



3 July 2025

Subject: Sierra Club Supports Clean Vehicle Rules 173-423 WAC for ACT and HDO Rulemaking

On behalf of the members in the Washington Chapter of Sierra Club, we want to thank Department of Ecology for this opportunity to comment in support of the updates to the Clean Truck Rules. The Washington Chapter of Sierra Club has over 24,000 members who support our mission to explore, enjoy, and protect the planet.

State leadership on clean transportation is even more important now than ever. Sierra Club commends the Department of Ecology for ensuring we have more clean trucks on our roads in Washington through the Clean Vehicles Program Rules (Chapter 173-423 WAC) by upholding the Advanced Clean Truck (ACT) and Heavy-Duty Low NO_x Omnibus (HDO) rules. The ACT rule is projected to cut 47 million metric tons of carbon dioxide through 2050. The Omnibus requirement for a 90% reduction in NO_x emissions below current standards starting in 2027 is projected to reduce over 35,000 tons of NO_x emissions by 2050.

Transportation emissions comprise a large amount of greenhouse gas emissions in Washington—approximately 45%, and emissions from heavy-duty vehicles especially pollute the air with fine particulate matter (PM_{2.5}) and oxides of nitrogen (NO_x), a precursor to the ground-level pollutant ozone, often referred to as smog. These pollutants increase the risk of cancer, asthma, heart and lung disease, and other illnesses. Trucks and other heavy-duty vehicles are a major source of the carbon emissions driving our climate crisis. Washington has not yet met its first goal of reducing transportation emissions down to 1990 levels; in fact, transportation emissions grew between 2010 and 2018.

Washington can demonstrate its commitment to combating pollution and protecting vulnerable communities with regulations like ACT and HDO. Air pollution levels are highest in areas adjacent to major roadways or facilities with significant vehicle traffic volumes, like the many ports and rail yards in the state. People who live, work, or go to school near such areas—often environmental justice communities—have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic. We need the strong emission standards of ACT and HDO to reduce these disproportionate burdens of vehicle pollution.

There is an ongoing national effort targeted at repealing these and other clean vehicle rules by the trucking industry and manufacturers. Yet rolling back vehicle pollution standards will make the next generation of American vehicles significantly more expensive to fuel, maintain, and repair. Rolling back the truck pollution standards will also impose significant costs on U.S. businesses, hurting job creation, and raising prices for consumers as increased freight costs are passed to end users.

The vehicle emission standards are technologically and economically feasible. As Ecology reported in the public workshops on this rulemaking, over 190 Class 2b-8 zero-emission vehicles are available for sale in the U.S.

We can't let polluters take away our clean air future. Every delay in clean truck policies directly impacts public health, especially for low-income communities and communities of color, who are disproportionately exposed to harmful diesel emissions. The benefits of these emission standard rules are needed now. Effectiveness and stability of Washington rules will benefit from tracking amendments to California's ACT and HDO regulations currently adopted and/or under consideration by the California Air Resources Board (CARB).

We strongly support Ecology's proposed amendments to the ACT and HDO rules, which are critical for improving public health and meeting our statutory greenhouse gas emission limits.

Sincerely,

Ben Avery
Director, Washington Chapter
Sierra Club