

## **Comment 1 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Dennis

Last Name: Miller

Email Address: dfmiller@msn.com

Affiliation:

Subject: comments on ships at berth

Comment:

Ships at berth allowed to operate engines using fossil fuels should be required to switch from such engines to Hydrogen Fuel Cells (HFC) as an energy source. Such HFC when operated have no air emissions. Using renewable Hydrogen, the supplier of Hydrogen will be eligible for financial benefits, which will help lower production cost. The only by-product of operation is water, which can be recycled in the ship's water system. Without air emissions, the air in the Port will be cleaner and there will not be any CO2 emissions that contribute to climate change. In addition, the health and public safety of ship employees, workers supplying the ship with goods and services, guests on the ship, and people working in and near the port will have improved health, which will contribute to lowering medical costs in support of all people who are in or near the ship. HFC's are currently in use in cars, buses, trucks, trains, and in some ships around the world. HFC is an emerging technology that will surpass the use of battery power for all such vehicles, trains, and ships without the problem of toxic battery disposal and the length of time required to recharge batteries. Refueling time for HFC equipment takes less than five minutes for an auto. Larger systems will probably require more time, but still much shorter time than battery recharging. Looking at this issue holistically, such ships should be served by trucks and buses and even fork lifts that use HFC as a source of energy. The sale price of the renewable Hydrogen is about the same as high test gasoline or diesel now used by many vehicles. If questions arise about the practicality or cost of such renewable HFC, I can easily provide supporting data and cost analysis for all points briefly stated above.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-26 12:26:35

No Duplicates.

**Comment 2 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jerilyn

Last Name: Mendoza

Email Address: Non-web submitted comment

Affiliation: Coalition for Clean Air

Subject: FAQs: California Air Resources Board Proposed At-Berth Regulation for Ocean Going Vessels

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/2-ogvatberth2019-VjUBZFc3A34Fcwdj.pdf](http://www.arb.ca.gov/lists/com-attach/2-ogvatberth2019-VjUBZFc3A34Fcwdj.pdf)

Original File Name: cca.pdf

Date and Time Comment Was Submitted: 2019-11-07 14:37:58

No Duplicates.

**Comment 3 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: David

Last Name: Mik

Email Address: mik@PowerEngConstruction.com

Affiliation: Power Engineering Construction Co.

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Please see attached comment letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/3-ogvatberth2019-UzAHYFckAzJQCVc0.pdf](http://www.arb.ca.gov/lists/com-attach/3-ogvatberth2019-UzAHYFckAzJQCVc0.pdf)

Original File Name: CARB Comment Letter\_At Berth Regulations\_11062019.pdf

Date and Time Comment Was Submitted: 2019-11-08 10:06:39

No Duplicates.

**Comment 4 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: David

Last Name: Mik

Email Address: Non-web submitted comment

Affiliation: Power Engineering Construction Co.

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/5-ogvatberth2019-WzYCbVQ+BHkEclUx.pdf](http://www.arb.ca.gov/lists/com-attach/5-ogvatberth2019-WzYCbVQ+BHkEclUx.pdf)

Original File Name: mik.pdf

Date and Time Comment Was Submitted: 2019-11-13 14:06:13

No Duplicates.

## **Comment 5 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jeffrey  
Last Name: Kilbreth  
Email Address: jeffrey.kilbreth@gmail.com  
Affiliation:

Subject: ogvatberth2019  
Comment:

I live in Point Richmond - roughly a half mile from Chevron's wharf where 400 tankers a year idle with their engines on. The amount of PM in Richmond is visibly greater than in say San Francisco. (I've lived in both cities). And I'm sure you know that Richmond has very high asthma and chronic respiratory health problems. Speaking frankly, it is astonishing to me that the State of California has been so unconcerned and passive about reducing PM where it can be easily reduced. Truck PM is a tough regulatory problem requiring long lead times and complex economic changes - marine vehicle PM is far less difficult.

Chevron's Richmond refinery is the biggest on the west coast - if they were forced to put a wet scrubber on their primary cracking unit and hook their tankers up to shore power, Richmond residents would experience a HUGE improvement in quality of life. These 2 things could have and should have been required ten or even twenty years ago. The installation of a wet scrubber might legitimately require 5 years lead time, but it is very difficult to understand why bringing electricity to the wharf should take even five years much less the ten that you are proposing.

From the documents you provided, a few facts stood out to me:

- 1) Tankers generate three times as much PM as container ships!
- 2) Richmond tankers (Chevron) generate more PM and DPM than is generated by the much larger Port of Oakland!
- 3) DPM can be reduced by 70% in Richmond and PM 2.5 by 30% (we need the wet scrubber to increase this number!)

PLEASE, re-draft this rule to implement the requirement to use shore power at Chevron's Richmond wharf within 2 or 3 years. And make sure that any regulation with a slower implementation schedule is fully justified by actual required lead times rather than simply Chevron's preferences.

Thank you for addressing this area of major possible improvement.

Jeff Kilbreth  
Richmond Planning Commission 2015-2016

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-18 12:39:27

No Duplicates.

**Comment 6 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Stephen  
Last Name: Rosenblum  
Email Address: poll@rosenblums.us  
Affiliation:

Subject: New Pollution Control for Oceangoing vessels  
Comment:

I support the goals and methods for this new control measure but object to the long time line of 2025 to include motor transport vessels and 2029 to include oil tankers in the control regime. Please examine what can be done to reduce this time line to the same 2021 date as for container and cruise ships. If it is a purely cost issue this needs to be carefully weighed against the costs of the well known damaging human health effects of delaying impementation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-19 14:17:48

No Duplicates.

## **Comment 7 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: joseph  
Last Name: puleo  
Email Address: joepuleo@hotmail.com  
Affiliation:

Subject: !0 year window to require electric power for docked tankers  
Comment:

The proposed ten year delay in implementing this requirement is unacceptable.

35 percent of Bay Area pollution comes from non motor vehicle mobile sources, primarily bulk carriers . Compare this to 28 percent from on-road motor vehicles.

Accordingly the single largest source of dangerous pollution, diesel particulates , is primarily from bulk carriers, tankers.

I live in Point Richmond where we yearly endure 400 + tankers at the Chevron Long Wharf dock running their diesel engines to generate electricity.

This electricity has a twofold purpose, first to heat the petroleum to increase its viscosity and secondly to run their pumps sending it up to the refinery .

Chevron had the opportunity five years ago to electrify its dock during plant modernization but refused to do so.

The Air Board has the power to, almost overnight, erase this dangerous condition but it is failing to do so.

This ten year delay will add to the communities health dangers with no justification except the convenience of the polluters .

Please require this to be done in at most the next two years.

Yours truly

Joseph Puleo

Attachment:

Original File Name:



Date and Time Comment Was Submitted: 2019-11-19 17:52:22

No Duplicates.

**Comment 8 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Larry  
Last Name: Wilske  
Email Address: Larry@mec.energy  
Affiliation:

Subject: Vessels at berth  
Comment:

Hello,

I've been following this closely and while I'm very impressed with CARB's clean air initiatives so far I'm wondering if you're going to include vessels at anchor as well. As you know in Long Beach, Los Angeles, San Diego, and the bay area numerous vessels are in close proximity to population centers while at anchor waiting a turn at berth, bunkering, or other reasons. While at anchor they run their high polluting auxiliary engines; I would like to inquire if you're going to place the requirements for vessels at berth and at anchor?

I await your response.

Very Respectfully,  
Larry A. Wilske

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-21 11:30:58

No Duplicates.

## **Comment 9 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Clayton  
Last Name: Heard  
Email Address: claytonheard@gmail.com  
Affiliation:

Subject: At-Berth Regulation  
Comment:

Require California ports to reduce air pollution from ocean-going vessels while in dock by implementing the following at-berth requirements.

1. OGV's must turn off auxiliary engines and connect to electrical grid based shore power
2. Use alternative control technology to achieve emission reductions as currently being used in the Port of Long Beach

Implementation should be immediate and without delay. The communities who live adjacent to the Ports deserve clean air and good health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-21 16:39:12

No Duplicates.

**Comment 10 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Health and Medical Support for At-Berth Rule

Comment:

Please see attached health and medical group letter in support of the At-Berth rule.

Attachment: [www.arb.ca.gov/lists/com-attach/11-ogvatberth2019-AmpTMFc3WGdXJQZu.pdf](http://www.arb.ca.gov/lists/com-attach/11-ogvatberth2019-AmpTMFc3WGdXJQZu.pdf)

Original File Name: Health Org Support\_At Berth Rule Letter.pdf

Date and Time Comment Was Submitted: 2019-11-22 13:17:20

No Duplicates.

**Comment 11 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Diana

Last Name: Bohn

Email Address: nicca@igc.org

Affiliation:

Subject: Cut Air pollution from ships

Comment:

Please approve a proposal that would make a big dent in toxic air pollution from ships at Bay Area ports and refineries.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-23 06:58:13

No Duplicates.

**Comment 12 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Justine Buenaflor  
Last Name: obo Jack Broadbent  
Email Address: jbuenaflor@baaqmd.gov  
Affiliation: Bay Area Air Quality Management District

Subject: BAAQMD Comments: Proposed Control Measure for Ocean-Going Vessels At Berth  
Comment:

Hello,

The attached is the Bay Area Air Quality Management District's comments on the Proposed Control Measure for Ocean-Going Vessels At Berth.

Sending the comments on behalf of Jack Broadbent, Executive Officer/APCO.

Sincerely,  
Justine Buenaflor

Attachment: [www.arb.ca.gov/lists/com-attach/13-ogvatberth2019-BmlTMIEUmBSIAFj.pdf](http://www.arb.ca.gov/lists/com-attach/13-ogvatberth2019-BmlTMIEUmBSIAFj.pdf)

Original File Name: ogvatberth2019\_baaqmd.pdf

Date and Time Comment Was Submitted: 2019-11-26 13:43:18

No Duplicates.

**Comment 13 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Zorik  
Last Name: Pirveysian  
Email Address: zpirveysian@aqmd.gov  
Affiliation: South Coast AQMD

Subject: South Coast AQMD Comments on Proposed Control Measure for OGV At Berth  
Comment:

Attached please find South Coast AQMD's comment letter on the Proposed Control Measure for OGVs At Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/14-ogvatberth2019-VCdWP1cjWX4AbgRb.pdf](http://www.arb.ca.gov/lists/com-attach/14-ogvatberth2019-VCdWP1cjWX4AbgRb.pdf)

Original File Name: South Coast AQMD Comments on CARB Proposed At-Berth Regulation 112619.pdf

Date and Time Comment Was Submitted: 2019-11-26 17:29:58

No Duplicates.

**Comment 14 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Joseph

Last Name: Puleo

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment on Shore Power Hearing

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/15-ogvatberth2019-AnJdLIM+BTMAaVB+.pdf](http://www.arb.ca.gov/lists/com-attach/15-ogvatberth2019-AnJdLIM+BTMAaVB+.pdf)

Original File Name: puleo.pdf

Date and Time Comment Was Submitted: 2019-11-30 16:41:19

No Duplicates.



**Comment 15 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Marinell  
Last Name: Daniel  
Email Address: marinellandaniel@gmail.com  
Affiliation: Resident of El Sobrante, CA

Subject: Proposed Control Measure for Ocean-Going Vessels @ Berth  
Comment:

Members,  
I will not be able to attend the meeting, so I am emailing my comments. I am an elderly citizen living in El Sobrante, CA. I have asthma/COPD and do not want to see others suffer from this condition. Children in our area have very high rates of asthma. These proposal will cut some of the particulates in our air, and we need to do all we can to clear our air. I support the staff proposal to extend pollutions control requirements to container and cruise ships and to include oil and chemical tankers ships. Adopting these measures would be a find Holiday gift to our community.  
Regards,  
Marinell Daniel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-02 09:49:55

No Duplicates.

**Comment 16 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jerilyn

Last Name: Lopez Mendoza

Email Address: Jerilyn@ccair.org

Affiliation: Coalition for Clean Air

Subject: Environmental and Environmental Stakeholder Letter for 12-5 Hearing

Comment:

Thank you for the opportunity to comment on the proposed At Berth regulation. Please find joint comments of the Coalition for Clean Air, the Center for Community Action and Environmental Justice, East Yard Communities for Environmental Justice, the Regional Asthma Management and Prevention, NRDC, and Sierra Club California. Please contact me with any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/17-ogvatberth2019-AWddMgdoAjBQOgdY.pdf](http://www.arb.ca.gov/lists/com-attach/17-ogvatberth2019-AWddMgdoAjBQOgdY.pdf)

Original File Name: Final Draft At Berth Comments 12-2-19.pdf

Date and Time Comment Was Submitted: 2019-12-02 12:05:50

No Duplicates.

**Comment 17 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Tracy  
Last Name: Fidell  
Email Address: tfidell@portoakland.com  
Affiliation: Port of Oakland

Subject: Port of Oakland comments on Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Thank you for the opportunity to provide comments on the Proposed Control Measure for Ocean-Going Vessels At Berth. Please see attached letter from the Port of Oakland.

Attachment: [www.arb.ca.gov/lists/com-attach/18-ogvatberth2019-UiJTOgNwVnFWDwZp.pdf](http://www.arb.ca.gov/lists/com-attach/18-ogvatberth2019-UiJTOgNwVnFWDwZp.pdf)

Original File Name: Port of Oakland comments on Proposed At-Berth Amendment 191202.pdf

Date and Time Comment Was Submitted: 2019-12-02 17:18:52

No Duplicates.

**Comment 18 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Ben  
Last Name: Keller  
Email Address: benk@sonic.net  
Affiliation:

Subject: Shore Power for Ocean-going Vessels - Support  
Comment:

Pollution from ocean-going vessels, especially fuel tankers, is particularly harmful to communities located near the Port of Richmond and other port communities. I strongly support the proposal to require such vessels to shut off their engines while docked and instead use cleaner shore-based power, and I urge the Board to implement such requirements on an aggressive timeline.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-02 18:13:04

No Duplicates.

**Comment 19 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Mike

Last Name: Jacob

Email Address: mjacob@pmsaship.com

Affiliation: PMSA, CAPA, CLIA, WSC, WSPA

Subject: Comments regarding Proposed Control Measure for OGV At Berth

Comment:

Please find attached comments of the California Association of Port Authorities, Cruise Line International Association, Pacific Merchant Shipping Association, Western States Petroleum Association, and World Shipping Council regarding the proposed Control Measure for Oceangoing Vessels At Berth, to be considered on the December 5, 2019 Board Meeting.

Attachment: [www.arb.ca.gov/lists/com-attach/20-ogvatberth2019-AGEGdARnWG4FcVIm.pdf](http://www.arb.ca.gov/lists/com-attach/20-ogvatberth2019-AGEGdARnWG4FcVIm.pdf)

Original File Name: AtBerth Coalition Formal comments (CARB)(ISOR)(120219) FINAL.pdf

Date and Time Comment Was Submitted: 2019-12-02 21:55:44

No Duplicates.

**Comment 20 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Dragos  
Last Name: Rauta  
Email Address: dragos.rauta@intertanko.com  
Affiliation: INTERTANKO

Subject: OGV At Berth Regulation INTERTANKO Comments  
Comment:

Please considered the INTERTANKO comments  
Kind regards  
Dragos Rauta  
INTERTANKO  
Technical Director

Attachment: [www.arb.ca.gov/lists/com-attach/21-ogvatberth2019-BWpVNARzAw9SNVMn.pdf](http://www.arb.ca.gov/lists/com-attach/21-ogvatberth2019-BWpVNARzAw9SNVMn.pdf)

Original File Name: OGV At Berth regulation INTERTANKO COMmentsAt Berth.pdf

Date and Time Comment Was Submitted: 2019-12-02 23:29:56

No Duplicates.

**Comment 21 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: John  
Last Name: Kaltenstein  
Email Address: jkaltenstein@foe.org  
Affiliation: Friends of the Earth

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth  
Comment:

Dear ARB,

Comment letter attached.

Thank you,  
John Kaltenstein  
Friends of the Earth

Attachment: [www.arb.ca.gov/lists/com-attach/25-ogvatberth2019-VDJcNVM3V1sHZwRt.pdf](http://www.arb.ca.gov/lists/com-attach/25-ogvatberth2019-VDJcNVM3V1sHZwRt.pdf)

Original File Name: FOE final letter to ARB on new shore power rule - 3 Dec 2019.pdf

Date and Time Comment Was Submitted: 2019-12-03 12:38:06

No Duplicates.

**Comment 22 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation: Western States Petroleum Association

Subject: WSPA Comments on the CARB Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Dear Office of the Clerk:

Please find the attached Western States Petroleum Association (WSPA) comments on the CARB Proposed Control Measure for Ocean-Going Vessels at Berth.

Thank you,

Catherine H. Reheis-Boyd  
President  
Western States Petroleum Association  
1415 L Street, Suite 900, Sacramento, CA 95814  
P 916.498.7752 C 916.835.0450

Attachment: [www.arb.ca.gov/lists/com-attach/27-ogvatberth2019-VSJdKAd2VmQHxgBh.pdf](http://www.arb.ca.gov/lists/com-attach/27-ogvatberth2019-VSJdKAd2VmQHxgBh.pdf)

Original File Name: WSPA At Berth Comment Letter CARB Dec\_3\_2019.pdf

Date and Time Comment Was Submitted: 2019-12-03 16:18:21

No Duplicates.



**Comment 23 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Morgan  
Last Name: Caswell  
Email Address: morgan.caswell@polb.com  
Affiliation:

Subject: POLA/POLB Joint Comment Letter to CARB on the Proposed At Berth Regulation  
Comment:

Please see attached. We are hopeful our letter can still make it into the CARB Board packet.

Attachment: [www.arb.ca.gov/lists/com-attach/28-ogvatberth2019-BnZQOVwxVGYDWgV1.pdf](http://www.arb.ca.gov/lists/com-attach/28-ogvatberth2019-BnZQOVwxVGYDWgV1.pdf)

Original File Name: POLA POLB Executive Director At Berth Rule Comments - FINAL - 12-3-19.pdf

Date and Time Comment Was Submitted: 2019-12-03 16:21:58

No Duplicates.

**Comment 24 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Ken  
Last Name: Fletcher  
Email Address: kfletcher@yti.com  
Affiliation: Yusen Terminals LLC

Subject: Comments regarding Proposed Control Measure for OGV At Berth  
Comment:

Comments attached and submitted to CARB regarding proposed Ocean-Going Vessels At Berth proposed regulation update.

Attachment: [www.arb.ca.gov/lists/com-attach/29-ogvatberth2019-AXhTIFAiUWdVPQZZ.pdf](http://www.arb.ca.gov/lists/com-attach/29-ogvatberth2019-AXhTIFAiUWdVPQZZ.pdf)

Original File Name: Yusen\_Terminals\_Comments.pdf

Date and Time Comment Was Submitted: 2019-12-03 17:13:16

No Duplicates.

**Comment 25 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Fern  
Last Name: Uennatornwarangoon  
Email Address: fernu@edf.org  
Affiliation: Environmental Defense Fund

Subject: Comments on proposed control measure for OGV at berth  
Comment:

Environmental Defense Fund respectfully submits our comments for the above proposed regulation. Please see the attached letter.

