November 5, 2025

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Sierra Club Comments on ZEVergreen State Dialogue Session

Washington has long been a leader in clean and affordable transportation. State leadership is more vital than ever, given the federal government's attacks on clean transportation. Governor Ferguson's ZEVergreen Initiative offers a pivotal opportunity to take bold actions to promote affordable transportation options, protect public health, meet clean air goals, and confirm Washington's commitment to a zero-emission transportation future.

The people of Washington, and disproportionately low-income communities and communities of color, currently suffer from unsafe and unhealthy air quality. Air pollution from fossil-fueled medium- and heavy-duty vehicles is directly responsible for serious negative impacts to public health that disproportionately harm environmental justice communities. The fossil-fueled transportation sector emits dozens of harmful pollutants, including carbon monoxide, black carbon, nitrogen oxides (NOx), fine and coarse particulate matter (PM2.5 and PM10), as well as a range of toxic air substances like benzene and formaldehyde.[1] Air pollution levels are highest in areas adjacent to major roadways or facilities with significant vehicle volumes, like ports and railyards (of which Washington has many). People who live, work, or go to school near such areas—often environmental justice communities—"have an increased incidence and severity of health problems associated with air pollution exposures related to roadway traffic" like asthma, cardiovascular disease, childhood leukemia, and premature death.[2]

Exposure to diesel exhaust is associated with severe health impacts, including increased risk of certain cancers, heart attacks, and decreased lung function. Fine particulate emissions from vehicles are particularly dangerous to human health; exposure can increase the risk of death from multiple distinct causes, including cardiovascular disease, chronic kidney disease, lung

[1] *See* Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles—Phase 2, 81 Fed. Reg. 73478, 73836-57 (Oct. 25, 2016).
[2] *See* Off. of Transp. and Air Quality, EPA, *Near Roadway Air Pollution and Health: Frequently Asked Questions* at 1, 2 (Aug. 2014), https://www.epa.gov/sites/production/files/2015-11/documents/420f14044_0.pdf.

cancer, and pneumonia.[3] Exposure to diesel engine exhaust carries dire costs, including premature death and lost workdays.

Transportation as a whole comprises Washington's greatest single source of greenhouse gas emissions.[4] Although Washington has adopted laudable climate goals, the state still needs to find ways to significantly reduce transportation emissions in order to meet those goals.

Washington State is an ideal location for electric vehicle ownership, thanks to its unique combination of economic and environmental benefits.[5] The state's clean, affordable power grid drives impressive savings; owners can save thousands of dollars over the vehicle's life compared to a gas-powered alternative. This has led to strong market adoption, with over 20% of new vehicle sales last year being electric or plug-in models.[6] This rapid adoption is also driven by the environmental benefits given the dramatic reduction in pollution: the average Washington EV emits an estimated 937 pounds of CO2e annually, compared with over 12,500 pounds for a gasoline vehicle.[7]

Sierra Club applauds the State's and the Department of Ecology's (Ecology) leadership and strongly supports the ZEVergreen Initiative. Below, we address Ecology's questions and express our support for bold, innovative policies across all vehicle types and transportation options. Additionally, Sierra Club encourages Washington to continue to collaborate with its colleagues in California and other clean transportation states and to consider the options that California agencies suggested in the August 2025 Report to the Governor.[8]

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[3] *See* Benjamin Bowe et al., *Burden of Cause-Specific Mortality Associated with PM2.5 Air Pollution in the United States*, 2 JAMA Network Open 1, 1 (Nov. 20, 2019), https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2755672.

[4] *See* Wash. State Dep't of Ecology, *ZEVergreen: Public dialogue session* at *7*, (Oct. 27, 2025), https://ecology.wa.gov/getattachment/ceeb29e7-a094-4352-9894-1d48e1fa5d0b/10272025_ZEVergreen_PublicSession.pdf.

[5] *See* Xinyi Wu et al., Argonne Nat'l Lab'y, *Adoption of Plug-in Electric Vehicles: Local Fuel Use and Greenhouse Gas Emissions Reductions Across the U.S.* at 18 (Feb. 2024), https://publications.anl.gov/anlpubs/2024/02/187786.pdf.

