

7 April 2022

Laura Watson, Director  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

Dear Director Watson:

Our undersigned organizations would like to thank you for including adoption of California's Heavy-Duty Engine and Vehicle Omnibus Regulation and a Fleet Reporting Requirement as a part of the rulemaking to adopt California's Advanced Clean Cars II (updates to Chapter 173-423 WAC, the Clean Vehicles Program, and Chapter 173-400 WAC, General Regulations for Air Pollution Sources).

On August 9, 2021 we submitted a letter asking the Department of Ecology (Ecology) to initiate a rulemaking to adopt the Heavy Duty Omnibus Rule as soon as California completed their regulation as well as to file a CR-101 requiring fleet reporting. We are very appreciative that Ecology listened to our recommendations and is now including these provisions in the current rulemaking.

By adopting the full suite of California's clean vehicle regulations, Washington State can simultaneously improve air quality, lower transportation costs, protect workers, address environmental health inequities, and help reduce greenhouse gas emissions. The Heavy-Duty Engine and Vehicle Omnibus Regulation and the Fleet Reporting Requirement are two important pieces of this regulatory framework.

We will be submitting more detailed comments about this rulemaking, including suggestions regarding questions raised at the stakeholder meeting on February 28, 2022, but for now we wanted to express our general support for adopting the Heavy-Duty Engine and Vehicle Omnibus Regulation, Advanced Clean Cars II, and a Fleet Reporting Requirement.

Thank you again for moving forward with these critical policies.

With appreciation,

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Washington State Policy Manager  
**BlueGreen Alliance**

Matthew A. Hepner  
Executive Director  
**Certified Electrical Workers of Washington**

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President

**Washington Physicians for Social Responsibility**

Larry Brown

President

**Washington State Labor Council, AFL-CIO**