

## **Comment 1 for Public Comments on At-berth and At-Anchor Regulation (atberth-atanchor-ws) - 1st Workshop.**

First Name: William

Last Name: Walters

Email Address: walters.william@ymail.com

Affiliation:

Subject: HRA - Use of defensible input assumptions (do not blindly use 2006 study inputs)

Comment:

The modeling files do not appear to provide reasonable accurate inputs by vessel type, including providing for appropriate vessel structure x,y,z parameters necessary to include stack downwash effects. Disagree with using the noted 2006 study approach and assumptions that does not factor in downwash, the previous modeling methods that can be improved on should be improved. OGVs at berth are obviously stationary and many or most of the stacks with these OGVs are connected to or are closely associated with other tall structures on these OGVs (primarily the bridge structures). Not including appropriate downwash parameters will clearly affect the results of the modeling analysis and this certainly would not be allowed for the modeling of other "stationary" sources and should not be allowed here. Other old 2006 study critical input assumptions including the stack height, the stack velocity, and stack diameter should have been confirmed/revised as necessary. These factors can be related to the size/type of vessel more explicitly, including the use of assumed engine size and load factors available from POLA/POLB emissions inventory documents to relate to appropriate diameter/velocity (total flow/plume rise) and assumed stack height by vessel type can be better reasoned using many available data sources...not improving on these old and most likely inaccurate and overly static 2006 study input data assumptions means the HRA analysis is severely flawed before running the model.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-12-17 14:27:26

No Duplicates.

## **Comment 2 for Public Comments on At-berth and At-Anchor Regulation (atberth-atanchor-ws) - 1st Workshop.**

First Name: William

Last Name: Walters

Email Address: walters.william@ymail.com

Affiliation:

Subject: HRA - POLB Berth Locations and Meteorological Data

Comment:

The Berth locations figure appears to show berth locations at the Port of Long Beach (at Pier F, perhaps others) that are no longer used/available for use. The modeled berth locations should be coordinated with the Ports to ensure currently used berths are modeled.

The HRA doesn't note that the Port of Long Beach also has two meteorological data sites, with ready to go formatted AERMOD meteorological data, that should have been considered for use. The Port of Long Beach outer harbor (Gull Park) site likely would not be considered the most representative/best site for the HRA modeling; however, the inner harbor site, which is the site closest to many sensitive receptor locations should have been considered and potentially used in the modeling analysis.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-12-18 11:27:13

No Duplicates.

**Comment 3 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Janet

Last Name: Rogers

Email Address: jsrogers624@hotmail.com

Affiliation:

Subject: Health Risk Analysis (HRA)

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report. Please remedy this situation.

Sincerely,  
Janet Rogers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-21 09:14:12

No Duplicates.

**Comment 4 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: julie

Last Name: connolly

Email Address: JSCONN5@GMAIL.COM

Affiliation: resident: 700 West E Street

Subject: Emissions for Cruise Ships

Comment:

I as that you consider implementing the increased requirements for emissions as soon as possible. As this affects all downtown residents and visitors to the harbor area.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-25 12:48:24

No Duplicates.

**Comment 5 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Ravi

Last Name: Bhola

Email Address: rbhola@cox.net

Affiliation: Resident at Electra High Rise Downtown

Subject: Health Risk Analysis

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report. Please remedy this situation.

Sincerely  
Ravi Bhola

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-25 14:19:12

No Duplicates.

**Comment 6 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Nora

Last Name: Khatib

Email Address: norakhatib@gmail.com

Affiliation:

Subject: Health Risk Analysis (HRA)

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report. Please remedy this situation.

Sincerely,  
Nora Khatib

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-25 22:06:14

No Duplicates.

**Comment 7 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Ernest

Last Name: Klinger

Email Address: etkhome@yahoo.com

Affiliation:

Subject: Cruise Ship Emissions

Comment:

I do not believe the emissions from the cruise ships is a Major contributor to our air quality and we live within a block of the Cruise Terminal (for over 7 years) and have not noticed any Soot/Dirt from the ships. There is however dirt and dust from all the building in the area which is essential to the growth of our city.

With the budget shortage we have and are experiencing and with the huge amount of money the ships bring into the city we believe a stricter air quality control could reduce the number of ships and as such the amount of money that is brought into the area.

Also, we are not sure how the determination was made that they have excessive emissions when there is no official measurement method currently.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-26 09:41:59

No Duplicates.

