



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. Assuming it takes an average person approximately three hours to read 100 pages, it would take about 45 hours of dedicated reading time to read the entire rulemaking package. Significant additional time would be required to process the contents of this dense rulemaking and to provide CARB with thoughtful comments.

Careful analysis and thoughtful comments are essential because the rulemaking package includes new material and is unprecedented in its scope and impact. It will affect over 3,000 vessels operating in California waters and cost California's harbor craft industry approximately \$2 billion, according to CARB's estimate. Industry cost estimates are considerably higher. Additional time is needed because the rulemaking package is large and the scope of impact to California's harbor craft community is extraordinary.

This is not the first time that stakeholders have requested extensions or pauses to this regulatory process. Members of the California legislature, along with dozens of industry stakeholders, have requested extensions almost from the inception of the preliminary rulemaking process, which also happened to coincide with the onset of the COVID-19 pandemic. CARB has not been responsive to these requests, providing insufficient extensions of 30 days for the comment period on the preliminary March 2020 draft amendments and a 7-day extension from November 8 to November 15, 2021, for the current rulemaking.

We are optimistic that careful deliberation and genuine dialogue between CARB and its regulated community may help to improve the rule, if there is sufficient time to do so. Therefore, Centerline Logistics hereby requests a 90-day extension to develop important feedback on this proposal that likely represents the most dramatic and costly regulation in the history of domestic commercial maritime



operations in California. Allowing Centerline Logistics 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,

A handwritten signature in blue ink that reads "Ravi Sekhon".

Ravi Sekhon
Director of Engineer
Centerline Logistics Corp.

CC: Patrick O'Donnell, Assembly-member, District 70
Lena Gonzalez, Senator, District 33
Dee Dee Myers, Senior Advisor and Director, Governor's Office of Business and Economic Development
Liane M. Randolph, Chair, CA Air Resources Board