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June 17, 2026

Washington State Department of Ecology
Clean Fuels Program
P.O. Box 47600
Olympia, WA 98504-7600

Re: Support for Adoption of an EER for Electric Harbor Craft and Updates to Capacity Crediting and Verification Rules

Dear Ms. Sanner:

The Port of Seattle appreciates the opportunity to comment on the Clean Fuels Program's proposed updates to Energy Economy Ratios (EER) and values the close collaboration with Ecology on our efforts to decarbonize maritime operations. The Port respectfully submits the following recommendations in response to this comment period:

1) **Establish one or more EERs for harbor vessel shore power usage that enables broad participation across the state's harbor vessel fleet**

To accelerate emissions reductions related to maritime activities in Washington, the Port encourages Ecology to establish an EER for harbor vessel shore power usage and/or harbor vessels with electric propulsion, as a means of 1) significantly increasing participation in the Clean Fuel Standard by allowing Washington's existing shore-power-capable harbor vessel fleet to participate, and 2) providing a clear incentive stream to support the deployment of additional shore power and vessel charging infrastructure.

The use of shore power at berth allows harbor vessels to plug in, avoiding harmful diesel emissions associated with running auxiliary engines to power critical electrical functions on board. Among maritime-related emissions sources in the Puget Sound, harbor vessels are responsible for 45% of diesel particulate matter emissions, 34% of NOx emissions, 30% of CO2e emissions and 70% of black carbon emissions.[1] The Port has successfully been generating credits for the use of shore power in cruise vessels under the eOGV shore power pathway, but an EER has not yet been established for harbor vessels in Washington.

Recently, Oregon's Clean Fuels Program approved an EER of 2.8 for tugboats, including ocean towing, tug (barge), and ship assist/escort vessels.[2] It should be noted that, while adopting a similar EER in Washington would be a step in the right direction, tugs are only a small fraction of the total number of harbor vessels operating in Washington waters. In the Puget Sound, for example, tugs comprised just

[1] Puget Sound Maritime Air Emissions Inventory, Volume 1 (April 2024).
[2] https://www.oregon.gov/deq/ghgp/Documents/cfpShaverT2rrApp.pdf

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15% (108 vessels) of the 700+ commercial and government harbor vessels inventoried in the Puget Sound Emissions Inventory.

Commercial fishing vessels made up the largest proportion of commercial harbor vessels, at 382 vessels or 54% of all harbor vessels in the Puget Sound. The Port of Seattle's Terminal 91 and Fishermen's Terminal are the homeport locations for the North Pacific Fishing Fleet that operates in the Bering Strait and Gulf of Alaska. The fishing fleet as a whole, can range from smaller fishing boats that operate locally, to mid-sized hook-and-line catcher processors ranging from 120-190 feet and large factory trawlers over 350 feet long.

Due to the size and high at-berth power requirements of large commercial fishing vessels, the emissions savings associated with providing shore power to offset the need to run auxiliary engines are significant when they are in port for extended periods of time unloading their catch, performing maintenance, and preparing for their next departure. At present, not all vessels are able to plug in to shore power and will require additional, costly upgrades to the Port's infrastructure that can range in the tens of millions of dollars. Furthermore, the vast majority of the larger fishing vessels are not understood to be eligible to generate shore power credits currently, as they do not meet the definition of ocean-going vessel under Ecology's current guidelines.

To rapidly enable the participation of the commercial harbor vessel fleet (including fishing vessels) and generate additional revenue streams to support the deployment of shore power infrastructure, Ecology should adopt an EER for harbor vessels, while taking into consideration that the harbor vessel fleet is highly diverse, including tugs and workboats, as well as much larger commercial fishing vessels, and that a narrowly targeted EER with stringent requirements based on vessel length or type may exclude significant numbers of vessels from participating in the program. The Port favors a more inclusive definition and accompanying EER. The Port would be happy to engage with Ecology as needed, to support this effort, including sharing available data, coordinating with vessel owner/operators, and any other assistance needed to inform the development of an EER that enables a wide range of harbor vessels to use shore power.

