

Marina del Rey
Lessees Association

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November 1, 2021

The Hon. Liane M. Randolph, Chair
Clerk's Office, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Public Comment - Proposed Amendments to Commercial Harbor Craft Regulation, Hearing of November 19, 2021

Dear Madam Chair:

The Marina del Rey Lessees Association represents the leaseholders of residential, commercial, marine and visitor-serving properties in unincorporated Marina del Rey. As a small craft harbor, Marina del Rey plays a vital role of fulfilling plans and policies of the California Coastal Commission for recreational boating and water-related activities.

Public access to the Marina del Rey's waterfront and amenities is one of the key goals promulgated by the County of Los Angeles for residents and tourists to enjoy recreational boating activities. Sportfishing, whale watching and yacht charters are popular activities that make Marina del Rey an attractive visitor-serving destination. The ability for County residents and tourists to enjoy dinner cruises, charter boat tours, whale watching and fishing excursions are especially important as the tourism and hospitality industry begin the slow process of recovering from a pandemic that devastated our local economy.

The Association is greatly concerned that the California Air Resources Board's contemplation of adopting significantly new restrictions severely limiting the use of diesel engines on yacht charter and fishing boats is ill-advised and fails to consider the ruinous economic consequences of moving forward on engine emission regulations that require technology that is not economically feasible nor has been fully developed or tested for safety on passenger harbor crafts.

The proposed CARB regulations are geared to "Commercial Harbor Craft," which too broadly includes "Excursion Vessels" consisting of dinner cruise and yacht charter boats, and "Commercial Passenger Fishing Vessels" consisting of fishing boats that operate as a small seagoing business with a limited number of passengers. We respectfully request that CARB not move forward with the proposed engine emission regulations that will have a direct and adverse impact on the Marina del Rey charter boats and fishing fleets. CARB's website notes there are several types of

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commercial harbor craft. The visitor-serving boats used in Marina del Rey should not be lumped in with ferries, barges, tug boats, dredges and the like. The Board should recognize the operational differences of various types of vessels.

The proposed engine emission regulations will hit small craft operations particularly hard and without any logical reasons. The small business operators of charter boats and fishing vessels in Marina del Rey will not be able to continue providing unique recreational opportunities for residents and tourists as the cost of vessel replacements is prohibitively expensive.

Within a short period of time, the proposed CARB regulation will result in most sportfishing and whale watching boats going out of business. CARB fails to understand that small business owners face dire economic calamity with financing new vessels while simultaneously trying to sell their existing boats that would have no resale value in California. It is unrealistic and unfair to impose a conversion requirement on the small business operators of excursion vessels and commercial passenger fishing vessels within the next two years, while larger commercial vessels moving cargo and freight are allowed a significantly longer period of time to reduce emissions from diesel engines.

Various economic forecasts predict that it will take many years after the pandemic, which is still ongoing, for the tourism and hospitality industry, which includes the charter boats, dinner cruises and sportfishing vessels, to fully recover. In the meantime, it is entirely counterproductive and financially destructive to our economy to impose new regulations that harm small businesses that are an essential component of tourist activities that attract visitors to the County of Los Angeles.

On behalf of a struggling recreational boating industry, the Association would appreciate your consideration of not putting visitor-serving sportfishing, whale watching tours, dinner cruises and excursion boat charters out of business. County residents and tourists need to have accessible and affordable access to water-oriented activities.

Thank you for your consideration of our position.

Respectfully,



Gregory F. Schem
President, Marina del Rey Lessees Association.