Clean Buildings Performance Standards: Best Practices and Lessons Learned

September 2025



Overview





Understanding Port of Tacoma and Northwest Seaport Alliance building portfolios



Navigating Clean Buildings Performance Standard (CBPS) requirements



Sharing key challenges and lessons learned

Port Overview



- The Port owns about half of the land (~2,500 acres) that makes up the Tacoma Tideflats.
- Over 100 leases including warehousing, logistics, recycling industries and terminal operators.
- Marine cargo operations managed by the Northwest Seaport Alliance.
- Marine cargo and real estate operations at the Port support more than 41,000 jobs.



Major Business Lines



Containers

Breakbulk

Autos

Grain

Real Estate





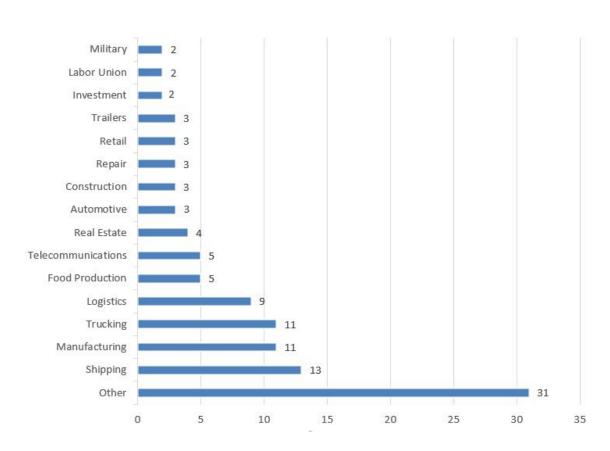


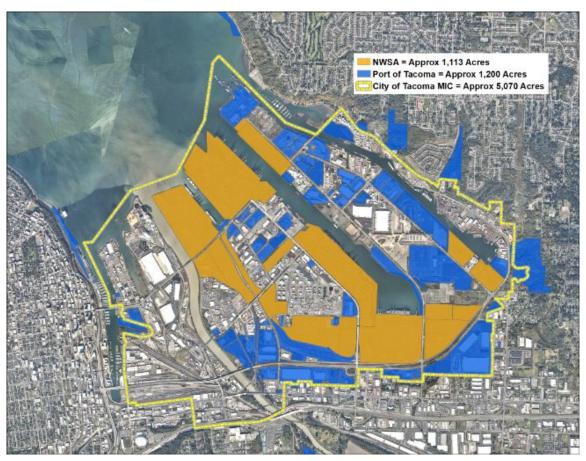




POT Building Portfolio



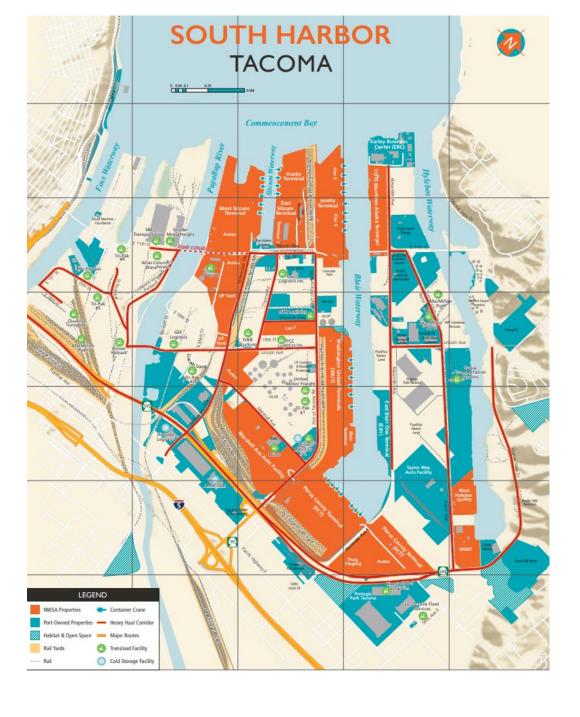




Up to four Tier 1 and four Tier 2 buildings subject to CBPS

Marine Cargo Operating Partnership: Seattle + Tacoma







Orange: Properties managed by the Northwest Seaport Alliance

North Harbor: 40

leases

South Harbor: 21

leases

Buildings over 20K primarily unenclosed and/or unconditioned warehouse space

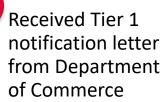
Up to two Tier 2 buildings subject to CBPS