Sincerely,  
Fern Uennatornwarangoon  
Air Quality Policy Manager, EDF

Attachment: [www.arb.ca.gov/lists/com-attach/30-ogvatberth2019-Wz5QMgBnAAwDZII9.pdf](http://www.arb.ca.gov/lists/com-attach/30-ogvatberth2019-Wz5QMgBnAAwDZII9.pdf)

Original File Name: EDF comments\_CARB vessels at berth regulation.pdf

Date and Time Comment Was Submitted: 2019-12-03 17:36:48

No Duplicates.

**Comment 26 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jerilyn Lopez  
Last Name: Mendoza  
Email Address: Jerilyn@ccair.org  
Affiliation: Coalition for Clean Air

Subject: REVISED Group Letter of Support for At Berth Regulation  
Comment:

Please see the following REVISED letter than includes the support of the Environmental Health Coalition. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/31-ogvatberth2019-AmNTIVAOAzJXNFMh.pdf](http://www.arb.ca.gov/lists/com-attach/31-ogvatberth2019-AmNTIVAOAzJXNFMh.pdf)

Original File Name: At Berth Reg Final2.pdf

Date and Time Comment Was Submitted: 2019-12-04 11:21:56

No Duplicates.

**Comment 27 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Micah  
Last Name: Mitrosky  
Email Address: mmitrosky@ibew569.org  
Affiliation: IBEW Local 569

Subject: Support at Berth Regulation  
Comment:

Please see attached letter from IBEW Local Union 569 supporting the Control Measure for Ocean-Going Vessels at Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/32-ogvatberth2019-AXhQMgAOAIEXsM0d.pdf](http://www.arb.ca.gov/lists/com-attach/32-ogvatberth2019-AXhQMgAOAIEXsM0d.pdf)

Original File Name: IBEW569 CARB Vessels at Berth SUPPORT 120419.pdf

Date and Time Comment Was Submitted: 2019-12-04 14:05:30

No Duplicates.

**Comment 28 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Roman  
Last Name: Berenshteyn  
Email Address: roman@bayplanningcoalition.org  
Affiliation: Bay Planning Coalition

Subject: Proposed Control Measure For Ocean-Going Vessels At Berth  
Comment:

Good afternoon,

Please find attached Bay Planning Coalition's comment letter on the Proposed Control Measure For Ocean-Going Vessels At Berth.

All the best,

Roman Berenshteyn  
Senior Policy Associate  
Bay Planning Coalition

Attachment: [www.arb.ca.gov/lists/com-attach/33-ogvatberth2019-VTZVMIEiAzIEXQlo.pdf](http://www.arb.ca.gov/lists/com-attach/33-ogvatberth2019-VTZVMIEiAzIEXQlo.pdf)

Original File Name: CARB At Berth Regulation Final.pdf

Date and Time Comment Was Submitted: 2019-12-04 16:45:26

No Duplicates.

## **Comment 29 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Shawn

Last Name: Dolan

Email Address: sdolan50@msn.com

Affiliation:

Subject: Opacity Measurement Ocean Going Vessels at Berth and Anchor

Comment:

In review of the proposed enhanced regulatory vision of Ocean going vessels at berth and anchor. Opacity is clearly the fastest and most efficient means for CARB and other Port enforcement to identify potential non-compliance events. However, the proposed regulation continues to perpetuate the 1970 vintage Method 9, human means to measure opacity using calibrated eyes. Most other states have realized that enforcement of human measured opacity violations has become very difficult do to the variations inherent to human eye sight, e.g. vision is a function of rest, eye pressure, sobriety, and many other factors to include the use of allergy, inflammation, and other medications, such as Erectile enhancement and disfunction medications used widely throughout California.

Due to these reductions in vision consistency, many states have abandon Method 9 as unenforceable, LA DEQ and AZ DEQ as examples.

US EPA has promulgated a Broadly Applicable Alternative Method 082, (Digital Camera Method), which uses common consumer grade digital cameras and computer software to perform stand off Opacity Measurements, create validated error free Visible Emission Observations, bringing credibility back to the stand off measurement of Opacity from Stationary, Mobile and Fugitive Sources. In fact the FerroAlloy NESHAP at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2010-0895-0280> defines the Digital Camera Method USEPA Broadly Applicable Alternative Method 082 and its supporting ASTM D7520-16 standard as the Best Available Technology for the measurement and analysis of process fugitive emissions, (roof vents) and source opacity.

Suggest that CARB insure the Best Available Technology for the measurement of Opacity NOT be excluded from the community and enforcement tool box, by specifically calling out the Legacy Method 9 and thus effectively eliminating the ability to use the best measurement technology.

The Digital Camera Method, preserves pictorial evidence of the opacity event, verifies method procedural compliance, e.g. sun behind the camera, perpendicular to plume travel and a reading every 15 seconds for the observation period, (normally 6 minutes).

Why would the most progressive Air Pollution control agency in world use out dated methods, that drive absorbent litigation cost, do to the reliance entirely on human honesty.

The Digital Camera Method is commercially available today, it has been reviewed and validated to be as accurate and more consistent and repeatable than Method 9 by the CARB smoke school program. 2011-2013, and recognized by CAPCOA as the Best Available Opacity Measurement capability.

Thank you, I hope CARB finds the wisdom in including the Best Available Technology for Stand off Opacity measurement, (The Digital Camera Method, ASTM D7520-16 and/or US EPA Broadly Applicable Alternative Method 82). Most all citizens carry cell phones with cameras these days and the ability to find and measure opacity sources is as simple as snapping a picture and uploading it to a cloud based platform for results. All 617 identified communities could benefit from a simple to use and operate, not training required means to measure opacity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-05 07:19:04

No Duplicates.



## **Comment 30 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Shawn

Last Name: Dolan

Email Address: sdolan50@msn.com

Affiliation:

Subject: Opacity Measurement Ocean Going Vessels at Berth and Anchor

Comment:

In review of the proposed enhanced regulatory vision of Ocean going vessels at berth and anchor. Opacity is clearly the fastest and most efficient means for CARB and other Port enforcement to identify potential non-compliance events. However, the proposed regulation continues to perpetuate the 1970 vintage Method 9, human means to measure opacity using calibrated eyes. Most other states have realized that enforcement of human measured opacity violations has become very difficult do to the variations inherent to human eye sight, e.g. vision is a function of rest, eye pressure, sobriety, and many other factors to include the use of allergy, inflammation, and other medications, such as Erectile enhancement and disfunction medications used widely throughout California.

Due to these reductions in vision consistency, many states have abandon Method 9 as unenforceable, LA DEQ and AZ DEQ as examples.

US EPA has promulgated a Broadly Applicable Alternative Method 082, (Digital Camera Method), which uses common consumer grade digital cameras and computer software to perform stand off Opacity Measurements, create validated error free Visible Emission Observations, bringing credibility back to the stand off measurement of Opacity from Stationary, Mobile and Fugitive Sources. In fact the FerroAlloy NESHAP at <https://www.regulations.gov/document?D=EPA-HQ-OAR-2010-0895-0280> defines the Digital Camera Method USEPA Broadly Applicable Alternative Method 082 and its supporting ASTM D7520-16 standard as the Best Available Technology for the measurement and analysis of process fugitive emissions, (roof vents) and source opacity.

Suggest that CARB insure the Best Available Technology for the measurement of Opacity NOT be excluded from the community and enforcement tool box, by specifically calling out the Legacy Method 9 and thus effectively eliminating the ability to use the best measurement technology.

The Digital Camera Method, preserves pictorial evidence of the opacity event, verifies method procedural compliance, e.g. sun behind the camera, perpendicular to plume travel and a reading every 15 seconds for the observation period, (normally 6 minutes).

Why would the most progressive Air Pollution control agency in world use out dated methods, that drive absorbent litigation cost, do to the reliance entirely on human honesty.

The Digital Camera Method is commercially available today, it has been reviewed and validated to be as accurate and more consistent and repeatable than Method 9 by the CARB smoke school program. 2011-2013, and recognized by CAPCOA as the Best Available Opacity Measurement capability.

Thank you, I hope CARB finds the wisdom in including the Best Available Technology for Stand off Opacity measurement, (The Digital Camera Method, ASTM D7520-16 and/or US EPA Broadly Applicable Alternative Method 82). Most all citizens carry cell phones with cameras these days and the ability to find and measure opacity sources is as simple as snapping a picture and uploading it to a cloud based platform for results. All 617 identified communities could benefit from a simple to use and operate, not training required means to measure opacity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-05 07:19:04

No Duplicates.

**Comment 31 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Scott

Last Name: Jones

Email Address: scott.jones@gensteam.com

Affiliation:

Subject: Proposed Regulations Order, Title 17, 93130-93130.20 CCR

Comment:

Please See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/36-ogvatberth2019-BnVRNFw8WWQHMwMz.pdf](http://www.arb.ca.gov/lists/com-attach/36-ogvatberth2019-BnVRNFw8WWQHMwMz.pdf)

Original File Name: scan20191204143610.pdf

Date and Time Comment Was Submitted: 2019-12-05 10:56:32

No Duplicates.

**Comment 32 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Ruben

Last Name: Garcia

Email Address: rubeng@aegtechnology.com

Affiliation: Advanced Environmental Group

Subject: ogvatberth2019

Comment:

Please see the attached file for your review.

Attachment: [www.arb.ca.gov/lists/com-attach/37-ogvatberth2019-VTsWPFNwWRRMm0d.pdf](http://www.arb.ca.gov/lists/com-attach/37-ogvatberth2019-VTsWPFNwWRRMm0d.pdf)

Original File Name: garcia.pdf

Date and Time Comment Was Submitted: 2019-12-05 11:09:40

No Duplicates.

**Comment 33 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Debi  
Last Name: Clifford  
Email Address: debicliff@gmail.com  
Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/38-ogvatberth2019-UjFRO1I6AjcFZVc4.pdf](http://www.arb.ca.gov/lists/com-attach/38-ogvatberth2019-UjFRO1I6AjcFZVc4.pdf)

Original File Name: clifford.pdf

Date and Time Comment Was Submitted: 2019-12-06 08:03:11

No Duplicates.

**Comment 34 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: David

Last Name: Belden

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/40-ogvatberth2019-AWMAY1M+BzBXNANt.pdf](http://www.arb.ca.gov/lists/com-attach/40-ogvatberth2019-AWMAY1M+BzBXNANt.pdf)

Original File Name: belden.pdf

Date and Time Comment Was Submitted: 2019-12-06 08:04:39

No Duplicates.

**Comment 35 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Simon  
Last Name: Brown  
Email Address: sbrown@pacificbasin.com  
Affiliation: Pacific Basin Shipping

Subject: Proposed Regulations Order, Title 17, 93130-93130.20 CCR  
Comment:

Please find attached letter with comments on behalf of Pacific Basin Shipping.

Attachment: [www.arb.ca.gov/lists/com-attach/41-ogvatberth2019-ViUAZVAwAj8CNAk5.pdf](http://www.arb.ca.gov/lists/com-attach/41-ogvatberth2019-ViUAZVAwAj8CNAk5.pdf)

Original File Name: scan0008.pdf

Date and Time Comment Was Submitted: 2019-12-06 09:44:14

No Duplicates.

**Comment 36 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Art

Last Name: Mead

Email Address: Art.Mead@crowley.com

Affiliation:

Subject: Crowley Maritime Corporation Comments on At-Berth Rule

Comment:

Attached please find Crowley Maritime Corporation's comments on the Proposed Control Measure for Ocean Going Vessels at Berth (At-Berth Rule).

Attachment: [www.arb.ca.gov/lists/com-attach/42-ogvatberth2019-UWNWYF1tUDoCNVRm.pdf](http://www.arb.ca.gov/lists/com-attach/42-ogvatberth2019-UWNWYF1tUDoCNVRm.pdf)

Original File Name: 20191206CARB At-Berth Rule Comments.pdf

Date and Time Comment Was Submitted: 2019-12-06 11:33:58

No Duplicates.



**Comment 37 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Matthew  
Last Name: Sullivan  
Email Address: matthew.sullivan@ssamarine.com  
Affiliation: SSA Marine

Subject: At-Berth Comment Letter  
Comment:

Attached is SSA Marine's comment letter regarding the proposed At-Berth Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/45-ogvatberth2019-B2FXOFY5WGoCaFIN.pdf](http://www.arb.ca.gov/lists/com-attach/45-ogvatberth2019-B2FXOFY5WGoCaFIN.pdf)

Original File Name: Final ISOR Comment Letter.pdf

Date and Time Comment Was Submitted: 2019-12-06 16:50:08

No Duplicates.

**Comment 38 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Art

Last Name: Mead

Email Address: Art.Mead@crowley.com

Affiliation:

Subject: Proposed Control Measure for Ocean Going Vessels at Berth

Comment:

Crowley Maritime Corporation comments on Proposed Control Measure for Ocean Going Vessels at Berth, as signed.

Attachment: [www.arb.ca.gov/lists/com-attach/46-ogvatberth2019-BmVXMFAjUmMCWwhp.pdf](http://www.arb.ca.gov/lists/com-attach/46-ogvatberth2019-BmVXMFAjUmMCWwhp.pdf)

Original File Name: CARB At-Berth Rule - Comments to ARB (12-06-2019).pdf.pdf

Date and Time Comment Was Submitted: 2019-12-06 21:33:01

No Duplicates.

**Comment 39 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Judith

Last Name: Schumacher-Jennings

Email Address: sjmadrone@sonic.net

Affiliation:

Subject: Added Pollution Control for Ships in Bay

Comment:

I am in favor of the CARB staff proposed rule that would extend pollution-control requirements to more container and cruise ships and include oil and chemical tankers and ships used to import and export cars. I'm concerned about air quality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-09 07:33:11

No Duplicates.

**Comment 40 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Diana

Last Name: Bohn

Email Address: nicca@igc.org

Affiliation:

Subject: Cut pollution at ports and refineries!

Comment:

Please cut Pollution from Ships at Ports, Refineries.

I Support CARB staff's proposed a rule to extend its pollution-control requirements to many more container and cruise ships and, for the first time, PLEASE! include oil and chemical tankers and ships used to import and export cars.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-09 08:47:53

No Duplicates.

**Comment 41 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Sande  
Last Name: George  
Email Address: sgeorge@stefangeorge.com  
Affiliation: CLIA

Subject: CLIA Comments on Proposed Control Measure for Ocean-Going Vessels at Berth  
Comment:

Attached are the comments from the Cruise Lines International Association (CLIA) on the Proposed Control Measure for Ocean-Going Vessels. If you have any questions, please contact me at the information above. Sande George

Attachment: [www.arb.ca.gov/lists/com-attach/49-ogvatberth2019-VzZVJwNdV2ZWNQI7.pdf](http://www.arb.ca.gov/lists/com-attach/49-ogvatberth2019-VzZVJwNdV2ZWNQI7.pdf)

Original File Name: At Berth CLIA FINAL Comments 12 9 19 (db).pdf

Date and Time Comment Was Submitted: 2019-12-09 09:03:15

No Duplicates.

**Comment 42 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Lawrence

Last Name: Sullivan

Email Address: Lawrencebsullivan@gmail.com

Affiliation: Contra Costa County retiree

Subject: Amend regulations for shipping

Comment:

As a retiree of the Contra Costa County probation department I experienced it firsthand for many years the air pollution created by inadequate controls and regulation of local refineries and the shipping they use. The proposed changes would greatly reduce air pollution for hundreds of thousands of residents in these areas. I fully support the proposed changes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-09 10:25:57

No Duplicates.

**Comment 43 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Public Comments In Conditional Support  
Comment:

The Coalition For a Safe Environment submits our public comments in support of the proposed Control Measure for Ocean-Going Vessels at Berth.

In our public comments we request specific changes and provide technical and legal justification for these requested changes.

See our attached detailed presentation and public comments.

Attachment: [www.arb.ca.gov/lists/com-attach/51-ogvatberth2019-AmEGZgZmBSUHZAjd.pdf](http://www.arb.ca.gov/lists/com-attach/51-ogvatberth2019-AmEGZgZmBSUHZAjd.pdf)

Original File Name: CFASE Public Comments - CARB Control Measure for Ocean-Going Vessels At Berth - V2 12-9-2019 PDF.pdf

Date and Time Comment Was Submitted: 2019-12-09 10:28:58

No Duplicates.

**Comment 44 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Bill  
Last Name: Carson  
Email Address: bill.carson@lbct.com  
Affiliation:

Subject: Comments for Proposed OGV at Berth Regulations  
Comment:

Attached are comments by LBCT.  
Very respectfully.

Attachment: [www.arb.ca.gov/lists/com-attach/52-ogvatberth2019-VzRSNQNwAjMKUwVp.pdf](http://www.arb.ca.gov/lists/com-attach/52-ogvatberth2019-VzRSNQNwAjMKUwVp.pdf)

Original File Name: CARB LBCT Comments Letter 12.9.19.pdf

Date and Time Comment Was Submitted: 2019-12-09 12:12:07

No Duplicates.



**Comment 45 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Douglas  
Last Name: Schneider  
Email Address: dschneider@worldshipping.org  
Affiliation: World Shipping Council

Subject: World Shipping Council Comments  
Comment:

Please see the attached comments of the World Shipping Council on CARB's proposed control measure for ocean-going vessels at berth.

Attachment: [www.arb.ca.gov/lists/com-attach/53-ogvatberth2019-USYBaABzBDtSMFMM.pdf](http://www.arb.ca.gov/lists/com-attach/53-ogvatberth2019-USYBaABzBDtSMFMM.pdf)

Original File Name: World Shipping Council Comments on CARB 2019 Proposed Regulation Order.pdf

Date and Time Comment Was Submitted: 2019-12-09 12:26:13

No Duplicates.

**Comment 46 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Lee  
Last Name: Kindberg  
Email Address: lee.kindberg@maersk.com  
Affiliation: Maersk

Subject: Comments on CARB At-berth ISOR  
Comment:

Attached are our comments on the ISOR and proposed regulatory language for the replacement At-berth rule.

Attachment: [www.arb.ca.gov/lists/com-attach/54-ogvatberth2019-WjcCZQFIVHVWIwRv.pdf](http://www.arb.ca.gov/lists/com-attach/54-ogvatberth2019-WjcCZQFIVHVWIwRv.pdf)

Original File Name: Maersk comments on CARB At-berth ISOR 12-6-2019 - Final.pdf

Date and Time Comment Was Submitted: 2019-12-09 13:08:14

No Duplicates.

**Comment 47 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Kathy

Last Name: Metcalf

Email Address: [kmetcalf@knowships.org](mailto:kmetcalf@knowships.org)

Affiliation: Chamber of Shipping of America

Subject: Chamber of Shipping of America Comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/55-ogvatberth2019-VzpTMARxV2cGYQll.docx](http://www.arb.ca.gov/lists/com-attach/55-ogvatberth2019-VzpTMARxV2cGYQll.docx)

Original File Name: metcalf.docx

Date and Time Comment Was Submitted: 2019-12-09 14:14:34

No Duplicates.

**Comment 48 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: David

Last Name: Yow

Email Address: dyow@portofsandiego.org

Affiliation:

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/56-ogvatberth2019-AW1cPwF0V3ADYAFz.pdf](http://www.arb.ca.gov/lists/com-attach/56-ogvatberth2019-AW1cPwF0V3ADYAFz.pdf)

Original File Name: Letter\_At Berth\_Comment\_191209.pdf

Date and Time Comment Was Submitted: 2019-12-09 14:50:16

No Duplicates.

