energy.

[8] Haseeb, A., Masjuki, H., Siang, C., & Fazal, M. (2010). Compatibility of elastomers in palm biodiesel. Renewable Energy.

[9] Kass, M., Janke, C., Connatser, R., West, B., Szybist, J., & Sluder, S. (2018). Influence of biodiesel decomposition chemistry on elastomer compatibility. Fuel.

[10] Sorate, K. A., & Bhale, P. V. (2015). Biodiesel properties and automotive system compatibility issues. Renewable and Sustainable Energy Reviews.

[11] Terry, B., McCormick, R. L., & Natarajan, M. (2006). Impact of biodiesel blends on fuel system component durability. SAE International.

[12] Thomas, E. W., Fuller, R. E., & Terauchi, K. (2007). Fluorelastomer Compatibility with Biodiesel Fuels. SAE International.

[13] U.S. Department of Energy. (2016). Biodiesel Handling and Use Guide - 5th Edition.

[14] Durbin, T., Miller, J.W., Jiang, S.M. (2010). Biodiesel fleet durability study. CARB Final Report.



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Below is the comment you selected to display. Comment 3236 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Arlene
Last Name: Christodoulou
Email Address: seacrazy4photos@gmail.com
Affiliation:

Subject: Save Whale Watching

Comment:

Whale watching is a sensation you feel and see out at sea. It's an experience like no other. It also helps teach out youngsters about pollution, not to over fish, to help protect the future. Boats are nothing as in plastics, toys, discarded by unthoughtful humans. What about cruise ships? Are you also going to ban them? Cruise ships are worse .

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First Name: Landon
Last Name: Felix
Email Address: Landonfelix92@gmail.com
Affiliation:

Subject: Sport fishing is good for my stress

Comment:

You can't get rid of sport fishing, it helps me cope with stress and depression.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:31:08

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Comment Log Display

Below is the comment you selected to display. Comment 3238 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Hugo
Last Name: Bonilla
Email Address: hugobonilla90@gmail.com
Affiliation: Costumer

Subject: Very sad about new regulations

Comment:

Please we do not need to put fishing boat outta Bussines.
This is hard working people, you are about to destroy this small
Business..I been fishing for 15 years and love this boats
The way they are....you are heartless people ...we do not want
New engines system...unless you guys are providing them
With no cost...thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:35:06

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Comment Log Display

Below is the comment you selected to display. Comment 3239 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Matthew
Last Name: An
Email Address: mattysurf11@gmail.com
Affiliation:

Subject: Save CA sport fishing!

Comment:

Don't ruin sportfishing in CA!! would like to continue what I started with my dad and one teach take my kids fishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:43:03

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Comment Log Display

Below is the comment you selected to display. Comment 3240 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Mark
Last Name: Mascola
Email Address: 8833mark@gmail.com
Affiliation:

Subject: Proposed Amendments to the Commercial Harbor Craft Regulation

Comment:

Dear Board Members,

I am respectfully asking that you vote down the proposed amendment as written. As a lifelong sportfisherman, it is deeply concerning that the past time that I have enjoyed since childhood will be taken away because of the new amendment. The amendment is well intentioned, but it is not economically feasible and will result in the majority of the charter boat fleet being non-compliant. These boats have limited space in the engine rooms and if the new engines will not fit, the boat will need to be replaced which is not realistically possible. A new charter boat will be millions of dollars, and even on the slim chance the owner could afford it, the ticket prices would be so high that the average middle class person would no longer be able to go fishing. Please vote down the amendment.

3240.1

3240.2

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:26:22

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Comment Log Display

Below is the comment you selected to display. Comment 3241 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nicholas
Last Name: Popoy
Email Address: npopoy@cedgeapparel.com
Affiliation:

Subject: Sportfishing

Comment:

To whom it may concern,

To me and many others sportfishing is a huge part of my life. It has been going on in the family for years and is a place where I can bond with my father, and where I used to bond with my grandfather before he passed. Its a place where people of all cultures come together and have one thing in common. I have been fishing on sportboats for some time now and every time I hop on a boat I forget about everything else. Not being able to afford to own a boat myself it is important that sportfishing stays available and affordable for myself and my friends/family. Please do not destroy sportfishing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:44:38

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Comment Log Display

Below is the comment you selected to display. Comment 3242 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: David
Last Name: Durkin
Email Address: dgdurkin1@gmail.com
Affiliation:

Subject: Please reconsider new Sportfishing boat regulations

Comment:

To Whom It May Concern:

I liege you to reconsider the new Sportfishing boat regulations on engines. As someone that grew up on these sport boats, losing them would be like losing part of who I am. These boats link people from all ages, races, religions, and political affiliations. The vast majority are family owned and operated. Forcing old boats to upgrade engines with the technology discussed would prove far too expensive for many owner-operators to stay in business. Many are still recovering from the covid pandemic. Please keep the current regulations in place until this technology is more common and readily available. I pride myself on eating the fish I catch on these boats throughout the year. Closing this resource would force a good amount of the population to rely on the commercial fishing vessels that have proved so devastating. Thank you for reading this. - David G. Durkin, Esq.

