



November 7, 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

The Sportfishing Association of California (SAC) and Golden Gate Fishermen's Association (GGFA) appreciate the opportunity to comment on the record to memorialize our continued work with CARB staff. CARB staff remain accessible and helpful to our ongoing efforts to invest in emissions reduction projects while investigating technological advancements to meet California's climate goals. As CARB staff relayed in the January 2022 Workshop on the Commercial Harbor Craft (CHC) rule, commercial passenger fishing vessels (CPFVs) were 80% of the marine projects under the Carl Moyer Program (CMP) over the past three-years.

Our members have a documented history of investing in emissions reductions programs where grant funding has been available. Unfortunately, the implementation of the CHC rule will prevent our members from continuing to utilize the CMP since it is limited to voluntary projects not those required by rule. Therefore, we actively engaged with the Legislature to allocate funds to allow our members to continue to invest in emissions reductions projects.

The Legislature and the Governor approved \$40 million in General Funds and \$20 million in Special Funds and prioritized CPFV and certain other vessel categories to support compliance with the CHC rule. While this is far short of the needs and will likely slow the ability to implement projects compared to those that were planned under the CMP, it is an important step to continued investment in emissions reductions with our members.

We have been engaged in many conversations with CARB staff and participated in workshops related to the funding program. CARB staff has assured our Associations, both in the workshop and in meetings, that the title used in the workshop presentation and in the Funding Plan will not limit CPFVs ability to access funding that we worked so hard to obtain in the State Budget so that we can continue to invest in best available retrofit technology. These projects will allow CPFVs to meet the required retrofits under the CHC Rule to qualify for the contemplated extensions, which are allowed in the Rule. This then allows our members to work with CARB staff to evaluate hybrid and zero emission technologies that are feasible for meeting California's 2045 goal.

As an example of our concern that confusion is created with the title, we refer to page 129 of the Funding Plan.

Tier-4 Commercial Harbor Craft: Projects that maximize emission reductions from vessels subject to CARB's Commercial Harbor Craft regulation. A portion of the funding will be prioritized for private ferry operators regulated by CPUC, and the remaining funding will be prioritized for public ferries, licensed commercial passenger fishing vessels, research vessels and excursion vessels. Staff will discuss further details of how these funds will be implemented and how much will be set aside for private ferries through a public work group process. Technologies can include Tier-4 engines with diesel particulate filters, or zero-emission capable marine technologies. The Legislature's \$60 million allocation will be used to support this project category, which includes \$20 million from GGRF which will require some projects funded under this category to also provide GHG emission reductions. Projects in this category will score higher if they are located in or benefit a disadvantaged or low-income community.

Because certain technologies do not exist for CPFVs, the CHC rule provides an alternative path for CPFV compliance based on available technology and their historic and significant investments in emissions reduction projects. These investments, where over 40% are currently using the best available technology and another 46% operate the next Tier of best available technology, have already documented a lower emissions contribution from the fleet. We were originally concerned that the title and text above could be limiting in terms of whether CPFVs would qualify for funding that we aggressively advocated be allocated to replace the CMP. However, CARB staff presented in the workshop and have assured us that this was not intended and CPFVs remain eligible.

We also continue to work with the CARB staff to align funding opportunities with the CHC rule to ensure that only full-time CPFVs qualify. The Legislature left the parameters of the program to CARB to design and approve. As we advocated for during the rule development, we believe that a limitation of grant funding to only CPFVs that operate 50 or more trips per year would ensure that the funds flow to the small businesses that operate CPFVs and eliminate those that purchase a CPFV license for other reasons.

SAC and GGFA will continue to engage with CARB staff on the final implementation of the program and demonstrate the further investments required to ensure that all these small businesses can continue to operate in California. CPFVs remain an important part of coastal tourism and bring significant investments to other coastal businesses.

Again, our Associations and members appreciate the accessibility of CARB staff and look forward to continuing to work with them on implementing a program that can replace the demonstrated successful emissions reductions that were occurring under the CMP.

Sincerely,



Ken Franke
Sportfishing Association of California



Rick Powers
Golden Gate Fishermen's Association