

## Laura Hodgson

Thank you for the opportunity to comment on Washington's proposal to phase out gas vehicles by 2035 (as noted here: Sept. 7 - Clean Vehicles Public Comment - Washington State Department of Ecology). It is very important that we address one of the largest emitters of carbon pollution in our state - our vehicles. I applaud our state for looking into this and focusing on a better future that is more sustainable. I also support the adoption of changes to require consumers to make better choices for our vehicles that are more climate friendly. Without a little bit of a push, we will not get where we need to go from a climate perspective.

However, I have concerns with the plan to require all sales of cars in Washington to be zero-emission vehicles by 2035 if the definition of ZEV does not include hybrid cars. If hybrid cars count as ZEV, I think this plan could work if the following three areas are addressed. If (1) there is sufficient electric vehicle infrastructure installed, reliable, and equitably distributed across the state PRIOR TO 2035, (2) equity issues are addressed, and (3) the issue of foregone gas tax that would result from the increase in ZEVs is addressed.

Re: Infrastructure. I know the state is working towards electric vehicle infrastructure and is funding significant improvements to the system now – this is great! However, we are not on track to have sufficient capacity by 2035 or a strong plan to achieve that capacity by 2035. The Washington State's Plan for Electric Vehicle Infrastructure Deployment does not plan for providing enough charging stations for the demand that would be needed if all new car sales in 2035 were ZEVs. Think about how many gas stations we have now – even if we needed 1/15th of those for ZEVs (which is super low to create the convenient and equitable charging experience noted), the funding and plan do not get us there before 2035. Furthermore, while the state's priority appears to be on WSDOT roads, who will be expected to build the charging on city and county streets? Local governments certainly don't have the funds, and I don't see the private market getting us there in a reliable fashion (the State's report does not include any data on market trends for private sector provision of charging facilities). Yes, many people will charge at home, but what are the costs to homeowners to not only buy an electric car, but to put a charging station in? Many homeowners will have trouble doing this within their means, which raises equity concerns. Also, without doing a rough analysis of who will charge at home and who will not, you can't adequately know how many charging stations you need not on residential properties.

The State's plan also notes significant infrastructure electric grid capacity and power system inadequacies for the future electricity needs. Until we do a more detailed statewide analysis of what these needs are, come up with a timeline to address them, and a plan for the funding by 2035 to do the work, a plan to set a deadline of sales for ZEV by 2035 seems extremely premature. Why don't we put incentives in place for ZEV purchases and do some planning for another year or two first, then let's set a future deadline for all vehicle sales to be ZEV based on that information and analysis (and analysis of all the other items noted in this comment letter)? Doing so otherwise is irresponsible.

Also, how will infrastructure needs be met as the technology changes so fast? The State's plan notes that electric vehicle charging infrastructure may become obsolete in a number of years. What is the plan to address that hurdle?

Re: Equity. Apartments and housing that uses street parking do not have access to charging anywhere in the state but Seattle (that I am aware of), and to build out that network in 13 years in a way that every person who wants to own a ZEV can charge it in a reasonable distance from their home is a bit unreasonable. This is an equity issue, as people of lower incomes and more BIPOC

households live in apartments and areas where it will be the hardest to provide this infrastructure. Also an equity issue is accessibility to charging stations for those who cannot afford to retrofit their home to add a charging station. This significantly scales up the need for charging facilities that is unreasonable to be built before 2035. And if there is not sufficient reliable, easily accessible, convenient charging facilities before 2035, those who are low income will be at a disadvantage – which does not support Washington's goals for equity.

Re: Foregone tax. Gas taxes play a large part of funding our transportation infrastructure. I realize the latest transportation package added new revenue sources, but how is the state planning to make up the gap in funds received from the gas tax that is foregone with the new influx of ZEVs? Our transportation infrastructure is woefully underfunded as it is, and probably still is with the latest transportation package. That transportation package did not account for this change in gas tax patterns in its funding. Until that is addressed and planned for – moving forward with this date and scale of change is unwise.

Before we set a date of 2035 for all new sales of cars to be ZEVs, we should have a detailed plan to address each of the items above. (And if we can't get there by 2035, let's revise the end date to one that is achievable.) More importantly, we should have a monitoring program to make sure we are making sufficient progress towards our goals (infrastructure build out, equity, and back funding for foregone taxes) so that we can make sure as we go that the 2035 date is achievable.

I also have SIGNIFICANT concerns with the proposal to require all sales of cars in Washington to be zero-emission vehicles by 2030. As alluded to above, there is no way we can address the infrastructure needs in time for a requirement date of 2030. I applaud our goals and support them, but being unrealistic about sufficient infrastructure is not smart or in the best interest of our state. If the state and ecology does move forward with either of these plans (2030 date or 2035 before concerns are addressed and monitoring plans are in place), I would like to have a discussion with staff to understand why we are moving forward without better planning.

Thank you for your time and work on this important issue. I look forward to learning more and being a part of the solution.

Laura Hodgson, kylie.rydland@gmail.com

A few other items...

(1) In WAC 173-423-040 (definitions for Clean Vehicles Program), the definitions refer to definitions in California statute. This requires the user to look up another state's code to find OUR definitions. That seems like a poor practice for a WAC. Please change the text in the definitions to say what the words mean and not make us chase a definition in another state's code.

(2) As we push for more ZEVs, what is the plan to recycle batteries? We as a society are notorious for just throwing everything away – what is Washington doing to think about the full lifecycle of this new part of the vehicle?

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