



Ms. Liane M Randolph
Chair, California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

September 24, 2021

RE: Harbor Craft Emissions Regulations

Dear Chair Randolph,

Please consider our concerns regarding proposed draft regulations on commercial harbor craft vessels coming before your Board in the next few months. The proposed new harbor craft engine emissions control regulations will have a significant impact on maritime businesses, tourism, local revenues and affordable ocean access for all Californians. PierPride Foundation is a non-profit devoted to preserving San Clemente Pier, a fishing and recreation Pier. In our love for the ocean, we partner with many groups who would be done a disservice by the proposed restrictions in this legislation.

As you know, the regulations will require passenger vessels and ferries, tugboats and barges, pilot boats, sportfishing boats and other marine vessels to either retrofit or replace vessels, and that CARB staff has conservatively estimated costs over \$2 billion.

Improved air quality is a desirable goal. However, technology does not exist for some vessels and will pose safety risks for others. The proposed regulations will require some operators to build new larger vessels to accommodate the weight and size of the mandated equipment. In other cases, due to the additional weight of the mandated engines and diesel particulate filters, vessels such as ferries and sportfishing boats would have to reduce passenger load; some potentially by half- which alone would double the cost of tickets, reducing tourism dollars and making ocean access unaffordable to many.

Please provide sufficient time to work collaboratively with the maritime industry on solutions that will achieve emissions reductions while preserving our coastal communities and allowing affordable access to our ocean waters for all Californians.

Sincerely,

Eileen Kawas

Eileen Kawas

PierPride Foundation Board President

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