3242.1

3242.2

3242.3

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:44:12

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Comment Log Display

**Below is the comment you selected to display.
Comment 3243 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Richard
Last Name: Mizuhara
Email Address: MIZURATI@YAHOO.COM
Affiliation: Anerica

Subject: No on Harbor Craft anendment
Comment:
No on harbor annendment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:51:34

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Below is the comment you selected to display. Comment 3244 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rich
Last Name: Nelson
Email Address: rnelson409@gmail.com
Affiliation:

Subject: CARB Standards

Comment:

Putting commercial and probably soon to be recreational sports fisherman potentially out of business makes me sick to my stomach. How do you let this happen???? This fight is just beginning.....really wish you guys would look at all aspects of things before you make decisions like this to shut down a whole industry and the millions of people who depend on it to make a living.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:47:08

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Comment Log Display

Below is the comment you selected to display. Comment 3245 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Ernesto
Last Name: Rivera
Email Address: erivera94242@gmail.com
Affiliation:

Subject: save sportfishing

Comment:

please save sportfishing. the law passed by newsom will end sport fishing for future generations as a lot of sportfishing businesses are mom and pop type stores and cant afford upgrading their engines

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:56:00

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Comment 3246 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Christine
Last Name: Mizuhara
Email Address: Cmizu1214@gmail.com
Affiliation:

Subject: Harbor Ammendment
Comment:
No on Harbor Ammendment

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:57:32

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Comment 3247 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: James
Last Name: Morgan
Email Address: Jdmorgan12@gmail.com
Affiliation:

Subject: No to aluminum vessels
Comment:
Leave us alone!! It is unproven.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:59:30

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Comment Log Display

Below is the comment you selected to display. Comment 3248 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Jessica
Last Name: Duong
Email Address: jessica.duong@asm.ca.gov
Affiliation: Assemblymember Phil Ting

Subject: CARB Commercial Craft Letter

Comment:

Please see the attached letter from members of the Legislature.

Attachment: www.arb.ca.gov/lists/com-attach/3675-chc2021-BmVRNIQnVGVXDlc0.pdf

Original File Name: CARB Commercial Harbor Craft Letter FINAL.pdf

Date and Time Comment Was Submitted: 2021-11-15 22:00:30

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November 15, 2021

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Support for the Commercial Harbor Craft Regulation

Dear Chair Randolph:

We are writing in support of the California Air Resources Board's (CARB) proposed draft Commercial Harbor Craft (CHC) Regulation because it achieves much needed air pollution reductions and protections for our communities, especially for port communities, and encourage the CARB to set more ambitious standards. We urge the Board to prioritize the health of frontline communities by adopting a robust commercial harbor craft rule this year that will bring zero-emission harbor craft to California ports.

Eliminating diesel emissions must continue to be a priority for the Board. Our communities are still forced to breathe diesel particulate matter (diesel PM), even though the National Institute for Occupational Health and Safety first identified diesel PM as a potential carcinogen over 30 years ago, and CARB designated diesel PM as a toxic air contaminant over 20 years ago.

In areas surrounding the San Pedro Bay, Oakland and San Diego Ports, harbor craft constitute one of the top three sources of cancer risk because of diesel particulate matter exposure. The continued exposure to toxic diesel PM in our communities is unacceptable; the proposed regulation to reduce toxic diesel PM emissions from CHC is a good first step, but CARB must do more. While diesel must eventually be eliminated entirely, we understand that zero emission technology is not yet available for all of the vessel types. Although the proposed regulation does not achieve the full health protection we demand, it is a step in the right direction and we will be looking for CARB to do more as technology advances.

While we understand there are concerns regarding the economic impacts on various businesses throughout the State, those costs can be passed along to end users and are dwarfed by the monetized benefits the State will realize through implementation of the regulation. As noted in CARB's Standardized Regulatory Impacts Assessment, the avoided negative health outcomes are valued at over **\$5.25 billion, 2.5 times the conservative estimates of costs associated with the regulation.** It is also important to note the scale of the emission reductions the proposed regulation will



California Legislature

achieve, which, over the lifetime of the regulation, are the equivalent to driving approximately 246,000 class 8 diesel trucks from Los Angeles to Sacramento every day for an entire year.

