



# THE PASHA GROUP

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November 7, 2024

Clerks' Office, California Air Resources Board  
1001 I Street,  
Sacramento, California 95814

RE: Proposed Changes to Low Carbon Fuel Standard Program

Dear California Air Resources Board Members and Staff,

The Pasha Group appreciates the opportunity to provide input on the proposed amendments to the California Air Resources Board's (CARB) Low Carbon Fuel Standard (LCFS) program. We support the LCFS program and appreciate the inclusion of an evaluation for incorporating ocean-going fuels into future rulemaking within Resolution 24-14: Public Hearing to Consider Proposed Amendments to the LCFS.

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, terminal operations in San Francisco, Oakland, Los Angeles/Long Beach, and San Diego. As a diversified global logistics and transportation company, our California facilities support critical shipping hubs to connect individuals and businesses to the world. The Pasha Group is a proven leader in bringing new technologies and alternative fuels to California. Pasha is dedicated to developing a fleet of vessels that minimizes its environmental footprint while continuing to provide timely and necessary ocean transportation of goods between the West Coast and Hawaii.

The Pasha Group supports the LCFS program and CARB's efforts to reduce the carbon intensity of transportation fuels – and appreciates the inclusion of an evaluation to include ocean-going fuels in the next LCFS rulemaking. Establishing an LCFS pathway for maritime Bio-LNG presents a significant opportunity for both the marine sector and the state to achieve its environmental objectives. Bio-LNG has established pathways for heavy-duty road transportation and could be applied to help decarbonization of the marine industry.

Additionally, the maritime industry shares several important similarities with the aviation sector, making it a valuable reference point for Bio-LNG applications in maritime use, similar to the existing pathway for Sustainable Aviation Fuel (SAF). Both industries encounter challenges related to long-lived assets, energy density requirements, and international operations. In both aviation and maritime, assets have operational lifespans that span decades, complicating rapid fleet turnover. Additionally, both sectors require high energy-density fuels for efficient long-distance travel, which limits the immediate feasibility of certain zero-emission technologies. Furthermore,

their global operations demand internationally compatible fuel solutions and regulatory frameworks.

Incorporating maritime fuels into the LCFS program would create a vital incentive to overcome barriers and transition legacy fleets to lower carbon technologies. Most of the ships today run on traditional marine diesel; however, a significant percentage of newbuild orders are incorporating LNG capability and recent trends show that LNG is quickly becoming the alternative fuel of choice for newbuilds. The timing is ripe to incentivize more ships to be LNG-capable and encourage the use of Bio-LNG to significantly decrease greenhouse gas emissions in the marine sector. We strongly encourage CARB to evaluate marine fuels in the next LCFS rulemaking.

We look forward to continuing to work with CARB and other stakeholders to support the inclusion of ocean-going fuels in the next LCFS rulemaking – and urge approval of the current proposed amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "George Pasha", with a long horizontal flourish extending to the right.

George W. Pasha IV  
President & Chief Executive Officer  
The Pasha Group