PMSA
PACIFIC MERCHANT SHIPPING ASSOCIATION

May 21, 2024

Hon. Michael Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

SUPPORT: Application by the NW Seaport Alliance, Ports of Seattle, Tacoma US EPA CPP Accelerating Zero-Emission Technology Deployment at Puget Sound Ports

Dear Administrator Regan,

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), we are pleased to support the application by the NW Seaport Alliance and the Ports of Seattle and Tacoma to the US Environmental Protection Agency (EPA) Clean Ports Program Zero-Emission Technology Deployment Competition. PMSA is a trade association that represents ocean carriers and marine terminal operators doing business at public port authorities on the US West Coast.

PMSA supports the Port's application for funding through the EPA's Clean Ports Program for Accelerating Zero-Emission Technology Deployment at Puget Sound Ports. The Ports have developed a suite of projects in its application in close collaboration with its marine terminal tenants, ocean carrier customers, and impacted communities.

In addition to the facial necessity to make this award on its individual merits, PMSA would like to emphasize the need to maximize allocations of Clean Ports Program Zero-Emissions Technology Deployment dollars to the NW Seaport Alliance and Ports of Seattle and Tacoma specifically and to all US West Coast ports generally. Having already adopted and implemented its Clean Air Strategy, the NW Seaport Alliance and the Ports of Seattle and Tacoma are already well ahead of many of their competitor ports in the Atlantic and Gulf coasts, Mexico, or Canada. As these plans mature and costs of capital increase, it is imperative that the ports which have been leading the charge for cleaner air for their communities and to improve ambient air quality do not end up getting penalized for being industry leaders in this competition.

In addition, it is imperative to focus investments on ports on the US West Coast in order to maximize greenhouse gas reductions, the underlying reason why Congress funded the Clean Ports Program and EPA is holding the Zero-Emission Technology Deployment Competition.

A study which was recently completed for PMSA by Starcrest Consulting Group in 2023 concluded that greenhouse gas emissions are reduced by an average of 19% when discretionary cargo flows through California ports and 26% at Washington state ports, rather than being diverted to competitor ports on the Atlantic and Gulf coasts. The study can be accessed at: https://www.pmsaship.com/wp-content/uploads/2023/08/GHG-Routing-Comparison-Study-08.25.23-FINAL-with-Attachment-A.pdf

Specifically, California and Pacific Northwest ports offer the most direct shipping route from Asia to the U.S., and to inland U.S. destinations. However, as the U.S. West Coast loses market share to other ports and cargo owners are choosing to ship to alternative gateways with longer transit times and distances, greenhouse gasses increase. The study prepared for PMSA analyzed a number of factors including port of origin, port of destination, ultimate inland destination and vessel sizes.

It is for all of these factors, including both the opportunity to reduce global greenhouse gas emissions as well as localized pollutant levels, that we support this application. We respectfully request that the US EPA prioritize the award of funds as requested by the NW Seaport Alliance and the Ports of Seattle and Tacoma.

Sincerely,



Mike Jacob
President

cc: NW Seaport Alliance