2) **Clarify whether the charging of electric/hybrid propulsion vessels would be eligible to generate credits under a harbor vessel shore power EER, or whether a separate EER would need to be established**

To decarbonize the maritime sector in Washington, harbor vessels will ultimately need to transition from fossil-fueled propulsion towards electricity or other alternative fuels. Given the significant cost gap at present associated with deployment of electric harbor vessels, the Port emphasizes the importance of incentive programs such as the Clean Fuels Program in supporting the deployment of vessels and charging infrastructure.

The Port is not aware of an EER that has been adopted in Washington or elsewhere that pertains to vessels with electric propulsion (as opposed to at-berth shore power). Ecology should clarify whether

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electric-propulsion vessels would be eligible for credit generation under the same EER for harbor vessel shore power, or whether a separate EER would be required.

Furthermore, for the majority of commercial harbor vessel operations in the near-term, electrification in the marine vessel space is likely to be dependent on hybrid-electric rather than full-electric propulsion given current technology status, and recommends that any EER or rulemaking language related to electric vessel charging should not limit eligibility to fully-electric or zero-emission vessels.

The Port is currently working with the National Lab of the Rockies to assess the technological and infrastructure requirements for decarbonization of harbor vessels, and would welcome the opportunity to leverage this work to support Ecology's data collection, modeling, or other needs related to inclusion of electric, hybrid, and alternative-fuel harbor vessels in the program.

3) Capacity credits for heavy-duty EVs at fleet's own sites

The Port of Seattle would like to electrify its airport heavy-duty bus fleet, which takes passengers to and from the Rental Car Facility and Employee Parking at Seattle-Tacoma International Airport. This bus fleet does not qualify for any traditional EV bus or infrastructure funding that other transit fleets receive because it isn't "public." We request that Ecology add capacity credits for heavy-duty fleets (HD FCI)- both private and public fleets- to the CFS and use the California LCFS formula, which provides a smaller credit than Washington's current capacity credit (HD-FCI) for charging at shared depots and truck stops. The logic for this is Ecology's stated objective of the statutory requirement to "harmonize" the CFS with other clean fuels jurisdictions. We agree with Tesla's point in the workshop regarding the benefit of capacity credits to an individual fleet; it is considerably more cost-effective for a fleet to install all the needed DC fast charging infrastructure all at once, rather than a slow incremental process over many years. This also applies to cargo trucking fleets using both the Port's maritime and aviation facilities.

Regarding the use of advanced credits (and not capacity credits) to stimulate public fleet adoption of heavy-duty EVs, we would like Ecology to provide a more detailed comparison with capacity crediting before we take a position. Even if the Advanced Credit system is reformed to allow more fleets, we are not sure if that will make a significant difference given the cap (5% of deficits), compared to our recommendation regarding capacity credits above.

4) Verification of Compliance

The CFS has extensive requirements for fleets and others to pay third-party verifiers annually for compliance with CFS. Ecology should align with California's LCFS and allow more time to encourage transportation electrification prior to the start of verification. One way that California did this was by starting verification for non-electric fuels in 2019 but waiting until now to begin verification of transportation electrification (TE). Similarly, Ecology should delay verification of TE credit generation until 2032 (rather than starting in 2028 for 2027 data). The logic for this is Ecology's stated objective that they have a statutory requirement to "harmonize" the CFS with other clean fuels jurisdictions.

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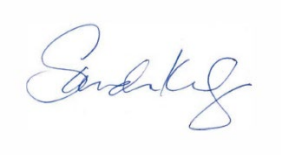
Furthermore, to lower administrative costs and stimulate TE adoption, Ecology should require virtual site visits every three years for verification of TE after the first site visit, and train verifiers in the meter accuracy regulations of utilities and the Division of Weights and Measures in the Department of Agriculture in order to avoid double regulation of meter accuracy.

Thank you for consideration of our comments. Please reach out to Lucian Go at go.l@portseattle.org if you have any questions.

Sincerely,



Sandra Kilroy
Senior Director, Environment and Sustainability