

**From:** [Charles Costanzo](#)  
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Hi – I would like to offer public comment at the January 12 Port Commission meeting re: the Northwest Ports Clean Air Strategy. Thank you!

- Charlie

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Thank you for the opportunity to speak today. Charles Costanzo on behalf of the American Waterways Operators, the national trade association for the tugboat, towboat and barge industry. The members of the AWO operate a variety of coastwise vessels and harbor craft engaged in marine freight transportation and interstate commerce around the world. We're proud to be a part of the greenest and safest mode of freight transportation and we recognize the role that we play as an industry that uses fossil fuels to do our work. We also recognize that we are part of a port industrial community that has to further reduce its carbon footprint and we work every day toward that goal.

AWO appreciates the regional approach of the Northwest Ports Clean Air Strategy and we believe that several guiding principles should continue to inform this important work.

First, please understand that vessel operators must comply with multiple regulatory regimes. This is a challenge for business and we would welcome more consistent regulation across multiple jurisdictions. AWO members seek a practicable regulatory framework that allows for the continued safe and efficient movement of critical maritime commerce across state and international boundaries. To achieve this goal, commercial vessels must be governed by clear and practical federal statutes and regulations, consistently and uniformly applied and administered across the country. When regulators seek to solve the problem for their back yard, the problem migrates into their neighbors yards. Directing advocacy towards federal and international bodies like EPA and IMO will create greater consistency farther up the chain.

Second, please be mindful of the operating profile of our coastwise fleet. There are very few vessels that spend their entire service life in one place. Even though a vessel might be working in Puget Sound today, it may well be working far from our shores someday soon. So in addition to considering the cross-jurisdiction impacts of regulatory action, consider as well the cross-operational impacts. Some vessels that look like local harbor vessels are working in direct competition with ocean-going vessels. We ask that the Port of Seattle and Northwest Seaport Alliance be mindful of the competitive landscape and establish a level-playing field for all participants.

Third, regulators should encourage maritime activity and policies should be developed that grow maritime freight operation. It is well understood that maritime is the cleanest mode, but too often regulators enact policy that disincentivizes maritime freight and unwittingly pushes cargo towards other modes or less green gateways. Regulators must consider costs, regulatory burdens, viability of alternatives, and long-term growth opportunities before considering further action. The maritime industry's story has been one of compliance and innovation – we are leading the way with emission reductions, fuel and engine modification, new propulsion technologies, and more. AWO encourages the Port of Seattle and Northwest Seaport Alliance to build on this momentum and encourage the industry trend towards sustainability and innovation.

We're grateful to continue our work together with the Port on the NW Ports Clean Air Strategy. It is a sound model to advocate for consistent broadly-applicable policy that respects the diverse operating profiles of many commercial vessels and that effectively balances the competitive nature of our business with the urgent demands of environmental action.

Thank you for the opportunity to address the Port Commission today.