

November 12, 2021

Liane Randolph, Chair  
California Air Resources Board  
1001 "I" St.  
Sacramento, CA 97814

**RE: Proposed Amendments to The Regulations to Reduce Emissions from Diesel Engines on Commercial Harbor Craft Operating Within California Waters And 24 Nautical Miles of The California Shoreline**

Dear Chairwoman Randolph,

On behalf of the Los Angeles County Business Federation, BizFed, a grassroots alliance of more than 215 business organizations representing 410,000 employers with over 4 million employees in Los Angeles County, advocating for policies and projects that strengthen our regional economy, we are expressing our concerns on the proposed amendments to the regulations to reduce emissions from diesel engines on commercial harbor crafts operating within California waters and 24 nautical miles of the California shoreline.

Los Angeles County marinas and ports are home to sportfishing and whale watching boats, a major source of tourism dollars and jobs. Additionally, our county holds the distinction of having the largest population of recreational anglers in the State of California.

Before the sportfishing industry and our coastal communities can recover their financial losses from the COVID-19 pandemic, the California Air Resources Board (CARB) has proposed impractical and cost prohibitive engine emission regulations. The proposed rule specifies technology that has not yet been manufactured or tested safe for these small passenger vessels.

By CARB's own admission, the proposed regulations are not compatible with many vessels, especially those constructed of wood and fiberglass. When this occurs, boats will be removed from service, impacting over 80 percent of California's sportfishing and whale watching boats.

These regulations as drafted, deliver severe economic consequences for coastal communities that depend on outdoor recreation for economic activity and jobs. It denies anglers of modest and lower economic means access to the sea at a time when fishing participation is experiencing a 12-year high among younger and urban residents, women, African Americans, and Hispanics. In addition, it will make many of the marine education programs that are operated in partnership with vessel owners, schools, and non-profit organizations infeasible or unavailable.

Boat owners have been upgrading to lower emission engines for years and this trend should continue, but without putting vessels out of business and causing economic harm. We are calling on you to intervene on behalf of boat owners seriously concerned for the well-being of their families and crew.

Thank you for your consideration of our concerns. If you have any questions, please do not hesitate to contact us.

Sincerely,



BizFed Chair  
Torrance Area Chamber



BizFed Founding Chair



BizFed Founding CEO  
IMPOWER, Inc.

## BizFed Association Members

7-Eleven Franchise Owners Association of Southern California  
Action Apartment Association  
Alhambra Chamber of Commerce  
American Beverage Association  
American Institute of Architects - Los Angeles  
Apartment Association of Greater Los Angeles  
Apartment Association, CA Southern Cities, Inc.  
Arcadia Association of Realtors  
AREAA North Los Angeles SFV SCV  
Armenian Trade and Labor Association  
Associated Builders & Contractors, Inc. Southern California Chapter  
Association of Club Executives  
Association of Independent Commercial Producers  
Azusa Chamber of Commerce  
Bell Gardens Chamber of Commerce  
Beverly Hills Bar Association  
Beverly Hills Chamber of Commerce  
Black Business Association  
BNI4SUCCESS  
Bowling Centers of Southern California  
Boyle Heights Chamber of Commerce  
Building Industry Association - Baldyview  
Building Industry Association - LA/Ventura Counties  
Building Industry Association - Southern California  
Building Owners & Managers Association of Greater Los Angeles  
Burbank Association of REALTORS  
Burbank Chamber of Commerce  
Business and Industry Council for Emergency Planning and Preparedness  
Business Resource Group  
CA Natural Resources Producers Assoc  
CalAsian Chamber  
Calabasas Chamber of Commerce  
California Apartment Association- Los Angeles  
California Asphalt Pavement Association  
California Bankers Association  
California Business Properties Association  
California Business Roundtable  
California Cannabis Industry Association  
California Cleaners Association  
California Construction Industry and Materials Association  
California Contract Cities Association  
California Fashion Association  
California Gaming Association  
California Grocers Association  
California Hispanic Chamber  
California Hotel & Lodging Association  
California Independent Oil Marketers Association (CIOMA)  
California Independent Petroleum Association  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Metals Coalition  
California Restaurant Association  
California Retailers Association  
California Small Business Alliance  
California Self Storage Association  
California Society of CPAs - Los Angeles Chapter  
California Trucking Association  
Californians for Balanced Energy Solutions  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
CDC Small Business Finance  
Central City Association  
Century City Chamber of Commerce  
Cerritos Regional Chamber of Commerce  
Chatsworth/Porter Ranch Chamber of Commerce  
Citrus Valley Association of Realtors  
Claremont Chamber of Commerce  
Coalition for Renewable Natural Gas  
Coalition for Small Rental Property Owners  
Commercial Industrial Council/Chamber of Commerce  
Construction Industry Air Quality Coalition

