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Dept. of Ecology

December 19, 2017

Brett Rude, Environmental Specialist
Mike Boyer, Environmental Specialist
Air Quality Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Mr. Rude and Mr. Boyer,

Thank you for your work in developing the state's Proposed Volkswagen Beneficiary Mitigation Plan. We are writing to express our support for the inclusion of Airport Ground Support Equipment (GSE), within the Non-Road Equipment category, as an eligible mitigation action in the final plan submitted to the trustee.

The reduction of air emissions is a priority for the Port of Seattle and its airline partners Delta and Alaska. GSE can include tugs, loaders, and pushback tractors to move luggage, cargo, and aircraft, and some of that equipment now runs on diesel with emissions consequences to surrounding communities. Through the use of public and private funds, the Port and our customers have made significant strides in reducing air emissions associated with our operations. The Airport and our partners have already reduced emission from aircraft operations by installing preconditioned air at almost all Sea-Tac gates. This system allows planes to shut off their engines while parked at gates, reducing emissions at a level equal to removing 8,000 cars off the road each year.

To that end, Sea-Tac International Airport's (Sea-Tac) initiative to install charging stations provides strong support to our airlines that are looking to replace their GSE with electric GSE (eGSE). These charging stations ensure that our airline partners have efficient and reliable access to electricity needed to charge eGSE, and when fully implemented could reduce as much carbon as removing 2,000 cars from the road. In recognition of our collective commitment, Sea-Tac was the first airport in North America to receive Airport Carbon Accreditation for reducing greenhouse gas emissions.

In addition to ensuring that the category is maintained in the final plan, we further recommend that the percentage cap placed on expenditures under this category be lifted so that it is commensurate with the potential level of reduction. Data presented by the Department of Ecology within the Mitigation Plan indicated that non-road mobile emissions account for 12 percent of NOx emission in our state in 2014. Therefore, we would support increasing the cap

for the Non-Road Equipment category from five to twelve percent of the total funding from the settlement, in order that the allocation of funds match the reduction potential.

The Port and its operating partners in industry, from the airlines at Sea-Tac to our joint operating partnership with the Port of Tacoma in the Northwest Seaport Alliance, have long recognized the need to reduce our emissions, especially on surrounding communities disproportionately impacted by our operations. The potential to transition more airport GSE to electric power reflects that commitment. Funding this effort can help address emissions concerns at the nation's fastest growing airport, and help address the impact of our operations on the residents of the cities that surround the airport.

We appreciate the opportunity to share our thoughts with you and look forward to the opportunity to partner with you to improve the air quality of Washington State.

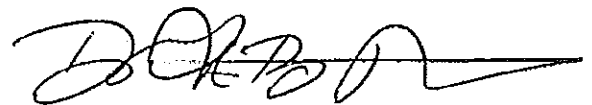
Sincerely,



Dave Soike
Interim Executive Director
Port of Seattle



Tony Gonchar
Vice President, Seattle
Delta Air Lines



Diana Birkett Rakow
VP, External Relations
Alaska Airlines

CC: Charles Knutson, Executive Policy Advisor, Office of Governor Jay Inslee