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I submit this comment in support of Chapter 173-423 WAC, the Clean Vehicles Program, from the perspective of a practitioner's experience in climate policy, land-use impacts, and local ecological systems in Washington State.

When evaluated using a comprehensive cost-benefit framework, stricter vehicle emission and zero-emission vehicle standards represent the most economically responsible path forward for the state. Transportation remains Washington's single largest source of greenhouse gas emissions and a major contributor to criteria air pollutants that directly affect public health. The economic costs of these emissions are already borne by Washington residents through increased healthcare expenditures, lost productivity, degraded ecosystems, and mounting climate adaptation costs. These are not speculative impacts; they are ongoing fiscal liabilities that continue to grow without preventive action.

The Clean Vehicles Program appropriately shifts the economic analysis upstream, where costs are lowest and benefits are greatest. Reductions in nitrogen oxides, particulate matter, and ozone precursors yield immediate and measurable public health benefits, including fewer asthma attacks, reduced cardiovascular disease, lower hospitalization rates, and improved worker productivity. Peer-reviewed studies consistently show that the monetized health benefits of cleaner vehicle standards exceed compliance costs, often by multiples, particularly in population centers and over multi-decade time horizons.

From a climate risk perspective, the program functions as a cost-containment strategy. Washington is already experiencing escalating expenditures related to wildfire response, smoke-related public health emergencies, flood damage, drought impacts on agriculture and hydropower, and infrastructure stress. Each incremental reduction in vehicle emissions reduces the probability and severity of future losses that would otherwise require taxpayer-funded recovery. Delaying emissions reductions increases long-term costs and narrows future policy flexibility.

The Clean Vehicles Program also protects critical ecosystem services that underpin Washington's economy. Air quality, snowpack stability, forest health, salmon recovery, and marine ecosystem resilience are all sensitive to transportation-related emissions and climate warming. Degradation of these systems transfers costs from natural processes to engineered solutions and emergency response, which are consistently more expensive and less reliable.

Preventing harm is fiscally preferable to attempting restoration after damage has occurred. Concerns regarding near-term vehicle costs must be evaluated against total cost of ownership and long-term household economic stability. Zero-emission vehicles offer lower operating and maintenance costs, reduced exposure to fuel price volatility, and increased energy security. Over time, these savings disproportionately benefit low- and moderate-income households when paired with appropriate infrastructure and incentive deployment, reducing—not increasing—economic inequality.

Importantly, alignment with California standards under Chapter 173-423 WAC provides regulatory certainty and market scale. Harmonization reduces compliance complexity for manufacturers, accelerates technology deployment, and lowers per-unit costs over time.

Regulatory certainty is itself an economic benefit, enabling long-term planning and investment while avoiding the far greater costs associated with delayed or fragmented action.

In summary, the Clean Vehicles Program represents prudent economic governance. When health impacts, climate risk, ecosystem services, and market stability are properly accounted for, stricter vehicle emission standards minimize long-term public costs and protect Washington's economic resilience. Weakening or delaying these standards would externalize known costs onto future budgets, ratepayers, and communities. For these reasons, I strongly support Chapter 173-423 WAC and urge the Department of Ecology to maintain and fully implement the Clean Vehicles Program as a cornerstone of Washington's long-term economic, public health, and climate strategy.