

## **Simon Mui, Natural Resources Defense Council**

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Great, thank you for the opportunity to speak today. I'm Simon Mui. The deputy director of the Clean Vehicles and Fields Group here at the Natural Resources Defense Council. We're a national environmental organization with more than three million members across the country including in Washington. We've participated in clean vehicle rulemakings, both federally as well as in California and across numerous other states, particularly as Washington and other states throughout the West suffer from extreme temperature days, wildfires, and droughts due to climate change.

This rulemaking is a very important first step to addressing the pollutants that are responsible for those changes as well as direct public health impacts. We strongly support the Department of Ecology moving forward with the ZEV and the ACT rulemakings without delay. As noted earlier in your presentation, we agree that the adoption of these clean vehicles standards is directed and required by the legislature and under statute, and is allowed under Section 177 of the Clean Air Act in order to address air pollution, including greenhouse gas emissions.

We strongly support you opting into the program without delay in order to have zero-emission passenger cars with the ZEV program and cleaner zero-emission trucks through the ACT program in Washington. These proposed rules will really ensure that Washington consumers and fleets continue to have the latest electric vehicle product offerings, and that really Washington establishes a floor in terms of sales to transition to pollution-free cars, trucks, and buses.

We don't think that Washington or other states should wait or delay. These programs as others have suggested the longer Washington waits the more model years that will be potentially forfeited, given lead time requirements under Section 177. The benefits from these rules will be significant from the public health perspective in terms of reduced smog-forming pollutants like NOx, as well as particulate matter from zero-emission vehicles displacing combustion of diesel and gasoline.

As you move forward with adopting these rules without delay, we ask that in the future rulemakings, that the department puts out a road map to address some issues in future rulemakings. The first I just wanted to raise with ZEV bank, credit bank. We appreciate ecology identifying, they plan to look at this issue around the credit bank for zero-emission vehicles as part of the future update to the program under Advanced Clean Cars II.

We support the department doing so in order to ensure the program will have the same effective credit stringency no more and no less in California's program going forward by taking in account the credit banks there and in Washington. We think providing that certainty in terms of what the program will deliver going forward under ACC II will be important to address particularly given the short time constraints around Advanced

Clean Cars I and providing certainty in terms of the trajectory going forward as we transition to higher volumes post 2025.

On the truck side, we support the department move forward with ACT but also want to flag the importance and the need to adopt the fleet reporting requirements that will allow the state to obtain baseline information on the existing truck fleets. Then last but not least, we understand Washington is awaiting for the finalization of the omnibus NOx rule in California. We fully support, in the future, Washington going forward to adopt that sister rule, the omnibus NOx rule that will deliver additional public health benefits to the state that are so critical. Thank you for your time and consideration.