



November 9, 2022

California Air Resources Board
Clean Transportation Incentives Plan
Public Comments

Electronic Submittal

RE: Proposed Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives

Flagship Cruises and Events is working to convert our two short-run ferries to zero-emission. While the legislature allocated some funds for Commercial Harbor Craft (CHC) rule compliance, the CORE program also contains funding that could extend the reach of the legislative funding. Unfortunately, not one manufacturer or developer has requested certification under the CORE program preventing access to those funds.

The level of funding offered under the existing CORE rules is also insufficient to make a project viable. My project developer and I have met with CARB staff to discuss how the CORE program rules and funding amounts could be revamped to allow access to the already authorized funding for CHC. The discussions with staff have been very constructive. The CARB Board should authorize staff to revise the CORE program to increase the likelihood of the funding being accessed or, preferably, authorize the funding to be combined with the legislative funding and operate under those guidelines. Doing so would increase the flexibility for CARB staff to ensure that the funding is distributed in a timely manner.

Further, the legislative funding is far short of the needs of CHC to develop the required projects for short-run ferries, which will be millions of dollars each. Combining the funds would increase the viability of fully zero-emission projects and expedite their deployment.

I appreciate the engagement of the CARB staff in discussing the concerns with the existing CORE program rules and encourage the Board to authorize staff to expeditiously modify how the funding is distributed so that it does not revert before it can be utilized.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Engel", written over a white background.

Brad Engel
President