



30 January 2026

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

RE: Amendments to Chapter 173-423 WAC, Clean Vehicles Program rule

Dear Gopika Patwa,

Climate Solutions thanks you for the opportunity to submit comments regarding the amendments to Chapter 173-423, the Clean Vehicles Program. Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub.

We have long supported the Clean Vehicles program. These regulations are critical tools to ensure Washington meets its statutory greenhouse gas reduction requirements, reduces local air pollution, and expands access to zero-emission vehicles (ZEVs), particularly in communities that have been overburdened by pollution. This work is all the more important considering the Federal rollbacks of clean transportation policies and funding, including the expiration of EV tax credits seven years ahead of originally planned.

We have the following initial comments regarding the proposed rule:

- **Climate Solutions supports adopting amendments that track California's** in order to maintain compliance with RCW 70A.30.010.
- **As this rulemaking progresses, we would like to continue discussion regarding Advanced Clean Trucks (ACT) pooling provisions.** As you know, California has not yet finalized these provisions in their rule. We want to ensure a balance between program flexibility and in-state ZEV adoption as well as ensure adoption across vehicle classes. The current California draft may

ClimateSolutions.org

Seattle
1809 7th Avenue, Suite 1212
Seattle, WA 98101
tel 206.443.9570

Olympia
P.O. Box 2003
Olympia, WA 98507-2003
tel 360.352.1763

Portland
4207 SE Woodstock Blvd #149
Portland, OR 97206
tel 503.206.4837



overvalue emission reductions from smaller medium-duty vehicles and limit sales of Class 7-8 tractor trucks in some ACT states.

- **We would like to see the exemption for “utility service vehicles” be more narrowly defined.** We appreciate the rationale for the exemption but are concerned that it would be difficult to enforce as written and may be too broad. Rather, would it be possible to specify a particular vehicle type, such as “utility bucket truck”? The exemption should apply to a specific vehicle type rather than, say, a passenger vehicle or pickup truck that may bring utility employees to respond to an outage.
- **We support authorizing Ecology to collect fleet reporting** and agree with expanding the reporting requirement to light-duty fleets with 25 vehicles or more. At the same time, we agree with removing previous requirements that provide less relevant information to meeting our state’s climate and other pollution reduction targets through grant programs and grid planning.

We commend the Department of Ecology for its hard work in advancing clean vehicle policies and we look forward to working with you on future related rulemakings.

Sincerely,

Leah Missik
WA Legislative Director
Climate Solutions

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