**Comment 49 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Janice

Last Name: Cecil

Email Address: jancecil8@gmail.com

Affiliation:

Subject: I support proposal for more pollution control for oil/chemical tankers

Comment:

I support Support CARB staff's proposed rule to extend its pollution-control requirements to many more container and cruise ships and, for the first time, include oil and chemical tankers and ships used to import and export cars.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-09 15:43:33

No Duplicates.

**Comment 50 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Eric  
Last Name: Bayani  
Email Address: eric.bayani@itslb.com  
Affiliation:

Subject: OGV At Berth Proposed Amendment  
Comment:

Dear Angela and CARB team,  
ITS has always supported and been at the forefront of marine terminal emission reductions. ITS has a signed Port Green Lease and continues to comply with the various CARB regulations. However, the proposed OGV At Berth Amendment includes significant changes that, we believe, require additional review and study. ITS would appreciate your responses and clarification on the concerns, questions, comments and recommendations per the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/59-ogvatberth2019-AGkCcFIgWVUEbVQz.pdf](http://www.arb.ca.gov/lists/com-attach/59-ogvatberth2019-AGkCcFIgWVUEbVQz.pdf)

Original File Name: ITS OGV At Berth Amendment Comments\_120919.pdf

Date and Time Comment Was Submitted: 2019-12-09 16:03:47

No Duplicates.

**Comment 51 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Bill  
Last Name: Schopp  
Email Address: bill.schopp@trapac.com  
Affiliation: TraPac, LLC

Subject: Comment regarding the proposed "at berth regulation"  
Comment:

Please see the attached.  
Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/60-ogvatberth2019-USVWIIU1AiEEYwZl.docx](http://www.arb.ca.gov/lists/com-attach/60-ogvatberth2019-USVWIIU1AiEEYwZl.docx)

Original File Name: TraPac Comments to Proposed CARB regulations 4832-8307-9342 v.2  
(003) 4849-1650-9870 v.1.docx

Date and Time Comment Was Submitted: 2019-12-09 16:31:55

No Duplicates.

**Comment 52 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Thomas

Last Name: Jelenic

Email Address: Non-web submitted comment

Affiliation: PMSA

Subject: PMSA Comments on Proposed Control Measure for Ocean Going Vessels at Berth  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/61-ogvatberth2019-B2tQMwZkAAhSyM0d.pdf](http://www.arb.ca.gov/lists/com-attach/61-ogvatberth2019-B2tQMwZkAAhSyM0d.pdf)

Original File Name: jelenic.pdf

Date and Time Comment Was Submitted: 2019-12-09 17:29:26

No Duplicates.



**Comment 53 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Giles

Last Name: Pettifor

Email Address: gpettifor@portofh.org

Affiliation:

Subject: Updated Comment Letter on At Berth Regulation

Comment:

See attached comment letter

Attachment: [www.arb.ca.gov/lists/com-attach/62-ogvatberth2019-AmEGYQd0VWRRCAh.pdf](http://www.arb.ca.gov/lists/com-attach/62-ogvatberth2019-AmEGYQd0VWRRCAh.pdf)

Original File Name: CARB At Berth Update Letter DECEMBER 2019.pdf

Date and Time Comment Was Submitted: 2019-12-09 17:35:03

No Duplicates.

**Comment 54 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Submission of Public Comments Control Measure For Ocean-Going Vessels At Berth  
Revised  
Comment:

Revised to correct an error on page 19.

Attachment: [www.arb.ca.gov/lists/com-attach/63-ogvatberth2019-AWIA YFMzWXkKaVIN.pdf](http://www.arb.ca.gov/lists/com-attach/63-ogvatberth2019-AWIA YFMzWXkKaVIN.pdf)

Original File Name: CFASE Public Comments - CARB Control Measure for Ocean-Going Vessels At Berth - V3 12-9-2019 PDF.pdf

Date and Time Comment Was Submitted: 2019-12-09 18:24:47

No Duplicates.

**Comment 55 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Roger  
Last Name: Strevens  
Email Address: roger.strevens@walleniuswilhelmsen.com  
Affiliation:

Subject: ogvatberth2019  
Comment:

Please respectfully see letter attached

Attachment: [www.arb.ca.gov/lists/com-attach/64-ogvatberth2019-W2lWYAY2UTsHMFVn.pdf](http://www.arb.ca.gov/lists/com-attach/64-ogvatberth2019-W2lWYAY2UTsHMFVn.pdf)

Original File Name: 20191209192123395.pdf

Date and Time Comment Was Submitted: 2019-12-09 19:17:38

No Duplicates.

**Comment 56 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Mishwa

Last Name: Lee

Email Address: mishwalee@gmail.com

Affiliation: Ms.

Subject: New rule to reduce air pollution from ships

Comment:

Thank you to the staff at CARB for proposing a rule to increase control of particulate matter and other air pollutants from more types of ships and tankers. I am a native of the Bay Area, suffer from asthma and have children and grandchildren who have more serious conditions than I. We all deserve clean air and yet suffer from pollution than can be drastically reduced.

I urge members of the CARB to vote for these improved air pollution control requirements to a greater types of ships. Your vote in favor of thee stricter regulation will show us that you truly care about the health of your district residents. Improved health outcomes will diminish public health financial burdens and increase productivity of us workers. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-12-09 20:28:49

No Duplicates.

**Comment 57 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Theral  
Last Name: Golden  
Email Address: THERALTG@MSN.COM  
Affiliation: West Long Beach Ass.

Subject: Proposed Control for Ocean Going Vessels at berth regulation.  
Comment:

If you have question please contact me at the above email address.

Theral Golden

Attachment: [www.arb.ca.gov/lists/com-attach/66-ogvatberth2019-AmNRI1QKU2IBYghp.docx](http://www.arb.ca.gov/lists/com-attach/66-ogvatberth2019-AmNRI1QKU2IBYghp.docx)

Original File Name: at bearth rual.docx

Date and Time Comment Was Submitted: 2019-12-09 22:53:11

No Duplicates.

**Comment 58 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Sean

Last Name: McCaskill

Email Address: Non-web submitted comment

Affiliation: igus Inc.

Subject: Comments on OGV At Berth 2019

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/67-ogvatberth2019-AmNHYgZkA1Bzwm0d.zip](http://www.arb.ca.gov/lists/com-attach/67-ogvatberth2019-AmNHYgZkA1Bzwm0d.zip)

Original File Name: OGVAAtBerth2019.zip

Date and Time Comment Was Submitted: 2019-12-10 08:16:42

No Duplicates.

**Comment 59 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Tyler  
Last Name: Welti  
Email Address: Non-web submitted comment  
Affiliation: CAPA

Subject: Comments on OGV At Berth 2019  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/68-ogvatberth2019-WyxXNFE8ACcAb1N9.pdf](http://www.arb.ca.gov/lists/com-attach/68-ogvatberth2019-WyxXNFE8ACcAb1N9.pdf)

Original File Name: welti.pdf

Date and Time Comment Was Submitted: 2019-12-10 08:42:13

No Duplicates.

**Comment 60 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 45 Day.**

First Name: Morgan

Last Name: Caswell

Email Address: Non-web submitted comment

Affiliation: Port of Long Beach

Subject: Comments on OGV At Berth 2019

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/69-ogvatberth2019-B2gQMww5WVOwem0d.pdf](http://www.arb.ca.gov/lists/com-attach/69-ogvatberth2019-B2gQMww5WVOwem0d.pdf)

Original File Name: Port of Long Beach At-Berth Regulation Comment Letter 12-9-2019.pdf

Date and Time Comment Was Submitted: 2019-12-10 08:53:21

No Duplicates.



**Comment 1 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Mike

Last Name: Jacob

Email Address: Non-web submitted comment

Affiliation: PMSA

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/43-ogvatberth2019-UzkGYVIwADwKbIV7.pdf](http://www.arb.ca.gov/lists/com-attach/43-ogvatberth2019-UzkGYVIwADwKbIV7.pdf)

Original File Name: jacob.pdf

Date and Time Comment Was Submitted: 2019-12-06 11:54:22

No Duplicates.

**Comment 2 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse

Last Name: Marquez

Email Address: Non-web submitted comment

Affiliation: Coalition for a Safe Environment

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/44-ogvatberth2019-Uj9cO1ckUXMLeFM2.pdf](http://www.arb.ca.gov/lists/com-attach/44-ogvatberth2019-Uj9cO1ckUXMLeFM2.pdf)

Original File Name: marquez.pdf

Date and Time Comment Was Submitted: 2019-12-06 11:55:58

No Duplicates.

**Comment 3 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Marvin

Last Name: Pineda

Email Address: marvin@lobby-california.com

Affiliation:

Subject: 06-25-20 ILWU Comment Letter CARB at Bert Regs

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/150-ogvatberth2019-VmYFNvxwB2YCMQIv.pdf](http://www.arb.ca.gov/lists/com-attach/150-ogvatberth2019-VmYFNvxwB2YCMQIv.pdf)

Original File Name: 06-25-20 ILWU (Adams) Comment Letter CARB at Bert Regs\_.pdf

Date and Time Comment Was Submitted: 2020-06-25 08:18:53

No Duplicates.

**Comment 4 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Public Comments  
Comment:

CARB Board:

The Coalition For A Safe Environment and the supporting et al organizations wish to submit our joint public comments on the proposed Control Measure for Ocean-Going Vessels At Berth Amendments.

We do not accept the majority of CARB management and staff recommended Amendments for the reasons that we have described in these written comments. In addition, there are numerous errors and omissions of information that the public has a right to know that we have also described in these public comments.

Please see attachment of all public comments.

Attachment: [www.arb.ca.gov/lists/com-attach/152-ogvatberth2019-BWZVNQRkVnYDYAdY.pdf](http://www.arb.ca.gov/lists/com-attach/152-ogvatberth2019-BWZVNQRkVnYDYAdY.pdf)

Original File Name: CFASE et al CARB At Berth Rule Public Comments 6-25-2020 PDF.pdf

Date and Time Comment Was Submitted: 2020-06-25 08:30:36

No Duplicates.

**Comment 5 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Art

Last Name: Mead

Email Address: art.mead@crowley.com

Affiliation: Crowley Maritime Corporation

Subject: Written Testimony to Informational Update on Control Measure for OGVs Vessels at Berth

Comment:

Attached please find Crowley's written testimony to the Board on the public meeting to hear an informational update on Control Measure for Ocean-Going Vessels at Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/153-ogvatberth2019-UDNRJQZoVHBSOANm.pdf](http://www.arb.ca.gov/lists/com-attach/153-ogvatberth2019-UDNRJQZoVHBSOANm.pdf)

Original File Name: Crowley Written Comments to CARB Meeting Regarding At-Berth Requirements for OGVs.pdf

Date and Time Comment Was Submitted: 2020-06-25 09:15:53

No Duplicates.

## **Comment 6 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Public Comments

Comment:

Coalition For A Safe Environment  
California Kids IAQ  
Community Dreams  
EMERGE  
American Legion Post # 6  
Wilmington Improvement Network  
San Pedro & Peninsula Homeowners Coalition  
NAACP- San Pedro-Wilmington Branch # 1069  
California Communities Against Toxics  
California Safe Schools  
Del Amo Action Committee  
Action Now  
St. Philomena Social Justice Ministry  
Comite Pro Uno  
350 South Bay Los Angeles  
Frack Free LA County  
West Long Beach Association

Public Comments Submission In Opposition To Specific Proposed  
Amendments  
And Requests To Correct And Include Additional Information

CARB Board:

The Coalition For A Safe Environment and the supporting et al organizations wish to submit our joint public comments on the proposed Control Measure for Ocean-Going Vessels At Berth Amendments.

We do not accept the majority of CARB management and staff recommended Amendments for the reasons that we have described in these written comments. In addition, there are numerous errors and omissions of information that the public has a right to know that we have also described in these public comments.

Please see attached written public comments

Attachment: [www.arb.ca.gov/lists/com-attach/154-ogvatberth2019-WjlcPAZmUnIKaQhX.pdf](http://www.arb.ca.gov/lists/com-attach/154-ogvatberth2019-WjlcPAZmUnIKaQhX.pdf)

Original File Name: CFASE et al CARB At Berth Rule Public Comments 6-25-2020 V2  
PDF.pdf

Date and Time Comment Was Submitted: 2020-06-25 09:30:36

No Duplicates.

**Comment 7 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Ellen

Last Name: Sweet

Email Address: w.ellensweet@gmail.com

Affiliation: 350Marin

Subject: ogControl Measure for Ocen-going Vessels At Berth

Comment:

I am representing a community of concerned citizens that work to support air emissions reductions from sources impacting the health and welfare of people living in Bay area. We therefore fully support the Proposed Control Measure for Ocean Going Vessels At Berth.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-06-25 09:46:08

No Duplicates.



**Comment 8 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Submitted Public Comments  
Comment:

Coalition For A Safe Environment  
California Kids IAQ  
Community Dreams  
EMERGE  
American Legion Post # 6  
Wilmington Improvement Network  
San Pedro & Peninsula Homeowners Coalition  
NAACP- San Pedro-Wilmington Branch # 1069  
California Communities Against Toxics  
California Safe Schools  
Del Amo Action Committee  
Action Now  
St. Philomena Social Justice Ministry  
Comite Pro Uno  
350 South Bay Los Angeles  
Frack Free LA County  
West Long Beach Association

Please see attached public comments

V3 Correction of a few errors in previously submitted comments

Respectfully Submitted,

Jesse N. Marquez

Attachment: [www.arb.ca.gov/lists/com-attach/156-ogvatberth2019-UjECYgBgUnIEZwFe.pdf](http://www.arb.ca.gov/lists/com-attach/156-ogvatberth2019-UjECYgBgUnIEZwFe.pdf)

Original File Name: CFASE et al CARB At Berth Rule Public Comments 6-25-2020 V3 PDF.pdf

Date and Time Comment Was Submitted: 2020-06-25 09:48:17

No Duplicates.

**Comment 9 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Ellen

Last Name: Sweet

Email Address: w.ellensweet@gmail.com

Affiliation: 350Marin

Subject: Control Measure for Ocean-going Vessels At Berth

Comment:

Air emissions from vessels at berth in California ports are composed of dangerous quantities of Particulates and Nitrogen Oxides - each day and on an annual basis - that seriously affect the air quality of nearby communities, especially children and other vulnerable residents. The carbon dioxide emissions from vessels at berth significantly contribute to climate impacts and ocean acidification, negatively affecting marine life ecosystems and our commercial aquaculture industry. The organization I represent in these comments FULLY SUPPORTS ARB in finalizing the statewide Proposed Control Measure for Ocean Going Vessels At Berth.

Thank you for acting to protect public health and welfare in our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-06-25 09:46:08

No Duplicates.

**Comment 10 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Tracy  
Last Name: Fidell  
Email Address: tfidell@portoakland.com  
Affiliation: Port of Oakland

Subject: Port of Oakland comments on Proposed At-Berth Regulation  
Comment:

Please see attached 6th comment letter from the Port of Oakland on this proposed at-berth regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/159-ogvatberth2019-USEHbgFyU3RWDwRr.pdf](http://www.arb.ca.gov/lists/com-attach/159-ogvatberth2019-USEHbgFyU3RWDwRr.pdf)

Original File Name: Port of Oakland at-berth comment letter 200625 Final.pdf

Date and Time Comment Was Submitted: 2020-06-25 11:50:46

No Duplicates.

**Comment 11 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Lindy

Last Name: Lavendar

Email Address: lindy@eblcmail.org

Affiliation:

Subject: Informational Update on Control Measure for Ocean-Going Vessels At Berth Comment:  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/160-ogvatberth2019-VTlcM1Y5VmEFegll.pdf](http://www.arb.ca.gov/lists/com-attach/160-ogvatberth2019-VTlcM1Y5VmEFegll.pdf)

Original File Name: lindylavendaratberth.pdf

Date and Time Comment Was Submitted: 2020-06-25 12:01:51

No Duplicates.

**Comment 12 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Adrian

Last Name: Martinez

Email Address: [amartinez@earthjustice.org](mailto:amartinez@earthjustice.org)

Affiliation:

Subject: Agenda Item No. 20-6-4 Control Measure for Ocean

Comment:

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/161-ogvatberth2019-AWAGZANwAzkKbQJs.zip](http://www.arb.ca.gov/lists/com-attach/161-ogvatberth2019-AWAGZANwAzkKbQJs.zip)

Original File Name: [adrianmartinezatberth.zip](#)

Date and Time Comment Was Submitted: 2020-06-25 12:23:53

No Duplicates.

**Comment 13 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Katrinka

Last Name: Ruk

Email Address: kpruk@sbcglobal.net

Affiliation:

Subject: 20-6-4: Public Meeting to Hear an Informational Update on Control Measure for Ocean-Going

Comment:

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/164-ogvatberth2019-VzxVMgYpBy4CbVQk.zip](http://www.arb.ca.gov/lists/com-attach/164-ogvatberth2019-VzxVMgYpBy4CbVQk.zip)

Original File Name: ka.zip

Date and Time Comment Was Submitted: 2020-06-25 13:08:40

No Duplicates.

**Comment 14 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Sonia

Last Name: Sharp

Email Address: nmj4me@gmail.com

Affiliation:

Subject: 2024 Implementation Date

Comment:

I support accelerated implementation dates for tankers and ro-ros, especially the 2023/2024 ro-ro date.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-06-25 13:29:32

No Duplicates.

**Comment 15 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Giles

Last Name: Pettifor

Email Address: GPettifor@portofh.org

Affiliation:

Subject: Brief Comments on Informational Update on Control Measure for Ocean-Going Vessels At Berth

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/166-ogvatberth2019-UzRXOFwxUmQCd1Ii.pdf](http://www.arb.ca.gov/lists/com-attach/166-ogvatberth2019-UzRXOFwxUmQCd1Ii.pdf)

Original File Name: gilespettiforathberth.pdf

Date and Time Comment Was Submitted: 2020-06-25 13:54:51

No Duplicates.



**Comment 16 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Mark

Last Name: Hughes

Email Address: markhughesiacc@gmail.com

Affiliation:

Subject: Proposed At-Berth Rule - Industrial Association Comments

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/167-ogvatberth2019-VjsGYQFyWWEHaQVw.zip](http://www.arb.ca.gov/lists/com-attach/167-ogvatberth2019-VjsGYQFyWWEHaQVw.zip)

Original File Name: markhughes.zip

Date and Time Comment Was Submitted: 2020-06-25 17:12:40

No Duplicates.

**Comment 17 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Doug

Last Name: Schneider

Email Address: dschneider@worldshipping.org

Affiliation: World Shipping Council

Subject: World Shipping Council Statement at June 25, 2020 CARB Board Hearing

Comment:

Please see the attached written statement of the World Shipping Council to the June 25, 2020 CARB Board Hearing.

Attachment: [www.arb.ca.gov/lists/com-attach/168-ogvatberth2019-UiVWP1ckWGcCYARb.pdf](http://www.arb.ca.gov/lists/com-attach/168-ogvatberth2019-UiVWP1ckWGcCYARb.pdf)

Original File Name: World Shipping Council At Berth Rule Statement CARB Board Hearing 25 June 2020.pdf

Date and Time Comment Was Submitted: 2020-06-25 17:23:31

No Duplicates.

