



R. E. STAITE ENGINEERING INC.

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Delivery via e-mail to: David.Quiros@arb.ca.gov

October 25, 2021

Mr. David C. Quiros
Manager, Freight Technology Section
Transportation and Toxics Division
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Request for 90-Day Extension for Comments to
Proposed Amendments to the Commercial Harbor Craft Regulation

Dear Mr. Quiros:

I am writing to request a 90-day extension of the November 15, 2021, public comment deadline for the California Air Resources Board's (CARB) Proposed Amendments to the Commercial Harbor Craft Regulation. We also request a 90-day extension of the CARB public hearing currently scheduled for November 19, 2021.

CARB has provided only 45 days for stakeholders to review and develop comments on the rulemaking package, which contains over 1,500 pages of material. R.E. Staite Engineering, Inc. is a small, family owned business. We do not have our own in-house attorneys and experts that review material for us and provide guidance, we do it ourselves. As you can imagine, with a company with less than 50 employees there are many hats that get worn by a few people. To make sure that we understand the full impact to our business, we have a team of employees that are reviewing the proposed amendment and proposal materials from their area of expertise, which pulls them away from other projects and priorities, at an ultimate cost to the company.

R.E. Staite has been very generous with CARB staff over the past year to provide data and business information about our company. This data has been incorporated into the proposed documents. While we are experts in our field, we are not air quality analysts, and making sure that our information is represented accurately is very important to us and to other stakeholders. We need time to review and process the information in order to provide CARB with honest and accurate feedback.

We are concerned about the outreach efforts by CARB to inform stakeholders of the proposed changes. We have been following the proposed regulations since their publication in March 2020, but not because we were notified (at the time we were not on the CARB Listserve). We ran across the information when we were looking at the CARB website for possible grant opportunities. The marine construction industry is a fairly small niche. We have reached out in the last few months to let our colleagues know of the proposed changes. There are several

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large companies that are aware of the proposed changes, but we found that many others have been unaware, especially the smaller organizations and ancillary industries that support the marine construction industry, such as hydrographic surveyors, divers and environmental monitors. These companies may only have one or two vessels that qualify as Commercial Harbor Craft that they use for construction support activities, but they will be greatly impacted. R.E. Staite has been processing this information for over a year, imagine how overwhelming this task would be if you only had 45 days to figure it all out?

R.E. Staite Engineering, Inc. has been in business since 1938. The proposed amendments will have a profound impact on our business, **and may ultimately put us out of business**, should this move forward. Allowing R.E. Staite Engineering, Inc. and other heavily impacted stakeholders to submit public comments and testimony with greater clarity and comprehensiveness will provide CARB with the additional information needed to develop a regulation that improves air quality for the citizens of California in a meaningful and reasonable manner.

Sincerely yours,

R.E. STAITE ENGINEERING, INC.



R.A. Carpenter
President

CC: Liane M. Randolph, Chair, CA Air Resources Board
[Delivery via e-mail: arbboard@arb.ca.gov](mailto:arbboard@arb.ca.gov)