**Comment 8 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Michael and Katherin  
Last Name: Schwartz  
Email Address: kschwartz52@yahoo.com  
Affiliation:

Subject: HEALTH RISK ANALYSIS (HRA)  
Comment:

We support the California Air Resources Board implementing stricter emission Controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

We live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on our balcony is also affecting our health, as shown in your report.

Please remedy this situation.

Sincerely,  
Michael and Katherine Schwartz

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-26 14:57:13

No Duplicates.



**Comment 9 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Sergio

Last Name: Fernandez

Email Address: sergio@asci.us

Affiliation:

Subject: Health Risk Analysis (HRA)

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report.

Please remedy this situation.

Sincerely

Sergio A. Fernandez, Ph.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-26 17:03:36

No Duplicates.

**Comment 10 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Michael

Last Name: Blasgen

Email Address: michael@blasgen.com

Affiliation: Bayside (1325 Pacific Hwy San Diego)

Subject: diesel emissions

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report.

On another point, 100 feet below my bedroom are locomotives that run for extended periods while parked. I can smell and see the diesel fumes from the engines. They do not need to run the engines, there is power available.

Please remedy this situation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-01-27 10:03:55

No Duplicates.

**Comment 11 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Catherine

Last Name: Mukai

Email Address: cmukai@portoakland.com

Affiliation:

Subject: Port of Oakland Comments on Preliminary Draft HRA for the Proposed Control Meas.  
for OGV

Comment:

Please find attached comments from the Port of Oakland on the Preliminary Draft Health Risk Assessment for the Proposed Control Measure for Ocean-Going Vessels At Berth and At Anchor. We appreciate the opportunity to provide comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-atberth-atanchor-ws-ATNUYIJiVD4ELwEx.pdf>

Original File Name: 2019-01-31\_At-Berth HRA\_Port of Oakland comments.pdf

Date and Time Comment Was Submitted: 2019-01-31 16:45:17

No Duplicates.

**Comment 12 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Fidel

Last Name: Escobedo

Email Address: fidelescobedo@gmail.com

Affiliation:

Subject: Health Risk Analysis (HRA)

Comment:

I support the California Air Resources Board implementing stricter  
emission  
controls on ocean going vessels at berth to reduce toxic diesel  
exhaust fumes AS  
SOON AS POSSIBLE.  
I live one block from the cruise ship terminal in San Diego Bay.  
The pollution is  
visible and the soot accumulating on my balcony is also affecting  
my health, as  
shown in your report.  
Please remedy this situation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-02-11 09:35:14

No Duplicates.

**Comment 13 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Umenhofer

Email Address: tumenhofer@wspa.org

Affiliation:

Subject: WSPA Comments on CARB At Berth Preliminary Health Analyses

Comment:

WSPA Comment Letter on CARB At Berth At Anchor Preliminary Health  
Analyses

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-atberth-atanchor-ws-UDFWJFMNU2JQMwBy.pdf>

Original File Name: At Berth Preliminary Health Analysis\_WSPA Comments\_02\_15\_2019.pdf

Date and Time Comment Was Submitted: 2019-02-15 11:44:04

No Duplicates.

**Comment 14 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Devin

Last Name: Richards

Email Address: devinr@cceeb.org

Affiliation: CCEEB

Subject: CCEEB Comments on Regulatory Concepts for Amendments to the ARB At-Berth  
Regulation

Comment:

Please see attached. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-atberth-atanchor-ws-U2EANIJiWTNVfQc3.pdf>

Original File Name: 2019.02.15 - CCEEB At Berth Comments.pdf

Date and Time Comment Was Submitted: 2019-02-15 16:00:08

No Duplicates.

**Comment 15 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Catherine

Last Name: Mukai

Email Address: cmukai@portoakland.com

Affiliation:

Subject: Port of Oakland Comments on Draft 2018/2019 Update to Inventory for OGV  
Comment:

Please find attached comments from the Port of Oakland on the Draft 2018/2019 Update to Inventory for Ocean-Going Vessels: Methodology and Results for the Proposed Control Measure for Ocean-Going Vessels At Berth and At Anchor. We appreciate the opportunity to provide comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-atberth-atanchor-ws-UGJWYAY2BG4AKwIy.pdf>

Original File Name: 2019-02-15\_At-Berth Emissions\_Port of Oakland comments.pdf

Date and Time Comment Was Submitted: 2019-02-15 16:13:39

No Duplicates.

