



TO: Department of Ecology
FROM: Carly Michiels, Washington Public Ports Association
RE: ZEVergreen Dialogue Sessions, Public Comment
DATE: November 5, 2025

Submitted Electronically through the web portal

The Washington Public Ports Association (WPPA) is a coordinating agency that represents Washington's 75 port districts across the state. Ports play a critical role in Washington's economy, supporting the global and local trade economy, transportation, recreation, and industrial activity while prioritizing environmental stewardship. We carry out our mission through advocating, educating, and connecting to serve our port members.

WPPA places a priority on practices that can benefit the environment and be implemented in ways that minimize negative impacts on our state's global trade competitiveness, basic port competitiveness, and local economic and environmental development opportunities in our port communities. Washington's public ports are at the forefront of the state's clean energy and transportation transition – facilitating decarbonization projects, enabling green technology deployment, and supporting job growth across key industries. However, this transition cannot succeed without reliable, adequate, and affordable energy.

Ports are already making major investments in electrification, alternative fuels, and zero-carbon infrastructure. Yet across the state we face serious barriers in accessing energy – insufficient supply, lacking transmission capacity, and complex permitting processes all slow down clean energy adoption and impact new business development.

WPPA provides the following comments on the proposed questions in the ZEVergreen Dialogue:

What is the number one action Washington should take to promote clean transportation and/or reduce transportation emissions?

Washington's top priority should be ensuring the infrastructure and energy supply needed to support the clean transportation transition is available and accessible while maintaining efficient freight movement and trade competitiveness. Ports are already experiencing significant grid constraints, and without proactive investment in new generation, storage, and increasing transmission capacity, shifting to electrification in the transportation sector will be challenging.

The state must scale energy infrastructure and improve permitting processes to support clean transportation and industrial decarbonization projects. A reliable, affordable, and resilient energy system is the foundation for reducing emissions in freight, maritime, and heavy-duty transportation systems. We already know that we will be facing a significant regional energy resource gap starting in 2026, addressing this needs to be top priority.



What types of programs would you like to see Washington State assess and possibly implement to meet air quality and climate targets for transportation?

WPPA supports projects that lower emissions, increase efficiency across the supply-chain, and improve freight mobility to strengthen Washington's role as a global trade gateway. The state should consider programs that:

- Support a freight investment program that identifies and prioritizes freight bottlenecks and agriculture export corridors where capital investment could speed freight movement.
- Increase investment and planning for truck parking that accounts for future demand and charging infrastructure needs, including land-use challenges.
- Freight and barge are critical elements for Washington's high-quality products developed by our agricultural and manufacturing exporters, and by the innovation and ingenuity of our importers to move products through our trade gateways. Continued state partnership in decarbonization investments across this supply chain is critical.
 - Expand and modernize Washington's rail system to support capacity and reduce congestion and emissions from truck traffic for a better-connected efficient supply chain.
 - Support barge efficiency improvements along the river system, recognizing barge as a highly efficient freight mode also enabling a reduction in road congestion.
- Continue to support the WSDOT Port Electrification Grant Program, including regional flexibility for planning, infrastructure, land use, and grid capacity.
- Support investments for locomotive engine upgrades and conversions, which reduce emissions and improve efficiency.
- Speed project delivery through permitting efficiencies under SEPA and NEPA, including categorical exemptions where appropriate.

Additionally, WPPA encourages continued state partnership in emerging clean technologies and energy solutions that benefit freight corridors and supply chain facilities statewide.

What kinds of programs, other than financial support, could provide incentive to purchase and operate zero-emission vehicles and equipment?

Beyond funding, project predictability and operational certainty are essential. Supporting efforts that could increase this may include:

- Streamlined, predictable permitting to reduce project delays and cost escalation.
- State support for grid and capacity planning with local utilities to ensure ports and transportation hubs have reliable access to energy.
- Tools to expand and modernize transmission infrastructure and enable innovative grid-enhancing technologies.
- Coordinated state-local planning to secure land and energy capacity needed for truck charging and port electrification.



- Clear state planning guidance, paired with support for local implementation. Any resource guides, templates, or access to grant assistance writers would be helpful to some of our small port districts.
- Strategies to address seasonal and climate-driven volatility ensuring that public ports and trade-dependent industries can rely on stable power year-round.

These efforts help ports plan with certainty in planning and ability to build the infrastructure necessary to enable zero-emission equipment and trucks at scale.

What principles for program design ensure we don't leave any Washingtonians behind in the transition to zero-emission transportation?

Equity and economic opportunity must be built into program design. Washington's transition should:

- Align climate investments with local economic development and workforce training opportunities, especially in trade-dependent communities.
- Consider regional differences in energy supply, land availability, and freight system needs.
- Avoid policies that unintentionally raise the cost of moving goods or disadvantage Washington exporters—protecting jobs, agriculture, and manufacturing. Taking into account the wider impact of tariffs and tax policies.
- Prioritize reliable and affordable energy access statewide, ensuring ports in rural and underserved regions can be successful alongside urban centers.
- Recognizing that improving local economic factors like job creation or infrastructure updates alongside efforts to maintain those benefits in the communities they were developed can contribute to thriving, healthy communities.

With partnerships and planning, Washington can reduce emissions while supporting local jobs, trade competitiveness, and community prosperity across all regions of the state.