Tim Gould, Sierra Club

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Thank you. My name is Tim Gould. I'm chair of the Transportation and Land Use Committee for Washington Chapter of Sierra Club. Our chapter has about 40,000 members and supporters here in Washington, and the Sierra Club overall represents over 4 million people across the entire country. It's clear that our state really needs to take immediate action to reduce climate-driven emissions. That's the largest source comes from transportation, something on the order of about 45% of the state's greenhouse gas emissions. It's very important that we take action immediately to put these rules in place. We keep hearing every week about the climate crisis, so definitely, the time to act is now.

Washington first adopted most of California's low emission vehicle standards in 2005 to reduce criteria pollutant emissions and greenhouse gases in an effective manner. We must now join California again to adopt the Zero-Emission Vehicle standard and the Advanced Clean Truck rule. Doing this will accelerate zero-emission vehicles in both the light duty, medium, and heavy duty vehicle sectors. Most of the approximately 3 million total vehicles on the road in Washington now are powered by fossil fuel, which produce air pollutions that will harm many of our communities, especially those along the front lines and near major highways, often communities of color and low income households.

It's really important to implement both the ZEV and the ACT rule and to do it very promptly. The ZEV program will reduce total greenhouse gas emissions in Washington by the equivalent of about a million metric tons of carbon dioxide per year. This would improve air quality in our overburdened communities and also increase access to the savings from reduced maintenance that those ZEVs would provide their owners. The truck rule will accelerate deployment of electric trucks and buses, the long-term standard that requires new sales of zero emission vehicles be 100% of the fleet by 2045.

It's very important to adopt these standards, both the ZEV standard and the ACT rule without delay. Adopting these will accelerate deployment of electric vehicles and provide immediate public health benefits through clean air for our communities, while combating the climate crisis that is only getting worse. We can't afford any delay in implementing these rules. There's no time to waste.

Additionally though, there are two important suites of regulations that have been left out and should be pursued in separate rulemaking. One of these is a fleet reporting requirement that California adopted, and it's currently absent from this Washington-proposed rule. Ecology must adopt the fleet reporting requirement in order to support a just transition as we shift towards clean transportation future.

Robust fleet reporting requirement is essential to developing complementary policies and programs and ensure the transition to pollution-free vehicles is fair for drivers, promotes dignified labor standards, and maximizes health benefits in overburdened

communities. Fleet reporting requirement is critical for ensuring that we can better address the health disparities through targeted policies in the future.

Also, Washington should seek to adopt California's Low NOx Omnibus Rule. Oxides and nitrogen are a precursor to ground-level ozone, which can cause or exacerbate numerous respiratory and other health ailments. As complementary policy to the clean truck rule, the Low NOx Omnibus Rule will reduce pollution from combustion engines and provide immediate benefits to reduce on the order of 90% of the NOx pollution by 2027.

Given that large trucks may be more of a challenge to electrify it's very important to adopt a Low NOx Omnibus Rule so that the remaining vehicles that might still be sold in the coming half a dozen years or decade will be Low-NOx-emitting. Thank you again for this opportunity to provide comments. The Sierra Club will be submitting more in-depth comments in writing ahead of the public comment deadline. Thank you.