

August 4, 2021

Elena Guilfoil

Department of Ecology, Air Quality Program

P.O. Box 47600, Olympia, WA 98504-7600

Re: Support for Adoption of Advanced Clean Truck Rule

The Northwest Seaport Alliance supports the adoption of Chapter 173-423 WAC – Low Emission Vehicles - and WAC 173-400-025, Adoption of federal rules. We also encourage the state to make more funding available to accelerate the equitable deployment of zero emission, class 8 trucks.

The Northwest Seaport Alliance (NWSA) is a partnership between the ports of Tacoma and Seattle for the joint management of our marine cargo facilities. Combined, the NWSA is the fourth-largest load center for containerized cargo in the United States and supports an estimated 58,400 Washington state jobs.

The impacts of climate change on our businesses, communities and environment are increasingly apparent and need to be addressed decisively. Our deep, protected harbors and proximity to markets along the Pacific Rim have afforded us natural advantages in maritime trade which underpin our economy. At the NWSA, we're committed to reducing the impacts of trade and travel on our health, environment and climate. In Washington state, the entire transportation sector, which includes aviation, cars, trucks, boats, and trains, is responsible for 40 percent of our state's carbon emissions¹.

The port trucking sector is made up of heavy duty (class 8) combination tractors that move cargo to and from port marine terminals and railyards. Trucks that serve the port exist within a much broader regional trucking "ecosystem" and serve many functions within the regional economy, many of which are not directly involved with hauling cargo to and from the port. These trucks are owned by a large number of different trucking companies that vary in size from small, independent owner-operators with fleets as small as one truck to large logistics companies with expansive fleets. Many of the owner operators are new Americans and people of color. It is also important to note that many of the trucks calling the two ports are purchased second or third-hand and have little residual value, especially those owned by smaller fleets. Because larger companies generally have much more access to capital than the smaller owner operators, we must take extra care to ensure that our programs in the trucking sector are developed and implemented equitably. The NWSA has implemented the NWSA Clean Truck Program at all our international container terminals since January 1, 2019, where all trucks entering the terminals in both

¹ Washington Department of Ecology. Washington State Greenhouse Gas Emissions Inventory: 1990-2015. Report to the Legislature, 2018. <https://fortress.wa.gov/ecy/publications/SummaryPages/1802043.html>

Seattle and Tacoma must now have a 2007 engine or newer, reducing diesel particulate matter emissions by up to 90% per truck.

The Northwest Seaport Alliance Managing Members have set aggressive goals for reducing the carbon and diesel emissions associated with our operations and facilities in the updated Northwest Ports Clean Air Strategy (NWPCAS)², with the aim “*To phase out emissions from seaport-related activities by 2050, supporting cleaner air for our local communities and fulfilling our shared responsibility to help limit global temperature rise to 1.5°C*”. The NWPCAS is a collaboration between The Northwest Seaport Alliance and the ports of Seattle, Tacoma, and Vancouver, British Columbia, to voluntarily reduce seaport-related emissions that contribute to air pollution in the shared Puget Sound-Georgia Basin Airshed as well as climate change. Each of the participating ports is developing a separate implementation plan, customized to their respective lines-of-business and emissions profiles and detailing port-specific actions to advance the vision of the joint Strategy.

As the NWSA and the port trucking community work together towards a zero-emission trucking future over the coming years, the adoption of the Advanced Clean Truck Rule in Washington State will help us meet our 2050 goal. However, there is still tremendous uncertainty as to when used zero emission trucks will be available and when their cost will allow them to be competitive in short to regional haul.

Regional haul is projected to be a viable duty cycle for zero emission trucks according to the CARB Advanced Clean Truck Rule Market Assessment³. Currently, zero emission trucks are much more expensive than new diesel trucks to purchase and by total cost of ownership. While new battery electric trucks are projected to have a lower total cost of ownership by 2030 than new diesel trucks, and hydrogen trucks are projected to be close to parity⁴, many of the trucks calling NWSA terminals are purchased as second or third-hand models, as opposed to brand new. This means that cost parity with used diesel trucks is unlikely to be achieved for trucks that call the NWSA in the foreseeable future and will likely only occur when a robust used zero emission truck market develops. We believe that, over time, the Advanced Clean Truck rule will help develop this used market. In addition, significant additional incentive funding for port and other short and regional haul drivers would allow for earlier adoption of zero emission trucks in this sector and reduce the risk of financial hardship that moving to zero emission trucks could cause for smaller owner/operators.

The adoption of the Advanced Clean Truck Rule should improve the availability of zero-emission heavy-duty trucks for port drivers in the future, and the NWSA urges the Department of Ecology to also look at other ways to help increase the number of ZE trucks in the state, such as providing truck owners with

² Northwest Ports Clean Air Strategy 2020. https://s3.us-west-2.amazonaws.com/nwseaportalliance.com.if-us-west-2/prod/2021-04/FINAL_2020_NWPCAS_Strategy.pdf

³ <https://ww3.arb.ca.gov/regact/2019/act2019/appe.pdf>

⁴ <https://ww3.arb.ca.gov/regact/2019/act2019/apph.pdf>

financial incentives to bring down the cost of these trucks. The NWSA has worked with the Department of Ecology on a number of port truck scrap and replace grant programs – these programs help drivers get into newer, cleaner trucks without placing them in financial peril or impacting their business.

For these reasons, The Northwest Seaport Alliance supports the adoption of Chapter 173-423 WAC – Low Emission Vehicles - and WAC 173-400-025, Adoption of federal rules.

Thank you for your consideration.

Sincerely,


Jason Jordan (Aug 4, 2021 11:17 PDT)

Jason Jordan,

Director, Environmental and Planning Programs

The Northwest Seaport Alliance