November 5, 2025

The Honorable Bob Ferguson
Governor of Washington

Casey Sixkiller; Director, Washington Department of Ecology
Joshua Grandbouche
Kate Brouns

Re: Comment Supporting ZEVergreen Initiative

Dear Governor Ferguson and Director Sixkiller:

Washington state has long been recognized as a national leader in clean transportation policy, consistently adopting forward thinking vehicle regulations, providing incentives to make electric vehicles more accessible, and investing in critical charging infrastructure. This leadership is especially vital now, as federal policies threaten to undermine progress on climate action and vehicle electrification.

Governor Ferguson's ZEVergreen Initiative represents a crucial step forward, supporting the continued growth of the electric vehicle (EV) industry and expanding access for all Washingtonians. The Natural Resources Defense Council (NRDC) is pleased to offer policy recommendations designed to help residents save money, reduce harmful pollution, and improve public health by accelerating the transition to zero-emission vehicles.

Washington should consider the following key areas for success:

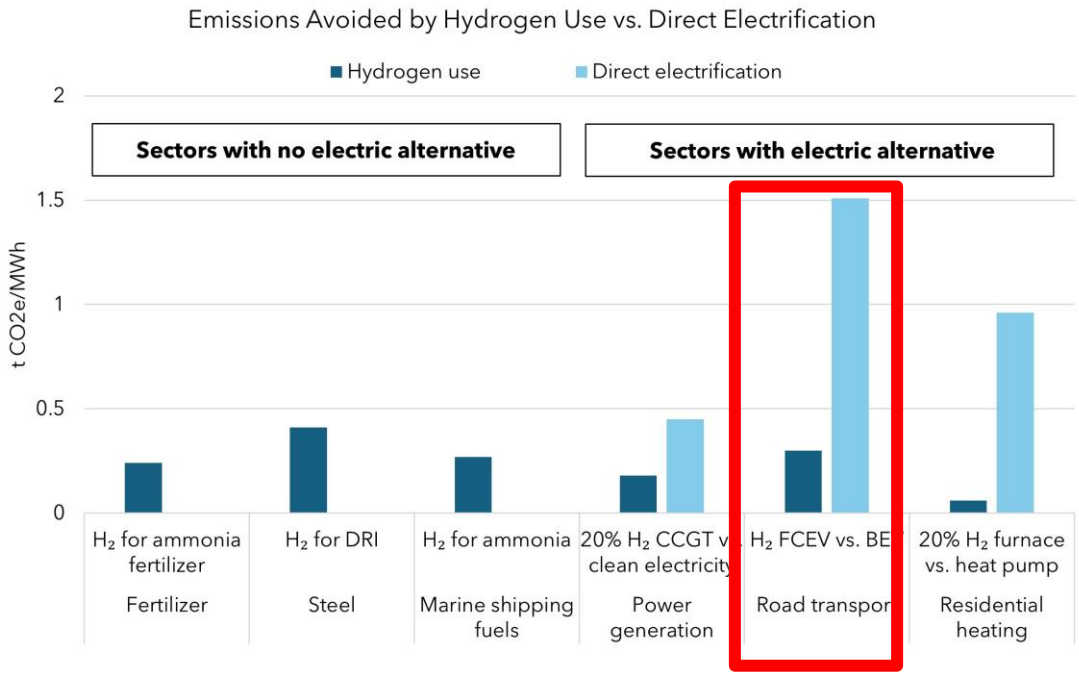
1. Continuing to Lead by Example
2. Reducing Cost Barriers
3. Expanding Infrastructure

The following recommendations are not exhaustive of the policy options Washington should consider but are intended to support the Department of Ecology in identifying practical, near-term strategies that can sustain momentum to zero-emission transportation, improve affordability and equity, support economic development, and ensure Washington remains a model for clean vehicle deployment nationwide. We look forward to continued engagement and discussions to further develop these policy priorities—and others—over the coming months.

