

Michael Johnson

Hello,

Thank you for taking the time to read and hopefully address my questions about the following document: "Rulemaking- Chapter 173-423 WAC Clean Vehicles Program Rulemaking: Draft Rule Language Feedback".

1 of 2.

The paragraph that begins "WAC 173-423-020 Applicability" (page 6) describes a number of vehicle categories: "passenger cars, light-duty trucks, medium-duty passenger vehicles, medium-duty vehicles, and heavy-duty vehicles".

Question:

Which of those categories do motorcycles belong to? Is there a glossary somewhere? Searching <https://search.leg.wa.gov/search.aspx> did not help me find the definitions of these vehicle categories to answer my own question.

Suggestion:

It would be helpful for laypeople to be able to easily find the definitions of jargon like "medium-duty vehicle" used in legislative documents. Tools like <https://search.leg.wa.gov/search.aspx> do not seem to help in their current form because it's difficult to identify which of hundreds of documents containing "medium-duty vehicle" actually contains a definition of the term.

Impact:

It will be easier for laypeople to read legislation like this and understand whether it affects their vehicle or not without having to pay a lawyer or tax professional.

Example:

If I am someone shopping for a daily driver on a budget of about \$10,000, and I'm reading legislation that could raise prices on small gasoline cars, there are plenty of used gasoline motorcycles for under \$10,000. I might be tempted to buy a gasoline motorcycle (that emits more environmentally unfriendly pollutants than a gasoline car) instead of a gasoline car, because the legislation does not appear to explicitly affect motorcycles.

If the following claims that motorcycle exhaust has a more negative impact than passenger car exhaust have merit, then it would appear that only penalizing polluting cars but not also penalizing polluting motorcycles isn't going to be as effective at reducing motor vehicle pollutants.

<https://motorbikefans.com/index.php/2024/09/10/impact-of-motorcycles-vs-cars/>

<https://ourworldindata.org/travel-carbon-footprint>

<https://citsustainable.com/motorcycles-environment/>

2 of 2.

At the top of this Public Comment Form (<https://ecology.commentinput.com/?id=6Pgt9kUcs>), the paragraph under the heading "Rulemaking Context:" contains this sentence: "These regulations ensure that new motor vehicles sold in Washington pollute less, [...]".

Question:

If we accept that motorcycles are sold to residents of Washington State (Google Maps reports at least 20 dealerships within 20 miles of Seattle), and if a motorcycle is not a member of any of the vehicle categories named by WAC 173-423, and a motorcycle is not a type of vehicle exempted by WAC 173-423-060 Exemptions, then isn't this legislation overlooking an entire category of polluting vehicles?

Suggestion:

Wouldn't this legislation more effectively "ensure that new motor vehicles sold in Washington pollute less" if it also applied explicitly to motorcycles or to whatever the broader vehicle category is that includes motorcycles?

Assumptions:

As a layperson reading WAC 173-423-060 Exemptions, it appears that motorcycles are not included among the exemptions. It also appears that WAC 173-423 is intended to apply to ALL street-legal vehicles not so exempted.

Context:

In case you were not aware, street-legal electric motorcycles do exist and are being manufactured in the United States and around the world. They are being bought and ridden on Washington State roads by customers like me as a viable alternative to internal combustion engine (ICE) motorcycles. However, electric motorcycles are unfairly taxed the same dollar amount as electric cars and SUVs despite being smaller, lighter, and quieter -- causing less wear, tear, and noise pollution on public roads. They are also more energy efficient than larger electric vehicles.

(Electric motorcycle = motorcycle whose propulsion energy comes entirely from electricity stored in batteries instead of from the combustion of fossil fuels.)

Examples of e-motorcycle manufacturers:

<https://www.livewire.com/> - spun off from Harley-Davidson

[https://en.wikipedia.org/wiki/LiveWire_\(company\)](https://en.wikipedia.org/wiki/LiveWire_(company))

<https://zeromotorcycles.com/>

https://en.wikipedia.org/wiki/Zero_Motorcycles

<https://energicamotor.com/>

https://en.wikipedia.org/wiki/Energica_Motor_Company

Examples of e-motorcycles in Washington:

(spotted in photos at charging stations)

<https://www.plugshare.com/location/507303> - Bellingham

<https://www.plugshare.com/location/37836> - Bellevue

<https://www.plugshare.com/location/61867> - Bellevue Connection

<https://www.plugshare.com/location/304017> - Bellevue Safeway

<https://www.plugshare.com/location/2308> - Bellevue Square

<https://www.plugshare.com/location/548755> - Burlington

<https://www.pluginshare.com/location/9882> - Castle Rock
<https://www.pluginshare.com/location/579379> - Chehalis
<https://www.pluginshare.com/location/11327> - Cle Elum
<https://www.pluginshare.com/location/205001> - Deer Island
<https://www.pluginshare.com/location/187663> - Issaquah
<https://www.pluginshare.com/location/188014> - Kelso
<https://www.pluginshare.com/location/186860> - Lake Stevens
<https://www.pluginshare.com/location/186861> - Monroe
<https://www.pluginshare.com/location/186843> - Mount Vernon
<https://www.pluginshare.com/location/168619> - North Bend
<https://www.pluginshare.com/location/322408> - Port Angeles
<https://www.pluginshare.com/location/9159> - Ridgefield
<https://www.pluginshare.com/location/662271> - Ridgefield Costco
<https://www.pluginshare.com/location/5530> - Sammamish
<https://www.pluginshare.com/location/8643> - Skykomish
<https://www.pluginshare.com/location/11298> - Snoqualmie Pass
<https://www.pluginshare.com/location/174653> - Stevens Pass
<https://www.pluginshare.com/location/8755> - Sultan
<https://www.pluginshare.com/location/166071> - Spokane
<https://www.pluginshare.com/location/186859> - Tulalip

Thank you for including motorcycles whenever you think of motor vehicles, and for prorating their taxation due to their smaller size relative to other motor vehicles.

--

Best regards,
Michael