

MARINA DEL REY®

convention and visitors bureau

September 28, 2021

Ms. Liane Randolph, Chair
Clerks' Office, California Air Resources Board
1001 I (eye) Street
Sacramento, CA 95814

RE: Public Comment – Proposed Amendments to Commercial Harbor Craft Regulation, November 19, 2021, Hearing. (CARB Engine Emission Regulations; Passenger Sportfishing, Whale Watching Boats, and Excursion Vessels).

Dear Madam Chair:

The Marina del Rey Convention and Visitors Bureau stand firmly opposed to the engine emission regulations proposed by the Administration that will decimate recreational fishing's \$5.6 billion annual contribution to our State's economy and undermine the Administration's efforts to restore half of the 1.2 million hospitality and tourism related jobs lost during the COVID-19 pandemic. We are concerned about the California Air Resources Board's (CARB) costly proposal on engine emission regulations because it 1) requires technology that has not been developed or tested safe on passenger harbor crafts and 2) would result in most passenger sportfishing and whale watching boats going out of business within 6 years from the adoption of the proposed regulations due to the cost of vessel replacement. Furthermore, CARB's expectation that these small business owners can easily finance new steel vessels is far-fetched especially if many existing vessels have no resale value in California and are still being financed via loans and these same businesses are focused on pandemic recovery.

Likewise, Excursion Vessels are equally vital to the visitor serving community and have faced huge business and economic challenges resulting from the Covid pandemic. Any new regulations, or further implementation of additional regulations and limitations, such as lowering the low use annual engine hour maximums and implementation of opacity testing should be avoided, or at the very least delayed, for a number of years so that this vital industry can recover.

Marina del Rey is a small tourist destination comprising 400 acres of land that is surrounded by hotels, restaurants and visitor attractions including popular sportfishing, whale watching, and excursion passenger boats—these passenger boat businesses, just like everyone else, are *struggling to recover from the devastating economic losses they experienced during the pandemic*. The sportfishing, whale watching and excursion vessel companies in the Marina and throughout California's coast provide communities a valued source of outdoor recreation and tourism dollars. Every year, boat charters in Marina del Rey are in the business of introducing

thousands of visitors and Angelenos to the magic of the open sea and appreciation for Pacific wildlife. Whale watching and sportfishing are two popular water activities in Marina del Rey, serving everyone from families with young children to multi-generational first-time and seasoned anglers.

While CARB's economic analysis of the proposed regulations most certainly underestimated the economic harm to passenger sportfishing, whale watching, and excursion vessel boat charters, the analysis did not evaluate the economic impact on California's hospitality and tourism industry as boat charters go out of business and visitor spending declines. It is unimaginable that the CARB board would consider the regulations until this oversight is corrected.

We support everyone working together to rebuild the State's post-pandemic economy. We urge you to take a closer look at CARB's irresponsible proposed engine emission regulations and realize that it would do the exact opposite: put passenger sportfishing, whale watching, and excursion boat charters out of business and deny Los Angeles County residents and tourists affordable and convenient access to offshore fishing and marine life excursions.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet Zaldúa", with a long horizontal flourish extending to the right.

Janet Zaldúa
CEO, Marina del Rey Convention and Visitors Bureau

CC: The Honorable Gavin Newsom
State Senator Ben Allen
State Assembly Member Autumn Burke
Los Angeles County Supervisor Janice Hahn