Continue to Lead by Example

- **Continue Electrification through State Fleets, guided by the Interagency Electric Vehicle Coordinating Council**. Washington should work with other states to develop a coordinated EV procurement strategy for public fleets. State, county, and municipal fleets in current or former clean vehicle states collectively own an estimated 1.2 million vehicles. Assuming a 7-year vehicle lifespan, this translates to roughly 180,000 new fleet purchases each year. A coordinated procurement strategy focused on lower-cost EVs could support the production of six full vehicle lines—equivalent to 30,000 vehicles annually—and potentially more if expanded to include private fleet purchases.

- **Target Clean Vehicle Incentive Programs Toward Manufacturers Aligned with Clean Air Goals.** Thousands of battery electric, plug-in hybrid, and fuel cell vehicles have been incentivized under Washington's EV incentive programs. Ecology should further target these and other clean vehicle incentive programs to a "Clean Air Aligned" manufacturer list developed by Washington and other Clean Car states and encourage manufacturers to scale-up lower-cost EV options.
- **Advance Complementary Regulatory Tools.** Washington can limit emissions from activities associated with a freight facility by enacting indirect source rules (ISRs). These public health regulations empower state and local air districts to implement life-saving measures that align with the federal Clean Air act and help meet emissions reduction goals. Finally, ISRs promote the adoption of zero-emission technologies and their supporting infrastructure. ISRs are an essential and effective strategy for achieving cleaner air, especially in communities most impacted by pollution from freight and goods movement and should be expanded to address pollution in more communities.
- **Support battery electric vehicles (BEVs) instead of hydrogen fuel cell electric vehicles (FCEV) for light duty vehicles.** To protect public health, improve air quality, and address the climate crisis, Washington must prioritize the technologies and fuels that most effectively reduce emissions. For transportation, battery electric vehicles have clear emissions reduction benefits over other technologies, such as hydrogen fuel cells.



Note: Pictured above are the emissions avoided by using 1 MWh of clean electricity, either deployed via 100 percent clean electrolytic hydrogen (dark blue bars) or direct electrification (light blue bars), compared to with emissions from the baseline case in each sector.

The figure above shows the relative payoff of using clean electricity to deploy hydrogen in different sectors and compares it to direct electrification where possible. In the example of

FCEV versus BEV, using 1 MWh of clean energy in a BEV displaces five times the amount of GHG emissions compared with using 1 MWh in an FCEV (1.51 vs. 0.30 tCO2e). This means that a BEV also requires one-fifth the electricity relative to an FCEV, given the same annual driving demand for a light-duty vehicle in both cases. Given the inefficiency of FCEV and the existing market for BEVs, Washington should prioritize using BEVs for light duty vehicles over hydrogen FCEVs.

- **Advance Tire Standards to Save Fuel and Strengthen ZEV Impact.** Tire efficiency is a long-overlooked but high-impact strategy to reduce emissions and lower vehicle operating costs. Replacement tires often have significantly higher rolling resistance than original equipment tires—undermining fuel economy and reducing EV range. A strong standard includes supporting strong enforcement, clear consumer labeling, and integration of tire efficiency into fleet procurement, incentive programs, and total cost of ownership tools. Fully realizing this standard will deliver annual emission reductions and meaningful cost savings for drivers, particularly in low-income communities where replacement tire quality can vary widely.