[6] The Center Square, *WA car makers may not meet 2026 EV sales goals, yet still remain in compliance,* Everett Post (Sept. 24, 2025), https://www.everettpost.com/state-news/wa-car-makers-may-not-meet-2026-ev-sales-goals-yet-still-remain-in-compliance/; Wash. State Dep't of Transp., *Electric vehicle registrations*, https://wsdot.wa.gov/about/data/gray-notebook/gnbhome/environment/electricvehicles/electricvehicles.htm (last visited Nov. 11, 2025).

[7] U.S. DOE, *Emissions from Electric Vehicles*, Figure: Annual Emissions per Vehicle: State Averages for Washington, https://afdc.energy.gov/vehicles/electric-emissions#:~:text=All%2Delectric%20vehicles%20and%20PHEVs,power%20plants%2C%20may%20generate%20emissions (last visited Nov. 4, 2025).

[8] Cal. Air Resources Bd. et al., *Report to the Governor in Response to Executive Order N-27-25 on Zero-Emission Vehicle Deployment* (Aug. 2025), https://ww2.arb.ca.gov/sites/default/files/2025-

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

Though multiple policies are needed to promote clean transportation and reduce transportation pollution, Sierra Club recommends that the state continue to prioritize the deployment of light- and heavy-duty charging infrastructure.

The availability of reliable charging infrastructure remains the largest barrier to ZEV adoption. A February 2025 J.D. Power report found that access to working chargers is the biggest barrier to EV adoption, with 20% of drivers unable to charge at public charging stations due to outages and equipment problems.[9]

Sierra Club applauds Washington for its quick obligation of available National Electric Vehicle Infrastructure (NEVI) grant funds and for creating dedicated Electric Vehicle Supply Equipment (EVSE) programs, including the Washington State Electric Vehicle Charging Program, the Department of Transportation's Zero Emission Vehicle Infrastructure Partnership (ZEVIP) program, and the state fleet charging program run by the Department of Enterprise Services.

We also applaud Washington for its recent announcement of more than $180 million in investments to help drivers buy ZEVs and to expand charging infrastructure.[10] We look forward to working with Ecology on developing the details of these programs and urge the state to continue these dedicated funding streams and innovative approaches to building a comprehensive statewide charging network that serves every community, including low-income, rural, and Tribal areas.

To ensure EVSE investments pay dividends for consumers as quickly as possible, we encourage Washington to prioritize strategies that accelerate infrastructure deployment, including permit streamlining and faster utility processes.

08/August%202025%20Report%20to%20the%20Governor%20in%20Response%20to%20Executive%20Order%20on%20ZEV%20Deployment%20FINAL_0.pdf [hereinafter, "Cal. Report to the Governor"].

[9] Mark Vaughn, *JD Power Finds Charging Access Biggest Deterrent to EV Adoption*, Autoweek (Feb. 28, 2025), https://www.autoweek.com/news/a63965563/ev-charging-access-jd-power-study/; *see also* Kalena Thomhave, *Slow EV infrastructure expansion out of step with rising demand: report*, Utility Dive (Sept. 18, 2025), https://www.utilitydive.com/news/ev-charging-infrastructure-slowing-growth-here-technologies/760442/.

[10] Wash. State Dep't of Ecology, *News Release: Washington continues moving forward on clean trucks* (Oct. 16, 2025), https://ecology.wa.gov/about-us/who-we-are/news/2025/oct-16-washington-continues-moving-forward-on-clean-trucks.

2. 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. State, City, or Individual Clean Warehouse and Port Rules.

Since 2020, e-commerce growth has fueled the construction of billions of square feet of warehouse space.[11] Rapid delivery expectations mean many facilities are being located closer to residential neighborhoods, which are often areas already heavily developed by industry. These warehouses and distribution hubs attract diesel trucks that emit large amounts of dangerous nitrogen oxide and fine particulate matter pollution.

