



November 4, 2025

Washington State Department of Ecology
Air & Climate Division
300 Desmond Drive SE
Lacey, WA 98503

RE: Recommendations for ZEVergreen

Dear Washington State Department of Ecology,

The American Lung Association has a long history of advocacy for eliminating deadly transportation pollution and is encouraged by the launch of *ZEVergreen* program. As federal actions undermine health-based clean air policies, Washington's administrative agencies and legislative leaders must continue to lead the way to healthier, safer, and more sustainable transportation systems.

Despite decades of clean air leadership and progress, Washingtonians continue to face air pollution challenges with the impacts of climate change, increasing this challenge. The Seattle – Tacoma metro area ranked ninth worst in the nation for short term particle pollution. King County was ranked the most polluted county in the metro for ozone, and King, Pierce, and Snohomish counties continue to receive failing grades for particle pollution according to our "State of the Air" 2025 report.

In Washington, the transportation sector is the largest source of greenhouse gas emissions, accounting for about 40% of total statewide emissions. These pollutants can affect everyone's health and are especially damaging to those near railyards, ports, warehouses, freeways, and other transportation hubs. The *ZEVergreen* process is a critical next chapter in the state's commitment to curbing health harm caused by cars, heavy-duty trucks, ferries, and other transportation sources.

To address these health impacts and disparities, we provide the following recommendations for your consideration:

Ensure consistent funding for consumer and business incentives and infrastructure buildout for zero-emission transportation: Washington's incentive programs for clean transportation must be supported with stable, consistent funding resources, including ongoing investments under the state's *Clean Fuels* and *Cap-and-Invest* programs as well as engagement on new programs to ensure ongoing investment. Policies to consider include securing revenues based on throughput of shipping containers, last-mile deliveries, efficiency-based vehicle registration fees, indirect source rules, or other systems and direct resources to stable funding for ongoing transportation pollution reductions – especially those that spur the ongoing transition in the freight sector.

Expand fleet requirements and purchasing options: Washington must continue to lead the way with fleet standards to increase clean technologies, as well as accelerating public

vehicle purchases that align with clean air and climate standards. The state should redouble efforts to transition public fleets to zero-emissions in all purchase decisions (all passenger vehicles, school buses, off-road vehicles, and equipment, etc.), as well as evaluate statewide strategies for larger purchasing opportunities for public and private fleets.

Accelerate and expand zero-emission infrastructure and transportation choices across state government: All state transportation-related investments must align with health and climate protection needs. Washington's *State Transportation Carbon Reduction Strategy* provides clear direction for aligning state transportation investments with statutory greenhouse gas reduction targets while advancing equity and public health. The state should give priority to projects that expand zero emission charging infrastructure through the *EV Infrastructure Deployment Plan* and the *Zero Emissions Access Program (ZAP)*, while maintaining ongoing investments in projects that promote transportation choices consistent with *WSDOT's VMT Reduction Targets and Implementation Plan*. The *Active Transportation Program*, coupled with incentives for zero emission strategies (transit, e-bikes, etc.) must continue to expand to support healthier, more connected communities.

Continue grid readiness planning and resources: To ensure ongoing rollout of infrastructure for zero-emission needs, agencies must continue to carefully monitor and implement utility planning for energizing new charging, buildings, and other zero-emission end use connections as demand grows. Lack of urgency for investments must not act as a barrier – or an excuse – for delaying clean air progress.

Evaluate options for the full fleet on Washington roads: In addition to building momentum for zero-emission technologies, we encourage Ecology to examine opportunities to reduce emissions from the existing on-road fleets. Heavy-duty vehicle inspection programs can help to identify excess emissions from these major contributors to local and regional air pollution impacts.

As Washington continues to lead clean air and climate transportation policies, we encourage close communication, sharing best practices and engagement on new policy developments with other states involved in maintaining strong zero-emission momentum.

These are actions that can be taken in the near-term to build momentum and lead the way to healthier air with a focus on zero-emission strategies. Thank you for considering our comments and for your ongoing work to improve air quality for all Washingtonians.

Sincerely,



Carrie Nyssen
Senior Director, Advocacy