



October 31, 2025

Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Dear Director Sixkiller and Members of the ZEVergreen Dialogue Team,

As a national consumer advocacy organization committed to advancing a zero-emission transportation future, Public Citizen commends the Department of Ecology and its partners for convening the ZEVergreen Dialogue to chart Washington's next phase of clean transportation leadership. In a moment when federal support for climate action and zero-emission vehicle infrastructure is backsliding, Washington's leadership is crucial to safeguard clean air, public health, and equitable mobility for all residents.

Washington's ZEV policies—rooted in the Clean Cars program and Section 177 authority—have already positioned the state as a national leader. Yet achieving the state's 2035 and 2050 emissions goals will require bolder, equity-driven action that accelerates ZEV adoption, infrastructure access, and accountability across sectors. We urge the Department of Ecology and participating agencies to consider the following policy priorities as part of the ZEVergreen initiative:

- Codify and Strengthen Washington's Clean Vehicle Standards
 - Accelerate implementation of the Advanced Clean Cars II, Advanced Clean Trucks, and Advanced Clean Fleets programs adopted from California.
 - Codify these standards in state statute or through executive action to insulate them from future federal or political reversals.
 - Broaden compliance pathways to emphasize workforce development, environmental justice, and community-based deployment of ZEV infrastructure.
 - Incorporate consideration of vehicle embodied emissions—including those from materials such as steel and batteries—into Washington's broader ZEV and clean transportation goals to ensure comprehensive lifecycle emissions reductions.
- Expand and Secure State-Level Incentives for ZEVs
 - Increase and stabilize funding for consumer and fleet ZEV incentives, with dedicated support for low-income, rural, Tribal, and pollution-burdened communities.
 - Develop state-level rebates or tax credits to complement or replace inconsistent federal incentives.

- Consider a feebate system that discourages high-polluting vehicle purchases while lowering upfront costs for zero-emission alternatives.
- Lead by Example Through Public and Private Fleet Transitions
 - Mandate aggressive ZEV procurement schedules for state, county, and municipal fleets, including transit and school buses.
 - Expand fleet electrification requirements to private high-impact sectors such as delivery, rideshare, drayage, and construction.
 - Prioritize contracts with manufacturers and suppliers aligned with Washington's clean transportation goals.
- Build Equitable and Resilient Charging Infrastructure
 - Target charger deployment in communities facing the greatest pollution burdens like those in freight corridors, or where there's infrastructure gaps, including rural and Tribal areas.
 - Encourage utilities and the Washington Utilities and Transportation Commission (UTC) to adopt equity-based charging investment requirements.
 - Expand rebates and financing tools for multi-unit dwellings, workplaces, and community charging hubs.
- Address Indirect Sources and Freight Pollution
 - Empower local air agencies and ports to adopt indirect source rules limiting emissions from logistics centers, warehouses, and freight corridors.
 - Pilot ZEV-only delivery and freight zones in major metropolitan and port areas such as Seattle, Tacoma, and Spokane.
- Uphold Complementary Standards and Mobility Reform
 - Strengthen the Clean Fuels Standard to drive deeper reductions in transportation emissions and support clean fuel innovation.
 - Expand electrification beyond on-road vehicles to include off-road, marine, agricultural, and construction equipment.
 - Integrate land-use, transit, and multimodal planning into the ZEVergreen framework to reduce vehicle miles traveled while improving access and mobility options.
- Coordinate Regionally and Hold Industry Accountable
 - Collaborate with Oregon, California, and British Columbia through West Coast Clean Transportation and Pacific Coast Collaborative initiatives.
 - Require automakers and large fleet operators to meet or exceed Washington's ZEV targets, ensuring accountability and transparency.
 - Exclude from state incentives or procurement programs any corporations actively opposing clean vehicle or climate standards.
- Invest in Legal, Analytical, and Public Engagement Capacity

- Support legal and policy analysis to defend Washington's Section 177 authority and its right to enforce stronger ZEV standards.
- Publish annual progress reports benchmarking Washington's performance against peer states.
- Engage communities, labor, and industry stakeholders through the ZEVgreen Dialogue to ensure an equitable and durable clean transportation transition.

Beyond supporting electrification, the full climate impact of ZEVs depends not just on how they operate, but how they're made. Without targeted policy intervention, auto manufacturers will continue to source emissions-intensive materials like coal-based steel and rely on outdated, opaque battery supply chains. Vehicle embodied emissions, the greenhouse gas emissions generated during the extraction, processing, and manufacturing of materials, can account for a substantial portion of an EV's total lifecycle emissions. In fact, steel production alone is responsible for [30% to 50%](#) of a vehicle's manufacturing-related emissions, while on a global level, [up to half of battery lifecycle emissions](#) stem from mineral processing, much of which occurs overseas under limited environmental oversight.

Thank you for the State of Washington's leadership, which has long helped shape the nation's environmental standards. As the state moves forward with ZEVgreen, this is an opportunity to double down on that legacy—by codifying strong clean vehicle standards, electrifying fleets, and ensuring that every community benefits from the transition to a zero-emission future. We look forward to supporting Washington's continued progress toward clean, equitable, and sustainable transportation for all.

Sincerely,

Will Anderson
ZEV Policy Advocate
Public Citizen