States, cities, and regional air quality agencies are beginning to address the outsized impact of warehouse pollution through clean warehouse rules that aim to reduce the pollution generated at these facilities.

In Southern California, the South Coast Air Quality Management District's Warehouse Rule, which was adopted in 2021, is a model for similar initiatives and offers insights for policy design.[12] The South Coast program gives large warehouse operators a menu of compliance choices to pick from, including acquiring zero-emissions trucks, installing charging infrastructure or solar panels, or paying a fee to mitigate community health harms from truck emissions, such as installing air filtration systems in schools and hospitals.[13] As of September 2024, the program generated $29 million in mitigation fees that will fund projects that facilitate emissions reduction in the same areas where the fees were paid into.[14] The program has resulted in the acquisition of hundreds of new electric trucks, charging ports, and has successfully reduced nitrogen oxide and diesel emissions.[15]

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[11] *See* Judith Lewis Mernit, et al., Sierra, *Free Shipping Isn't Free for Everyone: Online retailing delivers a public health problem* (Sept. 12, 2022), https://www.sierraclub.org/sierra/free-shipping-isn-t-free-for-everyone.

[12] NYC Off. of the Mayor et al., *Indirect Source Rules: Case Studies from California* (Mar. 2025), https://c40.my.salesforce.com/sfc/p/#36000001Enhz/a/Vo000000Ue01/GOfrsVZMkoXF2tkwms_m7UG2C2FTNA2yk64Y94MTY6o.

[13] S. Coast Air Quality Mgmt. Dist., *Rule 2305 - Warehouse Actions and Investments to Reduce Emissions Program*, https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-program-overview-factsheet.pdf?sfvrsn=7d9faf61_8 (last visited Nov. 4, 2025); Adrian Martinez, *California Reins in Its Smoggy Warehouse Problem,* Earthjustice (June 24, 2024), https://earthjustice.org/experts/adrian-martinez/california-reins-in-its-smoggy-warehouse-problem.

[14] S. Coast Air Quality Mgmt. Dist., *2nd Annual Report for the Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program* at 25 (Oct. 2024), https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/annual_report_waire_program_102024.pdf?sfvrsn=c6288561_9.

[15] *Id.*; *see also* Martinez, *California Reins in Its Smoggy Warehouse Problem*, *supra* n.13.

The South Coast rule has withstood legal attacks from the trucking and airline industries, providing a strong precedent that such rules are not preempted by the Clean Air Act, Airline Deregulation Act, or the Federal Aviation Administration Authorization Act.[16]

In addition to warehouses, indirect source rules are also being considered for ports, airports and railyards in New York City, Colorado, New Jersey and California.[17] The South Coast Air Quality Management District also adopted a Clean Railyard rule in August 2024,[18] and is actively considering a Clean Ports rule.[19]

Notably, the Clean Air Act expressly preserves each state's authority to "adopt or enforce … any requirement respecting control or abatement of air pollution," except where specific pre-emption provisions apply.[20] The Act also allows states to include indirect source rules in state implementation plans.[21] An "indirect source" is defined as "a facility, building, structure, installation, real property, road, or highway which attracts, or may attract, mobile sources of pollution."[22] This definition encompasses buildings, or even roads, that act as magnets for mobile sources. States may include in their programs "measures as are necessary to assure, or assist in assuring, that a new or modified indirect source will not attract mobile sources of air pollution, the emissions from which would cause or contribute to air pollution concentrations … exceeding any national primary ambient air quality standard for a mobile source-related air pollutant … or… preventing maintenance of any such standard[s]..."[23]

EPA approved the South Coast Warehouse Rule into California's state implementation plan,[24] providing a strong administrative precedent for EPA to approve other state rules into state

