

February 7th, 2025

Re: City of Seattle Comments on Washington Clean Vehicles Program Rulemaking

Dear Washington State Department of Ecology,

The City of Seattle appreciates the opportunity to provide comments on the Washington Clean Vehicles Program rulemaking. The City strongly supports the program's goals to accelerate the transition to zero-emission vehicles (ZEVs), reduce greenhouse gas (GHG) emissions, and improve air quality, particularly for communities disproportionately impacted by pollution. This rule has important implications for the City's sustainability goals, fleet management, and equity priorities, and we offer the following recommendations to ensure effective implementation while addressing potential challenges:

- **Prohibit ZEV Purchase Bundles with ICE Vehicles** - The City supports adding language to prohibit manufacturers and dealers from requiring the purchase of a ZEV as a condition to procure internal combustion engine (ICE) vehicles. Such practices would undermine equitable access to vehicles, increase costs and create unnecessary barriers for fleet operations.
- **Increase transparency around Credits** - The limited number of credits being made available in Washington is driving up the cost of vehicles and those costs are then being passed along to the end purchaser in the form of a fee. There is currently no prohibition on this practice and there is no transparency to the fee structures.
- **Provide Exemptions for Critical and Vocational Vehicles** - We recommend updating the definition of "Authorized Emergency Vehicle" to include utility trucks and other vocational vehicles essential for disaster response and critical operations. These vehicles often lack ZEV alternatives that meet operational and reliability requirements.
- **Address Infrastructure and Fiscal Challenges** - While Seattle is committed to fleet electrification, the program's accelerated timelines could exacerbate existing infrastructure and budget constraints. The City urges Ecology to develop policies or funding mechanisms to support the deployment of charging infrastructure and renewable fuels for vehicles where ZEV alternatives are unavailable. Additionally, allowing flexibility in procurement timelines could prevent the unintended consequence of prolonging the use of older, higher-emission vehicles. Wherever possible, we encourage the state to establish procurement contracts that allow for local jurisdictions to piggy-back and realize volume pricing.
- **Support for WMBE Businesses** - We encourage Ecology to provide targeted support for small businesses, including women- and minority-owned contractors, who may face financial barriers to transitioning their fleets to ZEVs. Tailored financial assistance, training, and outreach will help ensure equitable access to cleaner transportation technologies.

Thank you for considering City of Seattle's input. We look forward to continuing our partnership with Department of Ecology on this matter.

Sincerely,

Anna Johnson

State Legislative Affairs Director
City of Seattle