



**PUGET SOUND  
Clean Air Agency**

1904 3rd Ave #105  
Seattle, WA 98101

206-343-8800

[pscleanair.gov](http://pscleanair.gov)

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October 19, 2022

Joanna Ekrem  
Department of Ecology  
Air Quality Program  
Olympia, WA 98504-7600

*Via electronic submittal to:*  
<https://aq.ecology.commentinput.com/?id=NGd7e>

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

Dear Joanna Ekrem:

On behalf of the Puget Sound Clean Air Agency (Agency), I am writing to express our strong support for the Department of Ecology's (Ecology) proposed update for Chapter 173-423 WAC and Chapter 173-400 WAC by adopting California's Heavy-Duty Engine and Vehicle Omnibus Regulation and Advanced Clean Cars II rule.

The Agency is a special-purpose, regional government agency chartered by the Washington Clean Air Act. Our jurisdiction of King, Kitsap, Pierce, and Snohomish counties is home to over half of the state's population.

The Puget Sound region and Washington State are uniquely placed to benefit from an economy-wide transition to zero emission vehicles. Pollution from cars and trucks is the largest source of both greenhouse gas emissions and harmful air pollution in our region. Our studies show that diesel exhaust is the number one source of cancer risk from air pollution in our four-county jurisdiction.

Transportation pollution disproportionately impacts low-income and Black, Indigenous, and People of Color (BIPOC) communities,

often because these communities are more likely to live near major freeways, freight corridors, ports, and distribution centers.

By increasing the number of clean cars and trucks on the road, the Clean Vehicle rules will significantly reduce climate and air pollution and are a critical step to achieve both regional and state climate targets. The Clean Vehicle rules are also complementary to other climate legislation Washington is currently implementing, such as the Clean Fuel Standard, the Climate Commitment Act, the Zero Emission Vehicle Infrastructure Planning tool, Electric Vehicle Supply Equipment regulations, and the Clean Energy Transformation Act. Our region's electricity – already one of the cleanest in the country – will become even cleaner over the next decade, boosting the benefit of a transition to electric vehicles (EVs).

The Low-NOx Omnibus portion of the Clean Vehicle rules ensures that new diesel trucks will run as cleanly as possible at every point in their duty cycle. The rule also requires that those lower emissions be maintained over the truck's useful life by requiring longer warranties, which will protect the trucks' owners from expensive repairs. Requiring lower-emitting heavy-duty diesel trucks to be sold in Washington will help clean the air in communities close to ports, railyards, and distribution centers that are now heavily impacted by pollution from truck traffic.

The Clean Vehicle rules are also good for Washington consumers. The rules will increase the number and types of zero emission vehicle models on the market – both new and used. More electric vehicle models will enable an increasing number of Washington residents to save thousands of dollars annually due to EVs' lower fuel and maintenance costs. And as battery prices continue to drop, electric vehicles are expected to become cheaper to purchase than gasoline-fueled vehicles. Even zero emission trucks will soon approach cost parity with diesel-fueled trucks; after accounting for tax credits through the federal Inflation Reduction Act, some electric trucks will be cheaper than diesel trucks as soon as 2023.<sup>1</sup>

Further, we support Ecology's proposal to provide early action credits to automakers for zero emission vehicle sales for model years 2023 and 2024. This provision will encourage automakers to increase vehicle choice for consumers ahead of the rules' implementation and lead to more near-term pollution reduction.

Finally, we support the rules' inclusion of fleet reporting requirements that will enable the state to build an inventory of existing medium- and heavy-duty vehicles. This can then be used to help identify the resources and infrastructure needed to transition fleet vehicles to

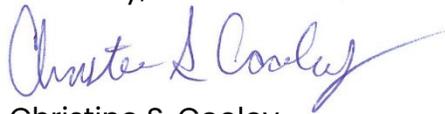
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<sup>1</sup> <https://rmi.org/inflation-reduction-act-will-help-electrify-heavy-duty-trucking/>

zero emission technology. We encourage Ecology to consider in future rulemakings a requirement for annual fleet reporting. Annual reporting would allow Ecology to track and report trends in emissions and changes to fleet makeup. Such an emissions inventory would facilitate reporting the health benefits that will accrue from replacing medium- and heavy-duty vehicles with zero emission vehicles.

Thank you for the opportunity to convey the Agency's strong support for Ecology's efforts to implement California's Clean Vehicle rules in Washington. The Agency looks forward to seeing the rules' impact in the Puget Sound region for years to come.

Sincerely,



Christine S. Cooley

Executive Director

CC/jwc