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October 20, 2021

City of Tacoma and Office of Environmental Policy and Sustainability
Tacoma Municipal Building, Fourth Floor
747 Market Street
Tacoma, WA 98402

Dear City of Tacoma and Office of Environmental Policy and Sustainability:

The Port of Tacoma (Port) appreciates the opportunity to provide comment on the City of Tacoma's Draft Climate Action Plan. We are writing to express our gratitude and support for the City taking climate action in our shared community and ensuring that the voices of frontline community members are heard in the planning process. We hope that future plans and engagement efforts will continue to push for inclusive engagement and that the City will embrace business and industry engagement as an opportunity. Furthermore, the City's goal of getting to net-zero emissions by 2050 is aligned with the Port's goal of phasing 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. Simply put, we have a shared responsibility to our community, to both phase out emissions and create family-wage jobs and economic opportunity in our regions for current and future generations.

We encourage and invite the City to join us in our advocacy at the international level for the worldwide decarbonization of the maritime industry to ensure environmental progress and a level playing field. Recently, the Port of Tacoma, working through The Northwest Seaport Alliance (NWSA), joined with the International Association of Ports and Harbors (IAPH) in signing the '[Call to Action for Shipping Decarbonization](#)' that urges world leaders to make zero emission shipping the default choice by 2030. The Call to Action asks world leaders to commit to decarbonizing international shipping by 2050 and deliver a clear and equitable implementation plan when adopting the International Maritime Organization (IMO) Greenhouse Gas Strategy in 2023.

The Port is a major industrial landowner in Tacoma and a fellow local government. We think it is worth highlighting our current work and the work of the broader industrial community.

Our Commitment to Tacoma and Commencement Bay:

As a fellow local government and major landowner in the Tacoma Tidelands, the Port plays an important role in addressing the impacts of a changing climate and shares in the responsibility to protect and enhance the environment of Commencement Bay and the Puyallup River. The Port's environmental leadership includes continuing to clean up Port-owned contaminated land, improve enhancing habitat and water quality and phasing out air emissions from Port operations that contribute to climate change. We are taking action to protect our future; as a public organization focused on the working waterfront, we are vulnerable to the impacts of climate change and climate inaction. We are investing in our infrastructure that is vulnerable to sea level rise and in reducing emissions to safeguard our future on the waterfront.

The Port is committed to doing our part to meet the urgent challenge of climate change, to taking the ambitious actions needed to stave off the worst impacts, and to limit global temperature rise to 1.5°C. In 2008, the Port joined The Northwest Seaport Alliance, Port of Seattle, and Vancouver-Fraser Port Authority in British Columbia in adopting the Northwest Ports Clean Air Strategy to proactively and voluntarily reduce air pollution. Through this voluntary initiative, we have reduced cancer causing diesel particulate matter by 80%

and greenhouse gas emissions by 20%.

Realizing more work was needed, the ports earlier this year went further with our update to the Northwest Ports Clean Air Strategy and took bold action to phase out seaport-related emissions by 2050 at the latest.

In addition to our climate action, the Port of Tacoma has worked to restore the health of Commencement Bay. Over the years we have successfully purchased, remediated and redeveloped multiple properties in the Tideflats. Through these and other efforts, the Port has attracted new employers and grown existing business in our region. Since the public Port District was founded in 1918, we have grown from 240 acres to over 2,300 acres in the Tideflats. Today, the Port's marine cargo and real estate operations help support over 42,000 jobs and nearly \$3 billion in economic activity. This also includes more than \$100 million annually in state and local taxes, supporting everything from K-12 education to social services to law enforcement. To date, we have:

- Cleaned up legacy contamination to return more than 420 acres of property to productive use under protective measures
- Restored more than 215 acres of critical habitat for fish and other wildlife and preserved more than 70 acres of open space to serve as a natural buffer between industrial operations and residential areas
- Worked with our tenants to eliminate illicit stormwater discharges and treat stormwater where appropriate.

The Port of Tacoma is a global gateway, and we must think and act from the local to the international level. We must balance our duty to protect the Port as a gateway for commerce and a creator of well-paying jobs for our region, while ensuring that our operations are compatible with and support our home communities of Tacoma and Pierce County. We want and need to stay competitive while continuing to push for cleaner practices. This will help ensure that we protect and grow the number of green, well-paying jobs in our region, while enacting transformational change of the maritime industry. The transition to zero emissions must be managed in a thoughtful manner to avoid shifting the burden to other communities with weaker environmental controls; a lose-lose situation for both climate action and local industry.

Comments on the Draft Climate Action Plan:

Climate action cannot wait and we need to continue working together to achieve our shared goals of phasing out emissions by 2050. Unfortunately, it appears that some activists have adopted an adversarial approach to this issue, seeking to pit the community versus local employers. Companies in our community have invested millions of dollars to reduce emissions—investments that are, at times, ignored. As the City perfects the Draft Climate Action Plan (Plan), we would encourage it to be mindful of the document's tone and work to ensure it does not unintentionally feed into that narrative. As such, we ask that the Plan mention the Port of Tacoma's progress—and that of our customers—on climate action and our aligned community commitments such as the Northwest Ports Clean Air Strategy. While the Northwest Ports Clean Air Strategy is highlighted in the Plan appendix, we encourage the City to include this in the body of the main Plan document. There is no doubt that the bad practices and legacy contamination of old industry have contributed to our climate crisis. The Port is a major industrial landowner in Tacoma, and a fellow local government. We think it is worth highlighting the current work the broader industrial community is doing, going beyond existing legal requirements to reach shared environmental goals. In this way, we can both help hold each other accountable.

Our ability to achieve success depends on all levels of government working together with industry partners. Investments from the federal government, the state and Tacoma Public Utilities are helping the Port and its customers reduce emissions from our operations. This level of collaboration between the City and the

working waterfront will be needed as well.

We commend the City for taking bold action in their engagement efforts and making sure to include voices that have been underrepresented in the past. We hope that future plans and engagement efforts will continue to push for inclusive engagement and that the City will embrace business and industry engagement as an opportunity, not a threat, to making the types of transformational changes that the plan references. As noted above, our customers and partners in the supply chain have already invested in reducing air emissions. They best can identify barriers to further progress and solutions for how to overcome them. We hope that the Port can be a partner in engaging industry and transportation in the future, including the frontline workers that keep cargo moving through our Gateway.

Attached are more detailed comments prepared by Port of Tacoma staff. In the meantime, thank you for considering our comments and we look forward to working together to take climate action for our community.

Sincerely,

A handwritten signature in blue ink that reads "Eric D. Johnson". The signature is written in a cursive style with a large, stylized "E" and "J".

Eric D. Johnson
Executive Director

Attachment: Staff Comment on Draft Tacoma Community Climate Action Plan and Appendices