AAA Washington

Thank you for the opportunity to provide comments regarding the future implementation of Zero-Emission Vehicle (ZEV) requirements in Washington State.

Since 1904, AAA Washington has been the trusted partner for generations of members, enhancing their journeys and empowering them to navigate life with confidence. We are the region's premier membership organization, serving over 1.2 million members across Washington and Northern Idaho. We offer unmatched value through 24/7 roadside assistance, exclusive discounts and rewards, expert travel planning, and comprehensive insurance solutions.

We support the adoption of ZEVs wherever feasible and have taken proactive steps to facilitate their adoption, including installing charging stations at our headquarters and locations across the state. However, we urge the Department to consider practical limitations in specific vehicle applications and ensure that the implementation of these policies does not negatively impact essential services.

1. Addressing the Impact on Vehicle Purchases

While the Department emphasizes that these rules apply only to the selling of vehicles, it is important to acknowledge that these regulations have a direct impact on the purchasing process. Buyers can only purchase what is available for sale, and constraints in vehicle availability could have unintended consequences, particularly for organizations and industries that rely on specialized vehicles. We recognize that the Department is operating within the legal framework of the adopted law, but we strongly encourage an approach that maximizes flexibility to avoid disruptions to essential functions.

2. Emergency and Essential Service Vehicles

The Advanced Clean Trucks (ACT) regulation exempts emergency vehicles as defined in RCW 46.04.040, recognizing the need for reliable transportation in critical situations. Tow trucks and flatbeds, while not technically classified as emergency vehicles, play an indispensable role in roadside safety and emergency response, particularly in clearing disabled vehicles from highways and assisting stranded motorists. In fact, during the height of the COVID-19 pandemic, our drivers were considered essential workers, which is additional proof of how critical these services are in times of need. These vehicles are essential to ensuring public safety and should be considered for similar treatment under the rule.

AAA Washington's fleet operates 24/7 across the state, providing critical assistance during storms and high-demand periods, such as holidays, when rapid response times are crucial. The current limitations of ZEV technology—including charging infrastructure constraints, range limitations, and extended refueling times—pose significant operational challenges for these vehicles. To maintain service reliability, we would need to increase fleet capacity to compensate for charging downtime, which could have unintended cost and efficiency impacts.

3. Commercial Charging and Infrastructure Gaps

The existing commercial charging infrastructure does not adequately support large fleet vehicles such as tow trucks and flatbeds, particularly those transporting disabled vehicles. Most charging stations are designed for consumer EVs and are located in shopping centers or other areas that are not accessible for larger vehicles. Additionally, our services often require long-distance travel, with member benefits extending up to 200 miles per tow, further highlighting the need for dependable charging infrastructure before a full transition to ZEVs can be considered viable.

4. Fleet Turnover and Replacement Challenges

Our fleet consists primarily of Class 3-6 categories, but we are actively exploring ZEV integration where feasible. For example, we recently added a Ford Lightning to test its capability for non-towing-related needs. However, electric tow trucks remain in the early stages of development, with only one known deployment among our sister organizations in Canada. Given the current state of technology, it is premature to mandate ZEV adoption for these vehicle types without further advancements in range, charging speed, and operational reliability.

Additionally, our fleet turnover cycles are designed to maximize quality and efficiency. Vehicles that are rotated out of service are often sold to contractors and independent service providers, who rely on access to affordable secondhand equipment. Supply chain challenges have already disrupted the vehicle replacement process, with upfitter timelines becoming increasingly unpredictable. Any policy that further restricts vehicle availability could have a cascading effect on our operations, as well as on the broader network of service providers who depend on access to fleet turnover vehicles.

5. Recommendations for Future Rulemaking

To ensure a practical and equitable implementation of ZEV requirements, we respectfully urge the Department to:

• Consider classifying tow trucks and flatbeds as emergency vehicles for the purpose of this rule, given their critical role in road safety and emergency response.
• Allow for exemptions or extended transition timelines for vehicle types where ZEV technology is not yet commercially viable or operationally feasible.
• Address the need for commercial charging infrastructure that accommodates larger vehicles and long-haul service requirements.

We appreciate the Department's efforts to advance clean transportation policies while balancing operational realities. We look forward to continued engagement on this issue and welcome the opportunity to collaborate in developing a transition strategy that meets environmental goals without compromising essential services.

Thank you for your consideration.