

February 2, 2026

Washington State Department of Ecology  
Attn: Clean Vehicle Program Rulemaking Team  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Chapter 173-423 WAC - Clean Vehicles Program Rulemaking

Dear Department of Ecology:

Sierra Club Washington State Chapter appreciates the opportunity to submit comments on the proposed amendments to Washington's Clean Vehicles Program (Chapter 173-423). Sierra Club is a grassroots environmental organization with more than 81,000 active members and supporters in Washington State focused on advocating for public lands, climate action and healthy communities.

We appreciate Ecology's work to update Washington's Clean Vehicle Program and to keep our state aligned with the strongest available standards. We support maintaining consistency with California's program, safeguarding robust clean-car requirements, and reducing climate and air pollution. This work is essential for improving air quality statewide, particularly for low-income communities and communities of color that bear a disproportionate burden from vehicle pollution, and reducing the climate impact of transportation (which remains the largest source of climate pollution in Washington).

In the face of federal attacks and rollbacks, we need Washington to continue to be a leadership state in the clean vehicle space. That leadership is needed now more than ever.

While Washington has made real progress on air quality, pollution from transportation continues to harm people across the state. This is especially true for people near railyards, ports, warehouses, freeways, and other transportation hubs. These exposures contribute to asthma and other respiratory illnesses, worsen cardiovascular disease, and can contribute to premature death. Climate-driven conditions such as wildfire smoke can compound these harms, making it critical that we reduce air pollution wherever possible.

Washingtonians are also facing high fuel costs and rising prices for essential goods. Clean transportation policies help address these pressures by reducing the total cost of ownership for drivers and fleets through lower fuel and maintenance costs and access to charging infrastructure. Washington is particularly well-positioned to benefit: switching from gasoline to electricity can deliver outsized fuel savings here due to relatively low electricity prices and consistently high gasoline prices. Fleets across the state are already taking advantage of programs like Washington's Zero-Emission Incentive Program (WAZIP) to electrify and reduce operating costs, helping business owners realize real savings at the point of purchase and over the life of the vehicle.

For all these reasons, we strongly support Ecology's continued work updating Washington's Clean Vehicles Program. We urge Ecology to:

1. Maintain strong clean vehicles standards that remain consistent with California's program, avoid any weakening or delays, and position Washington to implement and enforce these standards to the fullest extent allowed under federal law.
2. Advance complementary policies that accelerate deployment and accountability, including expanded fleet reporting requirements and clean bus policies.
3. Center equity and health outcomes by prioritizing reductions in pollution in overburdened communities disproportionately harmed by transportation pollution.

Ecology's work on the Clean Vehicle Program is a cornerstone of Washington's ability to meet climate requirements, reduce harmful air pollution, and protect public health. At a time when federal actions are placing clean transportation standards and important environmental protections at risk, Washington must continue to lead. We appreciate this opportunity to comment and look forward to working with Ecology to ensure Washington remains a national leader on clean transportation and clean air.

Sincerely,

Ben Avery

Director  
Sierra Club Washington State Chapter