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Ms. Liane Randolph, Chair
c/o Harborcraft
California Air Resources Board
1001 I (eye) Street
Sacramento, CA 95814

RE: Proposed CARB Engine Emission Regulations; Sportfishing/Whale Watching Vessels

Dear Madam Chair,

On behalf of the San Diego Regional Chamber of Commerce (Chamber), whose mission is to make San Diego the best place to do business in California, I write to you to express our grave concern regarding 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.

The Chamber represents almost 2,500 businesses in the region, translating to approximately 300,000 jobs. As you well know, sportfishing and whale watching boats provide coastal communities a valued source of outdoor recreation and tourism dollars. Their boat owners are in the business of introducing millions of Americans a year to the splendor of the open sea and its wildlife.

However, before these boat owners can recover from financial losses associated with the pandemic, the California Air Resources Board (CARB) has proposed costly engine emission regulations that require technology that has not been developed or tested safe on passenger harbor crafts. Similar technology used on trucks and farm equipment has been known to stall engines for hours at a time to clean emission control systems, and in worst case scenarios, catch fire. On land, a stalled engine or fire is a serious economic disruption; at sea, it is life threatening to both passengers and crew.

CARB readily admits the proposed regulations are not compatible with some vessels, specifically stating that "vessel replacement will be likely, especially the categories with wood or fiberglass vessels." When more than 80 percent of vessels are constructed with these

materials, industry leaders have reasonably concluded that many, if not most, boat owners will go out of business within 6 years from the adoption of the proposed regulations due to the cost of vessel replacement.

Moreover, CARB's expectation that these small business owners can easily finance new steel vessels is simply unrealistic. Even during the best of economic times, no business can lose its most valuable asset long before the end of its useful life and have to completely replace that asset within six years, especially if their existing vessels, many of which are still being financed via loans, are deemed illegal and have no resale value in California.

We share your desire to reduce engine emissions, as do the boat owners that have been repowering and upgrading their engines for years. The Administration should consider amending the draft regulations to incentivize passenger sportfishing and whale watching boat owners to continue to upgrade their vessels to lower emission engines, using available technology that is feasible and does not create safety concerns. This is the reasonable approach CARB applied to commercial fishing vessels, vessels with engines that are technically identical to the sportfishing boats.

The Governor has repeatedly underscored the importance of recreational fishing. It is a great form of outdoor recreation that is experiencing newfound growth among nontraditional participants that are younger, more urban, and more diverse with significant gains among women, African Americans, and Hispanics.

Now more than ever, rebuilding the State's post-pandemic economy is dependent on continuing this growth and not undermining it by denying millions of Californians access to offshore fishing and marine life by putting sportfishing companies out of business or making excursions unaffordable for disadvantaged communities and the vast majority of Californians. We understand and respect the spirit of these proposed new regulations, but the letter of them is deeply troubling.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Sanders', with a stylized flourish at the end.

Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce