

Questions and Comments
Re
Commercial Fishing & Aquaculture Advocacy
Ventura Port District
Monthly Report - March, 2022

The following questions and comments relate to your March, 2022 Report that is included in the April 20, 2022 Port Commission agenda packet.

Harbor Craft Regulations to Reduce Boat Emissions to Zero by 2035

Your report states that the California Air Resources Board (CARB) voted "...to require boats in the State's ports and marinas to fully transition to zero emissions by 2035 where feasible."

- ◆ What does "feasible" mean?
- ◆ What does "boats in the State's ports and marinas" mean? Will boats registered in other states invoke the *Full Faith and Credit Clause* to undermine this regulation?
- ◆ Without a definition or applicable criteria, a boat owner would have to research this and try to determine applicability. Do you plan to provide information to the District and the boat owners?
- ◆ Inasmuch as your report specified "commercial fishing" as a specific category of boats to be regulated, and Ventura Harbor has been described as the largest commercial fishing port in California, commercial fishing boats won't likely escape this regulation if CARB intends to reach its emissions targets. Does your understanding confirm this assumption? Has CMANC been involved in the development of this regulation?

The compliance schedule specifies that 50 HP engines must comply by 2025, sport fishing and excursion boats must comply by 2030, and commercial fishing boats must comply between 2030 and 2032. Will the District be organizing an effort to inform and assist boat owners about the steps they should take to meet the compliance deadlines?

The *Carl Moyer Memorial Grant Program* administered by the Ventura County Air Pollution Control District has funded replacement and re-powered heavy-duty diesel marine engines in the past but the emissions reductions achieved have always had to be "surplus" to what was required by regulation. In addition, eligible grant funding would be calculated based on cost-effectiveness of the new engine over time. I hope that the Port District has conferred with the Air District to determine upgrades for compliance that might be funded by the Moyer Program.

If the transition to zero emissions is determined to be feasible, boat owners would have to comply. Does the Port District have a plan to achieve zero emissions? I hope that you or someone at the District will clarify the implications of this new regulation to the ongoing operations of the harbor. If the boats don't comply, it would appear that the boats could not operate in California and would have to go elsewhere. If that were to happen, the direct economic impact to Ventura Harbor and the indirect impact of decreased Federal funding for dredging should be significant. This regulation presents the most ominous development on the coastal horizon for many years and I hope that the District has a strategic plan to deal with it

Ocean Innovation Clusters

More information about this would have been very useful, assuming it was available. I hope that future reports will provide more detail for those interested in investing in aquaculture development in the Santa Barbara Channel. Will you be providing follow-up or contacting Senator Murkowski or other co-authors to advocate for Ventura Harbor?

Seafood Inspection Program and Fee-for-Service Model

Information about this would affect an essential element of any project in the Santa Barbara Channel, as well as the work that has been developed by Coastal Marine Biolabs. Will you be providing more information about this? Is Coastal Marine Biolabs involved with you in your advocacy efforts?

Purse Seine Exemptions for Monitoring

- ◆ Details?

Pacific Halibut Fisheries: Catch Sharing Plan 2022 Annual Management Measures

- ◆ What are the measures?
- ◆ What would the percentage reductions be?

2022-2024 Commercial Fishing Restrictions for Pacific Bluefin Tuna in the Eastern Pacific

- ◆ What are the annual limits, compared to prior years?

More information on these topics would be very useful to the commercial fishermen in the harbor and anyone considering investment in aquaculture, so I hope your future reports will expand on what you have provided here.

Aquaculture 2022 in San Diego

I noted that you made a presentation about “Strategies for Efficient Aquaculture Permitting” on March 3. On March 4, a section included speakers on “Aquaculture Opportunity Areas – Updates”. Given the District’s decision last year to advocate for designation of these Areas in the Santa Barbara Channel, I had hoped that your report would include an update for the harbor tenants and general public. Would you provide an update with your April Report?

Topics for “People Who Really Want to Know”

Everyone’s time is valuable and limited, so it would be very helpful if your report included a separate section on topics that have no direct bearing on commercial fishing or aquaculture at Ventura Harbor. These include:

- ◆ South Florida Coastal Waters Act
- ◆ Jobs in the Maine Lobster Industry
- ◆ North Atlantic right whales and legislation to protect them from entanglement, re-outfit commercial fishermen, etc.
- ◆ Atlantic Fisheries Gear Replacement
- ◆ Boating Infrastructure Grants [Not Being Awarded in California]
- ◆ Central Valley Sportfishing
- ◆ Klamath River Sportfishing