Reducing Cost Barriers

- **Create Durable Funding for Clean Trucking**. New, innovative incentives are increasingly needed to accelerate the switch to zero- emission transportation, particularly for Class 2b through 8 vehicles such as urban delivery vans, drayage vehicles, and regional long-haul trucks. Ecology's WAZIP purchase incentive program funded by the CCA is a model for our region. Additional funding could be generated through a variety of mechanisms, such as: modest fees on shipping containers, charges on trips originating from ports and major freight hubs, last-mile delivery surcharges, fees on new internal combustion engine (ICE) sales from truck manufacturers, annual registration fees for commercial fleets, and mitigation fees tied to indirect source rules or other regulatory compliance mechanisms.
- **Develop Equitable and Innovative Financing Programs**. Public investment in financing tools, such as loan-loss reserve programs, can leverage five to ten times more private capital, according to estimates by NRDC and CALSTART. Washington should look at successful programs in other states and develop new innovative financing programs.
- **Promote Price Transparency in Truck Sales.** Electrifying heavy-duty vehicles is most effective when they are affordable for everyday users, but unfortunately, prices of commercial trucks are not public or transparent. To ensure transparency, Washington should require full price disclosures—including base vehicle cost, optional equipment, and dealer markups—as a condition of receiving any state incentive funds. Washington should also publish aggregated pricing data to inform program design, market monitoring, and public accountability.
- **Support Legislative Action to Waive State EV Fee Should Federal Fee Be Enacted.** State agencies should provide input to the legislature on the policy or fiscal impacts of a potential bill that would waive the state $150 annual ZEV registration fee if a federal annual fee on ZEVs is enacted at some point in the future. This would help ensure that vehicles are not punitively taxed.

Expanding Infrastructure

- **Redirect Highway Funding Toward High-Priority Mobility and Clean Vehicle Investments**. This could be done, for example, by 'flexing' eligible National Highway Performance Program dollars into the Surface Transportation Block Grant or Congestion Mitigation and Air Quality Programs. The state can also utilize other flexible state and federal transportation revenues to further fund incentive programs.
- **Prioritize Charging Infrastructure Dollars to High-Traffic, Disadvantaged Communities.** Washington should direct public charging investments to maximize both utilization and equity. Funding from the federal National EV Infrastructure (NEVI) and Charging and Fueling Infrastructure (CFI) programs, the Climate Commitment Act, and other state sources should be prioritized toward high-traffic corridors, freight hubs, and community-serving locations – such as grocery stores, schools, and libraries – within overburdened or underserved communities. The Washington Environmental Health Disparities Map and other equity-screening tools can help guide siting decisions so residents most affected by transportation-related air pollution benefit.

  To stretch each public dollar further, Washington should adopt a Make-Ready Infrastructure framework that requires utilities to build the utility-side infrastructure between the meter and the grid as part of their standard practice. This approach can reduce charging installation costs by roughly 25 percent and create a predictable foundation for private and public investment. Establishing clear expectations for utilities and developers will accelerate charger deployment, close the infrastructure gap in disadvantaged areas, and ensure that publicly funded charging is reliable, visible, and accessible to all drivers.
- **Enhance Utility Engagement and Grid Readiness.** Proactive coordination with utilities is essential to energizing charging states on time and at reasonable cost. The Utilities and Transportation Commission (UTC), in collaboration with the Departments of Ecology and Commerce, should establish energization timelines and direct utilities to plan and invest ahead of forecasted charging demand. Utilities should be required to identify priority corridors and communities where load growth from transportation electrification is expected and integrate those forecasts into resource and distribution system planning.

  Washington can also strengthen accountability by requiring utilities to report on energization performance and progress toward transportation electrification goals. Establishing reasonable average and maximum target energization timelines, building the workforce to meet them, and allowing timely cost recovery for necessary upgrades will improve grid reliability and predictability for charging developers and communities. Implementing equitable EV rate designs and vehicle-grid integration programs will reduce charging costs for households and fleets, enable smart charging during periods of abundant renewable generation, and ensure that EVs are a flexible asset supporting Washington's clean energy transition.

The recommendations outlined above are intended to support Washington state agencies in identifying near-term, high impact strategies that can sustain and accelerate Washington's zero-emission vehicle transition, even in the face of federal headwinds. As Ecology prepares its work under the ZEVergreen Initiative, NRDC recognizes the urgency and complexity of this task.

This moment not only calls for innovation, but for strategic alignment across agencies,

communities, interest groups, and sectors. We encourage you to prioritize policies that are equitable, cost-effective, and grounded in the lived experiences of Washingtonians— especially those in communities most burdened by transportation pollution.

We appreciate the opportunity to contribute to this process and stand ready to support Washington's continued leadership, resilience, and commitment to a clean transportation future.

Sincerely,

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