



June 30, 2022

Jonathan Foster, Marine Strategies Section
Jeff Jacobs, Freight Policy Section
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
Via Electronic submittal

RE: Innovative Concept from Carnival

Dear Mr. Foster and Mr. Jacobs:

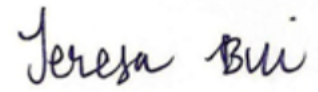
We would like to thank the California Air Resources Board for soliciting stakeholder input on the Innovative Concept from Carnival Corporation.

Pacific Environment is a global environmental organization that protects communities and wildlife of the Pacific Rim. We support community leaders to fight climate change, protect the oceans, build just societies, and move away from fossil fuels toward a green economy. Pacific Environment is headquartered in California and has earned rare permanent consultative status at the International Maritime Organization (IMO), the United Nations' entity that sets international shipping law. We are co-founders and leaders of a burgeoning new global coalition of environmental, environmental justice, and ocean organizations working to rapidly accelerate the shipping industry's zero-emission transition on a 1.5C-aligned timeline.

Pacific Environment through our Clean Up Carnival campaign with Stand.earth have been pressing the Carnival Corporation to stop using heavy fuel oil in the Arctic, Subarctic, and Alaska. We applaud Carnival for utilizing shorepower for their cruise ships when at berth. However, the application is missing a lot of details that are required to evaluate whether this will successfully achieve earlier or equivalent (or greater) emissions. For instance, shorepower is already a CARB Approved Emission Control Strategy, so there is no need to submit this as an innovative concept. If the intent of the application is to capture early credits in excess of what would be normally required, the application does not specify how much in excess of. In addition, the application fails to explain how to calculate and capture that data.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "Teresa Bui". The signature is written in a cursive style.

Teresa Bui
State Climate Policy Director

cc:

Angela Csondes, Manager, Marine Strategies Section, CARB
Bonnie Soriano, Chief, Freight Activity Branch, CARB