

Pablo R

Subject: Comment on Proposed Amendments to Chapter 173-423 WAC, Clean Vehicles Program

To Whom It May Concern,

I am writing to express my concerns regarding the proposed amendments to Chapter 173-423 WAC, which would require manufacturers to increase the percentage of new zero-emission trucks sold in Washington State.

While I strongly support efforts to improve air quality and address climate change, I urge the Department to reconsider the mandate for more zero-emission trucks, as the overall environmental benefits may not be as significant as intended. There are several critical factors that should be carefully considered:

1. Life-Cycle Greenhouse Gas Emissions

The production of batteries for electric trucks is highly carbon-intensive, often generating more greenhouse gases than the manufacturing of conventional diesel trucks. Research indicates that battery manufacturing can account for up to 60% of the total embedded emissions in an electric vehicle. When the full life cycle is considered—including mining, manufacturing, and eventual disposal—the net reduction in greenhouse gas emissions is far less than commonly assumed.

2. Electricity Generation Mix

The environmental impact of zero-emission vehicles depends heavily on the source of electricity used for charging. In Washington and across the U.S., a significant portion of electricity is still generated from fossil fuels such as natural gas. Charging electric trucks with fossil-fuel-based electricity undermines the intended climate benefits and can, in some cases, result in higher emissions than modern, efficient diesel engines.

3. Infrastructure and Practicality

The rapid transition to zero-emission trucks presents significant challenges, including high upfront costs, limited range, and a lack of charging infrastructure. These obstacles may inadvertently extend the use of older, higher-emitting vehicles, as operators struggle to comply with the new requirements.

4. Alternative Solutions

There are alternative fuels—such as renewable diesel and biomethane—that can offer immediate and substantial reductions in greenhouse gas emissions without the need for new infrastructure or technology. A technology-neutral approach that encourages the adoption of all low-carbon solutions would be more effective and practical in achieving Washington's climate goals.

In summary, while the intention behind these amendments is commendable, I believe that mandating more zero-emission trucks may not deliver the desired environmental outcomes, especially when considering the full life cycle of the vehicles and the current state of our energy grid. I urge the Department to consider a more balanced, flexible approach that recognizes the complexities of vehicle emissions and supports a wider range of clean technologies.

Thank you for considering my perspective.

Sincerely,

Pablo