November 4, 2025

Re: ZEVergreen State Dialogue Sessions

Dear Washington Department of Ecology:

Pacific Environment thanks you for the opportunity to provide comments regarding the state's actions on clean transportation. We are a global 501(c)(3) public-benefit corporation with a permanent consultative status at the International Maritime Organization (IMO), the United Nations entity that sets international shipping law. Through our Ports for People campaign, we are committed to rapidly eliminating emissions from ports and ships on a 1.5-degree Celsius timeline through action at the international, federal, state and local level.

We urge the Department of Ecology to support funding and regulations to reduce emissions from ships such as ocean-going vessels, cruises and harbor crafts such as ferries visiting the state's ports. Washington has the largest locally controlled public port system in the world, and the Ports of Seattle and Tacoma combined make up one of the largest container complexes in North America. In addition, the Washington State Ferries operates the largest ferry fleet in the United States. The maritime sector is an important part of the regional economy, but it has an outsized impact on public health and the climate. Demonstrating leadership in clean energy and sustainable maritime technologies is crucial to ensure we reduce the harmful impacts of this system.

In the Puget Sound air basin, ocean-going vessels (OGVs) across all modes (hoteling, maneuvering, and transiting) emitted 10,465 tons of NOx, 364 tons SO2, 125 tons of diesel particulate matter (DPM), and 609,081 tons of CO2e in 2021. Of the emissions associated with Northwest Seaport Alliance operations, OGVs hoteling and maneuvering are the #1 source of NOx, SO2, PM 2.5, PM 10, and CO2e, and the #2 source of DPM.

DPM is a toxic air contaminant associated with cancer risk as well as other health effects such as cardiovascular and respiratory hospitalizations and premature deaths. Once inhaled, these tiny particles can embed themselves deep within lung tissue and even reach the bloodstream. According to the Puget Sound Clean Air Agency, diesel exhaust

represents 85% of the potential cancer risk from all air toxics in Puget Sound with 20% of these DPM emissions attributed to maritime-related sources – a huge avoidable risk.

The technology already exists to significantly reduce the emissions from ships visiting port. Shore power technology, which has been widely adopted by ports around the world, reduces air pollution by allowing ships to turn off their auxiliary engines and connect to the electrical grid while docked in port. According to the Northwest Seaport Alliance, a ship docked for 40 hours using shore power can avoid emitting about 32 tons of CO2 and 22 pounds of DPM. Moreover, a 2023 study by the International Council on Clean Transportation found that **100% shore power connection for OGVs at berth at the Port of Seattle would reduce PM 2.5 pollution at the Port by 29% and full electrification (including shore power and harbor craft) would shrink the area affected by port air pollution by 82%.**

Washington ports have already made major strides to increase shore power usage. At the federal level, the state's ports collectively received tens of millions of dollars from the Environmental Protection Agency's Clean Ports Program for shore power infrastructure and planning. At the Ports of Seattle and Tacoma, shore power has been installed at a select number of terminals, and over 50% of vessel calls at their container terminals are shore power capable.

Still, more work needs to be done to accelerate the build-out and utilization of shore power and to electrify harbor craft. Earlier this year, Pacific Environment helped introduce a bill, HB 1689, that would require ocean-going vessels at the state's largest ports to reduce at-berth emissions by plugging into shore power or using an alternate emissions control technology. This would reduce pollution at ports, save lives, and provide opportunities for high-road jobs in green maritime technologies. In support of this bill, we urge the Department of Ecology to continue dedicating funding from the Climate Commitment Act and to explore additional funding pathways, such as a "retail delivery fee", for port electrification. Shore power requirements should also protect existing shipboard crew members' jobs and compensation.

Washington is making progress on port electrification, but the state must use the full extent of its legal authority to accelerate shore power installation and utilization and harbor craft

electrification. Therefore, we urge the Department of Ecology to support adoption of a statewide shore power policy, expand funding streams to support construction for ports' shore power infrastructure, and prioritize zero-emission harbor craft.

Sincerely,

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