



CITY AND BOROUGH OF SITKA

A COAST GUARD CITY

ADMINISTRATION

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September 11, 2025

[VIA EMAIL ONLY]

Alaska Marine Highway System

dot.regs@alaska.gov

Re: 2025 AMHS Reg Reform RFI- Maintain and Increase EV Transportation on AMHS

INTRODUCTION:

The City and Borough of Sitka (CBS) thanks the Alaska Marine Highway System (AMHS) for seeking input on potential reforms to regulations governing the AMHS. These comments were drafted and approved by the CBS Sustainability Commission, an advisory body to the Assembly tasked to work towards catalyzing a healthy community now and in the future by proposing solutions to environmental, social, and economic concerns of the CBS, its partners, and community members¹.

The AMHS is a critical component of public travel and rural economic development within Southeast Alaska, the majority of which is off the road system. Citizens of Sitka frequently use the AMHS as an affordable way to travel for work, sporting events, school extracurriculars, and to transport freight and goods throughout the region. **With the prevalence of electric vehicles (EV) in Sitka and the region, it is imperative that the AMHS continue to transport up to two EVs per sailing and work to increase the number of allowable EVs per sailing.**

Recent and significant efforts from Alaska's federal representatives have successfully brought hundreds of millions of dollars to improve the AMHS. The Draft 2045 AMHS Long-Range Plan (2045 AMHS LRP) identifies service, workforce, fleet and terminal infrastructure, financial efficiency, and sustainability as key focus areas. Goal 2A, "Modernize the fleet and terminals through new builds and renovations," contains numerous subgoals related to supporting the adoption and transport of alternative fuel vehicles (AFV)—which includes EVs—both on vessels and on shore². The 2024-2028 Alaska Department of Transportation and Public Facilities (AK-DOT&PF) Transportation Carbon Reduction Strategy calls for electrification of Sitka's ferry terminal³, and the Alaska Energy Authority's (AEA) electric vehicle infrastructure implementation plan includes projects for the communities served by the AMHS⁴. Given the priorities and actions within the 2045 AMHS LRP to modernize the AMHS, parallel efforts from AK-DOT&PF and AEA to support safe and effective transportation regardless of fuel type, it is imperative that regulations and operations of the AMHS are structured to support and accelerate these initiatives, as opposed to hindering these efforts.

¹ Sitka General Code 2.31 (2022) [Sustainability Commission](#)

² Alaska Department of Transportation & Public Facilities (2025) [Alaska Marine Highway System 2045 Long-Range Plan](#), Public Review Draft

³ Alaska Department of Transportation and Public Facilities (2023) [Carbon Reduction Strategy, Five-Year Comprehensive Plan: 2024-2028](#)

⁴ Alaska Energy Authority (2024) [State of Alaska Electric Vehicle Infrastructure Implementation Plan FY25](#)

Similar directives have been given to the City and Borough of Sitka (CBS). In 2022, the Assembly directed CBS to increase Sitka's energy independence by electrifying municipal operations where possible by 2030⁵. CBS has begun this process by evaluating and integrating AFVs into its fleet when feasible. Sitka is uniquely positioned to support vehicles that can utilize locally sourced power that is far more affordable than conventional fuel and less prone to price volatility. Utilization of EVs directly supports Sitka's energy independence by utilizing locally generated power from the municipal-run utility.

Pursuant to direction given by the municipal Assembly, CBS is invested in continuing efforts to electrify our municipal fleet and support residents in their ability to access AFVs and the benefits they provide. To improve the safety and accessibility of the AMHS as a critical partner in our municipal commitments, please consider the following recommendations:

1. Clarify and maintain that alternative fuel vehicles (AFV) are permitted on AMHS vessels.

Applicable Section: 17 AAC 70.020 (2) Classification of traffic - Vehicles

Align the definition of "vehicles," particularly in sections 2.A, C, and D, with the National Highway Traffic and Safety Administration (NHTSA) and Environmental Protection Agency (EPA) definitions for vehicles to remove potential ambiguity and affirm that AFVs fall under provisions for vehicle transport. Similarly, these definitions are inclusive of additional classifications that the ferry is likely to more frequently transport in the near future, such as E-bikes, micro-trucks, and other motorized vehicles that are not currently or clearly included. Furthermore, aligning definitions with those put forth by the NHTSA and EPA has the added benefit that many additional regulations specific to safety often utilize these definitions. Such alignment will streamline improvements that are critical, regardless of fuel type.

