

December 4, 2025

RE: LNG and the NW Ports Clean Air Strategy

Thank you for your thoughtful comments asserting that the use of liquified natural gas (LNG) as a marine fuel should not be included in the Northwest Ports Clean Air Strategy (NWPCAS) implementation plans. On behalf of the Port of Seattle, we are keenly aware of your concerns. We take our environmental responsibilities seriously, including the need to reduce the impacts of maritime-industry emissions on the climate and near-port communities.

In 2005, the Port of Seattle was the first in the nation to inventory greenhouse gases from maritime-related sources including air pollutants from trucks, cargo handling equipment, tugs and ocean-going vessels. Emissions from ships were further divided to account for when they are underway at cruising speed, when they are maneuvering in the harbor and while stationary at the dock.

Through the NWPCAS, we set a goal of zero greenhouse gas (GHG) emissions by 2050. Using our data, we developed strategies to reduce both air pollutants and GHG emissions from different sources. These inventories have been updated approximately every five years and clearly document significant progress.

The current NWPCAS makes three references to LNG (pages 22, 28 and 34), none of which support its expansion. The Port of Seattle's specific implementation plan, the Maritime Climate and Air Action Plan (MCAAP), makes no reference to LNG use as a strategy for lowering GHG, because the port does not consider LNG to be a climate solution.

While ships traveling approximately 100 miles from the ocean to the port produce the most emissions in our inventories, near-port communities receive greater exposure to these emissions from ships docked in our harbors, as well as from trucks and cargo handling equipment which operate closer to neighborhoods. To drive down emissions from these sources, we have focused on installing shore power, prohibiting older trucks from calling on our terminals and phasing out older cargo handling equipment. While we recognize this does not address the concerns you raised about emissions from Puget Sound Energy's LNG refinery, we are addressing the increasing use of LNG as a marine fuel.

However, we do not have the authority to determine the type of fuel used by ships that call on our harbors. The reality is that the number of LNG ships in operation worldwide doubled between 2021 and 2024 and is expected to double again before the end of the decade. In fact, 43% of new vessels on order are designed to use LNG. While LNG does offer significant reductions in diesel particulate matter (DPM), we recognize it is not a climate solution. Because ships have long lifespans, fuel-switching is a critical strategy for reducing emissions of the growing fleet over time. The use of renewable natural gas (RNG) – which can be used in combination with LNG – significantly lowers both GHG and conventional pollutants as compared to LNG alone. We are also evaluating the feasibility of using green methanol through our development of green corridors between our gateway and ports in Korea and Alaska.

While we are not promoting the use of LNG, it would be inappropriate to remove all mention of it in the update to the NWPCAS as you have requested given its increasing use as a marine fuel. However, we will continue to work locally on reducing maritime emissions we have direct control over, such as creating

incentives for the use of RNG and renewable diesel. Furthermore, we will continue to engage in discussions at the International Maritime Organization (IMO) to set aggressive timeframes for phasing out fossil fuels throughout the maritime industry.

Thank you again for engaging in the pressing need to decarbonize the maritime industry. We appreciate your feedback as we work to complete our [latest updates](#) to the NWCPAS implementation plans. We believe these initiatives will not only benefit the climate and near-port communities but will also make us a more competitive gateway. We hope you will collaborate with us in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fred Felleman', followed by a horizontal line.

Fred Felleman
Commissioner
Port of Seattle