Construction Industry Coalition on Water Quality  
Council on Trade and Investment for Filipino Americans  
Covina Chamber  
Crescenta Valley Chamber of Commerce  
Culver City Chamber of Commerce  
Downey Association of REALTORS  
Downey Chamber of Commerce  
Downtown Center Business Improvement District  
Downtown Long Beach Alliance  
El Monte/South El Monte Chamber  
El Segundo Chamber of Commerce  
Employers Group  
Encino Chamber of Commerce  
Engineering Contractor's Association  
EXP  
F.A.S.T.- Fixing Angelenos Stuck in Traffic FilmLA  
Friends of Hollywood Central Park  
FuturePorts  
Gardena Valley Chamber  
Gateway to LA  
Glendale Association of Realtors  
Glendale Chamber  
Glendora Chamber  
Greater Antelope Valley AOR  
Greater Bakersfield Chamber of Commerce  
Greater Lakewood Chamber of Commerce  
Greater Leimert Park Village Crenshaw Corridor Business Improvement District  
Greater Los Angeles African American Chamber  
Greater Los Angeles Association of REALTORS  
Greater Los Angeles New Car Dealers Association  
Greater San Fernando Valley Regional Chamber  
Harbor Association of Industry and Commerce  
Harbor Trucking Association  
Historic Core BID of Downtown Los Angeles  
Hollywood Chamber  
Hong Kong Trade Development Council  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
Huntington Park Area Chamber of Commerce  
Independent Cities Association  
Industrial Environmental Association  
Industry Business Council  
Inland Empire Economic Partnership  
International Cannabis Business Women Association  
Irwindale Chamber of Commerce  
La Cañada Flintridge Chamber  
LA Fashion District BID  
LA South Chamber of Commerce  
Lancaster Chamber of Commerce  
Larchmont Boulevard Association  
Latin Business Association  
Latino Food Industry Association  
Latino Restaurant Association  
LAX Coastal Area Chamber  
League of California Cities  
Long Beach Area Chamber  
Long Beach Economic Partnership  
Los Angeles Area Chamber  
Los Angeles County Board of Real Estate  
Los Angeles County Waste Management Association  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Gay & Lesbian Chamber of Commerce  
Los Angeles Latino Chamber  
Los Angeles Parking Association  
MADIA Tech Launch  
Malibu Chamber of Commerce  
Marketplace Industry Association  
Motion Picture Association of America, Inc.  
MoveLA  
Multicultural Business Alliance  
NAIOP Southern California Chapter  
Nareit  
National Association of Tobacco Outlets

National Association of Waterfront Employers  
National Association of Women Business Owners - CA  
National Association of Women Business Owners - LA  
National Federation of Independent Business  
National Hookah Community Association  
National Latina Business Women's Association  
Orange County Business Council  
Pacific Merchant Shipping Association  
Pacific Palisades Chamber  
Panorama City Chamber of Commerce  
Paramount Chamber of Commerce  
Pasadena Chamber  
Pasadena Foothills Association of Realtors  
PhRMA  
Planned Parenthood Affiliates of California  
Pomona Chamber  
Propel LA  
Rancho Southeast Association of Realtors  
ReadyNation California  
Recording Industry Association of America  
Regional Black Chamber-San Fernando Valley  
Regional Hispanic Chamber of Commerce  
Regional San Gabriel Valley Chamber  
Rosemead Chamber  
San Dimas Chamber of Commerce  
San Gabriel Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Pedro Peninsula Chamber  
Santa Clarita Valley Chamber  
Santa Clarita Valley Economic Development Corp.  
Santa Monica Chamber of Commerce  
Sherman Oaks Chamber  
South Bay Association of Chambers  
South Bay Association of Realtors  
South Gate Chamber of Commerce  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grantmakers  
Southern California Leadership Council  
Southern California Minority Suppliers Development Council Inc.  
Southern California Water Coalition  
Southland Regional Association of Realtors  
Sunland/Tujunga Chamber  
Sunset Strip Business Improvement District  
Torrance Area Chamber  
Town Hall Los Angeles  
Tri-Counties Association of Realtors  
United Cannabis Business Association  
United Chambers - San Fernando Valley & Region  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
US Green Building Council  
US Resiliency Council  
Valley Economic Alliance, The  
Valley Industry & Commerce Association  
Vermont Slauson Economic Development Corporation  
Vernon Chamber  
Veterans in Business Network  
Vietnamese American Chamber  
Warner Center Association  
West Hollywood Chamber  
West Hollywood Design District  
West Los Angeles Chamber  
West San Gabriel Valley Association of Realtors  
West Valley/Warner Center Chamber  
Western Electrical Contractors Association  
Western Manufactured Housing Association  
Western States Petroleum Association  
Westside Council of Chambers  
Whittier Chamber of Commerce  
Wilmington Chamber  
World Trade Center