



**BLUE GOLD FLEET**

July 3, 2008

Ms. Mary D. Nichols  
Chairwoman  
California Air Resources Board  
1001 I Street  
Sacramento, Ca. 95814

Re: Proposed Harbor Craft Regulations

Chairwoman Nichols and Members of the Board:

Blue & Gold Fleet operates thirteen vessels in the San Francisco Bay Area and has been in business since 1981. We would like to thank the California Air Resources Board and your staff for listening to the concerns of California operators like us.

We appreciate the opportunity to comment on the recently released proposed modifications to the harborcraft air emission regulations.

Proposed Compliance Extensions for Certain Owners with Multiple Vessels.

The proposed modification allows more flexibility for a covered owner with multiple engines or two or more vessels with a compliance date of 2011 or later. Under these circumstances the regulations would allow Blue & Gold a one-time extension of one year, upon the approval by the CARB Executive Officer. We request that CARB reconsider this part of the proposed modification and restructure it to be equivalent to the potential relief offered owners with a compliance date of 2009-2001.

In 2017 and 2018 Blue & Gold will need to replace five engines in each year. We are asking that the rule be modified to allow the CARB Executive Officer the latitude to approve a compliance extension plan that allows three to four years beyond the original compliance date.

Thank you once again for an opportunity to participate in the CARB harborcraft rulemaking process. Please do not hesitate to contact me if you need more information.

Sincerely,

Carolyn Horgan  
Vice President Operations