Moving Towards Compliance



Oct. 2021



 79 unique Building IDs were listed under our compliance obligations



Dec. 2024 – Feb. 2025

Internal data triage

- Data collection (historic building inventories, building drawings, past/planned demolitions)
- Identifying buildings exemptions



Jul. 2025

Tier 2 notification letter received from Department of Commerce



Kick-off with building consultants (TetraTech)

Nov. 2024

External data collection

- Tenant utility data
- Department of Commerce mapping tool walk-through
- Building site walks

Energy audits for Tier 1 buildings

O&M / EMP plans and benchmarking report

Installing building sub-metering

Apply for exemptions



Next Steps

Jul. 2027

First compliance requirements

Feb.-Sep. 2025

Building Site Visits

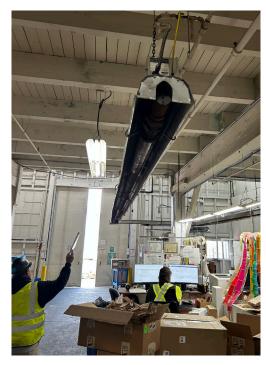


Purpose

 Confirm conditioned status of warehouse space

Challenges

- Access to tenant-operated facilities
- Obtaining heating capacity specifications for overhead heating units
 - Space heaters may push warehouse spaces into state's conditioned category



Space heaters at tenantoperated facilities subject to CBPS



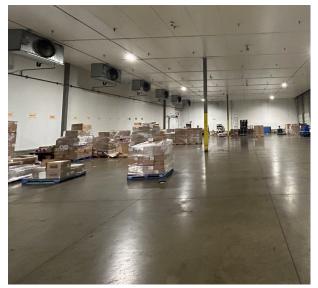


Portrait of a Tier 1 Building



- Tenant-occupied; 92,000 sq ft
- Required site visit to confirm conditioned status of warehouse and cooled rooms
- Next Steps:
 - EUI assessment and potential Energy Audit
 - O&M Plan, EMP, and certified benchmarking report







Key Challenges



Coordination with tenants, utilities, and internal business units	
Delays in data access and collection	
Uncertainty on future use of Port assets	
Unique and complex building portfolio	

Takeaways / Lessons Learned





Need for interdepartmental coordination and awareness building



Start early on data collection



Work closely with Department Commerce to resolve data discrepancies



Integrate future CBPS requirements into long-term asset management strategy

Next Steps



- Finalize site walks and conditioned space calculations
- Building audits for covered Tier 1 buildings
 - Implement cost-effective energy efficiency measures for buildings that exceed the state's EUI target
- Verified benchmarking reports
- Adopt Energy Management Plans (EMP) and implement Operations and Maintenance (O&M) Plans
- Sub-metering buildings that are currently metered on a campus-level



CBPS Overview



- The 2019 and 2022 Clean Buildings Laws adopted a statewide energy efficiency performance standard to reduce fossil fuel consumption in buildings
- The laws set the following requirements:
 - Create an energy performance standard for non-residential buildings larger than 50,000 sq. ft
 - Require energy management planning and energy tracking for non-residential buildings between 20,000 and 50,000 sq. ft

CBPS Dates and Deadlines



- Tier 1 buildings reporting schedule:
 - June 1, 2026 More than 220,000 sq. ft.
 - June 1, 2027 More than 90,000 sq. ft. but less than 220,001 sq. ft
 - June 1, 2028 More than 50,000 sq. ft. but less than 90,001 sq. ft
- Tier 2 buildings reporting schedule:
 - **July 1, 2027** More than 20,000 sq. ft. but less than 50,001 sq. ft. and all multifamily residential buildings more than 20,000 sq. ft.

The <u>building owner</u> is responsible for CBPS Compliance

Compliance Requirements



- Benchmark by measuring and tracking energy use in a building over time.
- Implement an operations and maintenance (O&M) program in accordance with the standard.
- Create an energy management plan (EMP).
- (Tier 1 only) covered buildings must meet an energy performance metric by either:
 - Meeting an energy use intensity target (EUIt); or
 - <u>Utilizing the "investment criteria" pathway</u>. This compliance route includes performing an energy audit and implementing all cost-effective efficiency measures (EEM).