

**Comment 1 for Public comments on the innovative concept application for Carnival (atberth-icapp-02-ws) - 1st Workshop.**

First Name: Teresa

Last Name: Bui

Email Address: tbui@pacificenvironment.org

Affiliation: Pacific Environment

Subject: Pacific Environment Comments on Innovative Concept from Carnival  
Comment:

Hello,  
Please see attached for our public comments. Thank you.  
Teresa

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-atberth-icapp-02-ws-AGNcO1QnVmsEawh+.pdf>

Original File Name: Carnival - PE comments.pdf

Date and Time Comment Was Submitted: 2022-07-04 21:50:21

No Duplicates.

**Comment 2 for Public comments on the innovative concept application for Carnival (atberth-icapp-02-ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Jeleni&#263;  
Email Address: tjelenic@pmsaship.com  
Affiliation: PMSA

Subject: At Berth Innovative Concept Application for Carnival  
Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-atberth-icapp-02-ws-UDITO1U6VWIXJwVk.pdf>

Original File Name: Innovative Concept Application - Carnival - Letter of Support.pdf

Date and Time Comment Was Submitted: 2022-07-05 13:08:45

No Duplicates.

**Comment 3 for Public comments on the innovative concept application for Carnival (atberth-icapp-02-ws) - 1st Workshop.**

First Name: Janet  
Last Name: Rogers  
Email Address: EmbarcaderoCoalition@gmail.com  
Affiliation: Embarcadero Coalition of San Diego

Subject: Carnival Innovative Concept application for OGV at berth  
Comment:

The Embarcadero Coalition is excited about the new clean air standards required by the OGV rule effective Jan 1, 2023. Our understanding is that all the cruise ships at berth downtown San Diego will have to connect to shore power or have another method to reduce emissions to meet an equivalent clean air standard. We understand that CARB is granting vessels an exemption for connecting to shore power of up to 5% of their total visits from the previous year for unavoidable technical difficulties which create a situation where they cannot connect. This is not 5% gift, but the VIE can only be used when there is a real problem. We don't object to the concept of Carnival combining its various subsidiaries in order to simplify record keeping, as long as it doesn't use this method to end up exempting specific vessels that have not converted. Our understanding is that failure to convert or provide another clean air methodology is not an exemption. They don't get to use the exemptions of ships that have converted to shore power capabilities to cover up for ships that have not gone through the conversion. If that is the intent, then do not let them combine fleets and do everything on a ship by ship basis. This is not a cover up game, but serious clean air requirements. We do object to Carnival claiming a total of 20% exemptions (80% connection rate through 2024) or 10% exemptions (90% connection rate starting Jan 2025) by including TIE's in their calculation. Our understanding is that TIE's are purely at the discretion of the terminal for problems created by the terminal. The Vessels have no right to TIE exemptions. Please do not grant Carnival the right to connect to shore power at less than the 100% less a maximum of 5% VIEs. The TIEs are for unique problems the terminal experiences and Carnival may qualify for some TIEs, but it is not part of their calculation.  
Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-05 15:07:41

No Duplicates.

**There are no comments posted to Public comments on the innovative concept application for Carnival (atberth-icapp-02-ws) that were presented during the Workshop at this time.**