

**From:** Rich Smith  
**To:** [ARB Clerk of the Board](#)  
**Subject:** VW Environmental Mitigation Trust Comments  
**Date:** Monday, May 21, 2018 3:40:28 PM

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I am submitting comments regarding the Volkswagen Environmental Mitigation Trust on behalf of Westar Marine Services headquartered in San Francisco, CA. Westar is a women-owned small business and currently operates 13 tugboats, 6 water taxis, and 12 barges, mainly in San Francisco Bay and tributaries. Westar's principal market is marine construction support and harbor services supporting ships calling in the Bay area, but the company also provides tank vessel escorts, ship assists, aggregate movements by barge, and other specialty barge services.

Westar has invested large capital sums to re-engine harbor craft starting in the late 1990's and continuing to the current day. The cost of installing new engines on harbor craft every 15 years is a considerable financial burden on smaller companies. Westar is grateful to have been the beneficiary of a number of Carl Moyer grants over the years which helped reduce these costs.

Westar encourages the California Air Resources Board to allocate a larger portion of the proposed marine funding to combustion-engine projects rather than zero-emission projects. Westar believes that zero-emission tugboat and towboat projects will benefit larger companies significantly more than smaller companies which may not have the resources to build new vessels. Westar also believes that there will be more demand for combustion-engine replacements on a larger number of existing vessels than a small number of zero-emission vessels, which will result in overall lower emissions.

Thank you for the opportunity to submit these comments.

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