

Puget Sound Clean Air Agency

June 18, 2025

Clean Vehicles Program
Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Dear Clean Vehicles Program Staff:

On behalf of the Puget Sound Clean Air Agency (Agency), I am writing to express strong support for proposed amendments to the Clean Vehicles Program Rules, Chapter 173-423 WAC. These amendments will incorporate changes to the Advanced Clean Trucks and Heavy-Duty Low-NOx Omnibus regulations adopted by the California Air Resources Board (CARB).

The Agency is a special-purpose, regional government agency chartered by Washington state law in 1967. Our jurisdiction covers King, Kitsap, Pierce, and Snohomish counties, home to over half of Washington state's population. Our mission is to preserve, protect and enhance air quality and public health, enforce the Clean Air Act, support policies that reduce climate change, and partner with communities to do this work equitably.

The Agency recognizes that the Clean Vehicle Program Rules are vital policy tools for addressing climate change and improving air quality. Additionally, we recognize that the proposed amendments integrate flexibility into the program for successful implementation. Despite uncertainty at the federal level of government, it is imperative that Washington proceed with timely adoption of the proposed program amendments. Delaying action will hinder our ability to meet state-mandated greenhouse gas emission targets and improve air quality, especially in overburdened communities.

Transportation is a major contributor to climate change and air pollution in the region. As identified in the Puget Sound Regional Emissions Analysis, transportation accounts for nearly 40% of regional greenhouse gas emissions, similar to the scale it accounts for at the state level. Engine exhaust contains fine particulate matter, smog-forming chemicals, and air toxics, all of which affect public health, especially cardiac, respiratory and cancer risk. Medium- and heavy-duty engines emit diesel particulate matter, which alone accounts for over 80% of potential cancer risk from all air toxics in our region. This risk is even greater for overburdened communities located near major transportation corridors. The Agency's EPA-funded study on air toxics in Tacoma and Seattle, found that lower-income and black, Indigenous, and other people of color (BIPOC) communities living near major roadways have higher potential cancer risks from air toxics. The proposed amendments to the Clean Vehicles Program Rules are a meaningful step toward addressing climate change and improving public health outcomes in our region.

The Agency fully supports Ecology's efforts to design the Clean Vehicles Program with flexibility for successful implementation. We recognize that the proposed amendments will meaningfully

support the program's successful implementation and the region and State's ability to address climate change and improve air quality.

Thank you.

Sincerely,

Christine S. Cooley
Executive Director

June 18, 2025

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Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

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Christine Cooley

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Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Cooley", with a long, sweeping horizontal stroke extending to the right.

Christine S. Cooley
Executive Director