

**From:** [Janet Rogers](#)  
**To:** [ARB Clerk of the Board](#)  
**Subject:** Additional Documents and/or Information for the Proposed Control Measure for Ocean-Going Vessels At Berth  
**Date:** Monday, July 27, 2020 8:55:30 PM

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As a resident of Downtown San Diego I am submitting additional public comment related to Ocean Going Vessels at Berth Rulemaking.

I am part of a group of downtown San Diego residents that has been in discussions with CARB Staff about this rule's impact on the 40,000 downtown residents living downwind of the cruise ship terminal.

I understand that CARB is diligently working to reduce emissions in California and I applaud your efforts. I look forward to the new rule going into effect for cruise ships January 1, 2023. I wish the rule was going into effect immediately, since every day these ships are not connected to shore power, they emit a huge amount of toxic fumes to foul the air downtown and make people sick. I strongly support requiring all cruise ships to connect to shore power, or equivalent, when at berth.

Eliminating the regulated and unregulated fleet designation for cruise ships and making each ship responsible for meeting environmental standards and obeying the rules will be a big improvement.

As with most rulemaking, I see areas for improvement. Every minute of reduced emissions really matters when you live so close to an extremely polluting industry, such as the cruise ship industry. The health and welfare of my loved ones, my friends and myself are significantly impacted by this industry.

I continue to be concerned about the time granted to connect and disconnect to shore power in the new rule.

Current standards allow the vessels to run their engines a total of 3 hours between tie down and leaving. CARB staff says this time period is too short since it is very hard to meet this standard.

The new rule still has a 3 hour window plus additional time to complete the READY TO WORK process. The rule establishes 2 hours to connect from READY TO WORK and 1 hour to disconnect from the time the Harbor Pilot boards the ship. We were told that a 2-hour connection time was requested by container ships, due to additional complications related to the containers.

I believe that cruise ships could have a shorter time to connect, and possibly disconnect, due to a comparatively simpler process than container ships. Yet this possibility is not considered in the proposed rule.

I believe that standards should be achievable and based on data. Unfortunately, CARB is setting these new standards without data to support the 2 hour and 1 hour rules.

There is no data to inform us how long it normally takes to get READY TO WORK, which involves readying the gangplank, and processes by both Coast Guard and Border Protection agents.

From earlier discussions with our Port Authority, it doesn't take 2 hours to connect to shore power once the cruise ship is READY TO WORK. As far as CARB knows, one hour from READY TO WORK is more than enough time for cruise ships to connect to shore power. The very limited data available suggests that two hours are not needed after READY TO WORK in order to connect cruise ships to shore power.

Every additional minute the people who live downtown are subjected to the toxic and harmful emissions from cruise ships is a minute too long.

I ask the CARB Board to consider:

1. Staff collecting Ready to Work data for cruise ships, on a random basis, to understand how long this normally takes.
2. Staff collecting connection times for cruise ships starting from Ready to Work, on a random basis, to understand how long this takes.
3. Staff should present this information in its 2022 interim evaluation and consider altering the rule if appropriate.
4. Staff should commission a time study to evaluate the times to connect and disconnect.
  - Is the READY TO WORK process handled efficiently?
  - Are the connect and disconnect processes being done efficiently?
  - Can the technologies be improved?
  - Can the labor processes be improved?
5. Staff should keep records of current connect and disconnect times and compare them to times after the implementation of the new rule. Allowing the ships time in excess of reasonable needs for the connect/disconnect process may result in longer times. This rule creates a big jump to 120 minutes after READY TO WORK for cruise ships, and people lose the incentive to complete the process quickly.
6. Staff could create incentives to shorten connect/disconnect times.
7. Adjust measurements so that averages remove outliers, like VIE and TIE, which skew results.
8. Use a wider range of statistical analysis, even something as easy as MODE, to find the normal breakpoints for a process.
9. More data collection, reporting and analysis can provide the tools CARB staff needs to reduce emissions.
10. Separate the cruise ship requirements from the container ships, since the process is not the same.
11. Consider making the cruise ship connection time 1 hour from READY TO WORK and adjust both the connect and disconnect times based on data from incentivized programs.

Please consider reducing the time cruise ships have to connect to or disconnect from shore power. I appreciate your efforts.

Sincerely,  
Janet Rogers