**Comment 18 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Fe

Last Name: Koons

Email Address: fepkoons3@gmail.com

Affiliation:

Subject: ocean going vessels measure AT BERTH

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/169-ogvatberth2019-VjBTMAZsU28AaQln.pdf](http://www.arb.ca.gov/lists/com-attach/169-ogvatberth2019-VjBTMAZsU28AaQln.pdf)

Original File Name: fekoonatberth.pdf

Date and Time Comment Was Submitted: 2020-06-25 17:56:12

No Duplicates.

**Comment 19 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Fe

Last Name: Koons

Email Address: fepkoons3@gmail.com

Affiliation:

Subject: ocean going vessels measure AT BERTH

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/170-ogvatberth2019-AWdXNARuBzsCa1I8.pdf](http://www.arb.ca.gov/lists/com-attach/170-ogvatberth2019-AWdXNARuBzsCa1I8.pdf)

Original File Name: fekoonatberth.pdf

Date and Time Comment Was Submitted: 2020-06-25 17:56:12

No Duplicates.

**Comment 20 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse

Last Name: Marquez

Email Address: Non-web submitted comment

Affiliation:

Subject: CFSA et al Public Comments Rebuttal Re: Tanker Ship Industry

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/171-ogvatberth2019-VDkCZV0uACIFdgl.pdf](http://www.arb.ca.gov/lists/com-attach/171-ogvatberth2019-VDkCZV0uACIFdgl.pdf)

Original File Name: marquez.pdf

Date and Time Comment Was Submitted: 2020-06-25 19:36:41

No Duplicates.

**Comment 21 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: creheis@wspa.org  
Affiliation: Western States Petroleum Association

Subject: WSPA Supplemental Written Comments Re Public Hearing to Consider At Berth  
Comment:

Please find the attached Western States Petroleum Association (WSPA) comments for the August 27, 2020 CARB public hearing to consider the proposed control measure for ocean-going vessels at berth.

Attachment: [www.arb.ca.gov/lists/com-attach/193-ogvatberth2019-VCNSJ1UkWGpQCVM1.pdf](http://www.arb.ca.gov/lists/com-attach/193-ogvatberth2019-VCNSJ1UkWGpQCVM1.pdf)

Original File Name: WSPA Final Comments Re Public Hearing to Consider Proposed Control Measure for Ocean-Going Vessels At Berth (August 27 2020).pdf

Date and Time Comment Was Submitted: 2020-08-27 08:23:58

No Duplicates.

**Comment 22 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Martha  
Last Name: Miller  
Email Address: mem@platinumadvisors.com  
Affiliation:

Subject: CA Association of Port Authorities Comments  
Comment:

Attached you will find out comments on the at-berth regulation.  
Thank you,  
Martha Miller  
Executive Director  
CA Assn of Port Authorities

Attachment: [www.arb.ca.gov/lists/com-attach/194-ogvatberth2019-UzBXMFwtUmACW1Ix.pdf](http://www.arb.ca.gov/lists/com-attach/194-ogvatberth2019-UzBXMFwtUmACW1Ix.pdf)

Original File Name: CAPA CARB At\_Berth Letter\_8\_25.pdf

Date and Time Comment Was Submitted: 2020-08-27 08:47:34

No Duplicates.

**Comment 23 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Support for Admenments & Special Reqeuests  
Comment:

Dear CARB Board Members:

The Coalition For A Safe Environment and et all signatory organizations submit these joint public comments on the Proposed Control Measure for Ocean-Going Vessels At Berth Rule Amendments.

We represent a broad base coalition of port community organizations in California and we support the Proposed Control Measure for Ocean-Going Vessels At Berth Rule Amendments with the following requests:

See attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/195-ogvatberth2019-VTZQMFExBSUHZAZZ.pdf](http://www.arb.ca.gov/lists/com-attach/195-ogvatberth2019-VTZQMFExBSUHZAZZ.pdf)

Original File Name: CFASE et al CARB At Berth Rule Public Comments Final 8-27-2020 PDF.pdf

Date and Time Comment Was Submitted: 2020-08-27 08:54:05

No Duplicates.



**Comment 24 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Art  
Last Name: Mead  
Email Address: art.mead@crowley.com  
Affiliation:

Subject: Crowley Comments on At-Berth Rule (2020-08-27)  
Comment:

Attached please find Crowley comments regarding CEQA violations of the Proposed Control Measure for Ocean-Going Vessels At Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/196-ogvatberth2019-U2EGMAQ1VzwKPgEw.pdf](http://www.arb.ca.gov/lists/com-attach/196-ogvatberth2019-U2EGMAQ1VzwKPgEw.pdf)

Original File Name: 200821CARBCEQACommentAtBerthRule(FINAL).pdf

Date and Time Comment Was Submitted: 2020-08-27 08:59:24

No Duplicates.

**Comment 25 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Janet

Last Name: Rogers-sbc

Email Address: jsrogers624@hotmail.com

Affiliation:

Subject: Ocean Going Vessels at Berth - Supplemental info for Embarcadero Coalition

Comment:

Please see file

Attachment: [www.arb.ca.gov/lists/com-attach/197-ogvatberth2019-BmMAa1AzVWdWlghr.docx](http://www.arb.ca.gov/lists/com-attach/197-ogvatberth2019-BmMAa1AzVWdWlghr.docx)

Original File Name: Embarcadero Coalition CARB letter 082620.docx

Date and Time Comment Was Submitted: 2020-08-27 09:12:23

No Duplicates.

**Comment 26 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Tracy

Last Name: Fidell

Email Address: tfidell@portoakland.com

Affiliation: Port of Oakland

Subject: Port of Oakland comment letter on at-berth regulation

Comment:

Please see attached comment letter

Attachment: [www.arb.ca.gov/lists/com-attach/198-ogvatberth2019-AjBXYQAzUDMHLAAw.pdf](http://www.arb.ca.gov/lists/com-attach/198-ogvatberth2019-AjBXYQAzUDMHLAAw.pdf)

Original File Name: 2020-08-27 Port of Oakland At-Berth Comments.pdf

Date and Time Comment Was Submitted: 2020-08-27 08:59:31

No Duplicates.

## **Comment 27 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Dominick

Last Name: Falzone

Email Address: dominick3@roadrunner.com

Affiliation:

Subject: Please require all ships to plug in to a power source on land

Comment:

I support your agency's proposal to require all ocean-going-vessels to plug into shore-based sources of electricity, while those ships are docked at port. This item is Item # 20-8-1 on today's board meeting, Thursday, August 27, 2020.

Our planet is at risk of becoming unlivable, if greenhouse gases destroy our atmosphere. Requiring ships to turn off their engines while they are docked in port will reduce greenhouse gases.

Persons who live near seaports suffer physical harm, such as asthma from pollution. This proposed measure will reduce pollution at our seaports.

I live in the city of Los Angeles. My city government operates one of the largest seaports in the world, on land which belongs to the state government. As a resident of Los Angeles, and a resident of California, I want the California Air Resources Board to make the air at the Port of Los Angeles as clean as possible.

Thank you for your help.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-08-27 09:20:50

No Duplicates.

**Comment 28 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Alice  
Last Name: Neuhauser  
Email Address: apntrc@msn.com  
Affiliation:

Subject: Comment uploaded from CARB Clerk Email Inbox  
Comment:

Hi, I had signed on to speak but have to get on a work call.

I fully support the Resolution and urge its adoption today. We have waited long enough.

Industry externalizes costs on to our BIPOC and lower income communities. Those communities cannot afford this.

I'm tired of industry complaining about feasibility. Where were their feasibility studies before they started spewing toxins into our air.

This is already a compromise and time to move on.

Thank you,

Alice

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-08-27 10:07:09

No Duplicates.

**Comment 29 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse

Last Name: Sanford

Email Address: 88jsanford88@gmail.com

Affiliation:

Subject: Comment uploaded from Clerk email inbox

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/202-ogvatberth2019-UTtVNgd1V3cGZQNc.pdf](http://www.arb.ca.gov/lists/com-attach/202-ogvatberth2019-UTtVNgd1V3cGZQNc.pdf)

Original File Name: Jesse Sanford At-Berth Regulation.pdf

Date and Time Comment Was Submitted: 2020-08-27 10:47:17

No Duplicates.

## **Comment 30 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Luis  
Last Name: Montes  
Email Address: [investedinchange@gmail.com](mailto:investedinchange@gmail.com)  
Affiliation: Inside Sustainability Social

Subject: Clean Ship Idling Rule  
Comment:

Good morning!

My name is Luis Alejandro Montes, the executive director of Inside Sustainability Social, a 501[c]4 organization helping build a just and sustainable future in southern California.

I am here representing over 50 members of our organization across southern California who believe that air pollution is an impact of systemic racism that working class communities.

The Air Resources Board over the last several years has made huge strides in mitigating the air pollution in the communities caught in the grips of supply chain logistics. We've been addressing NOx pollution from diesel and gas trucking, as well as pollution from the ports.

By passing the Clean Idling Ship rule, we will avoid hundreds of premature deaths by respiratory issues, save BILLIONS on healthcare costs from avoided trips to the hospital, especially in the working class communities of the Port of Los Angeles and Long Beach.

We strongly urge the CA Air Resources Board to pass the At-Berth Regulation-- the Clean Idling Ship Rule.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-08-27 10:04:40

No Duplicates.

**Comment 31 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: katie

Last Name: covell

Email Address: katiehebb1@yahoo.com

Affiliation: NELA Climate Collective

Subject: Support for 20-6-3

Comment:

I'm a member of Northeast Los Angeles Climate Collective and a mom. I am terrified for the future of California between the wildfires, rising heat, and droughts. We need to do everything in our power right now to eliminate fossil fuels and carbon emissions. This includes PASSING this At Berth Regulation. Please adopt this rule for the health of our communities. Thank you!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-08-27 10:50:54

No Duplicates.



**Comment 32 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019). (At Hearing)**

First Name: Jesse

Last Name: Sanford

Email Address: 88jsanford88@gmail.com

Affiliation:

Subject: Comment uploaded from CARB Clerk email inbox

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/205-ogvatberth2019-WjABY10vVnYFZgFe.pdf](http://www.arb.ca.gov/lists/com-attach/205-ogvatberth2019-WjABY10vVnYFZgFe.pdf)

Original File Name: Jesse Sanford At-Berth Regulation Comment.pdf

Date and Time Comment Was Submitted: 2020-08-27 11:01:09

No Duplicates.

**Comment 1 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: joseph

Last Name: puleo

Email Address: joepuleo@hotmail.com

Affiliation:

Subject: Dock side power to eliminate auxiliary diesel engine use in port

Comment:

I object to the insufficient minor revision of the date of implantation from 2029 to 2027.

I want the date to be no later than 2024. Ten years was too long to wait for relief of this most dangerous pollutant and pushing the date back by only two years is merely a bone tossed to a suffering public.

I also want the board to have discretionary authority to grant waivers of the 2024 date based solely upon technical difficulties not financial difficulties on a case by case basis.

the application for and facts underlying such waiver will be, in a timely manner, publicly disclosed and justified.

Very truly yours;

Joseph Puleo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-03-27 12:03:59

No Duplicates.

**Comment 2 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mizutani  
Last Name: Shingo  
Email Address: shingo.mizutani@nykgroup.com  
Affiliation:

Subject: ROG calculation  
Comment:

With reference to ROG, please advise more details how to calculate ROG, because a vessel which equips LNG fueled Diesel Generator engine will be delivered soon, Therefore we'd like to prove that the LNG fueled engine is acceptable for At-Berth Regulation. I understand that it is mentioned in attached file, Page.A-22, but sorry it is no clear. It mentions that "ROG shall be calculated as a fraction of the TOG, set forth in carb's Off- Road Diesel HAC to ROG/TOG Ratio ....." So, what is FRAC(Excel)-Fraction data for source categories, February 21, 2019 ? and how to calculate, please advise formula.

Attachment: [www.arb.ca.gov/lists/com-attach/71-ogvatberth2019-UzJVJ10oWGpQNVA4.pdf](http://www.arb.ca.gov/lists/com-attach/71-ogvatberth2019-UzJVJ10oWGpQNVA4.pdf)

Original File Name: Attachment A.pdf

Date and Time Comment Was Submitted: 2020-04-02 17:17:58

No Duplicates.

**Comment 3 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mizutani

Last Name: Shingo

Email Address: shingo.mizutani@nykgroup.com

Affiliation:

Subject: ROG calculation

Comment:

With reference to ROG, please advise more details how to calculate ROG, because a vessel which equips LNG fueled Diesel Generator engine will be delivered soon, Therefore we'd like to prove that the LNG fueled engine is acceptable for At-Berth Regulation. I understand that it is mentioned in attached file, Page.A-22, but sorry it is no clear. It mentions that "ROG shall be calculated as a fraction of the TOG, set forth in carb's Off- Road Diesel HAC to ROG/TOG Ratio ....." So, what is FRAC(Excel)-Fraction data for source categories, February 21, 2019 ? and how to calculate, please advise f

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-02 17:17:58

No Duplicates.

**Comment 4 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mizutani  
Last Name: Shingo  
Email Address: shingo.mizutani@nykgroup.com  
Affiliation:

Subject: ROG calculation  
Comment:

With reference to ROG, please advise more details how to calculate ROG, because a vessel which equips LNG fueled Diesel Generator engine will be delivered soon, Therefore we'd like to prove that the LNG fueled engine is acceptable for At-Berth Regulation. I understand that it is mentioned in attached file, Page.A-22, but sorry it is no clear. It mentions that "ROG shall be calculated as a fraction of the TOG, set forth in carb's Off- Road Diesel HAC to ROG/TOG Ratio ....." So, what is FRAC(Excel)-Fraction data for source categories, February 21, 2019 ? and how to calculate, please advise formula.

Attachment: [www.arb.ca.gov/lists/com-attach/73-ogvatberth2019-AGFdL1UgVWcKb1U9.pdf](http://www.arb.ca.gov/lists/com-attach/73-ogvatberth2019-AGFdL1UgVWcKb1U9.pdf)

Original File Name: Attachment A.pdf

Date and Time Comment Was Submitted: 2020-04-02 17:17:58

No Duplicates.

**Comment 5 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mizutani

Last Name: Shingo

Email Address: shingo.mizutani@nykgroup.com

Affiliation:

Subject: ROG calculation

Comment:

With reference to ROG, please advise more details how to calculate ROG, because a vessel which equips LNG fueled Diesel Generator engine will be delivered soon, Therefore we'd like to prove that the LNG fueled engine is acceptable for At-Berth Regulation.

I understand that it is mentioned in attached file, Page.A-22, but sorry it is no clear.

It mentions that "ROG shall be calculated as a fraction of the TOG, set forth in carb's Off- Road Diesel HAC to ROG/TOG Ratio ....."

So, what is FRAC(Excel)-Fraction data for source categories, February 21, 2019 ? and how to calculate, please advise formula.

Attachment: [www.arb.ca.gov/lists/com-attach/74-ogvatberth2019-VDVXJQdyUmACZ1U9.pdf](http://www.arb.ca.gov/lists/com-attach/74-ogvatberth2019-VDVXJQdyUmACZ1U9.pdf)

Original File Name: Attachment A.pdf

Date and Time Comment Was Submitted: 2020-04-02 17:17:58

No Duplicates.

**Comment 6 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mizutani  
Last Name: Shingo  
Email Address: shingo.mizutani@nykgroup.com  
Affiliation:

Subject: ROG calculation  
Comment:

With reference to ROG, please advise more details how to calculate ROG, because a vessel which equips LNG fueled Diesel Generator engine will be delivered soon, Therefore we'd like to prove that the LNG fueled engine is acceptable for At-Berth Regulation. I understand that it is mentioned in attached file, Page.A-22, but sorry it is no clear. It mentions that "ROG shall be calculated as a fraction of the TOG, set forth in carb's Off- Road Diesel HAC to ROG/TOG Ratio ....." So, what is FRAC(Excel)-Fraction data for source categories, February 21, 2019 ? and how to calculate, please advise formula.

Attachment: [www.arb.ca.gov/lists/com-attach/75-ogvatberth2019-BWRdL1QhWWsGY1Q8.pdf](http://www.arb.ca.gov/lists/com-attach/75-ogvatberth2019-BWRdL1QhWWsGY1Q8.pdf)

Original File Name: Attachment A.pdf

Date and Time Comment Was Submitted: 2020-04-02 17:17:58

No Duplicates.

**Comment 7 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Iain

Last Name: Hart

Email Address: iain.hart@mail.house.gov

Affiliation: Rep. John Garamendi (D-CA)

Subject: Rep. Garamendi letter to CARB re At-Berth Rule

Comment:

PLease find the uploaded PDF containing Rep. Garamendi's letter to the Board commenting on the proposed "Control Measure for Ocean-Going Vessels at Berth" (At-Berth Rule). Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/76-ogvatberth2019-BzUGMAY1VTZXYQg8.pdf](http://www.arb.ca.gov/lists/com-attach/76-ogvatberth2019-BzUGMAY1VTZXYQg8.pdf)

Original File Name: 20200406 Rep. Garamendi letter to CARB re At-Berth Rule.pdf

Date and Time Comment Was Submitted: 2020-04-06 09:29:41

No Duplicates.



**Comment 8 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: At berth comments from 19 groups

Comment:

see attached file

Attachment: [www.arb.ca.gov/lists/com-attach/77-ogvatberth2019-VzYBc1QKUGECYVAi.docx](http://www.arb.ca.gov/lists/com-attach/77-ogvatberth2019-VzYBc1QKUGECYVAi.docx)

Original File Name: At berth comments final 4.22.20 .docx

Date and Time Comment Was Submitted: 2020-04-22 16:23:07

No Duplicates.

**Comment 9 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Maureen  
Last Name: Decombe  
Email Address: maureen@decombe.com  
Affiliation:

Subject: Please adopt this regulation  
Comment:

My city is overburdened by air pollution from multiple sources. Regulation of toxic pollution from transport ships will have a direct positive impact on the health of my neighbors, and the state.

Thank you,

Maureen Decombe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-23 09:57:44

No Duplicates.

**Comment 10 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Michael  
Last Name: Meagher  
Email Address: michaelj2016@sonic.net  
Affiliation:

Subject: Marine emissions  
Comment:

As a 33 year Richmond homeowner, I support plans to control emissions from ships servicing Richmond California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-23 10:30:21

No Duplicates.

**Comment 11 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Janis

Last Name: Hashe

Email Address: openlinescom@gmail.com

Affiliation:

Subject: Support of further regulation of vessels at berth

Comment:

I am a resident of Richmond, CA, one of the areas most affected by air pollution from the oil tankers docking to be filled by the refineries. I am in complete support of CARB's proposal to further regulate how, and for how long, these ships can remain docked.

Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California, and money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

Please feel free to contact me directly if I can provide further information or support.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-23 10:52:32

No Duplicates.

