



Adrian Dominican Sisters
Seek Truth • Make Peace • Reverence Life

AMPLIFY
FLEET CHARGING SIMPLIFIED

ASPEN SNOWMASS

AVOCADO GREEN
BRANDS

BEN & JERRY'S

BOSTON COMMON
ASSET MANAGEMENT

CALIFORNIA HEALTH CARE CLIMATE ALLIANCE

CONGREGATION OF
St. Joseph

THE CHARITY OF JESUS CRUCIFIX URGES US
DAUGHTERS of CHARITY
PROVINCE of ST. LOUISE

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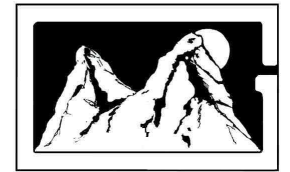
HEMP ACE
INTERNATIONAL

INDEPENDENCE SOLAR

IKEA

MERCY INVESTMENT SERVICES, INC

LEGACY VACATION RESORTS
CERTIFIED B CORP



lime

Nestlé
Good Food, Good Life

NEXT-TO-NATURE MARKET
LIFE, WITH YOUR PET

NIKOLA

Northwest Coalition for Responsible Investment

PROTERRA

RIVERMOOR ENERGY

Saunders Hotel Group

Life Is On | **Schneider Electric**

SIERRA NEVADA

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TripZero

umc
100 YEARS

Unilever

VERT
ASSET MANAGEMENT

WORTHEN

August 9, 2021 | Submitted Electronically

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

RE: Rulemaking - Chapter 173-423 WAC Low Emission Vehicles & WAC 173-400-025; Major Businesses Support Adoption of the Advanced Clean Trucks Rule

Dear Ms. Elena Guilfoil:

As major businesses, institutions, healthcare systems, employers, and investors with more than \$13 billion in assets under management, we write to express our strong support for adoption of the Advanced Clean Truck (ACT) rule across states. The ACT rule will help bring down costs for zero-emission medium- and heavy-duty vehicles by requiring manufacturers to increase model availability to meet the needs of fleet operators and driving investment in clean transportation research and development. This will enable cost-effective electrification of commercial vehicles at the pace and scale needed to meet climate and air quality goals, while delivering public health and economic benefits for communities and businesses alike.

We have made significant commitments to reduce our greenhouse gas (GHG) emissions to protect the health and economic well-being of the communities in which we live and operate. Transportation is now the largest source of GHG emissions across the nation, a substantial component of our carbon footprint, and a major operating expense. Moreover, transportation is a major source of harmful air pollutants that disproportionately impact low-income communities. Improving air quality is not only the right thing to do for public health and for these communities, it also makes economic sense. Fewer instances of respiratory illness, missed days of work and hospitalizations will increase personal disposable income and help reduce the financial pressure on our healthcare system. These impacts cross state lines, just like the commercial vehicles in our fleets and value chains.

Increased access to cost-effective zero-emission commercial vehicles across states will allow us to remain competitive in a market where our customers, investors, patients, students, and employees increasingly expect us to lead on sustainability. A growing number of clean vehicles offer significant cost savings through lower fuel and maintenance costs, and reduce the risk associated with the volatility of fossil fuel prices and supply. However, commercial vehicle electrification still faces significant challenges due to higher upfront costs, weight, charging time, battery range, and the availability of charging infrastructure. Market-enabling policies like the ACT will rapidly unlock the long-term savings, climate, and clean air benefits of medium- and heavy-duty vehicle (MHDV) electrification, while spurring the much-needed widespread deployment of charging stations. The more states that adopt ACT, the greater the market-forcing benefits of the rule, thereby lowering costs and creating a more stable and self-sustaining market.

Electrification of commercial transportation will support a cleaner, more energy-efficient economy through local innovation and investment in clean technology manufacturing—creating new jobs, cutting costs for our value chains, mitigating climate risk, improving public health, and reducing health care costs. Bold action by state leaders is urgently needed. We strongly support adoption of the ACT rule across states to accelerate MHDV electrification, allowing both manufacturers and fleet operators to capture savings from economies of scale and provide more cost-effective emissions reductions for all.

Sincerely,

Appropriate Technology Group
Avocado Green Mattress
AMPLY Power
Aspen Skiing Company
Ben and Jerry's
Boston Common Asset Management
California Health Care Climate Alliance
Congregation of St. Joseph
Daughters of Charity, Province of St. Louise
Domini Impact Investment
DSM North America
eBay
ECOS Corporation
The Episcopal Church (Domestic & Foreign
Missionary Society)
Hemp Ace International
IKEA Retail U.S.
Independence Solar
Legacy Vacation Resorts
Lime
Macroclimate
Mercy Investment Services, Inc.
Mountain Gear

Natural Investments, LLC.
Nestlé
Next to Nature
Nikola Corporation
Northwest Coalition for Responsible Investment
Proterra
Province of St. Joseph of the Capuchin Order
Rivermoor Energy
Saunders Hotel Group
Schneider Electric
Sigma Consultants, Inc.
Sierra Nevada Brewing Co.
Studio G Architects
Ten Directions Design
The Green Engineer, Inc.
Trillium Asset Management
TripZero
UMC, Inc.
Unilever
Vert Asset Management
Worthen Industries
WR Consulting, Inc.

**Bolded signatories have direct operations in Washington*

***The following signatories do not have logos available: Appropriate Technology Group, The Episcopal Church (Domestic & Foreign Missionary Society), Macroclimate, Natural Investments, LLC., Province St. Joseph of the Capuchin Order, Sigma Consultants, and WR Consulting, Inc.*

For more information or to connect with the signatories, please contact Jennifer Helfrich, Senior Manager for State Policy at Ceres (helfrich@ceres.org).