



LISA A. BARTLETT

ORANGE COUNTY BOARD OF SUPERVISORS
SUPERVISOR, FIFTH DISTRICT

ORANGE COUNTY HALL OF ADMINISTRATION
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November 12, 2021

Ms. Liane Randolph
Chair, California Air Resources Board
1001 I St
P.O. Box 2815
Sacramento, CA 95812

RE: Proposed Amendments to Airborne Toxic Control Measure for Commercial Harbor Craft

Dear Chairwoman Randolph,

I write to voice concerns over the proposed amendments to the Airborne Toxic Control Measure for Commercial Harbor Craft (CHC Regulations) and its impact on the commercial passenger fishing industry.

As an elected official representing several coastal cities in South Orange County, I serve on many regional boards and commissions, including those that manage and oversee regional transportation and regional air quality. I am no stranger to the challenges we, as Californians, face as we endeavor to reach and exceed state and federal air quality standards and enhance our quality of life. While I support the overarching goals of the proposed regulation, I have serious concerns about the potential implementation and negative impacts of the proposed regulation on a subset of the industry.

The commercial passenger fishing industry, often referred to as sportfishing, plays a critical role in the economic engines of our coastal communities. Prior to the COVID-19 pandemic, the Sportfishing Association of California reported that recreational fishing contributed approximately \$5.6 billion in economic activity and supports nearly 40,000 jobs. More than 500,000 individuals take to the waters for recreational fishing; their activity sparks, spurs, and supports our marinas, coastal communities, and other small businesses.

A common concern from those in the sportfishing industry, is that the CHC Regulations, as proposed, are impractical or impossible to meet with their current vessels. The retrofit of current sportfishing vessels to Tier 3 or Tier 4 engines and the necessary diesel particulate filters will take up additional space in the vessel, weigh more than the engines they are replacing, likely require framework modifications, and create potential vessel instability. Most concerning of all, is the comments received regarding the potential adverse impact this rule may have on the safety

and stability of vessels. Ultimately, even with potential compliance deadline extensions, owners would be required to replace their vessels to meet compliance which, is a significant economic burden and can have devastating impacts on this industry.

I share in CARB's desire to reduce diesel particulate matter and NOx emissions, however, the adverse effect on the sport fishing community is of great concern. I appreciate the opportunity to comment on the amendments to the CHC Regulations and voice my strong concerns. Should you have any questions, please do not hesitate to reach out to me at (714) 834-3550.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa A. Bartlett". The signature is fluid and cursive, with the first name "Lisa" being the most prominent.

Lisa A. Bartlett
Supervisor, Fifth District