**Comment 12 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Art

Last Name: Mead

Email Address: art.mead@crowley.com

Affiliation: Crowley Maritime Corporation

Subject: Comments on the Modified Text for the At-Berth Rule

Comment:

Attached are Crowley Maritime Corporation's comments on the Proposed 15-Day Changes to the Control Measure for Ocean-Going Vessels At Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/81-ogvatberth2019-UDMAdFwyU3cLYQNm.pdf](http://www.arb.ca.gov/lists/com-attach/81-ogvatberth2019-UDMAdFwyU3cLYQNm.pdf)

Original File Name: Crowley - Comments on At-Berth 15-Day Notice (2020-04-24).pdf

Date and Time Comment Was Submitted: 2020-04-24 11:51:42

No Duplicates.

**Comment 13 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Carol

Last Name: Weed

Email Address: carol4ofa@gmail.com

Affiliation: Sustainable Rossmoor

Subject: Air pollution, Public health

Comment:

I support stronger regulations to reduce the pollution of docked ships."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-24 18:07:19

No Duplicates.

## **Comment 14 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Rose

Last Name: Strogatz

Email Address: ogstrogatz@gmail.com

Affiliation:

Subject: In support of stronger regulations to reduce the pollution of docked ships

Comment:

I support stronger regulations to reduce the pollution of docked ships.

\* Regulation reduces harmful pollutants such as diesel particles in refinery and other vulnerable communities.

\* Health benefits are 2x the costs to ship owners, Ports and refineries.

\* Emission control costs add less than a penny to the cost of fuel at the pump.

\* Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California.

\* Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-24 18:13:27

No Duplicates.

**Comment 15 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Barry

Last Name: Brian

Email Address: barry.brian@gmail.com

Affiliation:

Subject: Regulating dock pollution

Comment:

I support stronger regulations to reduce the pollution of docked ships.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-24 18:18:18

No Duplicates.



## **Comment 16 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Arthur  
Last Name: Ungar  
Email Address: ajungar@gmail.com  
Affiliation:

Subject: "at berth" rule  
Comment:

- 1) Regulation reduces harmful pollutants such as diesel particles in refinery and other vulnerable communities
- 2) Health benefits are much greater than the costs to ship owners, ports and refineries
- 3) Emission Control costs add less than a penny to the cost of fuel at the pump
- 4) Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California
- 5) Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

Please take action on controlling at berth pollution.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-25 11:13:32

No Duplicates.

**Comment 17 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Lisa  
Last Name: Jackson  
Email Address: 67jacksonl@gmail.com  
Affiliation:

Subject: Support for CARB at Berth Rulings  
Comment:

To whom this may concern,

I support stronger regulations to reduce the pollution of docked ships in the Bay Area. It is imperative that we ensure the health and safety of our local communities in this area by decreasing the harmful effects of toxic chemicals and pollution in our air and waterways.

Regards

Lisa Jackson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-25 11:52:41

No Duplicates.

**Comment 18 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: DIANE

Last Name: LIVIA

Email Address: DIANELIVIA@SBCGLOBAL.NET

Affiliation:

Subject: Reduce pollution from ships at dock

Comment:

Regulate further emission from docked ships in order to reduce harmful pollutants. This control is very low cost. Bay Area terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California. Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-25 20:32:21

No Duplicates.

## **Comment 19 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: David  
Last Name: Gassman  
Email Address: dfgassman@aol.com  
Affiliation: No Coal in Oakland

Subject: Emission Control for Docked Ships  
Comment:

I strongly approve of & support controlling the emissions from docked ship for all of the reasons stated below:

Regulation reduces harmful pollutants such as diesel particles in refinery and other vulnerable communities

Health benefits are 2x the costs to ship owners, Ports and refineries

Emission Control costs add less than a penny to the cost of fuel at the pump

Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California

Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

The people of Oakland, & west Oakland in particular, suffer from various respiratory threats & this is one that can be eliminated. Please do so. Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-26 14:14:16

No Duplicates.

**Comment 20 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Edie

Last Name: Edelman

Email Address: Edelmane@aol.com

Affiliation:

Subject: Save our environment

Comment:

I support stronger regulations to reduce the pollution of docked ships.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-27 16:34:12

No Duplicates.

**Comment 21 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Elizabeth  
Last Name: Dortch  
Email Address: eldortch@gmail.com  
Affiliation:

Subject: ships in harbor. Bay Area  
Comment:

I support CARB's regulation to decrease emissions from ships in the harbor. I would prefer to see it happen sooner than 2032. This is very important for our health as Richmond residents. We have had enuf pollution, and want cleaner air and water.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-28 09:04:52

No Duplicates.

**Comment 22 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Garth

Last Name: Mitcham

Email Address: Non-web submitted comment

Affiliation: CSL Americas

Subject: Comments on At Berth Regulation for 2020 Amendment

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/91-ogvatberth2019-AmZdLlc4BTpVMgZ2.pdf](http://www.arb.ca.gov/lists/com-attach/91-ogvatberth2019-AmZdLlc4BTpVMgZ2.pdf)

Original File Name: dunlap.pdf

Date and Time Comment Was Submitted: 2020-04-28 09:09:33

No Duplicates.

**Comment 23 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Willie

Last Name: Robinson

Email Address: williejohnson@gmail.com

Affiliation: NAACP - RICHMOND-CA BRANCH

Subject: Proposed Control Measures for Ocean-Going Vessels At Berth

Comment:

Please find attached the support letter from the Richmond, CA Branch of the National Association for the Advancement of Color People (NAACP).

Attachment: [www.arb.ca.gov/lists/com-attach/92-ogvatberth2019-WzRQNVczBDZVPVR5.pdf](http://www.arb.ca.gov/lists/com-attach/92-ogvatberth2019-WzRQNVczBDZVPVR5.pdf)

Original File Name: Ocean-Going Vessels At Birth (Proposal).pdf

Date and Time Comment Was Submitted: 2020-04-28 22:59:48

No Duplicates.



## **Comment 24 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Shingo

Last Name: Mizutani

Email Address: shingo.mizutani@nykgroup.com

Affiliation: NYK LINE Automotive Quality Cont Group,

Subject: Comments for at-berth 15 days package

Comment:

Dear Sir and Madam,

Attached please find our comments for subject.

We strongly request that LNG fueled vessel to be exempt from this regulation in case the vessel consume LNG surely.

Please reply once you receive this message.

### 1. Implementation date

The biggest change we see between this draft and the original proposal is the change in implementation dates (page 28-29). As proposed, Ro-Ros would be required to comply in 2024 rather than 2025, tankers going to LA/LB in 2025 rather than 2027, and all remaining tanker trade in 2027 rather than 2029. As far as we can tell, CARB has offered no explanation for this revision. Given the current global circumstances and likely impact on the industry, we recommend providing comments to request the original compliance dates be maintained to allow sufficient time for fleets to come into compliance.

### 2. Page A-11 on Attachment A

Section 93130.2. Section Summary, and Definitions.

(b)Definitions.

(40) "IMO NOx tier" means the NOx tier level of a vessel as certified in the Engine International Air Pollution Prevention (EIAPP) Certificate. Vessel without an IMO NOx tier are considered pre-tier I vessel.

What is difference in correspondence between each vessel due to differences in tier?

If the vessel satisfied with tier 2 or 3, is there some preferential treatment?

### 3. Page A-19 on Attachment A

Section 93130.5. CARB Approved Emission Control Strategy

(d) Requirement for CARB approval of an emission control strategy.

(1) Emission reductions.

To receive CARB approval, a person must demonstrate that the emission controls strategy achieves emission rates less than 2.8g/kW-hr for NOx, 0.03g/kW-hr for PM-2.5, and 0.1g/kW-hr for ROG for auxiliary engines. Additionally, for strategies approved after

2020, GHG emissions from the strategy must be grid-neutral using the grid emission rate for the year that the technology is granted an Executive Order. Default emission rates of auxiliary engines on ocean-going vessels are 13.8g/kW-hr for NOx, 0.17g/kW-hr for PM-2.5, and 0.52g/kW-hr for ROG.

It is necessary to reduce the values of NOx, PM, and ROG respectively to the specified values, but we would like to know clearly the basis (reason) of these presented values, 2.8(NOx), 0.03(PM2.5) and 0.1(ROG).

In addition, enormous cost and time are required for measurement of above. Therefore, implementation date of regulation should not be advanced, and cost assistance is required for NOx, PM2.5 and ROG measurement.

Further, we should be able to refrain from using shoreside electrical power for LNG-fueled vessel by reporting or verifying that LNG fuel has been used in port.

#### 4. Page A-56/57 on Attachment A

Section 93130.17. Innovative Concept Compliance Option.

(a)General requirements for using an innovative concept compliance option.

(1) Applicants seeking approval of an innovative concept must submit their applications to the Exclusive Officer on or before the following dates in Table 5 for each vessel category:

Table 5: Innovative Concept Application Due Date

Vessel Type	Due Date
Container/Reefer	July 1, 2021
Passenger	July 1, 2021
Ro-ro	December 1, 2021
LA/LB Tankers	December 1, 2021
Other Tankers	December 1, 2021

(2) The proposed innovative concept must reduce NOx, PM 2.5, and ROG emissions equivalent to or greater than the level that would have been achieved by the Control Measure, while not increasing GHG. Emission reductions are verified each year through annual reporting in section 93130.17(d) of this Control Measure. It will be necessary to issue some documents from engine manufacturer such as the NOx Technical File, in order to comply with new regulation of NOx, and to describe who will allow CARB to approve the test result for PM2.5 and ROG measurement. If CARB accept the method/equipment for reduction of NOx/PM/ROG, we would like to request CARB to compensate the cost for test.

#### 5. Page B-4 on Attachment B

Summary of the 15-Day Changes

8)Connection time from ;\$Ready to Work;" determination. The Proposed Regulation adjusts the time allowed for connection to shore power or an alternative CAECS for vessels at berth from one hour after ;\$Ready to Work;". This Change is expected to have a minor impact to the emissions reductions compared to the connection time definition listed in the ISOR. This is based on past

compliance data for the original At-Berth Regulation. Staff do not connect to shore power or to an alternative CAECS. This change has no impact on costs.

Who has responsibility for emission control violations if more than two hours have passed since "Ready to Work" due to delays by shore-side works and/or any other reason to connect shore power. It should not be on vessel.

6. Page B-4 on Attachment B  
Summary of the 15-Day Changes

9) Updated non-cancer mortality. Total costs for all entities is expected to be about \$2.4 billion through 2032, with a statewide valuation of avoided health impacts valued at \$2.44 billion from 250 fewer premature deaths, 78 fewer hospital admissions, and 126 fewer emergency room visits statewide. More information on the updates to the Health Analysis can be found in Attachment D of the 15-day package.

Page D-3 on Attachment D

2. Updates to Regional PM2.5 Mortality and Illness Analysis for California Air Basins: PM Mortality and Illness: Reduction in Health Outcomes.

California Air Resource Board (CARB) staff estimated the reduction in health outcomes from reduced emission of PM2.5 from the 15-day change version of the Proposed Regulation. These health outcomes include cardiopulmonary mortality, hospital admissions, and emergency room visits. Based on the analysis, staff estimates that the total number of cases statewide that would be reduced due to the implementation of the Proposed Regulation are as follows:

„« 250 premature deaths (195 to 305; 95 percent confidence interval (CI)).

„« 78 hospital admissions (10 to 145; 95 percent (CI)).

„« 126 emergency room visit (79 to 172; 95 percent CI)

Updated Tables 20 through 22 show the estimated reductions in health outcomes resulting from the Proposed Regulation summed over 1 12-year period from 2021 to 2032. The values in parentheses represent the 95 percent confidence interval for each health outcome.

It understands as estimated figure, however, it is not just because of vessels. It seems to be not considered the underlying disease, inherited diseases, lifestyle-related diseases, etc.

Yours faithfully,

Attachment: [www.arb.ca.gov/lists/com-attach/93-ogvatberth2019-WyhGYQw4UHEBxM0d.pdf](http://www.arb.ca.gov/lists/com-attach/93-ogvatberth2019-WyhGYQw4UHEBxM0d.pdf)

Original File Name: mizutani.pdf

Date and Time Comment Was Submitted: 2020-04-29 16:15:39

No Duplicates.

**Comment 25 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Morgan

Last Name: Caswell

Email Address: morgan.caswell@polb.com

Affiliation: Port of Long Beach and Port of Los Angel

Subject: POLB/POLA Comments on the Proposed 15 Day Changes for the At Berth Regulation  
Comment:

Please find the Port of Long Beach and Port of Los Angeles comments on the proposed 15 day changes for the At Berth Regulation attached. Thank you for your consideration of these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/94-ogvatberth2019-WyhVIIU2BSZVDFMw.pdf](http://www.arb.ca.gov/lists/com-attach/94-ogvatberth2019-WyhVIIU2BSZVDFMw.pdf)

Original File Name: SPBP Comment Letter on the Proposed 15-Day Changes for the CARB At Berth Regulation.pdf

Date and Time Comment Was Submitted: 2020-04-29 16:49:12

No Duplicates.

**Comment 26 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Ashley Arax  
Last Name: obo Jack Broadbent  
Email Address: aarax@baaqmd.gov  
Affiliation: Bay Area Air Quality Management District

Subject: BAAQMD Comments to the Proposed 15-Day changes to the Control Measure for OGVs at Berth

Comment:

Hello,

The attached document is the Bay Area Air Quality Management District's comments on the Proposed 15-day changes to the Proposed Control Measure for Ocean-Going Vessels at Berth.

These comments are being sent on behalf of Jack Broadbent, Executive Officer/APCO.

Sincerely,

Ashley Arax

Attachment: [www.arb.ca.gov/lists/com-attach/95-ogvatberth2019-AmAGYQBgACIHbAZi.pdf](http://www.arb.ca.gov/lists/com-attach/95-ogvatberth2019-AmAGYQBgACIHbAZi.pdf)

Original File Name: BAAQMD Comment Letter on Proposed 15 Day Changes to At Berth Measure.pdf

Date and Time Comment Was Submitted: 2020-04-29 17:03:33

No Duplicates.

**Comment 27 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Lee  
Last Name: Kindberg  
Email Address: lee.kindberg@maersk.com  
Affiliation: Maersk

Subject: Maersk comments on 15 Day At-Berth Package  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/96-ogvatberth2019-WzYBZlw4UHEBdANo.pdf](http://www.arb.ca.gov/lists/com-attach/96-ogvatberth2019-WzYBZlw4UHEBdANo.pdf)

Original File Name: Maersk comments on CARB At-berth ISOR 15 day package 4-30-2020 Final.pdf

Date and Time Comment Was Submitted: 2020-04-30 12:34:37

No Duplicates.

**Comment 28 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Lee  
Last Name: Kindberg  
Email Address: lee.kindberg@maersk.com  
Affiliation: Maersk

Subject: Maersk comments on 15 Day At-Berth Package  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/97-ogvatberth2019-AWxRNlczVndXIII5.pdf](http://www.arb.ca.gov/lists/com-attach/97-ogvatberth2019-AWxRNlczVndXIII5.pdf)

Original File Name: Maersk comments on CARB At-berth ISOR 15 day package 4-30-2020 Final2.pdf

Date and Time Comment Was Submitted: 2020-04-30 12:34:37

No Duplicates.

**Comment 29 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Joy  
Last Name: Williams  
Email Address: JoyW@environmentalhealth.org  
Affiliation: Environmental Health Coalition

Subject: Support for Vessels at Berth Rule  
Comment:

Our comment letter is attached.Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/98-ogvatberth2019-UDEVII1BgAHEBxm0d.pdf](http://www.arb.ca.gov/lists/com-attach/98-ogvatberth2019-UDEVII1BgAHEBxm0d.pdf)

Original File Name: EHC\_SupportForVesselsAtBerth\_April30\_2020\_Final.pdf

Date and Time Comment Was Submitted: 2020-04-30 14:08:57

No Duplicates.



**Comment 30 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Steven

Last Name: Yang

Email Address: stevenyang@chevron.com

Affiliation:

Subject: Chevron Comments on At-Berth 15-Day Modified Text (3/36/20)

Comment:

Please find attached comments on the At-Berth Regulation Modified Text, made available March 26, 2020.

Attachment: [www.arb.ca.gov/lists/com-attach/99-ogvatberth2019-UjFUOIQwUHUBdVQ7.zip](http://www.arb.ca.gov/lists/com-attach/99-ogvatberth2019-UjFUOIQwUHUBdVQ7.zip)

Original File Name: Chevron Comments Submittal.zip

Date and Time Comment Was Submitted: 2020-04-30 14:10:33

No Duplicates.

**Comment 31 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Regina

Last Name: Hsu

Email Address: rhsu@earthjustice.org

Affiliation: Earthjustice

Subject: Support for the Proposed Control Measure for Ocean-Going Vessels At Berth  
Comment:

Attached please find comments from nine organizations in support of the Proposed Control Measure for Ocean-Going Vessels At Berth.

Attachment: [www.arb.ca.gov/lists/com-attach/100-ogvatberth2019-WmpcblV5VjZWYAKk.pdf](http://www.arb.ca.gov/lists/com-attach/100-ogvatberth2019-WmpcblV5VjZWYAKk.pdf)

Original File Name: 04-30-20 Final At Berth Regulation Comment Letter.pdf

Date and Time Comment Was Submitted: 2020-04-30 15:51:12

No Duplicates.

## **Comment 32 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Jan

Last Name: Warren

Email Address: jxwarren1947@yahoo.com

Affiliation: Interfaith Climate Action Network of Con

Subject: Support for Amendments to Control Measure For Ocean-Going Vessel At Berth

Comment:

Dear Board Chair & Members of the Board

I was happy to be able to attend the workshop you held in Oakland on December 5, 2019.

I applaud the Board's efforts to work to clean the air at our ports, particularly since impacted Enviroscreen communities live and work next to our Ports.

I particularly applaud you listening to comments to reduce the original deadline requirements for tankers at the Ports of LA & LB to meet earlier deadline emission deadlines moving from 2027 to 2025 and for other tanker terminals from 2029 to 2027. As has been noted, this will expedite emission reductions and improve peoples' health.

Since early studies already show a connection to COVID-19 and pollution health impacts it is important for you to maintain these new dates and not slip back to the earlier ones because of the slowing of the economy. We need health improvements sooner than ever.

I also support the new Airborne Toxic Controls for Auxiliary Diesels operated on Ocean-Going Vessels At-Berth-in a CA Port and Port Electrification.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-04-30 16:29:52

No Duplicates.

## **Comment 33 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Janet

Last Name: Rogers

Email Address: EmbarcaderoCoalition@gmail.com

Affiliation: Embarcadero Coalition

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations in Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents, including me, are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards to more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

I have attached two pictures. One shows the current cruise ship across from my balcony and the other is a 2018 picture showing how close the downtown residences and hotels are to a cruise ship. This picture is before the Savina condo was completed.

Sincerely,  
Janet Rogers

Attachment: [www.arb.ca.gov/lists/com-attach/102-ogvatberth2019-AGNUM1MgUGFSeIMp.zip](http://www.arb.ca.gov/lists/com-attach/102-ogvatberth2019-AGNUM1MgUGFSeIMp.zip)

Original File Name: CARB.zip

Date and Time Comment Was Submitted: 2020-04-30 17:28:07

No Duplicates.

## **Comment 34 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Ann-Marie

Last Name: Piskule

Email Address: ann-marie-sd2010@hotmail.com

Affiliation: Embarcadero Coalition

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 08:45:47

No Duplicates.