CARB has an opportunity to shift the State's marine sector towards zero-emissions, in line with the global technological shift we are seeing. Electrification for marine vessels is now considered a proven technology. Just last week, we saw the first US hydrogen fuel cell-powered, electric-drive ferry launch right here in California at the San Francisco Bay and more soon to follow. As is evident from the rapid advancements in this technology, the proposed regulation provides the regulated community plenty of time to comply.

CARB must continue to push for maximum emission reductions that are technically and economically feasible. The health of our communities depends on it. We urge the Board to adopt and **implement as robust a CHC regulation as soon as possible, and continue to track development of zero emission technologies for later regulatory updates.**

Sincerely,



PHILIP Y. TING
Assemblymember, 19th District



ISAAC BRYAN
Assemblymember, 54th District



CRISTINA GARCIA
Assemblymember, 58th District



ASH KALRA
Assemblymember, 27th District



AL MURATSUCHI
Assemblymember, 66th District



ROBERT A. WIECKOWSKI
Senator, 10th District

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0115



Kevin McCarty

KEVIN MCCARTY
Assemblymember, 7th District

Richard Bloom

RICHARD BLOOM
Assemblymember, 51st District

Comment Log Display

Below is the comment you selected to display. Comment 3249 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Judah
Last Name: Sanders
Email Address: judahdive@yahoo.com
Affiliation:

Subject: CARB Regulations

Comment:

As a diver and fisherman who has been on dozens of California sport and commercial vessels over the past 35-40 years, I oppose the current set of regulations proposed by the State of California. There needs to be viable alternatives to the vessels that exist currently. You can't simply shut down entire sectors of our economy without there being a viable alternative. The proposed fee hikes are strikingly unreasonable to most business' to operate profitably, creating almost uniform bankruptcy in most sport and commercial diving and fishing operations. If the state wishes to impose such drastic regulations changes then it should be prepared to offer a viable replacement at reasonable cost but that is not the case.

Thank You

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:50:22

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Below is the comment you selected to display. Comment 3250 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Gary
Last Name: Mizuhara
Email Address: CrazyGar@gmail.com
Affiliation:

Subject: Commercial Harbor Craft Regulations

Comment:

I can understand an initiative for NEW Vessels. But to straight across the board make running vessels meet these Strict restrictions for so many smaller operations will Kill Businesses up and down the Coast. It's a very Bad

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:54:41

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**Below is the comment you selected to display.
Comment 3251 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Jack
Last Name: Skahen
Email Address: jack.skahen@gmail.com
Affiliation:

Subject: Save Sportfishing

Comment:

Save sportfishing and allow thousands of parents and children to bond on the ocean without having to own their own boat.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 22:11:14

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Below is the comment you selected to display. Comment 3252 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Nancy
Last Name: Branchaud
Email Address: nancybranchaud@sbcglobal.net
Affiliation:

Subject: Please allow boats to continue to give people tours

Comment:

We love the experience of being on the high seas, and we can't afford our own boat. The people who make their living helping us enjoy and appreciate the sea are beneficial to the cause of conservation.
Please don't shut them down.

Sincerely,
Nancy Branchaud
Corona, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 22:12:15

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Below is the comment you selected to display. Comment 3253 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Albert
Last Name: Shin
Email Address: ashinguy84@yahoo.com
Affiliation:

Subject: Please Save Sportfishing

Comment:

To Whom It May Concern:

As a lifelong resident of California, I find it necessary to voice my opinion on the proposed legislation requiring dramatic upgrades in the sportfishing fleet in California. The requirements place undo financial pressure on sport boat owners that are already under tremendous strain from COVID and the current economic state of the country. Aside from the sportfishing industry, this legislation hurts the state in other ways. ■ Perhaps fishing isn't that glamorous or popular, but for some it is a vital part of what makes California great. Restricting access to coastal waters through the proposed legislation does a great disservice to our great state with highly questionable environmental benefits.

3253.1

Climate change is real. It is perhaps the most important problem that our generation needs to address. But, the fight to address climate change still has bigger targets than mom and pop owners of sportboats. The major global polluters contributing to climate change are the giant cargo ships that unload at our ports every day. We have massive wildfires every year yet we do not reduce the fuel in the forests with controlled burns. Let's do our part to address climate change, but let's do it in a way that doesn't destroy what makes California great, family businesses and open access to this beautiful state's natural resources.

3253.2

Sincerely,
Albert Shin

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:38:45

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First Name: Sean
Last Name: McGary
Email Address: seanmcgary@hotmail.com
Affiliation:

Subject: Fishing

Comment:

I oppose new restrictions on sport fishing. Public access to the natural resources, should not be restricted to people who can afford private sports fishing boats. Access for children to learn and to participate fishing, Are encouraged by the sport fishing fleet.

