

Department of Ecology, public comment submission for “ZEVergreen State Dialogue Sessions”
From: Chris Bruno, Washington resident and clean transportation advocate

Thank you for extending this public comment forum and for hosting the public dialogue session on October 27. I humbly submit this second letter to address Prompt 2.

Washington can best serve the public interest by establishing regulatory frameworks that allow the free market to flourish. For climate targets in the transport sector, there are two market solutions the state can support: 1) support the rollout of autonomous electric vehicle ride hailing and 2) allow for direct-to-consumer sales by EV manufacturers.

Autonomous vehicles can deliver climate and social benefits, as I discussed in my first letter. An additional benefit of this approach, from an administrative perspective, is that other states already have these legal frameworks. Washington legislators can copy what has been proven successful in other states. Texas, for example, has an established regulatory framework for AVs since the passage of SB 2205 in 2017, with subsequent amendments and enhancements, most recently SB 2807, effective this September.

Direct-to-consumer car sales were mentioned in the public dialogue session and in numerous comment submissions. It is shameful that Washington legislators strive for ambitious climate goals yet still have car dealership protection laws that ban EV manufacturers from direct sales. With yet another failure this year of HB 1721, I don't know how to convince lawmakers that they are only protecting dealerships' financial interests and hindering EV sales. Everybody (myself included) has car dealership horror stories, yet this industry is still protected as if sacred. Lawmakers should create a level playing field, with the necessary safeguards, that allow for choice and competition. They should allow direct sales by EV-only manufacturers.

In conclusion, I do not advocate for direct involvement through agency-led initiatives. Instead, I support market-based solutions, with the state merely providing the necessary legislative framework and safeguards. Thank you for considering my comment.