## **Comment 35 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Dragos

Last Name: Rauta

Email Address: dragos.rauta@intertanko.com

Affiliation: INTERTANKO

Subject: OGV At Berth Regulation INTERTANKO Comments

Comment:

INTERTANKO (The International Association of Independent Tanker Owners), is a non-profit association of independent (i.e. non-Governmental and non-oil company owned tankers) owners from 40 countries operating approximately 4,100 oil, chemical and gas tankers trading worldwide. INTERTANKO has made previous contributions to this process and some will be repetitive as we could not see being commented or taken into account. These previous comments expressed the INTERTANKO Members concern with the lack of safety assessment with regard to the enforcement of the Control Measures for OGV at Berth to tankers.

INTERTANKO comments are as follows:

Section 93130.3 Applicability. (b) Federal requirements it indicates that "Noting in the control measures shall be construed to amend, repeal, modify or change any applicable federal laws or regulations, including the USCG regulations or requirements". The synonyms for the word "construed" are "interpreted, read, taken, seen or understood". Based on this, we do suggest that Control Measures for OGV at Berth construe the air emissions limits regulated under the IMO's MARPOL Annex VI which USCG has incorporated in the US CFRs. We understand CARB may wish to have more stringent limits than the ones in CFRs and in the IMO MARPOL Annex VI but this is a serious challenge to the nature of the international legislation to ensure same applicable standards ships can comply with at any port. No need to stress the consequences in any States or any country setting their own and different limits.

Safety aspects - We studied the proposed amendments, we did studied the justifications and the annexed documents. Although we understand and do not disagree with the aim to improve the environment in the California ports, we would strongly suggest that such measures are efficient only if they are not impairing the safety of the operations. We are very concerned that of lack of assessment of the safety aspects as a consequence of the application of the Control Measures for OGV at Berth to tankers. There are three important safety aspects which need assessment:

(1) for use of shore power - responsibility and guaranty assumed by the shore power provider for possible damages or pollution events in case power cut or in case of insufficient/variable power provided to tankers, particularly large tankers, during cargo operation.

(2) standards for construction and certification of capture and control systems or other "innovative options", whether there are



shore based but particularly if they are on board barges.  
(3) safety operational procedures when capture and control systems or "innovative options" operate in tandem with tankers.

The first point was raised by INTERTANKO several times but we have not seen any response. It is of concern if such a risk, of which degree no one has assessed so far, is ignored.

With regard to number (2) and (3) and based on Section 93130.5 (i) or 93130.17, we note there are no provisions to address standards and regulations for manufacturing capture and control systems such "innovative option". The only requirements addressed their capturing performance and their durability. In addition, there is no provision or requirement for safe tandem operation of tankers with these capture and control systems or "innovative options".

Availability of capture and control systems/"innovative options" - INTERTANKO would suggest there is a need to clarify situations of availability of such systems, including providing shore power to tankers. If a tanker which has no means to use shore power arrives and the systems are not available, what would be the consequence of proceeding to berth and to cargo operations? Similarly, if a tanker can use shore power but the level of shore power required by a large tanker is not available to be supplied for some time, what would be the consequences? Would the ship wait with cargo operations until such an options becomes available? We strongly suggest such aspects need to be clarified in due time. INTERTANKO will suggest this question is not a pure commercial issue. Such a scenario could create a lot of bottle necks in port activities.

INTERTANKO appreciates the opportunity to provide its input on this rule development. We will continue to assist to the best of our ability and hope that CARB recognises the challenges that need to be addressed, since, as long as the tanker is moored at-berth, particularly during cargo operations, there is not much it can do to control many of the associated risks indicated.

Looking forward to further dialogue.

Kind regards  
Dragos Rauta  
Technical Director  
INTERTANKO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 09:13:26

No Duplicates.

**Comment 36 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Paul

Last Name: Herstein

Email Address: phersteinp@netscape.net

Affiliation: Grande South Condominiums in San Diego

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

1. To minimize particulate pollution in downtown San Diego, CARB should require ALL cruise ships berthing here to start using shore electric power 100% as of Jan 1, 2021, regardless of how many times a particular vessel comes to San Diego over the course of a year.

2 All cruise ships berthing here should be required to connect to shore power within one hour of arrival, and should not be permitted to utilize onboard diesel engines thereafter until one half hour prior to departure.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 09:08:04

No Duplicates.

## **Comment 37 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Stephen

Last Name: Kohn

Email Address: SteveKohn7595@gmail.com

Affiliation: Embarcadero Coalition

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

All of the condos referenced in this letter are due west of the cruise line terminals. An off shore breeze is the normal weather pattern for this area so the pollution produced by the cruise ships is continually directed right at the condos.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Stephen Kohn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 09:54:43

No Duplicates.

## **Comment 38 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Peter

Last Name: Pfau

Email Address: pmpfau@mac.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Peter Pfau

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 10:27:13

No Duplicates.

## **Comment 39 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Ann

Last Name: Pfau

Email Address: atpfau3@icloud.com

Affiliation: Embarcadero Coalition

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Ann Pfau

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 10:32:23

No Duplicates.



## **Comment 40 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Adrian

Last Name: Fremont

Email Address: adrian.fremont@me.com

Affiliation:

Subject: Comment on Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan

1, 2021.

Sincerely,

Adrian Fremont

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:01:15

No Duplicates.

## **Comment 41 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: eric

Last Name: fremont

Email Address: e.fremont@me.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

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4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore

power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

Eric Fremont

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:07:41

No Duplicates.

## **Comment 42 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Cynthia  
Last Name: Schimpf  
Email Address: cjschimpf2@gmail.com  
Affiliation:

Subject: Proposed Control Measures for Ocean-Going Vessels at Berth  
Comment:

As a resident of downtown San Diego, I appreciate the opportunity to comment on the proposed control measures for vessels at berth in San Diego harbor. Our tourist industry (including the cruise ship passengers) is important to us, but of course we are in the somewhat unusual position of having many residents who live very close to the harbor, so we also need to address pollution issues associated with the visiting cruise ships.

I am in favor of requiring ships in fleets to use shore power 100% of the time; concerned about exempting cruise lines that don't come in more than 4 times/year, as I understand that contributes significantly to pollution in the area.

I am also concerned about increasing the time after docking to berth to connect to shore power, particularly since the total time (including the time to get clearance) can be considerably longer than 2 hours.

I understand that our Port has only one connection to shore power, and it certainly seems like we need a second in our infrastructure. I understand that is a real complicating factor, especially given the financial impacts of the ongoing pandemic. Are there plans (and budgeting) in the works to do this?

Again, thanks for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:07:03

No Duplicates.

## **Comment 43 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Susan

Last Name: Smith

Email Address: sg.smith@cox.net

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

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3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour time frame to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Susan Smith  
1205 Pacific Hwy. #2303  
San Diego, Ca 92101

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:09:13

No Duplicates.

## **Comment 44 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Frances and Dave

Last Name: Low

Email Address: ftlow1221@gmail.com

Affiliation: San Diego Embarcadero Coalition

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the



additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

In case you aren't aware of the toxins in diesel pollution

Wikipedia

Chemical classes[edit]

The following are classes of chemical compounds that have been found in diesel exhaust.[24]

Class of chemical contaminant Note

antimony compounds[citation needed] Toxicity similar to arsenic poisoning[25]

beryllium compounds IARC Group 1 carcinogens

chromium compounds[26] IARC Group 3 possible carcinogens

cobalt compounds

cyanide compounds[26]

dioxins[26] and dibenzofurans

manganese compounds[26]

mercury compounds[26] IARC Group 3 possible carcinogens

nitrogen oxides[26] 5.6 ppm or 6500  $\mu\text{g}/\text{m}^3$ [1]

polycyclic organic matter, including

polycyclic aromatic hydrocarbons (PAHs)[1][26]

selenium compounds

sulfur compounds[26]

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:27:33

No Duplicates.

## **Comment 45 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Pat

Last Name: Pressel

Email Address: pat92101@att.net

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Proposed Control Measure for Ocean-Going Vessels At Berth

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore

power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Pat Pressel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 11:36:41

No Duplicates.

## **Comment 46 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Patricia  
Last Name: Lamborn  
Email Address: patricia.lamborn@aol.com  
Affiliation: Ms.

Subject: Strengthen CARB regulation- ships at berth  
Comment:

Ships at berth are a very large source of toxic pollution in our portside communities like Oakland, Richmond, and the refinery corridor. I live near the Port of Oakland, near the SF Bay, in Alameda. I support stronger regulations on these sources.

I understand that CARB has an opportunity to take action which will increase the number of container and cruise ships with controlled emissions and will extend requirements to ships used to import and export motor vehicles, oil and chemicals.

Strengthening regulation will have the following beneficial effects:

- 1.Regulation reduces harmful pollutants such as diesel particles in refinery and other vulnerable communities
- 2.Health benefits are 2x the costs to ship owners, Ports and refineries
- 3.Emission Control costs add less than a penny to the cost of fuel at the pump
- 4.Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California
- 5.Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

This quarantine for the COVID 19 pandemic has shown that we could clean up our air-- and we now know what that could look like. Don't back down-- our future is in your hands! Sincerely, Pat Lamborn

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 12:05:42

No Duplicates.

## **Comment 47 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Ann

Last Name: Fathy

Email Address: annfathy@gmail.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. I live three blocks from the B Street pier. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore

power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

Ann Fathy  
A member of the Embarcadero Coalition

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 12:19:53

No Duplicates.

**Comment 48 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Tracy  
Last Name: Fidell  
Email Address: tfidell@portoakland.com  
Affiliation: Port of Oakland

Subject: Port of Oakland comments on 15-day changes for Proposed At-Berth Amendment  
Comment:

Please see attached letter for comments from the Port of Oakland.

Attachment: [www.arb.ca.gov/lists/com-attach/117-ogvatberth2019-Wz1XOAdoVmRSOFcI.pdf](http://www.arb.ca.gov/lists/com-attach/117-ogvatberth2019-Wz1XOAdoVmRSOFcI.pdf)

Original File Name: Final Port of Oakland Comments on 15-day Changes to At-Berth Amendment.pdf

Date and Time Comment Was Submitted: 2020-05-01 12:26:08

No Duplicates.

**Comment 49 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: creheis@wspa.org  
Affiliation: Western States Petroleum Association

Subject: WSPA Comments on CARB 15-Day At Berth Regulation Changes  
Comment:

Attached is the WSPA Comment Letter regarding the CARB 15-Day At Berth Regulation Changes, dated May 1, 2020.

Attachment: [www.arb.ca.gov/lists/com-attach/118-ogvatberth2019-VjBUOwBvUGIEbglW.pdf](http://www.arb.ca.gov/lists/com-attach/118-ogvatberth2019-VjBUOwBvUGIEbglW.pdf)

Original File Name: Final WSPA At Berth CARB Comment Letter and Attachments May\_1\_2020.pdf

Date and Time Comment Was Submitted: 2020-05-01 12:52:06

No Duplicates.



**Comment 50 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: DAVID  
Last Name: KARLMAN  
Email Address: DMKTAK@GMAIL.COM  
Affiliation:

Subject: cruise ship pollution  
Comment:

ON BEHALF OF THE 172 RESIDENCES OF THE MERIDIAN CONDO BUILDING LOCATED AT 700 FRONT STREET, PLEASE STOP THE CRUISE SHIPS FROM POLLUTING OUR DOWNTOWN. THE STENCH FROM THE DIESEL ENGINES BLOW INTO OUR WINDOWS FREQUENTLY.

THERE ARE YOUNG CHILDREN AND SENIORS IN THE COLUMBOA NEIGHBORHOOD AND IT IS DISGRACEFUL THAT THE CITY ALLOWS THE SHIPS TO CONTINUE TO POLLUTE OUR BEAUTIFUL CITY.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 12:57:41

No Duplicates.

**Comment 51 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Terry Anne  
Last Name: Karlman  
Email Address: Terrykarlman@gmail.com  
Affiliation:

Subject: Please stop the ships from polluting our downtown  
Comment:

Please install second shore power system for the cruise liners. When they come into our city the diesel smoke and snoot is evident on the balcony's of our homes in downtown SD. It is effecting our real estate values and our health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 13:03:10

No Duplicates.

**Comment 52 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Marvin

Last Name: Pineda

Email Address: marvin@lobby-california.com

Affiliation:

Subject: At-Berth Regulations

Comment:

Dear CARB Staff - Please see attached ILWU letter on the At-Berth Regulations

Attachment: [www.arb.ca.gov/lists/com-attach/121-ogvatberth2019-BzdXZFxwBGcDNAkk.pdf](http://www.arb.ca.gov/lists/com-attach/121-ogvatberth2019-BzdXZFxwBGcDNAkk.pdf)

Original File Name: 05-01-20 ILWU Comment Letter - CARB At Bert Regs.pdf

Date and Time Comment Was Submitted: 2020-05-01 13:05:34

No Duplicates.

**Comment 53 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Marvin

Last Name: Pineda

Email Address: marvin@lobby-california.com

Affiliation:

Subject: ILWU At-Berth Regulations Comments

Comment:

Dear CARB Staff - Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/122-ogvatberth2019-ADBcb1R4WDsHMAkk.pdf](http://www.arb.ca.gov/lists/com-attach/122-ogvatberth2019-ADBcb1R4WDsHMAkk.pdf)

Original File Name: 05-01-20 ILWU Comment Letter - CARB At Bert Regs.pdf

Date and Time Comment Was Submitted: 2020-05-01 13:05:34

No Duplicates.

**Comment 54 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: Health and Medical Support for At-Berth Rule

Comment:

Please see attached letter of support from health and medical organizations in support of the OGV At Berth Rule.

Attachment: [www.arb.ca.gov/lists/com-attach/123-ogvatberth2019-UTkAY1U1UW4KeAlh.pdf](http://www.arb.ca.gov/lists/com-attach/123-ogvatberth2019-UTkAY1U1UW4KeAlh.pdf)

Original File Name: Health Support for At Berth Rule\_5.1.20.pdf

Date and Time Comment Was Submitted: 2020-05-01 13:08:13

No Duplicates.

**Comment 55 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Giles

Last Name: Pettifor

Email Address: gpettifor@portofh.org

Affiliation:

Subject: Port of Hueneme Comments on At Berth 15 Day Version

Comment:

See PDF

Attachment: [www.arb.ca.gov/lists/com-attach/124-ogvatberth2019-VzEGaV0yUGIFb1MM.pdf](http://www.arb.ca.gov/lists/com-attach/124-ogvatberth2019-VzEGaV0yUGIFb1MM.pdf)

Original File Name: FINAL Hueneme At Berth 15 Day Version Comment Letter May 2020 .pdf

Date and Time Comment Was Submitted: 2020-05-01 13:10:38

No Duplicates.

## **Comment 56 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Elaine

Last Name: Regan

Email Address: 13eregan@gmail.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am one of approximately 40,000 residents who live in Downtown San Diego.

Cruise ships visiting the Port of San Diego dock extremely close to our high-density residential neighborhood and I am very concerned about the toxic pollution caused by ships not connected to shore power. These ships contaminate all of downtown, but are especially dangerous for residents in the half-mile radius of the terminal (which includes the residential populations of high-rise condominiums, apartment complexes and hotels in the high-density districts known as Columbia, Marina and Little Italy). Many of these residents are literally one block from the cruise ship terminal - a distance of about 800 feet. There are approximately 1400 hotel rooms across the street from the ships.

I am concerned that CARB is not taking the proximity of the residential population to the docked ships into consideration during its rule making process. The San Diego cruise ship terminal situation is very different than that of Los Angeles and warrants different regulations. A "one size fits all" scenario does not provide the safeguards needed to protect the the health and welfare of the thousands of people living in Downtown San Diego.

1. The January 1, 2021 deadline for ships in fleets being required to connect to shore power is fine but, to safeguard the residents of Downtown San Diego, ALL cruise ships docking at the Port of San Diego should be required to meet this deadline, no exceptions. Cruise lines have had years to convert their ships so this should not create an undue burden for them, and would greatly reduce the pollution affecting downtown residents' lungs and homes.

2. Maintain (or shorten) the current time frame standards to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work is unacceptable. The Port of San Diego, and the visiting ships, need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards to allow more than two hours to connect to shore power.

3. As I understand it, the San Diego Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. This seems to be a reasonable and workable time-frame so increasing it to one hour, resulting in additional pollution, is not necessary. The risks to the health of downtown residents increases the longer the cruise ships are allowed to pollute downtown.

4. By January 1, 2021, please provide the necessary resources to the Port of San Diego so they may build the additional infrastructure to provide a second connection to shore power.

Thank you for your time and consideration.

Sincerely,

Elaine Regan  
San Diego

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 12:44:06

No Duplicates.



**Comment 57 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Doug

Last Name: Schneider

Email Address: dschneider@worldshipping.org

Affiliation: World Shipping Council

Subject: World Shipping Council Comments on Proposed 15-Day Changes

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/126-ogvatberth2019-BnEFbFUmU2wAYIQL.pdf](http://www.arb.ca.gov/lists/com-attach/126-ogvatberth2019-BnEFbFUmU2wAYIQL.pdf)

Original File Name: World Shipping Council Comments on CARB 15 Day Changes to At Berth Rule 1 May 2020.pdf

Date and Time Comment Was Submitted: 2020-05-01 13:48:46

No Duplicates.

**Comment 58 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Sande  
Last Name: George  
Email Address: sgeorge@stefangeorge.com  
Affiliation:

Subject: Comments on Proposed 15-Day Changes to the At Berth Regulation  
Comment:

Dear Clerk: Attached are the comments on the Proposed 15-day Changes to the Control Measure for Ocean-Going Vessels at Berth from the Cruise Lines International Association (CLIA). Thank you for the opportunity to comment. Sande George

Attachment: [www.arb.ca.gov/lists/com-attach/127-ogvatberth2019-B2YCcFYIUmMHZFMh.pdf](http://www.arb.ca.gov/lists/com-attach/127-ogvatberth2019-B2YCcFYIUmMHZFMh.pdf)

Original File Name: At Berth CLIA Final 15-Day Comments 5 1 20.pdf

Date and Time Comment Was Submitted: 2020-05-01 14:12:42

No Duplicates.

## **Comment 59 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Peter

Last Name: Warren

Email Address: pmwarren@cox.net

Affiliation: Indivisible San Pedro

Subject: OGVATBERTH2019

Comment:

ogvatberth2019

I am writing with regard to the At-Berth Regulation for Ocean Going Vessels (OGV) proposed for implementation in January 2021, and on behalf of Indivisible San Pedro and its more than 200 members, all residents and California voters.

The members of our group support the proposed update to existing At-Berth rules. They are necessary and overdue. The update strikes a compromise with industry, accelerating the date for inclusion of exempt classes of OGV, while providing additional flexibility for the shipping industry, a key source of jobs and vital economic activity for our city, state and nation.

We remain concerned that some who have long opposed At-Berth emission controls now suddenly discover the Covid-19 crisis and call for delay, claiming a new environment and an opaque future dictates rethinking this proposed update. Their cynicism and opportunism is breathtaking.

This new environment is killing people. That is a certainty. Rather than support delay, the pandemic emphasizes the urgent need for tough At-Berth regulation.

That's because Californians whose health is damaged by goods-movement driven pollution – those with underlying lung, asthma, heart, cardiovascular disease and high blood pressure – are the very people who are the most susceptible to the ravages of Covid-19, and those most likely to die from it, according to numerous reports in medical journals.

