

Anna Johnson

January 28th, 2026

Re: City of Seattle Comments on Washington Clean Vehicles Program Rulemaking

Dear Washington State Department of Ecology,

The City of Seattle appreciates the opportunity to provide comments on the Washington Clean Vehicles Program rulemaking. The City strongly supports the program's goals to accelerate the transition to zero-emission vehicles (ZEVs), reduce greenhouse gas (GHG) emissions, and improve air quality, particularly for communities disproportionately impacted by pollution. This rule has important implications for the City's sustainability goals, fleet management, and equity priorities, and we offer the following recommendations to ensure effective implementation while addressing potential challenges:

**Prohibit ZEV Purchase Bundles with ICE Vehicles** - The City supports adding language to prohibit manufacturers and dealers from requiring the purchase of a ZEV as a condition to procure internal combustion engine (ICE) vehicles. Such practices would undermine equitable access to vehicles, increase costs and create unnecessary barriers for fleet operations.

**Increase transparency around Credits** – The City supports a credit reporting requirement that is transparent to the public. This information can be useful for local jurisdiction when purchasing vehicles for their fleets, including insight into which OEMs are reliably supplying ZEVs in WA which can help local jurisdictions avoid risk of putting out an RFP for vehicles that won't actually be delivered, have confidence that models offered for bid are part of the manufacturer's compliance strategy, and help jurisdictions align procurement with manufacturers that need Washington deliveries to meet credit obligations. This in turn gives jurisdictions leverage to negotiate better pricing, ask for priority allocation and/or request dealer support, charging equipment, or service agreements. The limited number of credits being made available in Washington is driving up the cost of vehicles and those costs are then being passed along to the end purchaser in the form of a fee. There is currently no prohibition on this practice and there is no transparency to the fee structures.

Thank you for considering City of Seattle's input. We look forward to continuing our partnership with Department of Ecology on this matter.

Sincerely,

Anna Johnson  
State Legislative Affairs Director