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Connect with the  
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June 30, 2022

Mr. Jonathan Foster  
Marine Strategies Section  
Freight Activity Branch  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: At-Berth Regulation Innovative Concept for Pasha Hawaii, Docket *AtBerth-ICApp-07*

Dear Mr. Foster:

Thank you for the opportunity to comment on the preliminary Innovative Concept application submitted by Pasha Hawaii Holdings LLC (Pasha Hawaii). Innovative Concept projects are a potential compliance option under the At Berth Regulation and must provide equivalent or greater emissions reductions in and around a port compared to reducing emissions from vessels while at berth.

Pasha Hawaii is proposing several actions to achieve equivalent emissions reductions from their vessels calling at the Ports of Oakland and Long Beach until the vessels are upgraded to utilize shore power available at both Ports. These actions include the use of micro wind turbines and solar panels to generate electricity, battery storage systems, re-designed fuel nozzles for low-load operation of the propulsion steam boilers and improved energy efficiency of the boilers and main cooling pump. Pasha Hawaii's proposal includes extensive emissions testing and data collection.

We commend Pasha Hawaii's efforts to identify boiler design changes and clean energy systems to achieve emissions reductions from their vessels while in port and at berth. The potential added emissions reductions from the proposed wind turbine, solar and battery systems while the vessels are underway are appealing, especially since, if proven viable, they are systems that can be installed on other ocean-going vessels.

We encourage that Pasha Hawaii address the following in the final Innovative Concept application:

- Demonstrate and document how the Innovative Concept application will achieve equal or greater emissions reductions compared to shore power, with particular focus on emissions reductions in impacted communities.
- Identify the Pasha Hawaii vessels that will be equipped with the proposed clean energy systems and boiler energy efficiency upgrades.
- If any Pasha Hawaii owned or chartered vessels are not covered by the Innovative Concept application, please indicate how those vessels will comply with the At-Berth Regulation requirements.

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- Provide an expected timetable for the installation of the proposed clean energy systems and boiler energy efficiency upgrades.
  - Clarify the expected power output of the proposed solar arrays and the storage capacity of the battery backup systems.
  - Provide a plan for minimizing in-Port emissions if the wind turbines, solar, or battery systems become inoperable. for minimizing in-Port emissions.
  - Clarify the expected timelines for the design of and approval for use of the proposed fuel nozzles for low-load operations, and identify the expected emissions reductions from using the proposed fuel nozzles.
  - Clarify the duration of the Innovative Concept application by providing a timetable for upgrading the vessels to utilize shore power.
  - Consider collecting data on performance of the wind turbines and solar arrays when vessels are within 24 nautical miles of the California coast.

Thank you again for the opportunity to provide comments. We look forward to reviewing the revised, final application later this summer. Please contact Michael Murphy at [mmurphy@baaqmd.gov](mailto:mmurphy@baaqmd.gov) or (415) 749-4644 if you have any questions regarding our comments.

Sincerely,

for Greg Nudd

Greg Nudd  
Deputy Air Pollution Control Officer

cc: Ed Washburn, Pasha Hawaii Holdings, LLC  
Richard Sinkoff, Port of Oakland  
Ms. Margaret Gordon, West Oakland Environmental Indicators Project  
Brian Beveridge, West Oakland Environmental Indicators Project  
Michelle Ghafar, EarthJustice