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Gopika Patwa
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Rulemaking Lead
Olympia, WA 98504-7600

Submitted online via: https://ecology.commentinput.com/?id=6Pgt9kUcs&utm_medium=email&utm_source=govdelivery

Re: Washington's Clean Vehicles Program rule

Dear Ms. Patwa and Department of Ecology vehicle emissions standards staff:

Thank you for the opportunity to comment on amendments to [Chapter 173-423 WAC](#), Washington's Clean Vehicles Program rule. Washington's low- and zero-emission vehicle standards are powerful regulatory tools to increase the sale of zero-emission vehicles over time. King County strongly supports Washington's participation in a multistate coalition to fight federal action to rescind State authority to regulate vehicle emission standards. King County appreciates the Department of Ecology's efforts to consider amendments that will maintain consistency with California regulations as directed per RCW 70A.30.010.

Confronting climate change and reducing emissions from the transportation sector are top priorities in King County's newly adopted 2025 Strategic Climate Action Plan (SCAP). The 2025 SCAP is a five-year blueprint for County climate action, sets ambitious targets to reduce emissions by half by 2030, lead with climate justice, and prepares for the impacts of climate change. King County's 2025 SCAP charts a vision for connected communities that are more compact and walkable, served by transit and zero-emission vehicles, collectively reducing GHG emissions and improving air quality and public health.

Transportation is the largest source of greenhouse gas emissions in King County, and in Washington State, and we must take urgent and immediate action to lower emissions from that sector. King County's analysis of pathways to achieve emission targets reveals implementation of the WA Vehicle Emission Standards as the policy measure with the largest potential to reduce transportation emissions through 2050. The 2025 SCAP commits King County to support efforts to protect adopted State Advanced Clean Cars and Clean Trucks standards, and advocate for the adoption of additional zero-emission vehicle standards, including Advanced Clean Fleet rules.

As a large fleet owner, King County Metro has complied with fleet reporting to the State on alternative fuel and electric vehicle usage. King County is supportive of the Department of Ecology's efforts to track statewide electric vehicle adoption and assess utility grid infrastructure demands to support vehicle electrification. King County encourages the State to prioritize strategies that enable statewide planning, while limiting the reporting burden on fleet owners. King County has the following recommendations related to updating fleet reporting requirements for large fleet owners:

1. Encourage the use of existing data reported to the WA Department of Licensing for high-level statewide planning purposes. Encourage the State to explore the ability to develop high-level statewide estimates of power demand for fleets using a combination of vehicle and fueling type information from the Dept. of Licensing and default average vehicle usage information. Analysis based on state level data likely ensures greater consistency across the state, even if data for individual fleets or locations may be less precise.

2. Allow fleet owners to report power demand estimates by site, if available, rather than requiring all specific data inputs. King County has preliminary estimates of power demand for some fleet sites. King County encourages Ecology to ask directly for this information if available, rather than require all fleet owners to supply all the underlying data inputs. If fleet owners do not have estimates, then fleet owners could be offered a spreadsheet workbook to provide inputs or estimate power demand. This would avoid requiring all large fleet owners to provide detailed information on vehicle fuel usage, trips etc. King County can report on total fleet by vehicle type (light, medium, heavy) and percentage of vehicles that are electric. Detailed information on vehicle fuel usage by site is difficult and time consuming to gather and report.

King County encourages Ecology to prioritize investment in technical assistance, regional EV planning, and cohort accelerator programs to facilitate EV adoption by large fleet owners in Washington. For example, King County and other regional partners are supporting the Puget Sound Clean Air Agency's effort to develop a regional EV charging implementation roadmap. Washington State could support similar regional plans for other parts of the state, and/or fund plans for all counties or cities across the state. Another example is accelerator cohort programs where several property or fleet owners learn together from trusted messengers and peers who have successfully implemented EV charging. For example, several King County fleet managers participated in the [Breaking Barriers Collaborative](#) program and found it very useful to build capacity, develop shared understanding, and accelerate implementation.

Thank you for your continued partnership in furthering Washington State's emissions reductions goals. King County Metro would be happy to discuss these suggestions in greater detail.

Sincerely,



Huoi K. Trieu
Zero Emissions Program Director