



March 27, 2023

Ms. Sarah Dunham  
U.S. Environmental Protection Agency  
Docket Center  
WJC West Building, Room 3334  
1301 Constitution Avenue NW  
Washington, DC 20004

RE: California State Nonroad Engine Pollution Control Standards; Ocean-Going Vessels At-Berth and Commercial Harbor Craft; Requests for Authorization; Opportunity for Public Hearing and Comment (Docket ID No. EPA-HQ-OAR-2023-0153)

Dear Ms. Dunham:

We the undersigned respectfully request that the U.S. Environmental Protection Agency (EPA) hold a virtual public hearing to provide the regulated community with the opportunity to present oral testimony to inform EPA's consideration of the California Air Resources Board's (CARB) request for authorization of amendments to its Commercial Harbor Craft (CHC) rule pursuant to section 209(e) of the Clean Air Act (the Act).

Despite our engagement in a multiyear rulemaking process, our organizations remain concerned about the technological feasibility of the CHC rule and its impact on California's harbor craft operators. Due to the technological infeasibility of the CHC rule within the compliance timeline established by CARB, we believe that the standards and accompanying enforcement procedures are not consistent with section 209 of the Act. Further, CARB estimates that 3,000 vessels across the state will be impacted by this rule, at a cost to the industry of \$2 billion. However, these numbers are likely to be an underestimate because they do not account for vessels with homeports outside of California that transit through California waters.

A public hearing will give all affected harbor craft operators and other stakeholders the opportunity to share their concerns about the rule and CARB's authorization request with EPA.

Sincerely,

The American Waterways Operators

The San Diego Working Waterfront

Westar Marine Services

Jacobsen Pilot Services, Inc.

Baydelta Maritime

R.E. Staite Engineering, Inc.

MBC Aquatic Services

San Francisco Bar Pilots

Pacific Maritime Group, Inc.

The Vane Brothers Company

Centerline Logistics

Curtain Maritime

Crowley

Saltchuck Marine