**Comment 16 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Nilesh  
Last Name: Waghdhare  
Email Address: wsnilesh@chevron.com  
Affiliation: Chevron

Subject: Draft OGV Inventory Methodology and HRA Comments  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-atberth-atanchor-ws-UTJXJ1EoVFgCZwJt.pdf>

Original File Name: CVX\_Comments\_Perea\_20190215\_Public.pdf

Date and Time Comment Was Submitted: 2019-02-25 15:18:45

No Duplicates.



**Comment 17 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Morgan

Last Name: Caswell

Email Address: morgan.caswell@polb.com

Affiliation:

Subject: POLB/POLA Comment Letter on the At-Berth Regulation Health Analysis

Comment:

This letter addresses the Draft CARB Health analysis for the Draft  
Regulatory Concept for Ocean-Going Vessels At Berth and At Anchor.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-atberth-atanchor-ws-UCBQOQNuwGpSCwJj.pdf>

Original File Name: POLA and POLB At Berth Health Analysis Comment Letter Final.pdf

Date and Time Comment Was Submitted: 2019-02-28 09:37:45

No Duplicates.

**Comment 18 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Annie

Last Name: Phillips

Email Address: annie95@mac.com

Affiliation: Resident Sapphire Tower

Subject: Health Risk Analysis (HRA)

Comment:

I support the California Air Resources Board implementing stricter emission controls on ocean going vessels at berth to reduce toxic diesel exhaust fumes AS SOON AS POSSIBLE.

I live one block from the cruise ship terminal in San Diego Bay. The pollution is visible and the soot accumulating on my balcony is also affecting my health, as shown in your report. Please remedy this situation.

Sincerely  
Annie Phillips

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-04-12 17:23:54

No Duplicates.

**Comment 19 for Public Comments on At-berth and At-Anchor Regulation  
(atberth-atanchor-ws) - 1st Workshop.**

First Name: Amber

Last Name: Coluso

Email Address: acoluso@portla.org

Affiliation: Port of Los Angeles

Subject: Workshop: Comments on Draft Language for CARB At Berth Regulation  
Comment:

Dear CARB,

Attached is a joint comment letter from the Ports of Los Angeles and Long Beach on the concepts and draft language presented by CARB on the At Berth regulation update presented in May 2019.

Thank You,

San Pedro Bay Ports

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-atberth-atanchor-ws-VzEGaQNsWGpQOIUK.pdf>

Original File Name: Final Joint Ltr CARB At Berth 07-01-2019.pdf

Date and Time Comment Was Submitted: 2019-07-08 10:47:03

No Duplicates.

## **Comment 20 for Public Comments on At-berth and At-Anchor Regulation (atberth-atanchor-ws) - 1st Workshop.**

First Name: Bill

Last Name: Mayben

Email Address: bmayben@comcast.net

Affiliation: Wm Mayben and Associates

Subject: Ships at berth/at anchor/ws

Comment:

Dear CARB Staff;

These comments are Workshop/General in nature.

I favor CARB intervention in the operation of ships at anchor and berth. The fuel used for ship engines is the lowest, most polluting form of diesel fuel we use; calledd bunker oil. Norwegian scientists have been studying ways to reduce the emissions pollution of ships at sea. The difficulty, (I digress here, but stay with me)is that there is little that has been accomplished in International waters. I urge CARB to look at what could be described as "California Waters" The one solution that emerged, without changing any existing shipboard technology, was for ships to slow down. Reducing their speed by 1/3 saves 1/2 the fuel. That means 1/2 the pollution coupled with savings, both on fuel, wear and tear. The fuel savings help mitigate schedule losses, manpower costs, etc.

Could this be applied in National water off California? This would reduce the contamination of on-shore winds hitting California.

We're talking speed limits for ships.

Obviously, this revisits the same topic for automobiles, trucks on the highways. I remember driving 55 during the gas crisis. The speed limit was to save gas; but it also, by extension, reduced pollution. A lot. I believe CARB would receive broad support for reducing speed limits in our state. Would do much more, tangibly, than recycling our peanut butter jars.

One of the unexpected pleasures of visiting Maui recently, was the modest speed limits on their highways. Initially I was frustrated; then I understood. Where are we going and how are we getting there? What does our hurry cost?

Mahalo!

Bill Mayben

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-07-30 14:03:15

No Duplicates.



**There are no comments posted to Public Comments on At-berth and At-Anchor Regulation (atberth-atanchor-ws) that were presented during the Workshop at this time.**