



July 3, 2025

Nikki Harris  
Washington Department of Ecology  
Climate Pollution Reduction Program  
PO Box 47600  
Olympia, WA 98504-7600

*Re: Comments on proposed amendments to Chapter 173-423 WAC*

Dear Nikki Harris:

Washington Conservation Action appreciates the opportunity to provide comments on the most recent draft updates to the Clean Fuels Program through Chapter 173-424 WAC. Washington Conservation Action, formerly known as Washington Environmental Council, has been a leading policy voice for the environment in our state for nearly 60 years. We develop, advocate, and defend policies that advance environmental progress and justice, and we supported the 2020 legislation requiring Washington to adopt California's zero emission vehicle standards. We commend the agency for its work over the ensuing years to update rules in accordance with this law and aligned with our broader climate and air quality policy framework in a predictable way that supports public health, helps meet our greenhouse gas emission limits, and builds in flexibility for regulated manufacturers.

The proposed updates to the Advanced Clean Trucks and Heavy-Duty Low-NOx omnibus regulations are expected to cut nearly 50 million metric tons of carbon dioxide through 2050 and significantly reduce tailpipe pollution - dramatically slashing PM2.5, aka soot, and NOx emissions. This is significant, because medium- and heavy-duty vehicles are a primary source of diesel exhaust - the single most harmful air pollutant in Washington. Adoption of these rules will mean fewer hospital visits and deaths each year, and fewer family members and neighbors put at greater risk for cancer, asthma, heart disease, and other devastating ailments.

These benefits are why the legislature chose to join Washington with the many other states that have adopted California's vehicle emission standards. The agency's role is to make sure that this legislative mandate is faithfully executed, and the proposed rules for Chapter 173-423 WAC do exactly that. We strongly support adoption of the proposed rule changes and thank Ecology for upholding the spirit and letter of the law.

Sincerely,

Caitlin Krenn  
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