2. Increase the number of EVs allowed per sailing.

As of June 2025, Alaska has 4,911 EVs. 38% of those EVs are in areas served by the AMHS, with the vast majority of those EVs (30% of total) located in Southeast Alaska⁶. The prevalence of EVs is only rising; the region has experienced nearly a 350% increase in EVs since 2020⁷. Since 2022, Sitka has experienced a 75% increase of EVs and is one of the highest-adopting communities in the nation^{8,9}. As of 2024, with 2.7 EVs per 100 people^{9,10}, Sitka is only surpassed by Juneau—where there are 2.9 EVs per 100 people—which currently leads in Alaska^{10,11}. For comparison, Washington State has 1.8 EVs per 100 people¹², while Alaska has 0.6 EVs per 100 people⁶. The prevalence of EVs in Southeast Alaska is related to the region's abundant hydropower, which provides a relatively affordable source of electricity that increases our region's energy sovereignty and economic development opportunities.

As of September 1st, 2025, the AMHS is now the only way EVs can be transported to Southeast Alaska, as EVs are no longer transported by the sole private barge operator in the region¹³. The five-year annual average number of AMHS departures from the Bellingham port is 45¹⁴. Under current policy limiting transport of EVs to two per sailing, this theoretically limits the number of EVs that can be transported into Southeast Alaska via the AMHS to 90-100, depending on the number of sailings in a year. Sitka, alone, sees between 75-100 newly registered EVs in a year. With the new lack of other transportation options for

⁵ City and Borough of Sitka Assembly (2022) Resolution 2022–18: [Increasing the Energy Independence of the City and Borough of Sitka by Decarbonizing City Operations by 2030](#)

⁶ Alaska Energy Authority (2025) [EV Adoption Data](#)

⁷ Alaska Energy Authority (2020) White Paper: [Electric Vehicles and Infrastructure in Alaska](#)

⁸KCAW interview with Devon Kibby, Alaska Vehicle Association (May 25, 2022) [In the Fast Lane of Electric Vehicle Growth, Sitka Looks for a Place to Install Its First Public Charging Station](#)

⁹ State of Alaska Department of Transportation (September 2024) *Vehicle Identification Numbers in 99835*

¹⁰ Population Statistics by Location from the U.S. Census Bureau

¹¹ [Juneau Electric Vehicle Association](#) (September 22, 2024)

¹² Jeff Desjardins, Visual Capitalist (June 7, 2025) [Mapped: Electric Vehicles Per Capita by U.S. State](#)

¹³ Alaska Marine Lines (August 12, 2025) [Notice on Electric Vehicles and Plug-in Hybrid Electric Vehicles](#)

¹⁴ State of Alaska Department of Transportation and Public Facilities (2024) [Annual Traffic Volume Report](#)

EVs into Southeast Alaska, this limitation of the AMHS could quickly become a severe bottleneck for acquisition of EVs in the region. This policy also limits the intra-regional transportation of goods and people between communities that have high levels of EV adoption, as passengers wishing to travel with their EVs within the region will be competing for limited spots on AMHS ferries.

In line with the updated best practices and risk mitigations from the international maritime safety agencies elaborated in Recommendation 4, the AMHS should seek to increase the number of EVs allowed per sailing. This will help prevent anticipated bottlenecks of the increased EV adoption trends that are occurring across Alaska and will make AFVs more affordable and accessible for Alaskans citizens.

3. Establish a reservation system for EVs to increase booking certainty.

In addition to Recommendation 2, creating a reservation system that clearly indicates how many EV spots are available on any given sailing will provide booking certainty for entities like CBS to be able to make timely purchase orders and meet their procurement needs. Other municipalities that have implemented similar procurement procedures for EVs and AFVs will be better served if the AMHS is able to increase its certainty and reliability in the timing of delivery for these vehicles.

4. Proactively develop operational procedures informed by current best practices to improve utilization of AMHS.

An opportunity now exists for the AMHS to further support the transport of vehicles to Southeast Alaska, especially battery electric vehicles (BEV) and plug-in hybrid electric vehicles (PHEV). Fortunately, recently updated best practices and risk mitigations issued by the International Union of Marine Insurance (IUMI)¹⁵ and European Maritime Safety Agency (EMSA)¹⁶ are ample and available to improve mixed-vehicle transportation. These resources are primarily guided by International Maritime Dangerous Goods (IMDG), which is considered an extension of the Safety of Life at Sea (SOLAS) Chapter VII, (further explained in Recommendation 5), all of which can be used to inform AMHS-specific procedures. It should be noted that many of these risk mitigations do not just improve the safety of AFVs but also improve the safety of all vehicles by reducing the risk of fire, irrespective of potential source. Rather than waiting for mandates to improve, the AMHS should proactively employ best practices to increase safety immediately and minimize service disruptions to passengers, regardless of vehicle type.

5. Align all applicable sections of 17 AAC 70 to better adapt and respond to anticipated updates and safety protocols for transporting AFVs.