Sean

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 21:56:16

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Comment Log Display

Below is the comment you selected to display.
Comment 3255 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Reinsch
Email Address: mdrfish@gmail.com
Affiliation: Vessel Owner - Operator

Subject: Board Considering Report to Mandate Marine & Harborcraft Exhaust Upgrades

Comment:

My wife Patricia and I are partners in the sportfishing vessel Betty O, Marina Del Rey Sportfishing. The boat serves as an affordable, reliable, and safe choice for local fishing clubs and non profits for summer youth fishing programs and Disabled Armed Services Veterans fishing trips during the year.

The Betty O 's 5 year USCG Certificate of Inspection was reissued in February of this year. On Dec 15 she will mark her 100th birthday.

Exhaust system upgrades proposed in the CARB report to be considered by the Board Nov 19 would not be possible to undertake for the Betty O. Her wood construction could not easily accommodate the exhaust upgrade. The boat's engine compartment was subdivided in 2001 to meet a timely Federal Code of Regulations requirement, halving the original engine room space while retaining the overhead clearance established by the deck beams. An exhaust system upgrade could not be accommodated within this fixed engine space. There is minimal clearance now between the turbo charger and the compartment ceiling. Please bring this under consideration when evaluating the report proposals.

Attachment: www.arb.ca.gov/lists/com-attach/3683-chc2021-VDdQYVBIV2EAPgNn.jpeg

Original File Name: C74E8DA0-A49E-4190-944A-C37652EC1F4A.jpeg

Date and Time Comment Was Submitted: 2021-11-15 22:13:47

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Comment Log Display

Below is the comment you selected to display. Comment 3256 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: wayne
Last Name: blich
Email Address: wblicha@yahoo.com
Affiliation: flyingfish sportfishing

Subject: proposed tier 4 engine replacements for marine passenger vessels

Comment:

I appeal to CARB to reconsider the requirements to repower my 43 foot commercial passenger vessel, as it would put me out of business. My fiberglass vessel will not be compatible with the tier 4 engine. I cannot afford to purchase a new vessel to replace the one I currently own and operate. Please "grandfather" existing vessels like mine to continue to operate. I currently have tier 3 engines.

respectfully submitted,
Wayne Blich
owner/operator
Flying Fish Sportfishing

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 22:34:27

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Below is the comment you selected to display. Comment 3257 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: jeff
Last Name: schones
Email Address: nvlty@icoud.com
Affiliation:

Subject: Do Not Let THis pass.. Stop!!!

Comment:

Please do not let this pass. Come from a long line of fisherman in the family. That is our livelihood.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 22:49:42

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Comment Log Display

**Below is the comment you selected to display.
Comment 3258 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Gil
Last Name: Cedillo
Email Address: gil.cedillo@lacity.org
Affiliation: Office of Councilmember Gil Cedillo

Subject: Comments regarding Commercial Harbor Craft Regulation
Comment:
See attached.

Attachment: www.arb.ca.gov/lists/com-attach/3686-chc2021-VDcHbFQKUGAKaQNn.pdf

Original File Name: CM Cedillo Comments re CHC Regulation.pdf

Date and Time Comment Was Submitted: 2021-11-15 22:52:31

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GILBERT A. CEDILLO

COUNCILMEMBER

FIRST DISTRICT

November 15, 2021

Dear California Air Resources Board:

I join fellow public officials to end the continued emissions from harbor craft across the state of California. This proposed rule amendment is an answer to clean up an industry that continues to use the lowest quality of technology and dirtiest fuel at the expense of residents nearby our harbors and beyond. This rule avoids 531 premature deaths statewide, 161 hospital admissions, 236 emergency room visits, providing \$5.25 billion in benefits versus \$1.98 billion in costs, according to recent findings from air quality experts at the California Air Resources Board. Our health cannot afford additional delays in adopting this rule.

Given the climate emergency that we are facing, we need bold climate leadership. I'm asking you to strengthen the Commercial Harbor Craft rule:

- Move forward with a strong rule now to advance zero-emissions and clean up the dirtiest engines in other commercial harbor craft categories. 3258.1
- Set all ferries, tugboats, dredges and barges on an electrification pathway right now and require full electrification by 2035.
- Direct staff to revisit the rule with the Board as the zero-emissions boat market evolves to ensure the regulation achieves maximum emission reductions 3258.2
- Increase funding for zero-emissions boat pilots, retrofits and new vessels to spur innovation 3258.3

Let's keep California on a path towards innovation and clean air.