The At-Berth Regulation has been effective in reducing emissions from OGVs, one of the top sources of harmful air pollution in California, and the proposed changes to this regulation will save lives and money, as well as provide significant and widespread health benefits.

The answer to those who would use the pandemic disaster to undermine clean air rules is: Shame on you. And perhaps, the regulation should be tougher.

We cannot afford to delay or pause efforts to move forward with life-saving regulations, and it would be particularly inappropriate and a disgrace to delay the At-Berth Regulation in light of the COVID-19 pandemic, which is not going away this year or next,

perhaps not in some of our lifetimes.

Further and perhaps as important is that there is no connection between the proposed regulations and the decline in business at the twin ports.

You could cut emission rules and permit fees to the bone today and it would neither fix the feared recession in shipping nor the global recession, which are caused by the worldwide pandemic. The fix is not in easing regulation. It is in defeating the virus.

This cynicism from the Goods Movement folks is to be expected. They subscribe to Disaster Capitalism, which exploits every major catastrophe to externalize more costs and subsidize corporations at the expense of people's health. These very same industry voices have always opposed these regulations. This delay would simply exploit the disaster to push industry's longstanding opposition to regulations proven to save lives.

It is hard to find a silver lining in the pandemic. Yet, there are things about it that call to our better angels, that hang a lantern on the true cost of letting industry externalize its costs on the public, that tell us we must build a greener future.

These pandemic days, locals walk on Paseo del Mar in San Pedro, experiencing the vista across San Pedro Bay to Newport Beach as it was in Old Time California. The air is crystal clear and the pollution is diminished. The people in the Harbor Area are and will be healthier for it.

We are an inventive people. We are an entrepreneurial people. We are a hardworking people. Surely, both this vista and a thriving Goods Movement Industry can be in our future.

Yes, we need the jobs and the goods, but the industry must at the very least go electric, plug-in its ships at berth or bonnet them, and not fall for the dodge of turning to drilled gas to power trucks and equipment in the 21st Century.

Peter M. Warren  
Indivisible San Pedro

Attachment: [www.arb.ca.gov/lists/com-attach/128-ogvatberth2019-B2ZTNIIyByYDZwFe.docx](http://www.arb.ca.gov/lists/com-attach/128-ogvatberth2019-B2ZTNIIyByYDZwFe.docx)

Original File Name: aCARB letterFINALMAY1\_2020.docx

Date and Time Comment Was Submitted: 2020-05-01 14:14:48

No Duplicates.

## **Comment 60 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: becky

Last Name: vesterfelt

Email Address: beckyvesterfelt@gmail.com

Affiliation:

Subject: Comments Proposed Control Measure on Ocean-Going Vessels at Berth

Comment:

I am a resident of downtown San Diego, a predominantly residential downtown with 40,000 densely populated residents living in high-rise condominiums and apartment complexes. Over 1400 hotel rooms are across the street from the berthed ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft. The cruise ships docks are located within a half-mile radius of high-density residential populations of the Columbia, Marina and Little Italy neighborhood districts. The pollution created when the ships are not connected to shore power is toxic thus I am required to shut all windows and use AC when ships are at-berth in San Diego.

I don't believe CARB is considering the proximity of the ships to the residential population in its rulemaking. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk.

Comment on Section 93130.7 Vessel Operator Requirements

I am pleased passenger vessels will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise ship lines with their use of foreign registration currently circumvent safety, labor and environmental laws and it is very likely the cruise ship lines will simply begin repositioning their ships to berth at a variety of ports in 2021 to maintain the under 6 visits per year to avoid coming into compliance for however long they can continue circumventing California environmental mandates.

Section 93130.7b3A-B

Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and trained labor personnel are available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power. At San Diego downtown terminals Celebrity cruise line failed to connect to shore power on their Millenium and Eclipse ships in March and April 2020 for many days and nights. If the ship does not have trained personnel or proper equipment to make connection to existing shore power infrastructure then a Port official should not grant the ship access to a downtown terminal for berthing. If a ship is unable to connect to shore power the owner of the ship fund must meet mandate by retrofit, only use nonCalifornia ports, fund the cost of remediation, high-cost fines and/or fund infrastructure enhancements at ports they want to visit to allow for compliance.

Section 93130.8 Vessel Visit Exceptions is too lenient especially 8.e.(1) Until January 1, 2023 previously unregulated vessels are not subject to the vessel auxiliary engine requirements. Cruise lines already had years to convert their ships. Cruise ship lines desiring to come into San Diego Bay to dock at the San Diego downtown cruise ship terminal should not pollute the neighborhood people's lungs and homes.

Section 93130.8a (h) Remediation

Is there an incentive for a Port terminal operator to prefer remediation rather than ensure an individual cruise ship actually meets environmental mandates? Is the "remediation" actually cost effective for the ship fleet operator?

Section 93130.9 Terminal Operator Requirements

In order for the Port of San Diego to meet the connection requirements already proposed, it requires funding to build the additional infrastructure to provide a second and third shore-power connection for its 3 berths. Please provide the resources to make this happen before Jan 1, 2021.

Although the San Diego Port's website indicates there are 2 shore-power connections at the downtown cruise ship terminal the fact is there is a single connection. The San Diego Port should not be calendaring any more cruise ships than a single ship and also ensuring the ship can actually be connected to shore power. Unfortunately the San Diego Port has routinely allowed for multiple ships to be in port concurrently which results in ships not using shore power due to lack of infrastructure. Residents, like me, want this to end before or by Jan. 1, 2021.

Suggestion: Prior to a Port scheduling a visit by a cruise ship line ensure the proposed visiting ship's shore power requirements are known to match the existing shore-power and ensure each arriving ship will have trained personnel to perform hookup to shore power. If the ship cannot connect to the existing infrastructure then enhanced infrastructure be funded by the cruise line: cost of purchase, installation and maintenance of shore power to ensure their line has access to the type of shore power which their ships require to meet environmental mandates. And cruise ship personnel must be trained to perform hook-up to shore-power infrastructure each port terminal they plan to berth.

Section 93130.11-16

If a terminal has rarely visited berths within its terminal does that mean a noncompliant ship would then circumvent simply by assignment by the port to use the rarely used berth at a terminal.

I have concerns regarding how compliant local Port terminal operators are toward ensuring environmental mandates are met due to a likely close working relationship with fleet operators. And to be effective the timeliness of response time on CARB communications and terminal reporting of vessel visits and incident events is imperative thus staffing levels must meet those needs.

Section 93130.11-17 Innovative Concept Compliance Option

Funding the cost and educating ports of innovations toward delivery of goods which in San Diego is currently done via semi trucks serving berthed cruise ships at the downtown terminal and the current transport of passengers by bus/taxi/personal vehicles which also currently decreases air quality in the immediate and surrounding area. Suggest mandate such innovations to ports to offset poor air quality generated by terminal operations.

Thank you for considering my concerns. Every hour ships are allowed to pollute, especially in a densely residential downtown, places the health and welfare of thousands of people at risk.

Thank you for considering my concerns.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 14:33:11

No Duplicates.

**Comment 61 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: David

Last Name: Yow

Email Address: dyow@portofsandiego.org

Affiliation:

Subject: Comments re: Notice of Public Availability of Modified Text and Availability of Additional

Comment:

Please see attachments in ZIP file.

Attachment: [www.arb.ca.gov/lists/com-attach/130-ogvatberth2019-V2ZSYVJ+BzAEYwIw.zip](http://www.arb.ca.gov/lists/com-attach/130-ogvatberth2019-V2ZSYVJ+BzAEYwIw.zip)

Original File Name: 15-Day Comment.zip

Date and Time Comment Was Submitted: 2020-05-01 14:30:17

No Duplicates.



## **Comment 62 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Peter

Last Name: Warren

Email Address: pmwarren@cox.net

Affiliation: Indivisible San Pedro

Subject: OGVATBERTH2019

Comment:

ogvatberth2019

I am writing with regard to the At-Berth Regulation for Ocean Going Vessels (OGV) proposed for implementation in January 2021, and on behalf of Indivisible San Pedro and its more than 200 members, all residents and California voters.

The members of our group support the proposed update to existing At-Berth rules. They are necessary and overdue. The update strikes a compromise with industry, accelerating the date for inclusion of exempt classes of OGV, while providing additional flexibility for the shipping industry, a key source of jobs and vital economic activity for our city, state and nation.

We remain concerned that some who have long opposed At-Berth emission controls now suddenly discover the Covid-19 crisis and call for delay, claiming a new environment and an opaque future dictates rethinking this proposed update. Their cynicism and opportunism is breathtaking.

This new environment is killing people. That is a certainty. Rather than support delay, the pandemic emphasizes the urgent need for tough At-Berth regulation.

That's because Californians whose health is damaged by goods-movement driven pollution – those with underlying lung, asthma, heart, cardiovascular disease and high blood pressure – are the very people who are the most susceptible to the ravages of Covid-19, and those most likely to die from it, according to numerous reports in medical journals.

The At-Berth Regulation has been effective in reducing emissions from OGVs, one of the top sources of harmful air pollution in California, and the proposed changes to this regulation will save lives and money, as well as provide significant and widespread health benefits.

The answer to those who would use the pandemic disaster to undermine clean air rules is: Shame on you. And perhaps, the regulation should be tougher.

We cannot afford to delay or pause efforts to move forward with life-saving regulations, and it would be particularly inappropriate and a disgrace to delay the At-Berth Regulation in light of the COVID-19 pandemic, which is not going away this year or next,

perhaps not in some of our lifetimes.

Further and perhaps as important is that there is no connection between the proposed regulations and the decline in business at the twin ports.

You could cut emission rules and permit fees to the bone today and it would neither fix the feared recession in shipping nor the global recession, which are caused by the worldwide pandemic. The fix is not in easing regulation. It is in defeating the virus.

This cynicism from the Goods Movement folks is to be expected. They subscribe to Disaster Capitalism, which exploits every major catastrophe to externalize more costs and subsidize corporations at the expense of people's health. These very same industry voices have always opposed these regulations. This delay would simply exploit the disaster to push industry's longstanding opposition to regulations proven to save lives.

It is hard to find a silver lining in the pandemic. Yet, there are things about it that call to our better angels, that hang a lantern on the true cost of letting industry externalize its costs on the public, that tell us we must build a greener future.

These pandemic days, locals walk on Paseo del Mar in San Pedro, experiencing the vista across San Pedro Bay to Newport Beach as it was in Old Time California. The air is crystal clear and the pollution is diminished. The people in the Harbor Area are and will be healthier for it.

We are an inventive people. We are an entrepreneurial people. We are a hardworking people. Surely, both this vista and a thriving Goods Movement Industry can be in our future.

Yes, we need the jobs and the goods, but the industry must at the very least go electric, plug-in its ships at berth or bonnet them, and not fall for the dodge of turning to drilled gas to power trucks and equipment in the 21st Century.

Peter M. Warren  
Indivisible San Pedro

619 W 38 ST  
San Pedro, CA 90731

Original File Name: aCARB letterFINALMAY1\_2020.docx

Date and Time Comment Was Submitted: 2020-05-01 14:39:12

No Duplicates.

## **Comment 63 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Fred

Last Name: Hottinger

Email Address: frh119@me.com

Affiliation: Sapphire Tower HOA

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Please allow me to suggest a careful read of the attached articles from the NYT on 3/28/2020 and from the HuffPost on 3/31/2020 and then, in the light of this, please explain to the residents in the Columbia district of San Diego why the Port of San Diego still allows the deadly pollution from cruise ships, ferry boats and excursion boats to go on.

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density residential neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than Los Angeles/Long Beach's and should be treated differently.

1. We are pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one (1) hour. Please do not lower standards by allowing two(2) hours or more to connect to shore power. After all, when ships come in at speeds of 7-12 kn and with long prior notification of & permission from the Port of San Diego

3. San Diego's Port Authority allows cruise ships to re-start their engines 1/2 hour before leaving the berth. We want that to

continue. A one hour timeframe to pollute is not necessary. Every hour the cruise ships are allowed to pollute downtown puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen for the Port's readiness by Jan 1, 2021.

Sincerely,  
Fred Hottinger  
Vice President Sapphire Tower Home Owner Association

Attachment: [www.arb.ca.gov/lists/com-attach/132-ogvatberth2019-BWQFalMgWXpSOwdr.zip](http://www.arb.ca.gov/lists/com-attach/132-ogvatberth2019-BWQFalMgWXpSOwdr.zip)

Original File Name: AirPollution.zip

Date and Time Comment Was Submitted: 2020-05-01 14:35:48

No Duplicates.

## **Comment 64 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: LeAnna

Last Name: Zevely

Email Address: lzevely@gmail.com

Affiliation:

Subject: Proposed Control Measure for Ocean-going Vessels at Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan

1, 2021.

Sincerely,

LeAnna Zevely

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 15:06:51

No Duplicates.

**Comment 65 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: John

Last Name: Husar

Email Address: jthusar@gmail.com

Affiliation:

Subject: Ocean going vessels / cruise ships

Comment:

I live across the street from the cruise ships in Downtown San Diego. When the cruise ships are not plugged in all we smell is a Diesel smell and sometimes soot on are patios . I would like all the ships to plug in rather than using its polluted engines . Thank you !!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 15:09:30

No Duplicates.



## **Comment 66 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: C H

Last Name: Fitzgerald

Email Address: PrivacyEnjoyed@Gmail.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Proposed Control Measure for Ocean-Going Vessels At Berth

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore

power. Please provide the resources to make this happen before Jan  
1, 2021.

Sincerely,  
C.H.Fitzgerald

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 15:32:45

No Duplicates.

## **Comment 67 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Chalea

Last Name: Pierce

Email Address: Chaleapierce1@gmail.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the

additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,  
Chalea Pierce  
1199 Pacific Hwy #305  
San Diego, CA 92101

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 15:35:33

No Duplicates.

**Comment 68 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mike

Last Name: Jacob

Email Address: mjacob@pmsaship.com

Affiliation: Pacific Merchant Shipping Association

Subject: Industry Coalition Comments on At Berth 15 Day Change Notice 05012020

Comment:

Clerk of the Board,

Please find attached "Industry Coalition Comments on At Berth 15 Day Change Notice" on behalf of PMSA, CAPA, CLIA, WSC, and WSPA.

Sincerely,

Mike Jacob

PMSA

Attachment: [www.arb.ca.gov/lists/com-attach/137-ogvatberth2019-UzpXP1w5UnQCd1Im.pdf](http://www.arb.ca.gov/lists/com-attach/137-ogvatberth2019-UzpXP1w5UnQCd1Im.pdf)

Original File Name: Industry Coalition Comments on At Berth 15-Day Change Notice 05012020 (002).pdf

Date and Time Comment Was Submitted: 2020-05-01 15:41:52

No Duplicates.

**Comment 69 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Thomas  
Last Name: Jelenic  
Email Address: tjelenic@pmsaship.com  
Affiliation: PMSA

Subject: PMSA Comment Letter on At Berth 15-Day Changes  
Comment:

Please find attached PMSA's comment letter on the 15-Day Changes for the At Berth Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/138-ogvatberth2019-BnZTOAFzUGIBWFc0.pdf](http://www.arb.ca.gov/lists/com-attach/138-ogvatberth2019-BnZTOAFzUGIBWFc0.pdf)

Original File Name: PMSA Comments on At Berth 15-Day Change Notice 05012020.pdf

Date and Time Comment Was Submitted: 2020-05-01 15:47:21

No Duplicates.

**Comment 70 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: ROBERT  
Last Name: PISKULE  
Email Address: rjp527@yahoo.com  
Affiliation: downtown resident

Subject: BROADWAY AND B STREET PIER CRUISE SHIP RULES

Comment:

We need one more at least power hook station for cruise ships ASAP.  
They need to hook up within 1/2 hour after docking. This needs to apply to ALL ships(100%).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 15:48:39

No Duplicates.

**Comment 71 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Igor  
Last Name: Tregub  
Email Address: itregub@gmail.com  
Affiliation: Sierra Club

Subject: SUPPORT for Measure  
Comment:

I support this proposal because:

Regulation reduces harmful pollutants such as diesel particles in refinery and other vulnerable communities;  
Health benefits are twice higher than the costs to ship owners, Ports and refineries;  
Emission Control costs add less than a penny to the cost of fuel at the pump;  
Bay Area oil terminals should be required to comply by 2025, on the same schedule as terminals located in Southern California;  
Money from penalties or alternative compliance actions should be spent in consultation with local communities on local emission reduction actions.

Thank you for your consideration!

Igor

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 16:04:12

No Duplicates.



**Comment 72 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Brian

Last Name: McDonald

Email Address: BCMcDonald@Marathonperoleum.com

Affiliation: Marathon Petroleum Company

Subject: Marathon Petroleum Corporation's comments on the California Air Resources Board proposed C

Comment:

Marathon Petroleum Corporation's comments on the California Air Resources Board At-Berth Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/141-ogvatberth2019-VjsCdANhBQIQNQdo.pdf](http://www.arb.ca.gov/lists/com-attach/141-ogvatberth2019-VjsCdANhBQIQNQdo.pdf)

Original File Name: MPC Comment letter to the proposed At-Berth regulation.pdf

Date and Time Comment Was Submitted: 2020-05-01 16:18:39

No Duplicates.

## **Comment 73 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: James

Last Name: Nathenson

Email Address: natesr@aol.com

Affiliation:

Subject: Subject: Proposed Control Measure for Ocean-Going Vessels At Berth I am a resident of do

Comment:

Subject: Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

James M. Nathenson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 16:35:49

No Duplicates.

## **Comment 74 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Barbara

Last Name: Nathenson

Email Address: bjnathenson@aol.com

Affiliation:

Subject: Subject: Proposed Control Measure for Ocean-Going Vessels At Berth I am a resident of do

Comment:

Subject: Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

Barbara J. Nathenson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 16:35:49

No Duplicates.

**Comment 75 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Steven  
Last Name: Wallauch  
Email Address: stw@platinumadvisors.com  
Affiliation: CAPA

Subject: Comments on Ocean-Going Vessels At Berth  
Comment:

Please find attached comments from the California Association of Port Authorities (CAPA).

Attachment: [www.arb.ca.gov/lists/com-attach/144-ogvatberth2019-BmUAZwZ3UmBWD1Q3.pdf](http://www.arb.ca.gov/lists/com-attach/144-ogvatberth2019-BmUAZwZ3UmBWD1Q3.pdf)

Original File Name: CAPA CARB At Berth Letter 5-1 version\_MC .pdf

Date and Time Comment Was Submitted: 2020-05-01 16:46:09

No Duplicates.

## **Comment 76 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Janet

Last Name: Fox

Email Address: janetcf0602@gmail.com

Affiliation: Mrs

Subject: Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

My husband and I are residents of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotel. Over 1400 hotel rooms are across the street from the ships and any residents are literally one block from the cruise ship terminal, a distance of about 800 feet.

We don't believe CARB is considering the proximity to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

We are happy that ships in fleets will be required to connect to shore power Jan. 1, 2021 but we want EVERY ship to meet this requirement with no exceptions, at the San Diego cruise ship terminal. The cruise lines have had years to convert their ships.

Maintain the current time frame standards, or make them even tougher, to connect to shore power. One hour after the ship dock is acceptable. Changing this connection time to 2 hours after "Ready to Work is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect one hour - please do not lower standards.

