



October 25, 2022

Clerks' Office, California Air Resources Board
1001 I Street, Sacramento, California 95814
Electronic submittal: <https://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Proposed Amendments to the Commercial Harbor Craft Regulation

On behalf of the Sportfishing Association of California (SAC), the Golden Gate Fishermen's Association (GGFA), their members that operate Commercial Passenger Fishing Vessels, and their crews and families, we wish to extend our appreciation to the staff at the California Air Resources Board for their continued collaboration on improving the Commercial Harbor Craft rule.

We believe that the modifications made to the data reporting requirements not only fully clarify the types of data to be reported but also simplify the reporting process by aligning with the data already collected by CDFW through mandated electronic logs submitted by each vessel. This alignment will allow reporting entities to utilize the electronic logs transmitted to CDFW if CARB is unable to obtain the data directly.

SAC and GGFA strongly support the collaboration between CARB and CDFW to upgrade the current electronic logs and share data relevant to CARB's mandate and mission while maintaining data confidentiality. This collaboration will also improve data accuracy and uniformity and will reduce the burden on reporting entities if the data can be transmitted from CDFW directly to CARB.

SAC and GGFA will continue to engage with the Governor, Legislature and CARB to request adequate funding to replace the Carl Moyer Program funding that the fleet relied upon for engine retrofits to reduce emissions. With adequate funding the fleet will continue to aggressively pursue emission reduction projects and allow those vessel operators to engage with CARB staff on reviewing hybrid and zero emission technology for future repowers when feasible.

Sincerely,

A handwritten signature in black ink that reads 'Greg Hurner'. The signature is written in a cursive, flowing style.

Greg Hurner