Sincerely,

Gil Cedillo
Councilmember, First District

CITY HALL 200 N. Spring St. Room 460 Los Angeles CA 90012

Tel: (213) 473-7001 • Fax: (213) 473-7462

HIGHLAND PARK FIELD OFFICE 5577 N. Figueroa St. Los Angeles CA 90042

Tel: (323) 550-1538 • Fax: (323) 550-1579





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**Below is the comment you selected to display.
Comment 3259 for Proposed Amendments to Commercial Harbor
Craft Regulation (chc2021) - 45 Day.**

First Name: Dre
Last Name: Ortiz
Email Address: Dreortiz1760@gmail.com
Affiliation:

Subject: CARB

Comment:

Words cannot describe how much fishing has impacted my life.. I mean just take a look at this photo.
To me there one grandpa, 4 uncles, 3 aunts, and one cousin.
All enjoying what we do best.. fishing..

Attachment: www.arb.ca.gov/lists/com-attach/3687-chc2021-U2NSNQFhWWgDZgBj.jpeg

Original File Name: 0AABCCD4-2FFD-40DE-B145-8D36C6429096.jpeg

Date and Time Comment Was Submitted: 2021-11-15 22:28:16

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Comment Log Display

Below is the comment you selected to display. Comment 3260 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Harry
Last Name: Markarian
Email Address: Boatburgers@gmail.com
Affiliation:

Subject: Please do not pass this !

Comment:

There are families at risk , tests haven't been done on sea goin vessels and the risk of putting thousands of people in risk and out of homes and their livelihood is at risk. Please conduct more test , find other ways and less costly . These fishermen and women are the backbone of Californian seafood . Please don't pass this law !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 23:05:28

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Comment Log Display

Below is the comment you selected to display. Comment 3261 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Melissa
Last Name: Miller-Henson
Email Address: fgc@fgc.ca.gov
Affiliation: California Fish and Game Commission

Subject: Commission comments on proposed amendments to commercial harbor craft regulation (chc2021)

Comment:

Please see the attached file. Thank you.

Attachment: www.arb.ca.gov/lists/com-attach/3690-chc2021-UT1QIlwvUI4YAlu.pdf

Original File Name: LTR_FGC to CARB_Proposed CHC Regs_111521.pdf

Date and Time Comment Was Submitted: 2021-11-15 23:27:45

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Samantha Murray, Vice President
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McKinleyville

Eric Sklar, Member
Saint Helena

Erika Zavaleta, Member
Santa Cruz

STATE OF CALIFORNIA
Gavin Newsom, Governor

Fish and Game Commission



*Wildlife Heritage and Conservation
Since 1870*

Melissa Miller-Henson
Executive Director
P.O. Box 944209
Sacramento, CA 94244-2090
(916) 653-4899
fgc@fgc.ca.gov
www.fgc.ca.gov

November 15, 2021

Liane M. Randolph, Chair
Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Sent via the CARB public comment portal

Re: Proposed amendments to commercial harbor craft regulation (chc2021)

Dear Chair Randolph and members of the board,

The California Fish and Game Commission is a constitutional body with a wide range of responsibilities related to ensuring that California has abundant, healthy, and diverse fish and wildlife as well as a rich and sustainable outdoor heritage. Since gaining statehood, California's outdoor heritage has included recreational fishing and, in 1870, it was the first activity the Commission was given responsibility to manage. *I write to convey our concerns with how proposed regulation changes could negatively affect recreational fishing and the coastal economies that depend on it.*

Healthy fish and wildlife require a healthy environment, a shared goal between our organizations. The Commission fully supports the work of the California Air Resources Board in addressing climate change, the harmful effects of air pollution, and environmental justice. The Commission also recognizes the importance of regulations such as those being considered in the subject rulemaking to achieving a healthy environment. Specifically, the proposed regulations are intended to help California meet National Ambient Air Quality Standards set by the U.S. Environmental Protection Agency.

Your agency's efforts to meet air quality standards have focused in the past on the most egregious sources of emissions, where costs to implement regulation changes are outweighed by the long-term benefits. **We are concerned that the subject regulations proposed by CARB place excessive burden on the commercial passenger fishing vessel (CPFV) fleet, a segment of vessels that may not contribute as greatly to reducing emissions as estimated nor in a cost-effective manner, but whose regulation as proposed would likely reduce equitable access to the marine environment and cause economic harm to coastal fishing communities.**

3261.1

The proposed amendments to the commercial harbor craft (CHC) regulation would (1) for the first time separate CPFV from commercial fishing vessels (previously combined in a single category with the same requirements), and (2) expand more stringent emission reduction requirements to CPFV engines than to commercial fishing vessel engines. Both CPFV and commercial fishing vessels must be licensed by the California Department of Fish and Wildlife, use similar sizes and types of boats, spend most of their operating time far away from population centers, and are often used interchangeably, depending on the season, making it unclear how the proposed regulation would apply when a vessel is used for both purposes. These vessels are unlike any other category of vessel that will be affected by the proposed amendments, and it seems inappropriate to divide them into separate categories. 3261.2

