

September 9, 2021

Lian M. Randolph
Chair

Richard Corey
Executive Officer

David Quiros
Manager, Freight Technology Section
Transportation and Toxics Division

California Air Resources Board (CARB)
1001 'I' Street
Sacramento, CA 95814

Re: Harbor Craft Emissions Regulations

Dear Ms. Randolph et al:

On behalf of the many Catalina Island businesses, residents and visitors that are directly or indirectly dependent upon Marine Vessels, the undersigned are writing today to request your consideration of several major impacts that will result from the proposed regulations. Knowing public comment will open on September 15, 2021, we felt the need to put our concerns in front of you with urgency.

Catalina offers some of California's most pristine water and land resources. While we fully support the preservation and enhancement that environmental stewardship will provide, we must approach new regulations with a holistic evaluation of feasibility. Catalina's sustainability is wholly dependent on tourism, and its physical isolation makes the island economy uniquely vulnerable. It is our cumulative opinion that:

- The proposed regulations will place an undo financial burden on small businesses causing many operators to close and lay off staff. Estimated job losses on Catalina Island alone would be several hundred.
- The proposed regulations would require modifications that are financially or structurally infeasible on most currently operating vessels. As an example, the cost of modifying a typical high-speed ferry capable of carrying 300 to 400 passengers for Catalina Express is estimated to be between \$7 to \$8 million. Those modifications would also take passenger capacity down to 170 people due to weight and space impacts. To build a replacement watercraft of comparable size to meet the proposed regulations, would be \$20 million.
- The proposed regulations will cause significant waste due to scrapping of currently operating vessels, many of which have been only recently put into service or undergone multi-million-dollar upgrades to meet tier 3 standards.
- New watercraft that will meet the proposed standards will take many years to construct and put into service, with an added impact of increased demand driving up costs and adding to delays in building timelines. Shipyard availability would also be of great concern.

- Replacement vessels will have to grow in size and weight to accommodate the required technology making them less efficient than the vessels that are currently in service and in many cases, they may be too large to safely navigate the harbor facilities in which they operate. Catalina's small coves, docks and some mainland facilities simply cannot accommodate a larger or heavier craft than they currently do. Combined, those coves and camps and facilities like the USC Wrigley Institute accommodate upwards of 70,000 guests/students each year.
- The regulations will result in fewer boats being in operation and therefore greatly reduce public access to the sea and California's coastal environment. This should be of great concern to the residents of California who cannot afford their own private boats and to the California Coastal Commission which acts to protect public access to same.
- Catalina's 4,000 residents would be among the most impacted of all Californians as every aspect of their daily lives is dependent upon waterborne vessels from grocery delivery to medical transportation and shopping.
- The regulations will result in significantly higher prices for services further reducing the resident and visitor access to the ocean waters and waterborne activities due to lack of affordability.
- Privately owned passenger vessel operators are not eligible for grants and subsidies to upgrade, so the costs will be passed on to the public.
- Renewable diesel technologies can make existing vessels much cleaner and result in significant reduction in emissions for most vessels, without the expenses and waste outlined above.

The cumulative impacts of the proposed regulations will cause irreparable harm to the Catalina Island economy and significantly reduce the million plus visitors each year who support jobs, schools, medical services and pay taxes. The recent impacts of COVID-19 have all too clearly demonstrated the rapid and comprehensive impacts of fewer visitors coming to the island and made clear that we cannot sustain or embrace the proposed regulations in their current form.

A longer timeframe for implementation of new standards is the only viable solution. 2023 is far too soon for feasibly implementing such drastic and impactful change.

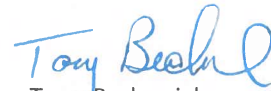
Respectfully,



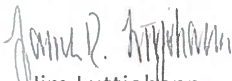
Denise Radde
City Manager




Geoff Rusack
President/CEO

Tony Budrovich
President/CEO

Jim Luttjohann
President/CEO

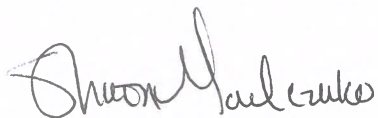



Greg Bombard
CEO




Armen Gugasian
Owner

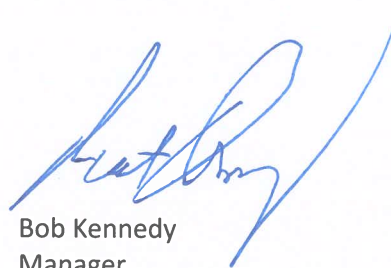




Sharon Gorelczenko
Owner



Tim Bombard
Owner



Bob Kennedy
Manager



CC: Steve Padilla, California Coastal Commission
Marybel Batjer, California Public Utilities Commission
Janice Hahn, Supervisor, Los Angeles County
Ben Allen, California State Senator
Patrick O'Donnell, California State Assembly