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**From:** Michael Mann  
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**RE:** Policy Recommendations for ZEvergreen Initiative

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## ZEvergreen Comments

Clean & Prosperous (C&P) thanks Governor Ferguson, Director Sixkiller, Secretary Meredith, and Director Nguyen for their commitment to an equitable, effective, and accelerated transition to electric vehicles. At nearly 40 percent, transportation makes up the largest share of Washington state greenhouse gas (GHG) emissions; decarbonizing this sector is crucial to meeting our net-zero goals, improving air quality - particularly in overburdened communities, and keeping Washington state at the forefront of innovation.

Additionally, supporting electric vehicle (EV) uptake puts money directly back in Washington residents' and businesses' pockets by transitioning away from more expensive, more volatile fuel sources toward cheaper, more reliable electricity. According to [Coltura](#), right now in Washington state the average driver can save more than \$3,700 per year by switching to an electric vehicle. EVs also can [lower electricity prices](#) by creating a more stable, resilient grid. Transitioning to EVs also keeps spending in-state, as drivers fuel payments directly to local utilities, rather than international fossil fuel corporations.

Please find C&P's ZEvergreen recommendations below. Many are based on expanding or accelerating initiatives Washington is already pursuing. Please do not hesitate to reach out with any questions.

## Barrier: Upfront Cost of Zero-Emission Vehicles (ZEV)

### Passenger Vehicles

A significant barrier to widespread adoption - exacerbated by the federal government's rollback of EV tax credits - is the upfront cost of EVs. EVs are progressing toward - but have not yet reached - cost-parity with gas-powered vehicles. To address this, C&P recommends:

- ❖ Developing a second round of the [Washington State EV Instant Rebate Program](#), administered by the Department of Commerce in 2024. In its first iteration, the program was incredibly popular and effective; it provided rebates to approximately 6,200 low-income people in less than three months. We urge the state to prioritize low-income households, and when developing instant rebate levels, take into account the recently expired federal purchase incentives.
- ❖ Renewing the State sales tax exemption for a targeted selection of the passenger EV market, focusing on supporting more affordable EVs.

### Medium- and Heavy-Duty (MHD) Vehicles

MHDs make up 10 percent of vehicles on Washington's roads, but they account for [30 percent](#) of GHG emissions that come from on-road vehicles. Making the transition to zero-emission MHDs means cleaner air, particularly for Port-adjacent communities like the Duwamish Valley in Seattle. It saves money for fleets, and by providing a quieter, more comfortable experience, it's better for the drivers themselves.

To address this, C&P recommends:

- ❖ Implementing the Washington Zero-Emission Incentive Program (WAZIP), a \$126 million point-of-sale voucher program for ZEVs Class 2b - 8.
- ❖ Similar to California's program, [which sees funding run out in a matter of days](#), we expect WAZIP will be incredibly popular once launched. We urge the State to prioritize funding for WAZIP for multiple years, to help mature this market and reach cost-parity.
- ❖ Ensuring there are "plus-ups" for small business fleets and drayage fleets in current and future versions of WAZIP. This is crucial to support equitable outcomes both in terms of the purchasers themselves, and the impacts on air quality in communities.

## Barrier: Accelerate Charging Infrastructure Deployment

Increasing charging infrastructure is crucial for increasing EV uptake. [Research shows](#) that poor EV charging availability/reliability is one of the primary barriers to converting drivers to EVs. The State is making good progress through the [Washington Electric](#)

[Vehicle Charging Program](#) (WAEVCP), run by the Department of Commerce and funded by the Climate Commitment Act. In the coming months, WAEVCP will bring nearly 5,300 new EV charging ports online across Washington state.

To expand on this progress, Clean & Prosperous recommends:

- ❖ Implementing and continuing to expand WAEVCP beyond the [current funding round](#) of \$19.4 million. To maximize the efficacy of investments, prioritize areas of high EV density over geographic distribution.
- ❖ Exploring long-term incentive structures like tax credits or utility rebates focused on the operations revenue gap to more effectively catalyze private sector public charging investment.
- ❖ Establishing a new program to support the development of high-speed, pull-through charging depots from medium- and heavy-duty ZEVs.
- ❖ In our experience with the first round of WAEVCP, the significant delay between a site being built and a utility providing power is a major barrier to increasing charging stations statewide. We strongly recommend the State require timelines for utility engagement with EV charging applications to ensure installation timelines are dramatically reduced.

## Barrier: Needed Supports for ZEV Supply-Side

To increase ZEV adoption, we also need to scale up support for Original Equipment Manufacturers (OEMs) to continue building a robust vehicle supply in Washington state.

To do this, C&P recommends:

- ❖ Considering regulatory frameworks that reward OEMs for selling vehicles in the WA market that reduce the cost of transportation for businesses and residents.
- ❖ Allowing direct-to-consumer vehicle sales by ZEV-only manufacturers to reduce barriers to the purchasing process. Research shows that removing these restrictions could increase EV adoption by [up to 13 percent between 2023 and 2030](#).

## Conclusion

Increasing EV uptake is critical for meeting Washington's net-zero goals, improving air quality - particularly in overburdened communities, reducing transportation costs for households and businesses, and retaining our state's economic competitiveness.

Addressing upfront costs, increasing charging infrastructure, reigning in utility engagement timelines, and supporting the supply-side of ZEVs are all crucial for increasing uptake. The State has an opportunity to build on and refine existing programs, and tap into resilient sources of funding like the Climate Commitment Act.

Clean & Prosperous is ready to work with Governor Ferguson, the Washington State Departments of Ecology, Transportation, and Commerce, and all other parties to help decarbonize Washington's transportation sector.