CARB staff have also made a number of assumptions about the CPFV fleet and existing emissions that appear problematic:

- (1) Optimistic vessel replacement costs that are not supported by recent price quotes, even for smaller vessels; 3261.3
- (2) the ability to sell existing vessels out of state to recoup some capital when attempted sales of these vessels have not been successful to date; 3261.4
- (3) an elastic demand that can absorb additional costs through increased ticket prices when, based on industry experience, small price changes have led to significantly reduced ticket sales, pointing to a highly inelastic demand;
- (4) that CPFVs can pass along the increased costs to customers but commercial vessels cannot, without data to show that commercial fishing vessels cannot otherwise absorb the costs; 3261.5
- (5) the availability of financing for new vessel construction when such financing is difficult to obtain just for 60% of value for an existing vessel, much less 80% or more of the value for a new vessel; 3261.6
- (6) using the Automatic Identification System for calculating what portion of CPFV activity occurs within 24 nautical miles of the California coast when the majority of the fleet is not required to use the system and spends most of its time outside those bounds; 3261.7
- (7) using a baseline number of inspected CPFVs that appears to overestimate the actual number compared to uninspected "six-pack" charter boats, which have a very different fuel burn rate;
- (8) using acknowledged faulty data on the estimated time spent in regulated waters with a four- to five-fold error range and, hence, potentially far less air quality and health benefits than estimated;
- (9) that CPFV vessels are used solely for passengers when many are used in the off season for commercial fishing, and providing no indication of how such vessels will be regulated under the proposed amendments; 3261.8
- (10) potential underestimation of the number of associated jobs and businesses that will fail with a reduction in the CPFV fleet; and 3261.9
- (11) that there will be no loss in license sales revenues to the California Department of Fish and Wildlife when the staff analysis makes clear that some vessels will be removed from service, even if temporarily. 3261.10

Also of concern is that CARB's staff has acknowledged, for CPFVs, the proposed emission reduction requirements are currently impossible to meet for one of several reasons: The technology is not yet available on the open market, is infeasible to install and also conform to U.S. Coast Guard vessel safety requirements, or is unsafe to install in wood and fiberglass hulls due to the operating temperatures at which they run. As a result, most CPFVs will necessarily have to be replaced, even after several years of compliance extensions. For a variety of reasons, it has been economically infeasible to build new CPFV vessels for decades. For example, most vessels in the southern California fleet were built in the 1970s and 1980s and it is estimated that more than 80% are constructed with wood or fiberglass. Without adequate grant funding to support vessel replacement, many CPFV businesses will shutter. 3261.11

While the initial statement of reasons for the regulation changes indicates that "the macroeconomic impacts of the regulation are relatively small in relation to the California economy," which is true, the negative economic impacts will be concentrated in coastal fishing communities. CPFVs are a critical part of coastal fishing communities and are typically small businesses. CARB's staff estimates the average cost for a CPFV to comply with the proposed regulation changes—assuming the appropriate technology will be developed—at over \$500,000, a significant burden for a small business that cannot simply be transferred to its customers. As written, the proposed regulation changes will certainly result in the loss of CPFV vessels from the fleet and, thus, reduce an affordable method of accessing marine recreation. In addition, CPFVs often provide educational and fishing access that is otherwise unavailable to many, such as for school groups, disadvantaged youth, veterans, and families that cannot afford their own boats. 3261.12

The California State Legislature has directed that implementation programs to reduce airborne toxins should be practicable (Health and Safety Code, subdivision (k) of section 39650). CARB's work to improve air quality, protect public health, and address climate change is vitally important, and can continue without imposing impracticable burdens on the CPFV fleet. Electrification of all types of engines is rapidly evolving, and it is easy to imagine a future in the coming years where zero-emission vessels are the norm. As currently written, the draft rule changes appear to be less forward-thinking than possible, which will leave those vessel owners that can afford it, incurring greater costs than necessary by retrofitting in-use diesel engines or purchasing new vessels with Tier 3 or Tier 4 engines and then having to convert to zero-emission and advanced technologies just a few years later. Rather than prolonging the use of diesel engines, perhaps CARB could consider incentivizing a faster transition to zero-emissions harbor craft, especially those vessels that spend the majority of their operating time closer to shore. 3261.13

The Commission urges CARB to direct its staff to modify the proposed regulation changes to maintain CPFVs and commercial fishing vessels in the same vessel category and to work with the sport fishing and commercial fishing industries to develop regulations that are economically feasible—with adequate funding assistance—to incentivize continuing to lower engine emissions and prepare the fleets for ultimate conversion to zero emission technologies. We also encourage CARB to direct its staff to consult with the California Department of Fish and Wildlife, the California Coastal Commission, port/harbor/marina groups, and boat construction firms to better understand maritime and fishing practices in California's CPFV and commercial fishing fleets to help ensure the most effective and practicable regulation amendments. 3261.14

3261.15

If you or your staff have any questions about the Commission's comments, please contact Melissa Miller-Henson, the Commission's executive director, by email at fgc@fgc.ca.gov or by phone at 916-653-4899.

