

## Ernest Hood

While I appreciate the Department of Ecology's intent to improve air quality and address climate change, I have serious concerns about the proposed amendments to Chapter 173-423 WAC, particularly the adoption of California's Advanced Clean Trucks and Heavy-Duty Low NOx Omnibus regulations.

One-size-fits-all policy misalignment: Washington's geography, economy, and transportation infrastructure differ significantly from California's. Adopting CARB's aggressive zero-emission vehicle (ZEV) mandates without tailoring them to Washington's unique needs risks creating disproportionate burdens on local industries—especially in rural and economically vulnerable areas.

Economic strain on small and regional fleets: While large manufacturers may have the resources to adapt, smaller fleets and independent operators could face insurmountable costs in transitioning to ZEVs or complying with stricter NOx standards. This could lead to reduced competition, higher freight costs, and downstream price increases for consumers.

Infrastructure readiness is lacking: The rule assumes a level of electric charging and hydrogen fueling infrastructure that simply does not exist statewide. Without a robust and equitable infrastructure rollout plan, these mandates may be premature and punitive rather than transformative.

Credit trading loopholes: Allowing manufacturers to purchase credits from others may undermine the environmental integrity of the program. It risks creating a compliance shell game where emissions reductions are delayed or unevenly distributed.

I urge Ecology to reconsider the pace and scope of these amendments. A more balanced approach—one that incentivizes innovation without penalizing those who lack the means to comply—would better serve Washington's environmental and economic interests.