



WASHINGTON STATE POTATO COMMISSION  
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October 17, 2022

On behalf of the Washington State Potato Commission, we welcome this opportunity to comment on Washington's new mandate for zero-emission vehicles by 2035. The Washington State Potato Commission in support of 250 Washington State potato growers encourages an economically and environmentally sustainable Washington State potato industry by providing strong leadership, innovation, and building partnerships to meet the demands of domestic and global consumers.

Our farmers have concerns about Washington's proposed rulemaking that requires vehicles sold in Washington to meet zero-emission vehicle (ZEV) standards by 2035. While we understand that Washington is set to adopt California standards, it's worrisome that in California, the California Air Resources Board (CARB) staff acknowledged in a report to Board members that ***the ban will have potentially significant adverse impacts to agricultural and forest resources.***

**Our specific concerns include the following:**

- Is Washington's electrical grid able to keep up with the demand that comes with this mandate? Our farmers cannot stop in the middle of growing and harvesting and put their crops at risk if there is no electricity during the hottest points in the summer, keeping our crops irrigated. Electrical outages are currently happening which forces utilities to pick winners and losers during peak load hours. No new load capacity is under construction or is planned to be construction in our western electrical grid.
- The need for vastly more charging infrastructure will be needed. 150 miles may seem like a lot in urban areas, however in rural areas the miles pass by quickly; both in harvest and getting our time sensitive perishable crops to in-state markets and ports. To maintain food safety our crop must be refrigerated or frozen. Fuel must be used to power units on trucks to maintain the critical function of meeting strict federal food safety guidelines. There are currently no products available to meet the need for powering a truck and refrigeration unit.
- Will the necessary vehicles be available within the compliance timelines put forward and will they be affordable for farmers? Our farms are already underwater, trying to swim in the current economical environment. Food inflation is skyrocketing, another layer adding to food inflation will place undue stress on our current economic environment.

Beyond direct on farm impacts, adopting the proposed zero emission rules may also have far-reaching implications because trucking is such a crucial part of the farm and food supply chain for potato

growers. [December 2020 report](#) by the U.S. Department of Agriculture (USDA) found that trucks account for 83% of agricultural freight movements by tonnage and 88% by market value.

Thank you again for the opportunity to comment. Washington Potato growers are committed to remaining good environmental stewards as they continue to focus on producing a crop that feeds families around the world.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Harris', with a long horizontal flourish extending to the right.

Matt Harris  
Director of Governmental Affairs  
Washington State Potato Commission