The regulatory landscape is quickly changing as AFV—specifically BEVs and PHEVs—become increasingly common. While not the direct governing entity of the AMHS, the International Maritime Organization (IMO) passed updates in 2024 for SOLAS that will take effect in 2026 and will apply to new vessels with some retrospective updates required for existing vessels to be made by 2028, specifically for existing RO-RO/RO-PAX (SOLAS II-2/20) vessels like those in the AMHS fleet¹⁷. These regulations are interpreted, integrated, and implemented by the United States Coast Guard (USCG) through the Code of Federal Regulations (CFR; specifically titles 46 and 49), and the Department of Transportation's (DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) which oversees shipping requirements of hazardous materials. This includes both internal combustion engine vehicles (ICEV) and AFVs like BEVs and PHEVs¹⁸.

¹⁵ International Union of Marine Insurance, (2025) [Risk Mitigation for the Safe Ocean and Short Sea Carriage of Electric Vehicles \(EVs\)](#)

¹⁶ European Maritime Safety Agency (2025), [Guidance on the Carriage of AFVs in RO-RO Spaces](#)

¹⁷ Marine Safety Council (2024) [Resolution MSC.550: Amendments To Chapters II-2 And V Of The International Convention For The Safety Of Life At Sea, 1974](#)

¹⁸ 49 CFR 171.22 includes guidance to utilize IMDG regulations

17 AAC 70.070.A recognizes that the AMHS is subject to the jurisdiction of the USCG. However, specific CFRs are not referenced in the AMHS regulations, nor is the jurisdiction of DOT-PHMSA recognized. This leaves AMHS regulators, staff, and the public with ambiguity about how relevant federal laws/regulations are being interpreted and applied in AMHS operations. Additionally, this lack of clarity has led to inconsistent treatment of AFV transportation among AMHS vessels and routes.

6. Ensure Fare Parity for AFVs.

Applicable Section: 17 AAC 70.040. Rates, fares and charges.

While this section of AMHS regulations provides general guidance for setting rates, fares, and charges, it does not ensure impartial treatment between fuel types and/or drivetrains which could result in disproportionate financial impacts and negatively affect access to AFVs and other new technologies. Add language to establish impartial treatment of vehicles regarding rates and remove ambiguous language that could allow disparate rates to be applied across fuel types and/or drivetrains.

7. Improve public communication with up-to-date information via the AMHS website.

Applicable Section: 17 AAC 70.010 - Purpose of the Ferry System.

Timely and accurate communication is essential for travelers, particularly in rural and remote communities that depend on the AMHS. Given frequent changes to sailings and ambiguity on the AMHS website, critical information regarding ferries—specifically with regard to BEVs and PHEVs—is not clearly or effectively communicated to passengers. All regulatory and/or policy changes affecting travelers and vehicles should be made timely, clearly, and transparently, with explanations and an opportunity for stakeholders to review impacts of said changes and comment as necessary for a minimum of 30 days. Consider revising the section to include a statement that comprehensive information, with particular emphasis on changes in regulation and/or policies in addition to seasonal schedules, is regularly published on both the website and in informational brochures. This should include a public comment period if applicable.

CONCLUSION:

Improvements to safety in marine transportation have been a growing need for well over a decade and are driven by multiple, oft-compounding factors, such as increased hazardous weather conditions, aging vessels, and technological advancements that have diversified the kinds of materials transported and their associated hazards. Regardless, advancing and implementing safety measures should be a constant task, and the current regulatory landscape is changing quickly as the technology used in vehicles and batteries in general rapidly evolves. It should be noted that safety on ships is not the sole responsibility of one entity, nor should it be. While regulatory improvements should be kept in line with technological advancements, it will take time and effort to fill current gaps and will require active collaboration between not only vessel operators and regulators, but vehicle manufacturers, as well. Additionally, passengers should be well-informed of their options to mitigate risks associated with their vehicles, regardless of type, and should apply mitigation practices evenly. By sharing knowledge and building capacity between all stakeholders and actively embracing best practices in line with current research, current and future developments in the transportation landscape can be effectively addressed as they arise. Interruptions to critical services, like the AMHS, can be minimized without compromising safety or service.

The mission of the City and Borough of Sitka is to provide public services to Sitka to support a livable community for all. While transportation is a unique service that is not the sole responsibility of CBS, we look forward to collaborating as needed with the AMHS to remain a viable, affordable, and, most critically, safe transportation option for Sitkans, Alaskans, and beyond.

On behalf of CBS, thank you for the opportunity to comment.

For any follow-up questions, please contact the Sustainability Coordinator at sustainability@cityofsitka.org

Sincerely,

A handwritten signature in black ink, appearing to read 'J Leach', with a stylized flourish at the end.

John Leach

Municipal Administrator

CC: Representative Himschoot, representative.rebecca.himschoot@akleg.gov [via email only]
Representative Stedman, senator.bert.stedman@akleg.gov [via email only]