



**PUGET SOUND  
Clean Air Agency**

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Cynthia Wang

June 17, 2022

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

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

Re: Department of Ecology's Proposed Rulemaking for  
Chapter 173-423 WAC, Clean Vehicles Program; and Chapter  
173-400 WAC, General Regulations for Air Pollution Standards

Dear Ms. Ekrem:

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 adopt California's Heavy-Duty Engine and Vehicle Omnibus Regulation and Advanced Clean Cars II rule (hereafter, "CA Clean Vehicle Rules") in Washington. We also support the proposed fleet reporting requirements, with some expansions.

In our four-county region, on-road transportation accounts for approximately 35% of all greenhouse gas emissions. To help 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 CA Clean Vehicle Rules in Washington is a critical step to achieve regional and state climate targets.

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 CA Clean Vehicle Rules work best when they are part of a comprehensive suite of state policies and incentives to plan for ZEV market growth. In combination with Washington's complementary suite of enacted climate legislation including its Clean Fuel Standard, Cap and Invest rule, ZEV Infrastructure Planning tool, and Electric Vehicle Supply Equipment (EVSE) regulations, Washington is well positioned to achieve net carbon

neutrality by 2050 and bring electrification benefits, and cleaner air, 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 including harmful diesel particulate matter (DPM). These emissions present an environmental justice problem that directly and disproportionately impacts overburdened communities that frequently are located near major freeways, freight corridors, ports, and distribution centers. Adopting and implementing CA Clean Vehicle Rules will provide significant and necessary emissions reductions to those communities.

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. Further, we support the proposed rule's language offering credits for vehicles sold of model years 2023, 2024, and 2025, as a means of stimulating manufacturers to increase vehicle choice for consumers ahead of the rule's mandate to offer ZEVs in-state.

Finally, the fleet reporting requirements will enable the state to build an inventory of existing medium- and heavy-duty vehicles, which can then be used to help identify and plan for the resources and infrastructure needed to replace those outdated vehicles with ZEVs. We encourage Ecology to require annual reporting and to require reporting each vehicle's engine model year. Annual reporting would allow Ecology to track and report trends in emissions and changes to fleet makeup. And having engine information would enable Ecology to estimate annual emissions based on the reported annual mileage. Such an emissions inventory would facilitate reporting the health benefits that will accrue from replacing medium- and heavy-duty vehicles with ZEVs, using a tool such as EPA's BenMAP.

Thank you for the opportunity to convey our support for Ecology's efforts to implement CA Clean Vehicle Rules in Washington. The Agency is ready and willing to serve as a resource to Ecology at any time.

Sincerely,



Cynthia Wang  
Interim Executive Director

CW/jwc