



Comments on ZEVergreen in Washington State

November 5, 2025

To Governor Ferguson and Washington State Department of Ecology:

Washington State has made great strides in transportation electrification, with one of the highest rates of EV adoption in the nation. Efforts to tackle transportation emissions – one of the single largest sources of greenhouse gas emissions and air pollution in our community – are critical to protecting public health and a sustainable future for the next generation.

The City of Vancouver, Wash., has ambitious greenhouse gas reduction targets. For vehicle trips that cannot easily switch to public transit, bike, or other active transportation, encouraging the shift to electric vehicles is the most impactful and immediate action we can take to achieve those goals. With support from a Washington Department of Commerce Climate Planning Grant, we have been developing a Citywide EV Infrastructure Strategy over the past year and are keenly aware of the important role the state plays in advancing equitable transportation electrification locally.

We thank you for the opportunity to weigh in on the state's next steps to ensure the benefits of transportation electrification are felt by all Washingtonians. Our responses to the questions outlined for the ZEVergreen State Dialogue Sessions are below.

What is the number one action Washington should take to promote clean transportation and/or reduce transportation emissions?

Create consistent and recurring funding programs with phased grants for planning and implementation of transportation electrification initiatives. Consistency in funding program availability enables local communities to plan capacity, build partnerships at the speed of trust, and build local momentum for initiatives through community education and awareness efforts. When funding or incentive programs come and go quickly, it makes it challenging to meaningfully activate local community networks, adapt long-range work plans, and maintain trust with partners.

As it is throughout the state, the top barriers our community faces to EV adoption are up-front costs, access to charging infrastructure, and familiarity with EVs. While the federal government and states have historically provided incentives to lower vehicle purchase costs, the City of Vancouver is focused on catalyzing development of public EV charging infrastructure to help fill local infrastructure gaps and promote equity. The Washington EV Charging Program (WAEVCP) is a critical source of funding for installation of charging

infrastructure in our community, and we hope the program continues to fund a variety of charging types and levels in all sizes of communities to help achieve local goals, particularly as federal infrastructure funding is reduced or eliminated. However, installing charging stations is just one part of our strategy, and many other supportive strategies do not have sources of funding to advance. A transportation electrification formula grant that could fund a broad range of strategies would enable us to take a more holistic and integrated approach to promoting community uptake, private investment, and equitable distribution of benefits.

What types of programs would you like to see Washington State assess and possibly implement to meet air quality and climate targets for transportation?

- A **vehicle exchange program** was identified as a top community priority during our EV strategy engagement in 2025, and this type of strategy seems well suited for state leadership. The Vehicle Exchange Colorado (VXC) Program is an example that helps income-qualified residents recycle and replace old or high-emitting vehicles with EVs. Our community members emphasized that a vehicle exchange program should be designed so that benefits are not assigned based on vehicle resale value, since older cars may have less market value but are higher emitting.
- **Low-interest loan programs**, also identified as a top priority by Vancouver communities, are another strategy well suited for state leadership. The California Driving Clean Assistance Program, which grew out of the nonprofit Community Housing Development Corporation and is now funded statewide by California Air Resources Board, is an example program that provides holistic assistance for low-income and disadvantaged communities in purchasing clean air vehicles. Their program offerings include financial coaching, tiered vehicle purchase incentives, scrap and replace program, fair financing for participants with challenged or no credit through trusted credit union partners, support for home charging equipment installation or prepaid public charging card, down payment assistance, vehicle search support, and referrals to other social programs to help offset monthly costs.

What kinds of programs, other than financial support, could provide incentive to purchase and operate zero-emission vehicles and equipment?

- Continue to advance policies and programs that reduce barriers for consumers to purchase, own and operate electric vehicles, e-motorcycles, e-bikes and e-scooters, particularly renters and low-income households. For example, consider **expanding statewide right-to-charge laws to include renters** to ensure households are not unduly limited in their access to charging at home.
- Mechanics were identified by Vancouver community partners as a key audience for EV education and training because of their role as trusted experts on vehicle decisions, especially for those with limited English proficiency who rely on mechanics that speak their native languages for vehicle information. **Explore outreach and training programs to develop local mechanics and mechanics at car dealerships as EV ambassadors.**
- **Make EVs and EV charging infrastructure more visible to the general population** to promote and normalize them as a viable option for drivers ready for a new car. For example, Colorado established the EV license plate for plug-in hybrid and battery electric vehicles (HB 21-1141) to raise awareness of EVs and to make them easily identifiable. Highway signage for EV charging also helps raise awareness that EV charging is easy to access, reducing one of the primary concerns for consumers.

What principles for program design ensure we don't leave any Washingtonians behind in the transition to zero-emission transportation?

The following priorities for equitable incentive programs were developed by the Vancouver Community Transportation Electrification Cohort, a collaborative effort to engage underrepresented communities in Vancouver that included local nonprofits Vietnamese Community of Clark County, Odyssey World International Education Services (OWIES), and Community in Motion. These groups collected more than 400 engagement responses during May-June 2025 and worked together to interpret and respond to local community needs by setting priorities for an equitable transition to electric mobility. These priorities included the following:

- **Design sliding scale incentives and rebates** for all types of electric mobility, e.g. cars, bikes, etc., with larger, upfront cost savings scaled based on need, including qualifiers like income, disability, family size, distance from services, and other marginalized status or demographic. Design incentives so that they do not count as taxable income when applying for social services, e.g. TANF, SNAP, affordable housing.
- Partner with local financial institutions and car dealerships to make **low-interest loans** available for purchasing new or used EVs and replacing EV batteries. Design loan programs so that common challenges faced by low-income households are not barriers (e.g. poor credit scores, background checks), and provide education and outreach to target communities.
- Develop **trade-in (or "buy-out") program** for replacing ICE vehicles with EVs that accounts for barriers including being behind on car payments or having an older vehicle that may have a low market value but high climate value for getting off the roads.
- Ensure **ADA vehicle accommodations and modifications are eligible** for EV incentives and rebates to enable disabled community members to purchase a low-cost EV option that meets their mobility needs.

Sincerely,

Signed by:

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