



R. E. STAITE ENGINEERING INC.

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November 19, 2021

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Attn: Ms. Liane Randolph, Chair, California Air Resources Board

RE: Public Hearing Comments For Incorporation Into Public Record

Subject: Proposed Amendments to the Regulation to Reduce Emissions from Diesel Engines on Commercial Harbor Craft Operated within California Waters and 24 Nautical Miles of the California Baseline

Dear Chairperson Randolph and Board Members:

My name is Ray Carpenter, and I would like to submit these written comments in-lieu of live public comments today. I would like my comments incorporated into the public record.

I am the President of R.E. Staite Engineering, Inc., a heavy marine construction and dredging company headquartered in San Diego. My company is a small family business that has been in operation over 80 years, since 1938. My company has tug boats, dredges, work boats and barges that will all be impacted by the CHC Proposed Amendments. This equipment is integral in the performance of new construction, repair and maintenance of essential marine infrastructure for governmental agencies, ports, cities and private entities along the west coast.

Governor Newsom's Executive Order N-79-20 directed CARB and other State agencies to transition off-road vehicles and equipment to 100 percent zero-emission by 2035 where feasible and cost effective. **The CHC Proposed Amendments are not feasible, nor cost effective as required by the Governor's Executive Order.** R.E. Staite requests that the Board deny the CHC Proposed Amendments; if not deny, then suspend the rulemaking and direct Staff to work with the maritime industry to develop reasonable, workable regulations that take into consideration how harbor craft are used in the real world.

Our company has gone out of its way to share company information and suggest solutions that will make a difference. **As a small business, we do not feel heard or understood.** We are extremely disappointed to see that our company data was incorporated into the Standardized Regulatory Impact Assessment (SRIA), but that none of our concerns about safety, practicality, cost or feasibility have been addressed. We would like to make it clear that our company has invested millions of dollars since 2009 in up-tiering our equipment to Tiers 2 and 3 and 4 levels. The goal posts keep moving, guaranteeing that small business can't keep up with each new and different requirement imposed by CARB.

Proposed Amendments to the Regulation to Reduce Emissions
from Diesel Engines on Commercial Harbor Craft Operated within
California Waters and 24 Nautical Miles of the California Baseline

I submitted a letter dated November 15, 2021 that provides information regarding my company and outlines my specific concerns and suggested solutions. The CHC Proposed Amendments are not a workable roadmap for my company or other small family businesses in California. It is almost certain that my company will go out of business if the Amendments, as proposed, are adopted. Thousands of jobs will be lost when you take into consideration our company and the other small businesses affected by the Amendments.

We need workable regulations that take our specific harbor craft, work activities and vessel limitations into consideration. The Board needs to recognize how much time it takes to go from one industrial energy source to another. We need a workable timeline for implementation and enough funding to assist with compliance so that R.E. Staite Engineering, Inc., and others in the maritime industry, can continue to contribute to the California economy.

Thank you for your consideration.

R.E. STAITE ENGINEERING, INC.



R.A. Carpenter
President