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[16] *Order Re: Plaintiff's Motion for Summary Judgment as to Plaintiff's Complaint for Declaratory Judgment and Injunctive Relief (Dkt. 65); and Plaintiff-Intervenor Airlines for America's Motion for Summary Judgment (Dkt. 73)*, Case No. LA CV21-06341 JAK (MRWx), ECF No. 162 (C.D. Cal. Dec. 14, 2023).
[17] C40 Cities Climate Leadership Group & TYLin, *Developing an indirect source rule (ISR) for warehouses: Key considerations and lessons from New York City* at 7 (Sept. 2025), https://www.c40knowledgehub.org/s/article/Developing-an-indirect-source-rule-ISR-for-warehouses-Key-considerations-and-lessons-from-New-York-City?language=en_US.
[18] Freight Rail Yards, *Rule 2306: Freight Rail Yards* (Aug. 2, 2024), https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/rule-2306-freight-rail-yards.pdf?sfvrsn=8.
[19] S. Coast Air Quality Mgmt. Dist., *Proposed Rule 2304: Commercial Marine Ports*, https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-2304 (last visited Nov. 4, 2025).
[20] 42 U.S.C. § 7416.
[21] *Id.* § 7410(a)(5)(A)(i).
[22] *Id.* § 7410(a)(5)(C).
[23] *Id.* § 7410(a)(5)(D).
[24] Air Plan Approval; California; South Coast Air Quality Management District, 89 Fed. Reg. 73568 (Sept. 11, 2024).

implementation plans. Industry did not challenge EPA's action approving the South Coast rule into the state plan.

Sierra Club fully supports comments submitted by Front and Centered et al., which detail how mobile source pollution from goods movement disproportionately affects certain communities in Washington, such as in port-adjacent communities near Tacoma and Puget Sound.[25]

Washington should initiate a process to consider programs like the South Coast Warehouse Rule to reduce emissions from large warehouses, ports, airports, and railyards that are located in overburdened communities. These rules can reduce emissions, improve public health, and support attainment and maintenance of air quality standards.

B. Prioritize Use of ZEVs in State Procurement

Washington can continue to lead by example by using its purchasing power to expand the ZEV market. The state already has exemplary policies that require state agencies and local governments to use electricity to fuel publicly owned vehicles.[26] Those policies could be improved by the following ideas:

- Expand ZEV-first policies in state procurement procedures to prioritize the use of ZEVs in state-contracted services. The state's Department of Enterprise Services could adopt scoring that more strongly favors ZEV use in a broader selection of state-contracted services.
- Require all state and local fleets to utilize ZEVs whenever feasible.
- Expand the installation of EV charging infrastructure at state facilities to include workplaces for state employees, and ensure workplace charging aligns with state rules and standards for interoperability, multiple payment methods, and reliability.
- Explore opportunities for the development of voluntary programs for fleets to identify that they are operating ZEVs to be prioritized in the state procurement process.[27]
- Develop an aggregated state procurement process for local, state, and Tribal fleets. This could be a promising strategy to lower costs by introducing economies of scale.

C. Restart Low-Income EV Instant Rebate Program

In August 2024, the Washington State Department of Commerce launched an electric vehicle rebate program that provided $45 million in funding for $9,000 rebates for low-income drivers leasing EVs, $5,000 for purchasing a new EV, or $2,500 for purchasing a used EV.[28] The

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[25] Front and Centered et al., Comments Re: Chapter 173-448 WAC – Air Quality in Overburdened Communities Rulemaking at 6 (Oct. 23, 2025).
[26] *E.g.*, RCW 43.19.648; State of Wash., Off. of the Governor, Exec. Order 20-01: State Efficiency and Environmental Performance (Jan. 23, 2020).
[27] Cal. Report to the Governor.
[28] Washington Electric Vehicle Instate Rebates, *2024 Program Results*, https://waevinstantrebates.org/program-results/ (last visited Nov. 4, 2025); Wash. State Dep't of Com., *New state rebate program reduces cost to buy or lease electric vehicles for low-income*

program was a huge success, and we urge the state to initiate a new program. Funding elapsed in October 2024, but not before the program helped bring $38 million in federal money into the state, lowering transportation costs for more than 6,000 participants and reducing thousands of tons of nitrogen oxides and greenhouse gas emissions.

