

Sonia Hitchcock



February 2, 2026

Gopika Patwa
Washington State Department of Ecology
Clean Vehicles Program
PO Box 47600
Olympia, WA 98504-7600

Re: Comments on the Proposed Amendments to Chapter 173-423 WAC

Dear Gopika Patwa:

Washington Conservation Action (WCA) appreciates the opportunity to provide comments on the proposed changes to the Clean Vehicles Program through Chapter 173-423 WAC.

WCA, formerly known as Washington Environmental Council, has been a leading policy voice for the environment in our state for nearly 60 years. We develop, advocate, and defend policies that advance environmental progress and justice, and we supported the 2020 legislation requiring Washington to adopt California's zero-emission vehicle standards. We commend the agency for its work over the ensuing years in updating rules in accordance with this law and aligning them with our broader climate and air quality policy framework in a predictable manner that supports public health, helps meet our greenhouse gas emission limits, and builds in flexibility for regulated manufacturers.

The proposed updates will ensure that Washington continues progress on reducing diesel exhaust pollution, one of the most harmful sources of air pollutants in Washington State. Less diesel pollution means fewer hospital visits and deaths each year, and fewer community members put at risk for cancer, asthma, heart disease, and other devastating ailments. Additionally, these proposed updates will help Washington continue progress towards meeting our statutory greenhouse gas emission limits.

These benefits are why the legislature chose to join Washington with the many other states that have adopted California's vehicle emission standards. The agency's role is to ensure that this legislative mandate is faithfully executed, and the proposed rules for Chapter 173-423 WAC — as well as the current public comment period — do just that.

We are interested in ongoing stakeholder engagement on aligning ACT pooling provisions with those currently under consideration in California under Section 1963.7. Going forward, it will be important to ensure that any new conversion rates balance the need for program flexibility with continued progress in increasing sales of larger zero-emission vehicles in all ACT states.



Washington must protect our hard-fought climate and clean air leadership, including ensuring timely updates to the Advanced Clean Cars, Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Low NOx Omnibus standards. We support the Department of Ecology's prioritization of protecting the health and safety of Washingtonians, especially those who bear the greatest burdens of this pollution.

Sincerely,
Sonia Hitchcock
Climate and Clean Air Manager
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