



THE PASHA GROUP

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November 14, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: FY 22-23 Low Carbon Transportation Funding Plan

Dear California Air Resources Board Members and Staff,

The Pasha Group appreciates the opportunity to provide input on CARB's proposed FY 2022-23 Low Carbon Transportation Funding Plan and support proposed investments for emerging opportunities, including marine and off-road goods movement.

Commented [ES1]: Should this be CARB or ARB?

Commented [MJ2R1]: Made the change

The Pasha Group, a family-owned, third-generation company, is proud to have over 1,200 team members across California, with our corporate headquarters in San Rafael, and terminal operations at the Ports of San Francisco, Oakland, Long Beach, Los Angeles, and San Diego. As a diversified global logistics and transportation company, our California facilities support critical West Coast shipping hubs to connect individuals and businesses to the world.

We greatly appreciate the grant funding support from CARB for the Green Omni Terminal Demonstration Project at our breakbulk terminal in the Port of Los Angeles. We expect to have a complete micro-grid in 2023 which will use solar power, wind power (from a WindWall installed on top of the crane cabin), crane regeneration and battery electric storage to enable us to operate the terminal with renewable energy created and stored on the terminal. We look forward to opportunities to continue to partner with CARB.

As part of our ongoing infrastructure and vessel investment plan for our California/Hawaii maritime services, we proudly welcomed the first of two new 'Ohana Class containerships, *MV George III* into service on August 17, 2022.

George III is the first Liquefied Natural Gas (LNG) powered vessel to fuel on the West Coast and the first to serve the West Coast/Hawaii trade lane. The new 774-foot Jones Act (US built, US flagged, and US crewed) vessel surpasses the International Maritime Organization (IMO) 2030 emission standards for ocean vessels with close to zero sulfur emissions, a 99.9% reduction in particulate matter, a 90% reduction in nitrogen oxide and 25% reduced carbon dioxide as compared to liquid oil fuels.

We will soon welcome our second 'Ohana Class vessel, *MV Janet Marie*. She will also operate on LNG from day one and mirror *George III* in size and design. In addition, our containership *Horizon Reliance* is currently being retrofitted to operate on LNG and is expected to re-enter service in the first half of 2023.

The Pasha Group is a proven leader in deploying innovative technologies in California to reduce emissions in the marine and goods movement sector. In addition to the Green Omni Terminal, we are in the process of developing plans for a wind and solar powered micro-grid for our National City Marine Terminal in the Port of San Diego and solar powered EV charging for our Pier 80 terminal in the Port of San Francisco. We strongly support the proposed investments outlined within the Low Carbon Transportation Funding Plan, specifically the proposed multi-year allocations for emerging opportunities and medium- and heavy-duty vehicles and set asides for Commercial Harbor Craft. Along with the investments being made by the Energy Commission to support vessel and vehicle infrastructure deployment, this funding will be necessary to provide the vessels and vehicles needed to support successful deployments and commercialization of zero-emission marine and goods movement technologies.

Within the investments in emerging opportunities, we support funding for marine projects, including ocean-going vessels, to support commercialization of technologies to support reduction of GHG and criteria pollutants in port terminal communities. This should include investment in demonstration projects of oceangoing vessels and port terminals and support the development of infrastructure to deliver cleaner fuels for oceangoing vessels (LNG, hydrogen, **methanol** and bio-fuels), and the improvement of ship infrastructure and the electrical grid for port terminals to enable more oceangoing vessels to use shore power. We also believe that providing an exemption for alternative fuels utilized while operating in California waters would provide appropriate incentives for vessel operators to transition to cleaner marine fuels. Another strong addition would be to include Ocean Going Vessels while in California waters in the Low Carbon Fuel Standard program to create additional incentives to switch and power from alternative fuel and energy sources.

The Pasha Group appreciates the opportunity to support and provide input on CARB's proposed Low Carbon Transportation Funding Plan update for FY 2022-2023. We look forward to continuing to work with the CARB and other stakeholders to accelerate the transition to zero-emission technology and reduce emissions from the marine and goods movement sectors.

Best regards,



George Pasha, IV
President & CEO

Commented [KM3]: Recommend adding methanol in since it will be a player more so than Hydrogen at the moment.

Commented [MJ4R3]: Agreed