

February 7, 2025

Dear Washington Department of Ecology Staff,

This letter is submitted as a response to the current Clean Vehicles Program Rulemaking Informal Comment period. On behalf of the undersigned groups and the Washington residents that we represent, we write to thank you for your work to date in adopting and implementing the Heavy-Duty Omnibus (HDO) and Advanced Clean Trucks (ACT) rules, as well as to urge you to remain committed to advancing the critical transition to clean medium-and heavy duty (MHDV) transportation.

As you know, the ACT and HDO are crucial in the fight against toxic diesel pollution in Washington that disproportionately harms frontline communities, with MHDV diesel vehicles accounting for [59 percent of nitrogen oxides \(NOx\) and 53 percent](#) of particulate matter (PM) emitted by on-road vehicles. Diesel vehicles also account for [9% of total statewide greenhouse gas emissions](#), and MHDV electrification is key for meeting the state's ambitious statutory climate targets—recently reaffirmed by the rejection of measure 2117. The timely implementation of these rules honors community well-being as well as state investments to date, including the Legislature's \$120 million allocated last biennium to a new point-of-sale voucher program.

With regard to the current rulemaking process, we support the proposed adoption of amendments to Washington regulations that will track amendments to California's ACT and HDO regulations currently adopted and/or under consideration by the California Air Resources Board (CARB). However, in light of the growing industry opposition to these rules—on display at the December 10th, 2024 public information session, through public statements by state legislators, and other outlets, we are deeply concerned about the potential for rollback of these regulations. Even more concerning is the fact that this opposition represents a pattern of behavior seen across several states that have adopted these policies—culminating in Oregon and Massachusetts' decision to delay the HDO by one year, and legislation introduced in New Jersey to delay the ACT by two years (successfully defeated by advocates in December 2024), and a similar bill introduced in Oregon for the 2025 legislative session.

This is a crucial time to proactively defend the implementation of these rules at the onset of ACT implementation in 2025. Given the current political climate at the federal level, such regulations are more crucial than ever for reducing harmful air pollution and public health inequities, meeting the state's climate mandates, and facilitating the transition to clean MHDV transportation. To this end, many of the undersigned groups have and will continue to engage in the Clean Vehicles Program Rulemaking process, provide legislator outreach, and engage in other efforts to support these rules.

Washington regulatory agencies must stand up against any further attacks on our hard-fought climate and clean air leadership, and refuse to weaken or delay the ACT and HDO rules.

Thank you,

Natural Resources Defense Council
Climate Solutions
Earthjustice
Sierra Club Washington State Chapter
Washington Conservation Action
Washington Physicians for Social Responsibility
CALSTART
NW Energy Coalition
Duwamish River Community Coalition
Communities for a Healthy Bay
People for Climate Action - Seattle
Seattle Cruise Control
Pacific Environment
Rivian