Seattle

October 14, 2025

Department of Ecology
Dustin Watson, Mobile Source Air Quality Specialist
P.O. Box 47600
Olympia, WA 98504-7600

Re: Recommendations to Advance Zero Emission Vehicle Adoption under the ZEVergreen Initiative

Dear Mr. Watson and members of the ZEVergreen workgroup,

As Washington State continues its leadership in clean transportation and environmental stewardship, the City of Seattle appreciates the opportunity to submit policy recommendations that will support the Department of Ecology's implementation of Governor Ferguson's ZEVergreen initiative. In alignment with the goals of the ZEV Action Plan and the recent recommendations of the Electric Vehicle (EV) Council, Seattle's recommended strategies, below, are intended to accelerate the adoption of Zero Emission Vehicles (ZEVs), equitably expand access, and strengthen supportive infrastructure statewide.

1. Renew and Expand the State Sales Tax Exemption for ZEVs

One of the most effective incentives for increasing ZEV adoption is the state sales tax exemption for qualifying vehicles. Renewal and expansion of this exemption to include a broader range of new and used ZEVs, including electric motorcycles and light-duty trucks. By reducing upfront costs, this exemption has historically encouraged thousands of Washingtonians to choose electric vehicles, and its continuation is critical to meeting emission reduction targets.

2. Support Local Government ZEV Procurement via State Contracts

To increase ZEV adoption among local jurisdictions for fleet purposes, the state should expand and streamline bulk purchasing programs through master contracts with manufacturers. Leveraging state purchasing power can lower vehicle costs for cities, counties, transit agencies, and school districts—many of which face budgetary constraints. Technical assistance and grant funding to support fleet conversion, charging infrastructure, and maintenance training should also be made available.

3. Targeted Incentives for Super Commuters and Delivery Drivers

The state should pilot a targeted incentive program for high-mileage drivers, such as "super commuters" traveling 60+ miles per day and commercial delivery drivers. These drivers stand to benefit significantly from fuel and maintenance cost savings, while transitioning them to ZEVs could result in substantial emissions reductions. Incentives could take the form of tax credits, toll discounts, or direct rebates for qualifying vehicles.

4. Implement EV Battery and Tire Fees to Support Charging Infrastructure

To sustainably fund ZEV infrastructure, consider establishing a modest EV battery fee, collected at the point of sale for new vehicles, and increasing the existing tire fee. Revenue from these fees should be directed into a dedicated grant program for environmental mitigation and for charging infrastructure development.

5. Update and Integrate the Commute Trip Reduction (CTR) Program

The CTR program should be modernized to align with climate goals and reflect current commuting patterns, including remote work and the rise of gig economy drivers. Consider integrating ZEV adoption rates as a performance metric and providing CTR employers with new tools and incentives to encourage employee ZEV use. Expanding eligible participants beyond the current thresholds would also broaden program impact.

6. Charge-Ready and Reliable: Partnering with Utilities and Municipalities to Expand Equitable Access

Washington should prioritize a statewide "Charge-Ready & Reliable" initiative that accelerates grid readiness and builds a robust public charging network, especially critical for residents without off-street parking who lack home chargers. We urge the state to coordinate closely with utilities and municipalities to develop the program in a way that would create a playbook that equitably advances fast, predictable interconnection, implement service-level targets for public charger uptime (e.g., 97 %+), and tie funding to measured operations and upkeep. This approach not only speeds charger deployment and mitigates grid bottlenecks but also lowers infrastructure costs and expands access in underserved areas both urban and rural. The program design must emphasize affordability, geographic and modal equity, and durable reliability so that no Washingtonian is left behind. That means overlaying diesel-burden and priority-population maps when siting infrastructure, publishing permitting/interconnection timelines for transparency. Non-financial tools should include streamlined interconnections and permitting for ZEVs, and a publicly available "Total Cost of Ownership in WA" educational materials and other planning tools. Such measures complement rebates and foster widespread adoption by addressing the complex barriers, both grid- and access-based, that often slow the transition to zero-emission transportation.

7. Build on the EV Council's Recommendations

Finally, I urge the Department to build upon the strong foundation laid by the EV Council. Several of the Council's recommendations—such as public-private partnerships for charging stations, equitable access programs, and workforce development—deserve full implementation and additional funding. Regular updates to the ZEV Roadmap should track progress and adjust strategies based on real-world feedback.

Washington State has a once-in-a-generation opportunity to lead the transition to a zero-emission transportation future. The recommendations above can help ensure that this transition is equitable, economically beneficial, and environmentally effective. Thank you for the opportunity to provide feedback and please reach out if we can assist in any way.

Sincerely,

Michelle Caulfield
Interim Director, Office of Sustainability and Environment