Sincerely,

 for

Peter Silva
President

cc: Charlton Bonham, Director, California Department of Fish and Wildlife
Craig Shuman, Regional Manager, Marine Region, California Department of Fish and Wildlife
Andrea Lueker, President, California Association of Harbor Masters & Port Captains
Brad Gross, Executive Director, California Association of Harbor Masters & Port Captains
Bill Shedd, Chairman, Coastal Conservation Association of California
Wayne Kotow, Executive Director, Coastal Conservation Association of California
Rick Powers, President, Golden Gate Fishermen's Association
John McManus, President, Golden Gate Salmon Association
James Stone, President, Nor-Cal Guides and Sportsmen's Association
Ken Franke, President, Sportfishing Association of California



Comment Log Display

Below is the comment you selected to display. Comment 3262 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Marshall
Last Name: Heaton
Email Address: mheaton21@cox.net
Affiliation: Patron

Subject: CARB mandate on passenger sportfishing boats

Comment:

Please reconsider the new CARB mandate, these sportfishing boats provide the only access for tens of thousands of Californians like myself who's only option for fishing the States ocean waters are these boats. I've fished these boats for over 55 years introducing my kids and grand kids to fishing just as many others have.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 23:01:23

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Below is the comment you selected to display. Comment 3263 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Rob
Last Name: Lynn
Email Address: lynn_rob@sbcglobal.net
Affiliation:

Subject: CHC2021

Comment:

It's clear that CARB clearly does not understand nor did not take time to learn about the affected vessels' operations and business environment. They also don't understand the demographics, motivations and financial abilities of their customers. Assuming

the customers of the affected vessels, who commonly hail from lower income environments, will simply accept higher prices and not decrease their days of fishing is ludicrous. If these amendments are passed as proposed, the results will significantly reduce the revenue California receives for oceans and fisheries conservation, impact lower income communities and cost the state economy nearly over \$13 million in state tax revenues 1,500 jobs and \$37.8 million in income.

There are serious shortcomings in CARB's statements and claims as presented in its economic analysis (SRIA). The State of California needs to carefully considers the potential impacts before making decisions that can potentially harm businesses, their employees and California residents who want to access the ocean. Thank you.

Sincerely,

Rob Lynn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-15 23:34:11

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Comment Log Display

Below is the comment you selected to display. Comment 3264 for Proposed Amendments to Commercial Harbor Craft Regulation (chc2021) - 45 Day.

First Name: Michael
Last Name: Franchak
Email Address: relentlesscharters@outlook.com
Affiliation: Relentless Charters

Subject: chc2021

Comment:

ATTN: Ms. Liane Randolph,
Chair California Air Resources Board,

I would very much like to briefly address severe concerns with the proposed amendments to CHC regulations on behalf of Relentless Charters, our employees, our customers, my family, and all that have supported us in our seven year existence.

I am an independently owned small business operating out of picturesque San Diego, encompassing operations from commercial sportfishing, whale watching, bird watching, floating classroom education, and marine research. We specialize in commercial sportfishing off the coast of Southern California and Northern Baja. I have worked in industry since graduating high school in 2005, became a licensed 100T Master (United States Coast Guard licensed Captain) in 2007, started running boats in 2009, and very proudly entered vessel ownership in 2015. I have spent 16 years invested in the maritime community here in Southern California and owe everything I have ever done professionally to the opportunities we are so fortunate to have available here in California through our access to the Pacific Ocean. It has been an extremely challenging, yet invigorating journey thus far. The support from family, friends, neighbors, customers, and many more have been beyond humbling. The vessel Relentless is a 57'x19'

plywood/fiberglass USCG inspected passenger carrying vessel. We are currently capable of sleeping up to 21 passengers, in addition to 5 crew, and operate on trips from a few hours to 3 days. We have carried local school groups out to experience the beauty and mystique of the Pacific for the first time, we have had trips of family meeting each other from all across the nation, we have laid our nations best to rest. The diversity of the business and our client base is absolutely awe inspiring. We have celebrated the elation of a father and son catching a fish together for the first time, and we have piously celebrated the last birthday of a

3264.1

terminally ill passengers with his brothers and friends. It is again humbling, intimidatingly so, to look back at 7 years of trips and to think that our existence on the Relentless has made a difference. From the local high school fishing club to out of state business and tourist events, we are proudly a viable part of the San Diego waterfront economy and look forward to continuing to be. To say that our survival has been guaranteed is a gross misconception. We are still in recovery from the fallout from the Covid-19 pandemic, as are most all small business, economic hardship, rising fuel and overhead costs, inflation, these are all current concerns to all. However, nothing means our imminent demise as does the proposed Commercial Harbor Craft regulations.