San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth and should be continued. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

For the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before January 1, 2021.

Sincerely,

Janet and Alan Fox

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 16:23:21

No Duplicates.



## **Comment 77 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Nancy

Last Name: Lietzke

Email Address: nancy@lietzke.com

Affiliation:

Subject: Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I am a resident of downtown San Diego, along with 40,000 other people. The cruise ships dock extremely close to our high-density neighborhood and the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A one hour timeframe to pollute, is not necessary. Every hour the cruise ships are allowed to pollute downtown, puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 17:28:23

No Duplicates.

**Comment 78 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Mugurel  
Last Name: Calin  
Email Address: mugurel.calin@swirecnco.com  
Affiliation:

Subject: Assigning VIE's for a small fleet  
Comment:

Good afternoon,

We, as a very small fleet operator, we are concerned with wording on legislation for assigning VIE to a fleet. For container fleets it is said to be 5% of total amount of visits from previous year and the number will be rounded to the nearest whole number. On our fleet, we average 9 to 11 port calls a year and that resulting in a total assigned VIE of 0.45 to 0.55. In a year where we would have only 9 port calls, assigned VIE for following year would be 0.44 which rounded to nearest whole number would become zero. While we are not planning to have non compliant call, as the board is very well aware, vessel breakdowns happens that sometime results in emergency replacement of tonnage. Could the board consider reviewing wording to read "The number of VIEs granted is rounded UP to nearest whole number"?

Respectfully,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-05-01 17:31:04

No Duplicates.

## **Comment 79 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Kent

Last Name: Pryor

Email Address: kentp@alum.mit.edu

Affiliation:

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

I love seeing the cruise ships coming and going from the window of my condo in downtown San Diego a block away from the B Street terminal. That said, the pollution caused when the ships are not connected to shore power is toxic. The ships contaminate the whole downtown, but are especially dangerous for residents in the half-mile radius of the terminal, including the high-density populations of Columbia, Marina and Little Italy Districts, with high-rise condominiums like mine, apartment complexes and hotels. Over 1400 hotel rooms are across the street from the ships and many residents are literally one block from the cruise ship terminal, a distance of about 800 ft.

I don't believe CARB is considering the proximity of the ships to the residential population in its rule making. A one size fits all scenario for rule-making does not work since the health and welfare of thousands of people is being put at risk. The San Diego cruise ship terminal is very different than LA's and should be treated differently.

1. I am pleased that ships in fleets will be required to connect to shore power Jan 1, 2021. I want ALL cruise ships to meet this requirement, no exceptions, at the San Diego cruise ship terminal. Cruise lines already had years to convert their ships. If they want to dock in San Diego they should not pollute the neighborhood and people's lungs and homes.

2. Maintain the current timeframe standards, or make them tougher, to connect to shore power. One hour after the ship docks to berth is acceptable. Changing this connection time to 2 hours after Ready to Work, in our situation, is unacceptable. Vessels and the Port need to make sure that the connections are maintained and labor is available to connect in one hour. Please do not lower standards and allow more than two hours to connect to shore power.

3. San Diego's Port Authority allows cruise ships to re-engage their engines 1/2 hour before leaving the berth. I want that to continue. A full hour to pollute is not necessary. Every hour the cruise ships are allowed to pollute downtown puts our health at increased risk.

4. In order for the Port of San Diego to meet the connection requirements already proposed, it needs money to build the additional infrastructure to provide a second connection to shore power. Please provide the resources to make this happen before Jan 1, 2021.

Please find enclosed a photograph taken from the balcony off my master bedroom just now. The trees in the foreground are planted right in front of my building--that is not a zoomed-in photo! Two Celebrity ships have been camping out here full-time since the coronavirus lockdown; neither is shore power-capable and they have been making the air in my home smell like exhaust and giving me headaches. I beg you to help with the air quality situation for me and my many thousands of neighbors in downtown San Diego!

Sincerely,  
Kent Pryor

Attachment: [www.arb.ca.gov/lists/com-attach/148-ogvatberth2019-UzoFbII0UFwFM1dm.jpeg](http://www.arb.ca.gov/lists/com-attach/148-ogvatberth2019-UzoFbII0UFwFM1dm.jpeg)

Original File Name: IMG\_0181.jpeg

Date and Time Comment Was Submitted: 2020-05-01 18:33:21

No Duplicates.

**Comment 80 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-1.**

First Name: Christopher  
Last Name: Cannon  
Email Address: ccannon@portla.org  
Affiliation: Port of Los Angeles

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels At Berth  
Comment:

Thank you for the opportunity to submit the attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/149-ogvatberth2019-BnUAdlAzWXoBWAY3.pdf](http://www.arb.ca.gov/lists/com-attach/149-ogvatberth2019-BnUAdlAzWXoBWAY3.pdf)

Original File Name: SPBP 15-Day Changes Comment letter\_CARB - FINAL 5-1-2020.pdf

Date and Time Comment Was Submitted: 2020-05-01 22:12:56

No Duplicates.

**Comment 1 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Art  
Last Name: Mead  
Email Address: art.mead@crowley.com  
Affiliation:

Subject: Crowley Comments on Second 15-Day Notice  
Comment:

Attached are Crowley Maritime Corporation's comments on the second proposed 15-day changes to the At-Berth Rule.

Attachment: [www.arb.ca.gov/lists/com-attach/172-ogvatberth2019-WjlSJlM9AycFb1Uw.pdf](http://www.arb.ca.gov/lists/com-attach/172-ogvatberth2019-WjlSJlM9AycFb1Uw.pdf)

Original File Name: Crowley Comments on Second 15-Day Packet (2020-07-22).pdf

Date and Time Comment Was Submitted: 2020-07-22 13:59:19

No Duplicates.

**Comment 2 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Wayne

Last Name: Natri

Email Address: Non-web submitted comment

Affiliation: South Coast AQMD

Subject: Second 15-Day Changes on the Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/173-ogvatberth2019-UCNVMFExWWhoGbQVh.pdf](http://www.arb.ca.gov/lists/com-attach/173-ogvatberth2019-UCNVMFExWWhoGbQVh.pdf)

Original File Name: scaqmd.pdf

Date and Time Comment Was Submitted: 2020-07-24 14:31:30

No Duplicates.



**Comment 3 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Shingo  
Last Name: Mizutani  
Email Address: shingo.mizutani@nykgroup.com  
Affiliation:

Subject: Opnion statement  
Comment:

Dear Sirs,

Please find attached file.

B.Regards,  
Mizutani/NYK LINE  
Automotive Quality Control Group

Attachment: [www.arb.ca.gov/lists/com-attach/176-ogvatberth2019-AGFTMVA1UGoLeVA5.pdf](http://www.arb.ca.gov/lists/com-attach/176-ogvatberth2019-AGFTMVA1UGoLeVA5.pdf)

Original File Name: Additional opinion Statement to Second Proposed 15-Day changes for ocean-going vessels at berth dated on July 10 2020\_(inc Initial & 2nd opinion).pdf

Date and Time Comment Was Submitted: 2020-07-25 01:58:56

No Duplicates.

**Comment 4 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Lee  
Last Name: Kindberg  
Email Address: lee.kindberg@maersk.com  
Affiliation: Maersk

Subject: Comments on At-berth Second 15-day Notice  
Comment:

Please see attached for our comments on the Second Public Availability of Modified Text and Availability of Additional Documents and Information for the Proposed Control Measure for Ocean-Going Vessels At Berth, Board item ogvatberth2019.

Attachment: [www.arb.ca.gov/lists/com-attach/177-ogvatberth2019-VThQN1M3BCUDdgRv.pdf](http://www.arb.ca.gov/lists/com-attach/177-ogvatberth2019-VThQN1M3BCUDdgRv.pdf)

Original File Name: Maersk comments on CARB At-berth Second 15 day package 7-24-2020.pdf

Date and Time Comment Was Submitted: 2020-07-26 18:23:57

No Duplicates.

**Comment 5 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Mike  
Last Name: Jacob  
Email Address: mjacob@pmsaship.com  
Affiliation:

Subject: Industry Coalition Comments on At Berth 2d 15 Day Change Notice 07272020  
Comment:

Good afternoon,  
Please find attached coalition comments on behalf of California Association of Port Authorities, Cruise Lines International Association, Pacific Merchant Shipping Association, Western States Petroleum Association, and World Shipping Council regarding the proposed 2d 15-day changes to the proposed Ocean Going Vessels At Berth control measure.  
Best,  
Mike Jacob  
PMSA

Attachment: [www.arb.ca.gov/lists/com-attach/178-ogvatberth2019-Vj8AaAFkUXcGwdz.pdf](http://www.arb.ca.gov/lists/com-attach/178-ogvatberth2019-Vj8AaAFkUXcGwdz.pdf)

Original File Name: Industry Coalition Comments on 2nd At Berth 15-Day Change Notice 07272020.pdf

Date and Time Comment Was Submitted: 2020-07-27 12:48:47

No Duplicates.

**Comment 6 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Doug

Last Name: Schneider

Email Address: dschneider@worldshipping.org

Affiliation: World Shipping Council

Subject: World Shipping Council Comments on 2nd Notice of 15-Day Changes

Comment:

Please see the attached comments of the World Shipping Council on CARB's second notice of 15-day changes to the proposed control measure for ocean-going vessels at berth.

Attachment: [www.arb.ca.gov/lists/com-attach/179-ogvatberth2019-AHdSJ1EzBAGeYVc4.pdf](http://www.arb.ca.gov/lists/com-attach/179-ogvatberth2019-AHdSJ1EzBAGeYVc4.pdf)

Original File Name: WSC Comments on Second 15 Day Changes on CARB Proposed At Berth Rule 27 Jul 2020.pdf

Date and Time Comment Was Submitted: 2020-07-27 13:57:51

No Duplicates.

**Comment 7 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Sande  
Last Name: George  
Email Address: sgeorge@stefangeorge.com  
Affiliation: Lobbyist for CLIA

Subject: CLIA Comments on Second Supplemental 15-Day Notice - Proposed Reg of  
Oceangoing Vessels

Comment:

Thank you for the opportunity to comment on the proposed At Berth  
Regulation Second 15-Day Changes on behalf of the Cruise Lines  
International Association (CLIA). Sande George

Attachment: [www.arb.ca.gov/lists/com-attach/180-ogvatberth2019-VzRcO1YIWGIWDwhu.pdf](http://www.arb.ca.gov/lists/com-attach/180-ogvatberth2019-VzRcO1YIWGIWDwhu.pdf)

Original File Name: CARB F SECOND 15 DAY AT BERTH CLIA COMMENTS 7 27  
2020.pdf

Date and Time Comment Was Submitted: 2020-07-27 14:41:48

No Duplicates.

**Comment 8 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Steven

Last Name: Wallauch

Email Address: stw@platinumadvisors.com

Affiliation: California Association of Port Authoriti

Subject: CAPA Comments on Second 15-Day Notice

Comment:

Please find attached CAPA's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/181-ogvatberth2019-UzBcO1MiVWcLUIQ3.pdf](http://www.arb.ca.gov/lists/com-attach/181-ogvatberth2019-UzBcO1MiVWcLUIQ3.pdf)

Original File Name: CAPA CARB 2nd 15 Day Comment Letter 7-24.pdf

Date and Time Comment Was Submitted: 2020-07-27 15:59:48

No Duplicates.

**Comment 9 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Thomas  
Last Name: Jelenic  
Email Address: tjelenic@pmsaship.com  
Affiliation: PMSA

Subject: OGV At Berth -- PMSA Comments on Second Supplemental 15-Day Notice  
Comment:

Please find attached PMSA's comments on the Second Supplemental 15-Day Notice for the proposed At Berth Regulation

Attachment: [www.arb.ca.gov/lists/com-attach/182-ogvatberth2019-UiJVPIMhVWdQCVAz.pdf](http://www.arb.ca.gov/lists/com-attach/182-ogvatberth2019-UiJVPIMhVWdQCVAz.pdf)

Original File Name: PMSA Comments on 2nd At Berth 15-Day Change Notice 07272020.pdf

Date and Time Comment Was Submitted: 2020-07-27 17:08:28

No Duplicates.

**Comment 10 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Matt

Last Name: Arms

Email Address: Matthew.Arms@polb.com

Affiliation: Port of Long Beach

Subject: SECOND 15-DAY CHANGES TO THE PROPOSED CONTROL MEASURE FOR OCEAN-GOING VESSELS AT BERTH

Comment:

SPBP Letter Attached

Attachment: [www.arb.ca.gov/lists/com-attach/183-ogvatberth2019-B3RTJQNgACNQCVMj.pdf](http://www.arb.ca.gov/lists/com-attach/183-ogvatberth2019-B3RTJQNgACNQCVMj.pdf)

Original File Name: SPBP Ports Letter.pdf

Date and Time Comment Was Submitted: 2020-07-27 17:16:16

No Duplicates.



**Comment 11 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Tracy  
Last Name: Fidell  
Email Address: tfidell@portoakland.com  
Affiliation: Port of Oakland

Subject: Port comment letter on 2nd 15-day changes  
Comment:

Please see attached comment letter on the 15-day changes.  
Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/184-ogvatberth2019-BXVVPFYIAyQLUgZp.pdf](http://www.arb.ca.gov/lists/com-attach/184-ogvatberth2019-BXVVPFYIAyQLUgZp.pdf)

Original File Name: Port of Oakland at-berth comment letter FINAL 200727.pdf

Date and Time Comment Was Submitted: 2020-07-27 16:55:36

No Duplicates.

## **Comment 12 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Jesse N  
Last Name: Marquez  
Email Address: jnm4ej@yahoo.com  
Affiliation: Coalition For A Safe Environment

Subject: Public Comments Submission  
Comment:

Re: Public Comments Submission In Opposition To Specific Proposed Amendments  
And Requests To Correct And Include Additional Information

Dear CARB Board Members:

The Coalition For A Safe Environment and et all signatory organizations submit these joint public comments on the Proposed Control Measure for Ocean-Going Vessels At Berth Rule Amendments.

We represent a broad base coalition of port community organizations in California and we object to the significant last minute and unacceptable changes to the Proposed Control Measure for Ocean-Going Vessels At Berth Rule. Many of the changes are delays in implementation or compliance which have significant impacts on public health, the environment and climate change. Hundreds of innocent residents and children will die prematurely and hospitalized with the new delays in implementation and compliance. This is an act of Environmental Racism.

CARB Staff has continuously failed to include 99% of all EJ Community recommendations, requests, information omissions, needed corrections and definitions that have been submitted in writing during the public comment periods. This is an act of Environmental Racism.

We request that you not approve the Proposed Control Measure for Ocean-Going Vessels At Berth Rule as presented by CARB Staff until the final At Berth Rule includes information corrections, information omissions, additional assessments information, recommendations and requests by the organization in these public comments. CARB Staff ignored 99% of all our concerns, document errors, information omissions, recommendations and requests.

See attached complete public comments.

Respectfully submitted,

Jesse N Marquez

Executive Director  
Coalition For A Safe Environment

Attachment: [www.arb.ca.gov/lists/com-attach/185-ogvatberth2019-AmFTM1U1BSVSMVMM.pdf](http://www.arb.ca.gov/lists/com-attach/185-ogvatberth2019-AmFTM1U1BSVSMVMM.pdf)

Original File Name: CFASE et al CARB At Berth Rule Public Comments Final 7-27-2020 PDF.pdf

Date and Time Comment Was Submitted: 2020-07-27 20:09:23

No Duplicates.

**Comment 13 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Giles

Last Name: Pettifor

Email Address: gpettifor@portofh.org

Affiliation:

Subject: Port of Hueneme Comment Letter

Comment:

See Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/186-ogvatberth2019-VDwHdANnV2oHZAJv.pdf](http://www.arb.ca.gov/lists/com-attach/186-ogvatberth2019-VDwHdANnV2oHZAJv.pdf)

Original File Name: Hueneme At Berth 15 Day Version Comment Letter July 2020.pdf

Date and Time Comment Was Submitted: 2020-07-27 22:04:04

No Duplicates.

**Comment 14 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Shingo

Last Name: Mizutani

Email Address: Non-web submitted comment

Affiliation:

Subject: Questions for At Berth Regulation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/187-ogvatberth2019-VThSPQN4ACZWJAR1.pdf](http://www.arb.ca.gov/lists/com-attach/187-ogvatberth2019-VThSPQN4ACZWJAR1.pdf)

Original File Name: mizutani.pdf

Date and Time Comment Was Submitted: 2020-07-29 09:44:07

No Duplicates.

**Comment 15 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Sophie  
Last Name: Ellinghouse  
Email Address: [sellinghouse@wspa.org](mailto:sellinghouse@wspa.org)  
Affiliation: WSPA

Subject: WSPA Comments on the Second 15-Day Changes  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/188-ogvatberth2019-ViEFcAZ3BTdQeAh4.pdf](http://www.arb.ca.gov/lists/com-attach/188-ogvatberth2019-ViEFcAZ3BTdQeAh4.pdf)

Original File Name: [wspa.pdf](#)

Date and Time Comment Was Submitted: 2020-07-29 09:46:16

No Duplicates.

**Comment 16 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Janet

Last Name: Rogers

Email Address: jsrogersd624@gmail.com

Affiliation: Embarcadero Coalition

Subject: Comment on Proposed Control Measure for Ocean-Going Vessels At Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/189-ogvatberth2019-VCZWPwRiWW9SJIMg.pdf](http://www.arb.ca.gov/lists/com-attach/189-ogvatberth2019-VCZWPwRiWW9SJIMg.pdf)

Original File Name: rogers.pdf

Date and Time Comment Was Submitted: 2020-07-29 09:47:51

No Duplicates.

**Comment 17 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Pat

Last Name: Pressel

Email Address: pat92101@att.net

Affiliation:

Subject: Comments on Proposed Control Measure for Ocean-Going Vessels at Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/190-ogvatberth2019-AnJXI1UxUHBVIFI3.pdf](http://www.arb.ca.gov/lists/com-attach/190-ogvatberth2019-AnJXI1UxUHBVIFI3.pdf)

Original File Name: pressel.pdf

Date and Time Comment Was Submitted: 2020-07-29 09:49:53

No Duplicates.



**Comment 18 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Bob  
Last Name: Piskule  
Email Address: rjp527@yahoo.com  
Affiliation: Embarcadero Coalition

Subject: CARB ruling for Cruise Ships  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/191-ogvatberth2019-VycBblQmVm5VJgNv.pdf](http://www.arb.ca.gov/lists/com-attach/191-ogvatberth2019-VycBblQmVm5VJgNv.pdf)

Original File Name: piskule.pdf

Date and Time Comment Was Submitted: 2020-07-29 09:50:48

No Duplicates.

**Comment 19 for To Consider Proposed Control Measure for Ocean-Going Vessels At Berth (ogvatberth2019) - 15-2.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Proposed Control Measure for Ocean Going Vessels At Berth

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/192-ogvatberth2019-B2pVM1A2V2VXJwVg.pdf](http://www.arb.ca.gov/lists/com-attach/192-ogvatberth2019-B2pVM1A2V2VXJwVg.pdf)

Original File Name: magavern.pdf

Date and Time Comment Was Submitted: 2020-07-29 10:00:52

No Duplicates.