ATTN: Ms. Liane Randolph,

Chair California Air Resources Board,

I would very much like to briefly address severe concerns with the proposed amendments to CHC regulations on behalf of Relentless Charters, our employees, our customers, my family, and all that have supported us in our seven year existence.

I am an independently owned small business operating out of picturesque San Diego, encompassing operations from commercial sportfishing, whale watching, bird watching, floating classroom education, and marine research. We specialize in commercial sportfishing off the coast of Southern California and Northern Baja. I have worked in industry since graduating high school in 2005, became a licensed 100T Master (United States Coast Guard licensed Captain) in 2007, started running boats in 2009, and very proudly entered vessel ownership in 2015. I have spent 16 years invested in the maritime community here in Southern California and owe everything I have ever done professionally to the opportunities we are so fortunate to have available here in California through our access to the Pacific Ocean. It has been an extremely challenging, yet invigorating journey thus far. The support from family, friends, neighbors, customers, and many more have been beyond humbling. The vessel Relentless is a 57’x19’ plywood/fiberglass USCG inspected passenger carrying vessel. We are currently capable of sleeping up to 21 passengers, in addition to 5 crew, and operate on trips from a few hours to 3 days. We have carried local school groups out to experience the beauty and mystique of the Pacific for the first time, we have had trips of family meeting each other from all across the nation, we have laid our nations best to rest. The diversity of the business and our client base is absolutely awe inspiring. We have celebrated the elation of a father and son catching a fish together for the first time, and we have piously celebrated the last birthday of a terminally ill passengers with his brothers and friends. It is again humbling, intimidatingly so, to look back at 7 years of trips and to think that our existence on the Relentless has made a difference. From the local high school fishing club to out of state business and tourist events, we are proudly a viable part of the San Diego waterfront economy and look forward to continuing to be. To say that our survival has been guaranteed is a gross misconception. We are still in recovery from the fallout from the Covid-19 pandemic, as are most all small business, economic hardship, rising fuel and overhead costs, inflation, these are all current concerns to all. However, nothing means our imminent demise as does the proposed Commercial Harbor Craft regulations.

We have a wonderful working relationship with the United States Coast Guard, both locally and in Washington. As an inspected vessel we are exactly that, inspected thoroughly bi-annually by the USCG. Under the proposed amendments to CHC, there is no possible way to remain an inspected passenger carrying vessel and maintain compliance with CHC regulations. USCG at both the local and national level has concerns with both stability and heat generation of required machinery under the proposed regulations. We certainly share the same interest with CARB for protecting the vitality of our coastal and offshore waters. Without such a biodiverse aquatic ecosystem we have nothing special about our business, however these proposed amendments would put me and my family out of business permanently. We are in the process of attempting to use the Carl Moyer Grant program to upgrade to Tier 3 emission motors. We already applied last year with the San Diego County Air Pollution District and were not funded on our project. We currently are reapplying with the help of Robert Mercado and Heidi Gabriel-Pack to hopefully achieve funding to upgrade to cleaner power for the vessel Relentless. Currently all revenue generated by the business has been allocated to just staying above water. Vessel mortgage, insurance, documentation/permit fees, and vessel maintenance are all critical to our operations and have allowed no funding available for out-of-pocket machinery upgrades. Without the ability for the vessel to operate as an inspected passenger carrying vessel in California, it unfortunately has very little value. I would lose virtually everything, not from a failed economy, not from a lack of business, not from failed fiscal practices, not from Covid-19, but from an inability to remain compliant with CARB.

We absolutely need support from the board in staying afloat. We are registered with both the National Oceanic and Atmospheric Administration as well as California Fish & Wildlife as a commercial fishing vessel. We fill out commercial take logbooks for CA F&W, and are recognized by state and federal agencies as a commercial vessel with commercial registration numbers. As a fleet we have done upgraded our fleet to newer and cleaner marine power than much of the commercial fleet. Why are we not allowed within the same exemptions and considerations? Without such understanding and continued cooperation between CARB and the CFPV fleet, then unfortunately I am one of many whose business is likely to fail or leave California. My employees will join the ranks of unemployed. The contractors and businesses that support us (i.e. boatyards, mechanics, electricians, wholesalers, fish processors, hotels, restaurants, etc.) will all suffer. I vehement hope there is an alternate course we can take.

Sincerely,

Michael Franchak

Relentless Charters

619-818-5664