Given the sunset of federal EV incentives, state incentive programs are even more critical. Colorado recently announced it will expand its low-income rebate program with $25 million in funding to help ensure EVs remain affordable for all Coloradans. The state increased its rebates from $6,000 to $9,000 for new EV purchases and leases, and $4,000 to $6,000 for used EVs.[29]

D. Last Mile Delivery Fees / Port Fees

Colorado and Minnesota have adopted retail delivery fees that apply to most vehicle-based deliveries, and the fees generated by Colorado's program support transit and clean transportation programs.[30] Colorado's fee has generated a total of $218 million since July 2022. A similar program could be designed to support EV programs in Washington. In 2023, Washington funded a report to analyze a retail delivery fee.[31] The study found that a fee of 30 cents per order could generate between $45 and $112 million in revenue in 2026, growing to between $59 and $160 million by 2030. The study also found that higher-income households, on average, would pay more in retail delivery fees than lower-income households.

California's Clean Truck Fund imposes fees on containers moved by diesel trucks at the Ports of LA and Long Beach to fund incentives for electric replacements and infrastructure.[32] The incentives are designed to lower the upfront cost of a ZEV truck to help accelerate the transition. The program has built hundreds of charging stations and paid out millions for new ZEV trucks. A portion of revenue from the program was also used to support pilot programs and demonstrations to build customer support. Washington should consider both the last-mile delivery fee and the port fee programs.

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drivers (Aug. 1, 2024), https://www.commerce.wa.gov/commerce-opens-ev-rebate-program-2024/.

[29] Colo. Energy Off., *Polis Administration Announces Increased incentives for ElectricVehicles* (Oct. 2, 2025), https://energyoffice.colorado.gov/press-releases/polis-administration-announces-increased-incentives-for-electric-vehicles.

[30] Mitch Arvidson, *Question: Have states implemented or considered adoption of a retail delivery fee?,* The Council of State Governments Midwestern Off. (Feb. 27, 2025), https://csgmidwest.org/2025/02/27/question-have-states-implemented-or-considered-adoption-of-a-retail-delivery-fee/.

[31] Wash. State Joint Transp. Cmte., *Retail Delivery Fee Analysis* (June 2024), https://leg.wa.gov/media/kqojsh4i/retaildeliveryfeeanalysis_finalreport.pdf.

[32] The Port of Los Angeles, *Clean Truck Program,* https://www.portoflosangeles.org/environment/air-quality/clean-truck-program (last visited Nov. 4, 2025).

E. Continue medium- and heavy-duty voucher programs while leveraging them to increase pricing clarity and market fairness.

We appreciate the state launching the Washington Zero-Emission Vehicle Incentive Program (WAZIP) to help more businesses switch to commercial medium- and heavy-duty zero-emission vehicles and equipment. In the U.S., truck sales are often negotiated without transparency and prices vary widely among buyers. Recent analysis by the International Council on Clean Transportation found that prices for large ZE trucks have been rising in the United States, while prices for similar vehicles are falling globally. To ensure public funds are efficiently deployed, Washington should explore requiring full price disclosure as a condition of eligibility for state incentive funds.[33]

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

A. Education Campaigns

A state-sponsored public education campaign is an effective way to provide state residents with credible and trustworthy information on ZEVS. State campaigns can help overcome common consumer concerns regarding ZEVS, including range anxiety, performance, and maintenance needs. Many prospective buyers, especially in underserved communities, are unaware of purchase incentives.[34] The state of Colorado has an exemplary EV education campaign called EV CO that Washington can reference for ideas.[35]

B. Allowing Single-Occupancy EVs Access to High-Occupancy Vehicle (HOV) Lanes

Carpool lane access for EVs is an effective and inexpensive way to encourage electric vehicle sales. Although the federal program that allowed states to grant EVs access to HOV lanes expired in September 2025, Congress is trying to reauthorize the option for states to allow single-occupancy EVs to use HOV lanes.[36] Washington should ensure that this incentive is in place if Congress reauthorizes the HOV lane exemption program. To maximize the benefits of the

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[33] Yihao Xie & Ray Minjares, ICCT Working Paper: *Battery electric commercial vehicle pricing in the United States* (Sept. 8, 2025), https://theicct.org/publication/battery-electric-commercial-vehicle-pricing-in-the-us-sept25/.

