

July 2, 2025

Subject: Public Comment Opposing California-Style Emission Mandates in Washington (Chapter 173-423 WAC Amendments)

To the Washington Department of Ecology:

I am writing to express my strong opposition to Washington's continued alignment with California's vehicle emissions standards under RCW 70A and the Clean Vehicles Program.

While environmental stewardship is important, adopting California's Advanced Clean Cars II and related programs imposes rigid, one-size-fits-all mandates that do not reflect Washington's unique geographic, economic, and transportation realities. The following concerns highlight why Washington should reconsider this approach:

1. Lack of Local Autonomy and Accountability

Washington's automatic adoption of California Air Resources Board (CARB) standards effectively outsources major policy decisions to an unelected body in another state. This deprives Washington residents and lawmakers of meaningful input on transportation policy and emissions timelines that directly impact our economy and infrastructure.

2. Disproportionate Impact on Rural and Working-Class Residents

California's ZEV mandates disproportionately harm rural communities, small businesses, and low-income households, who depend on affordable internal combustion engine (ICE) vehicles and cannot easily transition to electric vehicles (EVs) due to cost, charging infrastructure, and towing/load needs. These realities are even more pronounced in Washington's agricultural and mountainous regions.

3. EV Infrastructure is Not Ready

Despite growing EV sales, Washington's charging network remains inadequate—particularly in rural areas and for medium- and heavy-duty commercial vehicles. Forcing rapid ZEV adoption without robust infrastructure creates unnecessary burdens and logistical risks for consumers, fleet operators, and supply chains.

4. Market Distortion and Supply Constraints

Tying Washington's vehicle market to California's aggressive mandates exacerbates supply bottlenecks and limits consumer choice. Dealers and consumers should be able to access a full range of vehicle options based on demand—not dictated quotas.

5. Legal and Economic Uncertainty

With ongoing federal scrutiny and Congressional action challenging California's waiver under the Clean Air Act, continued reliance on these rules exposes Washington to regulatory whiplash. The Department

of Ecology's recent pause acknowledges these risks. Until legal clarity is achieved, it is premature and irresponsible to further embed California-style mandates into our state regulatory framework.

Recommendation:

I urge the Department of Ecology to fully withdraw its adoption of California's vehicle emissions standards, including ACC II and ACT programs, and instead develop Washington-specific rules that prioritize clean technology **without** undermining consumer choice, economic resilience, or infrastructure readiness.