



November 1, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

To whom it may concern;

I write this letter as the current owner and operator of the passenger carrying sportfishing vessel *Islander*, which is located in San Diego, CA. Current regulatory changes proposed by CARB threaten to shutter not only my business but the businesses of every passenger carrying sport vessel on the California coast. Nearly all of these vessels are small, family owned businesses representing tens of thousands of jobs, not to mention a historical significance that goes back to the late 1800's.

My first point of contention with this proposal is that (at least in my case) it doesn't take into account the amount of time many of these vessels operate within 24 miles of the California coast. My vessel operates in Mexican waters for the majority of its season. When in US waters we are rarely within 24 miles of the coast except when transiting. I would like to see the equation that shows my vessel's contribution to the pollution within this 24 mile zone. I'm sure each vessel owner who is about to see their life's work snatched from them would like to see that equation worked out as well.

My vessel is wood and while it was built in 1968, it is in fantastic condition due to extensive maintenance and upkeep. That being said, we are in no position to retrofit our engine room to allow for the extensive recapture systems laid out in the plan. Because of this, my vessel and basically any other wood or fiberglass vessel has been deemed incapable of making the necessary upgrades. My option at this point is to destroy the boat and start over from scratch. The suggestion from CARB to finance this endeavor is to raise my ticket prices and start looking for a loan. Obviously, whoever came up with this solution has never run a business. It would have been simpler to say 'let them eat cake'. The cost of doing business in California is well known the world over. We can barely keep up with expenses by raising our prices as it is. Raising prices to cover a repower of this magnitude or (God forbid) to start over would mean doubling or tripling our current prices. I've seen the feedback when our trip prices go up by fifty dollars. I wonder how we'd fare as a fleet when we double or triple the cost. My suspicion is golf would become very popular. Let's assume for a moment that California's commercial passenger vessel owners did find a way to finance new construction. From an environmental perspective that seems like a step backward. I'm sure the readers of this letter have spent little time in a shipyard but I have. New boat construction is a massive project that consumes millions of dollars in new materials, many of which California is already trying to do away with. To rebuild the California sportfishing fleet from scratch defies logic on a number of levels but if

you think that is an eco-friendly option you are sorely mistaken. Honestly, the realistic end to this situation would likely be the fire sale of these boats to other states where these regulations aren't in place. From a nationwide perspective there would be no reduction. The boats would go elsewhere as would the previous owners in search of new livelihoods and affordable housing.

I understand the need to clean up our air and I am not denying the effects that carbon emissions play in the degradation of our environment. What I don't understand is how the elimination of 200 boats along our coast is going to play a major role in helping the situation. Since 2020 Governor Newsom has granted well over 1500 permits to drill for oil and gas in this state. That represents a 190% increase from 2019. California is one of the nation's largest oil producers. I realize that billions of dollars flow from gas companies to politicians and I realize that these companies' lobbyists are hugely influential but these statistics point out the absurdity of this situation. Let's ramp up gas and oil extraction in this state and at the same time start eliminating the small businesses that consume them. I recognize that as an industry our significance is dwarfed by a company like Chevron but you need to understand that each boat affected by this plan represents a family or families that have put their lives into these businesses. When I bought the Islander 18 years ago I leveraged everything. There were years where we almost lost it all but we persevered. I've put two kids through school with this boat and along the way employed dozens of bright, hard working men and women. I'm 48 now and at some point looked forward to selling my business and enjoying the fruits of my labor. To be told I should start saving for an eventual repower to build a new vessel is laughable to me. I can say without doubt, that if this plan goes through you will be responsible for destroying the livelihoods, dreams and futures of every boat owner affected. Additionally, you will be destroying part of California's heritage as well thousands of job opportunities for young kids who are more inclined to be outdoors in the environment than in front of a screen.

My final point on the matter is the fact that this proposal creates different criteria for passenger carrying vessels and commercial fishing vessels. Why is that? Walk along Sunset Cliffs in San Diego any morning in October and you will see twenty to thirty commercial, diesel burning vessels pulling lobster traps within one mile of the coast. If you look hard you may see two half day boats with passengers. That's because the other passenger vessels are further than 24 miles out. Why does the commercial fleet have a different set of rules? Most of the vessels you see off the coast are commercial fishing vessels or recreational vessels yet our fleet is the one being mandated to change. In September the Governor signed a \$25 billion climate change bill which would provide assistance to numerous industries. To think that this bill wouldn't offer some coverage to the small businesses this proposal seeks to ruin is disheartening to say the least.

I thank you for your time and look forward to any response.

Sincerely,

John Conniff
Owner/Captain
M/V Islander
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