



**PUGET SOUND
Clean Air Agency**

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August 5, 2021

Elena Guilfoil
Department of Ecology
Air Quality Program
P.O. Box 47600
Olympia, WA 98504-7600

Via electronic submittal to:
<https://aq.ecology.commentinput.com/?id=SdA6s>

Re: Department of Ecology’s Proposed Rulemaking for
Chapter 173-423 WAC, Low Emission Vehicles; and WAC 173-400-
025, Adoption of federal rules

Dear Ms. Guilfoil:

On behalf of the Puget Sound Clean Air Agency (Agency), I am writing to express our support for the Department of Ecology’s (Ecology) proposed rulemaking for Chapter 173-423 WAC and 173-400 WAC to implement the California Advanced Clean Cars Program in Washington. The Agency recommends that Ecology implement the program as soon as possible.

The Agency is a special-purpose, regional government agency chartered by state law in 1967. Our jurisdiction covers King, Kitsap, Pierce, and Snohomish counties, home to over half the state’s population. The Agency works to realize a vision of clean and healthy air for all people, all the time, regardless of socio-economic status or geographic location.

In our region, on-road transportation emissions account for approximately 35% of the climate pollution. To help our region reduce transportation emissions, the Agency synergizes efforts with state and regional climate strategies and works to stimulate shifts in transportation sector policies in favor of lower-carbon fuels, zero-emission vehicles (ZEV), and alternative modes of travel. Adopting the California Advanced Clean Cars Program in Washington is one way to work towards these efforts and is a necessary step to achieve Washington’s target to reduce greenhouse gas emissions to 95% below 1990 levels by 2050.

Electrification of Washington’s transportation sector presents an important opportunity to reduce harmful pollutants and improve public health outcomes for the state’s residents. The ZEV

regulation works best when it is part of a comprehensive suite of policies and incentives to plan for market growth. In combination with Washington's complementary suite of enacted climate legislation including HB 1091 (Clean Fuel Standard), SB 5192 (Cap and Invest), HB 1287 (ZEV planning), and SB 5192 (EVSE regulations), Washington is well positioned to achieve net carbon neutrality by 2050 and bring electrification benefits to communities that need them the most.

Fossil-fuel-related emissions from vehicles, especially medium- and heavy-duty vehicles (MHDVs), are a major source of pollutants including volatile organic compounds (VOCs), nitrogen oxides (NOx), particulate matter, and multiple air toxics. These emissions present an environmental justice problem that directly and disproportionately impacts disadvantaged communities that frequently are located near major freeways, freight corridors, ports, and distribution centers. California's requirements for MHDVs to be ZEVs will provide significant and necessary relief to those communities and we support the state's adoption of California's Heavy-Duty Engine and Vehicle Omnibus Regulation when it is final.

Importantly, we note that the ZEV mandate will increase consumer choice for Washington residents, who are currently limited in their options for EVs and other ZEVs because manufacturers direct those vehicles to existing ZEV states. The number and type of ZEV models available will increase in Washington under the mandate as car companies develop a portfolio of ZEV technologies for their product lines and meet the state's targets.

Thank you for the opportunity to convey our support for Ecology's efforts to implement the California Advanced Clean Cars Program in Washington. The Agency is ready and willing to share our expertise and serve as a resource to Ecology at any time.

Sincerely,



Craig Kenworthy
Executive Director

CK/jwc