



June 3, 2022

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

SUBJECT: Comments Regarding the 15-Day Amended Commercial Harbor Craft (CHC) Regulation

To Whom It May Concern:

Thank you for the opportunity to share my concerns regarding the Proposed 15-Day Modifications to the Proposed Regulation Order.

CARB's proposed rules:

1. Ignore the effects on existing long-run ferries which cannot be feasibly modified to meet Tier IV
2. As written, the rulemaking risks bankrupting the private ferry operator serving Santa Catalina Island thereby stranding their customers who are reliant on such ferries for daily transportation and risks doing permanent harm to Catalina Island's tourist dependent economy
3. The rules, as written, offer no solution or alternative that would mitigate the economic impact on Catalina Express, a long run private ferry operator, which is now compelled to face the dual dilemma of:
 - a. Expending limited private resources to build Tier IV vessels which would otherwise be utilized to achieve eventual transition to a ZE option;
 - b. No ZE tech option is yet available to long run ferries
4. Notwithstanding, CARB staffer's and CARB Board members clear encouragement that funding resources are available to CCE, search of available funding resources reveals there are no state programs with funds available to assist CCE in building a new Tier IV ferry.
5. With some state assistance, CCE is prepared to build a new Tier IV vessel which would accommodate 500 passengers, and, in exchange, it would be prepared to retire 2 of its other vessels. We need assistance in identifying a state resource which can help with grant funding toward the financing of that new vessel. The cost of doing so cannot be made a burden on our passengers (i.e. through significant increases in ticket prices). We are privately operated under the authority of the California Public Utilities Commission and do not enjoy government subsidies like many of the public ferry operators in the Bay Area. We have worked hard for 40 years to keep our fares within the economic reach of our Island commuters and visitors.

Regards,

Greg Bombard
President, Catalina Express