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**Humboldt Bay**  
**Harbor, Recreation and Conservation District**

(707)443-0801

P.O. Box 1030

Eureka, California 95502-1030



Clerk's Office

California Air Resources Board  
1001 I Street Sacramento, CA  
95814

November 4, 2021

Re: Proposed CARB Commercial Harbor Craft Regulations/Sportfishing Boat Regulations

Dear California Air Resources Board,

On behalf of the Board of Commissioners of the Humboldt Bay Harbor, Recreation and Conservation District, I am providing comments regarding the California Air Resources Board's (CARB) proposed engine emission regulations that would affect charter sportfishing boat operators in Humboldt County, California. CARB staff is in the process of amending or replacing existing regulations to further reduce emissions from charter sportfishing boats and other vessels. We agree about the need to reduce emissions. However, for the following reasons, the currently proposed regulations for charter sportfishing boats are not appropriate.

1. Charter sportfishing boats are currently recovering from lost revenue due to substantially reduced customers during the Covid-19 pandemic. In Humboldt County, revenue has also been lost due to short fishing seasons for Pacific halibut and Chinook salmon. Requiring the fishing fleet to begin costly upgrades to vessels as soon as 2023 may result in closure of many businesses.
2. Humboldt's Charter sportfishing boats are all under 45 feet in length and have relatively small engines which generally carry less than six passengers.
3. Charter sportfishing and commercial fishing boat engines are technically the same. Historically they shared the same vessel category and were regulated in the same fashion. However, under CARB's proposed regulations, charter sportfishing boats will be disproportionately impacted. In many cases, boats constructed of wood or fiberglass cannot be structurally modified for new and larger engines and will have to be removed from service starting as soon as 2023. The expense of purchasing a new steel vessel is too great for family operated businesses.

We urge CARB to work with the charter sportfishing industry to develop air quality regulations that provide economically feasible incentives for sportfishing boat owners to continue to lower engine emissions. They should once again share the same vessel category as commercial fishing boats and be regulated in the same fashion. The currently proposed regulations threaten the existence of charter sportfishing businesses in Humboldt County. These businesses are an important part of the region's economy and culture.

Sincerely,

Stephen Kullmann  
Board President

cc: State Senator Mike McGuire, 2<sup>nd</sup> District  
State Assembly Member Jim Wood, 2<sup>nd</sup> District  
Congressman Jared Huffman, 2<sup>nd</sup> District  
County of Humboldt Board of Supervisors  
Eureka City Council