

## Summary of Comments Received During the 15-Day Comment Period and ARB Responses

Commenter: Turtle Island Restoration Network and Friends of the Earth

1. **Comment:** Turtle Island Restoration Network and Friends of the Earth are writing to support the California Air Resources Board (ARB) proposed disapproval of the Alternative Control of Emissions (ACE) plan submitted by Hornblower Cruises and Events for its California Hornblower vessel under the state Commercial Harbor Craft Regulation. (Turtle Island Restoration Network and Friends of the Earth)

**Agency Response:** We agree. We have disapproved the ACE plan.

2. **Comment:** Allowing Hornblower to modify the Moyer agreement after the fact and more than four years after the repower would undermine the intent and implementation of the Carl Moyer diesel emissions reduction program. Therefore, we urge the ARB to disapprove Hornblower's ACE as submitted and not to allow any of the exceptions, explanations or "compromises" that Hornblower proposed in its appeal of ARB's proposal to disapprove the ACE. (Turtle Island Restoration Network and Friends of the Earth)

**Agency Response:** We have disapproved the ACE plan.

3. **Comment:** We would like to bring to your attention several possible omissions in the list of Hornblower's harborcraft fleet. In reviewing Hornblower's vessel fleet and emissions profiles that were submitted to ARB, we noticed that the Hornblower Hybrid and several other commercial harborcraft that the ferry company operates were not listed, particularly those vessels operating on the Alcatraz route. In addition, we request that ARB also seek the emissions profiles and regulatory compliance for the Alcatraz Clipper and Alcatraz Flyer featured on Hornblower's websites that don't seem to appear on the fleet emissions data sheet provided to ARB by Hornblower. (Turtle Island Restoration Network and Friends of the Earth)

**Agency Response:** Vessels not included in the ACE plan are not required to be listed in the plan.

4. **Comment:** We urge the ARB to request that Hornblower, which also operates as Alcatraz Cruises, to provide the exact emissions profile of the Hornblower Hybrid vessel and to explain whether it meets current state Harbor Craft Regulations. See attached fact sheet and press release on the vessel. (Turtle Island Restoration Network and Friends of the Earth)

**Agency Response:** This excursion vessel has Tier 2 engines installed and is therefore compliant with the engine performance requirements of the Commercial Harbor Craft Regulation.

5. **Comment:** Can ARB verify whether in fact Alcatraz Clipper and Alcatraz Flyer are currently “two of the greenest diesel-powered ferry boats” on the Bay? This request is relevant to the state’s commitment to reducing marine engine emissions. An objective analysis by ARB of Hornblower’s marketing claims about “green” ferries would benefit the public and entities that may be contemplating hiring or chartering ferry vessels on San Francisco Bay. (Turtle Island Restoration Network and Friends of the Earth)

**Agency Response:** ARB does not verify marketing claims.