We have a wonderful working relationship with the United States Coast Guard, both locally and in Washington. As an inspected vessel we are exactly that, inspected thoroughly bi-annually by the USCG. Under the proposed amendments to CHC, there is no possible way to remain an inspected passenger carrying vessel and maintain compliance with CHC regulations. USCG at both the local and national level has concerns with both stability and heat generation of required machinery under the proposed regulations. We certainly share the same interest with CARB for protecting the vitality of our coastal and offshore waters. Without such a biodiverse aquatic ecosystem we have nothing special about our business, however these proposed amendments would put me and my family out of business permanently. We are in the process of attempting to use the Carl Moyer Grant program to upgrade to Tier 3 emission motors. We already applied last year with the San Diego County Air Pollution District and were not funded on our project. We currently are reapplying with the help of Robert Mercado and Heidi Gabriel-Pack to hopefully achieve funding to upgrade to cleaner power for the vessel Relentless. Currently all revenue generated by the business has been allocated to just staying above water. Vessel mortgage, insurance, documentation/permit fees, and vessel maintenance are all critical to our operations and have allowed no funding available for out-of-pocket machinery upgrades. Without the ability for the vessel to operate as an inspected passenger carrying vessel in California, it unfortunately has very little value. I would lose virtually everything, not from a failed economy, not from a lack of business, not from failed fiscal practices, not from Covid-19, but from an inability to remain compliant with CARB.

We absolutely need support from the board in staying afloat. We are registered with both the National Oceanic and Atmospheric Administration as well as California Fish & Wildlife as a commercial fishing vessel. We fill out commercial take logbooks for CA F&W, and are recognized by state and federal agencies as a commercial vessel with commercial registration numbers. As a fleet we have done upgraded our fleet to newer and cleaner marine power than much of the commercial fleet. Why are we not allowed within the same exemptions and considerations? Without such understanding and continued cooperation between CARB and the CFPV fleet, then unfortunately I am one of many whose business is likely to fail or leave California. My employees will join the ranks of unemployed. The contractors and businesses that support us (i.e. boatyards, mechanics, electricians, wholesalers, fish processors, hotels, restaurants, etc.) will all suffer. I vehement hope there is an

3264.2

3264.3

3264.4

3264.5

alternate course we can take.

Sincerely,
Michael Franchak
Relentless Charters
619-818-5664

Attachment: www.arb.ca.gov/lists/com-attach/3693-chc2021-BmVWMVQnAjNWD1Jg.docx

Original File Name: CARB 2021.docx

Date and Time Comment Was Submitted: 2021-11-15 23:56:14

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RELENTLESS CHARTERS

San Diego, CA

ATTN: Ms. Liane Randolph,
Chair California Air Resources Board,

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2803 Emerson St.
San Diego, CA 92106

Michael Franchak
Owner/Operator

619-818-5664
relentlesscharters@outlook.com

RELENTLESS CHARTERS

San Diego, CA

national level has concerns with both stability and heat generation of required machinery under the proposed regulations. We certainly share the same interest with CARB for protecting the vitality of our coastal and offshore waters. Without such a biodiverse aquatic ecosystem we have nothing special about our business, however these proposed amendments would put me and my family out of business permanently. We are in the process of attempting to use the Carl Moyer Grant program to upgrade to Tier 3 emission motors. We already applied last year with the San Diego County Air Pollution District and were not funded on our project. We currently are reapplying with the help of Robert Mercado and Heidi Gabriel-Pack to hopefully achieve funding to upgrade to cleaner power for the vessel Relentless. Currently all revenue generated by the business has been allocated to just staying above water. Vessel mortgage, insurance, documentation/permit fees, and vessel maintenance are all critical to our operations and have allowed no funding available for out-of-pocket machinery upgrades. Without the ability for the vessel to operate as an inspected passenger carrying vessel in California, it unfortunately has very little value. I would lose virtually everything, not from a failed economy, not from a lack of business, not from failed fiscal practices, not from Covid-19, but from an inability to remain compliant with CARB.

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Sincerely,

Michael Franchak

Relentless Charters

619-818-5664

2803 Emerson St.
San Diego, CA 92106

Michael Franchak
Owner/Operator

619-818-5664
relentlesscharters@outlook.com