

February 7, 2025

Clean Vehicles Program  
Department of Ecology  
300 Desmond Drive SE  
Lacey, WA 98503

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 Puget Sound Clean Air Agency (Agency), I am writing to express support for proposed amendments to the Clean Vehicles Program rule, Chapter 173-423 WAC, that will track amendments to California's Advanced Clean Trucks (ACT) and Heavy-Duty Low-NOx Omnibus (HDO) regulations currently adopted and/or under consideration by the California Air Resources Board (CARB).

The Agency is a special-purpose, regional government agency chartered by Washington state law in 1967. Our jurisdiction covers King, Kitsap, Pierce, and Snohomish counties, home to over half of Washington state's population. Our mission is to preserve, protect and enhance air quality and public health, enforce the Clean Air Act, support policies that reduce climate change, and partner with communities to do this work equitably.

The Puget Sound Clean Air Agency recognizes the potential for the Clean Vehicles Program rule to improve air quality and protect public health in the Puget Sound region, especially in overburdened communities. As identified in the Agency's [EPA-funded study on air toxics in Tacoma and Seattle](#), diesel exhaust, specifically the tiny particles released from diesel engines, is the biggest air pollution concern in our region. It accounts for about 85% of the potential risk for cancer from air toxics. Inhalation of diesel exhaust can cause irritation of the eyes and nose, headaches, nausea, respiratory disease, and lung cancer. The study further found that black, Indigenous, and other people of color and lower income households have higher potential cancer risks from air toxics from living near major roadways. Accordingly, the Agency's 2030 Strategic Plan includes objectives to "Reduce harmful diesel pollution emissions and exposures," and "Reduce inequities in air pollution."



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Christine Cooley

Many overburdened communities are in near-road communities where they are largely exposed to transportation emissions. The Clean Vehicles Program rule and its implementation is critical to protecting these communities from the public health risk they disproportionately face.

The Agency fully supports Ecology's proposed amendments to the Clean Vehicle Program rule. The proposed amendments align with the Agency's 2030 strategic objectives and will help implement a policy that enhances air quality and advances environmental justice in the Puget Sound region.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine S. Cooley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Christine S. Cooley  
Executive Director