[34] The Greenlining Institute, *Increasing EV Awareness*, https://greenlining.org/electric-vehicles-toolkit/increasing-ev-awareness/ (last visited Nov. 4, 2025).

[35] State of Colo., *About EV CO*, https://evco.colorado.gov/about (last visited Nov. 4, 2025).

[36] Press Release: Representatives DeSaulnier and Stanton Introduce Legislation to Incentivize Electric Vehicle Use, Alleviate Congestion, and Protect the Environment, Off. of Mark DeSaulnier (Aug. 13, 2025), https://desaulnier.house.gov/media-center/press-releases/representatives-desaulnier-and-stanton-introduce-legislation.

incentive, the state should limit decals to full battery-electric vehicles and restrict access during peak hours in the most congested areas.[37]

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

Sierra Club is eager to collaborate with Ecology to develop programs that incentivize the purchase of affordable EVs. Engaging impacted communities in program design, communication, and implementation is essential, as is partnering with local organizations to increase awareness and trust in programs.

Potential options include the low-income rebate discussed above, and a revenue-neutral incentive or "feebate" system that could be designed to incentivize more favorable attributes of certain vehicle models, like lower-cost and compact vehicles. Other options include:

- Collaborate with affordable housing developers to implement shared electric vehicle programs and community charging stations into new and existing developments.[38]
- Update state building codes to require new construction—especially multifamily buildings—to include EV-ready electrical infrastructure.[39]
- Fund electric bike lending library services in low-income communities,[40] and e-bike incentives and rebates.
- Invest in the expansion and electrification of rail and buses.

By combining targeted funding, equitable design, strategic partnerships, and robust oversight, Washington can create effective and inclusive EV carshare and e-bike lending programs that meaningfully expand zero-emission mobility options for low-income Washingtonians—and potentially serve as models nationwide.

Finally, Washington State should make sure EV registration fees are fair, equitable, and reasonable. Washington State currently levies $225 in annual fees on EV drivers, including a $150 standard registration fee and a $75 transportation electrification fee. Originally intended to fund transportation electrification projects, as of July 2025, the $75 fee is directed to the state's motor vehicle fund for general highway and road expenses. These fees exceed the average amount of gas tax paid for by Washington drivers, making Washington's fee policies punitive for

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[37] *See* Elaine Borseth*, EV HOV Lane Access Is Ending – Here's Why It Matters,* Electric Vehicle Association (Aug. 15, 2025), https://www.myeva.org/blog/ev-hov-lane-access-is-ending-heres-why-it-matters.

[38] *E.g.*, Jake Richardson, *Low-Cost Electric Carshare Program Launched In Charlotte,* CleanTechnica (2025), https://cleantechnica.com/2025/04/29/low-cost-electric-carshare-program-launched-in-charlotte/; Cal. Air Resources Bd., *LCTI: Our Community CarShare Sacramento Pilot Project*, https://ww2.arb.ca.gov/lcti-our-community-carshare-sacramento-pilot-project (last visited Nov. 4, 2025).

[39] *E.g.*, Mirsky Electric, *EV Charger Regulations: What Homeowners Need to Know* (Mar. 19, 2025), https://www.mirskyelectric.com/ev-charger-regulations/.

[40] *E.g.*, Shared Mobility Inc., *E-Bike Libraries*, https://www.sharedmobility.org/ebike-libraries; https://www.wired.com/story/ebike-lending-libraries/ (last visited Nov. 4, 2025).

EV drivers.[41] We recommend reducing the total fees on EVs, especially for lower-income drivers, and directing more of the remaining EV fees to transportation electrification programs.

Conclusion

Sierra Club appreciates the opportunity to collaborate in this process and is excited to support Washington's continued leadership in zero-emission vehicle adoption strategies.

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[41] Consumer Reports, Which States Have the Highest Fees for Electric Vehicles? https://www.consumerreports.org/hybrids-evs/which-states-have-the-highest-fees-for-electric-vehicles/ (last visited Nov. 5, 2025)