WASHINGTON STATE AUTO DEALERS ASSOCIATION
EST. 1920
Serving Washington Franchised New Car & Truck Dealers for Over 100 Years

November 3, 2025

Department of Ecology
State of Washington
P.O. Box 47600
Olympia, WA 98504-7600

Re: ZEVergreen Initiative

The Washington State Auto Dealers Association (WSADA) supports Governor Bob Ferguson's "ZEVergreen" initiative and thanks the Department of Ecology for initiating dialogue on this subject. WSADA represents 292 franchised new car and truck dealers and their 22,000+ employees, who serve over 70 communities across Washington.

Franchised dealers have EVs and hybrids to sell and are committed to increasing adoption of clean vehicles throughout Washington, though surveys show consumers are still hesitant due to vehicle cost and "range anxiety" (both as to the availability of and delay for charging).[1]

WSADA encourages state agencies to coordinate with the Legislature to craft bills and policies investing in electric vehicle incentives and infrastructure.

COST: New EVs generally cost about $10,000 more than similar traditionally powered vehicles.[2] Last year, the Department of Commerce oversaw the extremely successful Instant Rebate Program, which helped roughly 6,000 Washingtonians purchase EVs between August and October 2024 – **almost all from franchised dealerships**.

CHARGING: The expense of charger installation and lack of sufficient public charging facilities discourage EV ownership. A leading energy data consultant recommends a Level 3 charger for every 141 EVs in the state.[3] This would require at least 1,063 Level 3 chargers in Washington, currently we have just 409. To meet this need, it is essential for Washington build out its Level 3 charger network, adding 100 Level 3 chargers per year for five years.

Although many drivers rely on charging away from home, using at-home Level 2 chargers is often the most convenient option because they plug into the same size electrical socket as a dryer or kitchen range. Despite state incentives for multi-family installation and those offered by some utilities, installation of a Level 2 charger can easily cost a new EV owner $2,000.[4] Subsidizing the installation of this equipment could help offset these costs, especially for lower-income consumers.

[1] https://newsroom.acg.aaa.com/americans-slow-to-adopt-electric-vehicles-despite-widespread-availability/#
[2] https://mediaroom.kbb.com/2025-04-09-Kelley-Blue-Book-Report-New-Vehicle-Prices-Hold-Steady-in-March-as-Sales-Increase-Ahead-of-Anticipated-Tariff-Driven-Price-Hikes
[3] https://press.spglobal.com/2023-01-09-EV-Chargers-How-many-do-we-need
[4] https://www.kbb.com/car-advice/how-much-does-it-cost-to-charge-an-ev/

Consumer costs could also be reduced by assisting local utilities implement and promote “Time of Use” rate programs, providing lower electricity prices during off-peak times like late night and early morning.

LEGALIZING MANUFACTURER DIRECT SALES IS NOT THE ANSWER: Contrary to claims made by direct sales proponents like Rivian and Lucid, legalizing manufacturer direct sales has far greater costs than benefits and will not create meaningful changes in EV adoption among everyday consumers. Brands like Rivian and Lucid together offer only a few luxury models in limited quantities, at a price that is out of reach for most households. Franchised dealers offer dozens of EV models, including affordable options, in addition to a wide selection of HEVs and PHEVs. Rivian and Lucid should join the rest of the auto industry and franchise their retail operations, as state law requires. Up to now, they have chosen not to do so, presumably to avoid the cost of investing in the type of broad operational network needed to properly serve customers across the state – something the franchise system is already set up to do. In addition, manufacturer direct sellers operate in a gray area whereas franchised dealers are subject to a comprehensive framework of licensure and consumer protection laws.

Rivian and Lucid aside, more importantly, legalizing manufacturer direct sales would give traditional, legacy manufacturers the opportunity to compete with their own franchised retailers – threatening hundreds of small local businesses around the state that employ over 22,000 Washingtonians, keep the automotive retail industry competitive, and provide convenient access to service for residents in over 70 communities, from rural to urban.

WSADA urges government leaders to not buy into the hype. Instead, WSADA encourages the Department of Ecology, the Department of Commerce, and the Legislature to collaborate on public investments that will ensure a cleaner and greener future for all.