Northwest Energy Coalition

My name is Vivian Wang, V-I-V-I-A-N W-A-N-G, and I testify today on behalf of the Northwest Energy Coalition. We appreciate the opportunity to provide public comment and would like to express our support for the Department of Ecology's proposal to adopt ACC II, the heavy-duty Omnibus Low-NOx Rule, and the fleet reporting requirement. The Northwest Energy Coalition has been working to address air pollution, to improve public health, protect frontline communities, and increase access to the benefits of electricity as a transportation fuel. 4 million people in Washington live or work near transportation corridors that are exposed to harmful, high levels of diesel missions, particularly communities of color and low-income communities. We see these three regulations as critical to addressing these disproportionate impacts. In addition to reducing emissions, adopting ACC II will allow consumers to have more accessibility and options to zero-emission vehicles, save money on fuel, and increased job opportunities as over 3,400 Washingtonians are already in clean transportation jobs. On top of the environmental economic, and health benefits of 100% zero-emission standard for new car sales, we wanted to highlight the benefits of the rules as it relates to the electricity sector. As Washington increasingly relies on electricity as a transportation fuel, proactive planning for this new load is essential to reliably and affordably serve all Washington residents. Utilities are actively planning for new load from electric vehicles, both in integrated resource planning and distribution system planning. ACC II is helpful for utility planning as it provides more certainty so utilities can account for these new vehicles and respond accordingly. Trucks and buses are responsible for 49% of nitrogen oxide and 53% of particulate matter. Adopting the heavy-duty Omnibus Low-NOx rule will help reduce these toxic air pollutants. Lastly, data collected through the fleet reporting requirement will help identify and prioritize trucking operations that will provide the greatest relief in air pollution exposure to overburdened communities and ensure that the burden of complying with clean truck regulations are not placed on drivers who often do not have the resources to comply. We believe that these three rules are important parts of a comprehensive strategy to decarbonize the transportation sector and create a more just and equitable transportation future in Washington. Thank you again for the opportunity to comment. We support Ecology's proposal to adopt ACC II, the heavy-duty Omnibus Low-NOx rule, and the fleet reporting requirement this year. I plan to follow up with written comments to address a few specific items.