

Department of Ecology

State of Washington

P.O. Box 47600

Olympia, WA 98504-7600

RE: Rule Update of Chapter 173-423 WAC, Clean Vehicles Program Formal Comment Period

June 23, 2025

Dear Washington Department of Ecology Staff,

On behalf of the undersigned groups and the Washington residents that we represent, we write to thank you for your work to date in adopting and implementing the Heavy-Duty Omnibus (HDO) and Advanced Clean Trucks (ACT) rules, as well as to urge you to remain committed to advancing the critical transition to clean medium-and heavy duty (MHD) transportation.

ACT and HDO are crucial in the fight against toxic diesel pollution in Washington that disproportionately harms frontline communities. MHD diesel vehicles account for [59 percent of nitrogen oxides \(NOx\) and 53 percent](#) of particulate matter (PM) emitted by on-road vehicles. Diesel vehicles also account for [9% of total statewide greenhouse gas emissions](#), and MHD electrification is key for meeting Washington's ambitious statutory climate targets—recently reaffirmed by the rejection of Initiative 2117. The timely implementation of these rules honors community well-being as well as state investments to date, including the Legislature's \$126 million allocated this biennium to our new point-of-sale voucher program.

We support the proposed adoption of amendments in the current rulemaking that will track amendments to California's ACT and HDO regulations currently adopted and/or under consideration by the California Air Resources Board (CARB). In light of the recent federal decision to illegally use the Congressional Review Act to disapprove the waivers for these rules, Washington's strong commitment to reducing dangerous vehicle pollution and protecting the health and safety of communities is more important than ever. We applaud the agency for its strong public response, emphasizing its commitment to continue working to ensure the transportation sector reduces its emissions. The undersigned organizations stand firmly with Washington's leaders in reducing harmful pollution, lowering consumer costs, boosting high-paying jobs, and supporting the transition to a cleaner, zero-emission transportation system, despite roadblocks.

Given the current political climate at the federal level, Washington's ACT and HDO regulations are more crucial than ever for reducing harmful air pollution and public health inequities, meeting the state's climate mandates, and facilitating the transition to clean MHD transportation. To this end, many of the

undersigned groups have and will continue to engage in the Clean Vehicles Program Rulemaking process, provide legislator outreach, and engage in other efforts to support these rules.

Washington must stand up against any further attacks on our hard-fought climate and clean air leadership, and refuse to weaken or delay the ACT and HDO rules. We support and stand with the Department of Ecology in your continued resolve and vital leadership to protect the health and safety of more than 7 million people in Washington, particularly for the communities that disproportionately bear the burdens of this pollution.

Thank you,

Alliance for Community Engagement (ACE) SW WA
Church of the Earth Ministry/Washington Interfaith Power & Light
Climate Action Families
Climate Action of Southwest Washington
Climate Solutions
Coltura
Communities for a Healthy Bay
Earthjustice
Earth Ministry/Washington Interfaith Power & Light
Keystone Church UCC
Natural Resources Defense Council
Sierra Club Washington State Chapter
The Lands Council
University Congregational UCC
Vashon Climate Action Group
Vashon Friends Worship Group
Wallingford Indivisible
Washington Conservation Action
WA Build Back Black Alliance
Washington Physicians for Social Responsibility
350 Everett
350 Seattle
350 Yakima Climate Action
350Wenatchee.org