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Washington State Department of Ecology  
Air Quality Program  
P.O. Box 47600  
Olympia, WA 98504

**Re: Chapter 173-423 WAC Clean Vehicles Program Rulemaking – Draft Rule Language  
Feedback**

Dear Washington State Department of Ecology,

On behalf of the undersigned organizations, we write in support of the Washington State Department of Ecology's ongoing work to strengthen the Clean Vehicles Program under Chapter 173-423 WAC and to provide feedback on the current draft rule language.

Transportation is Washington's [largest single source](#) of greenhouse gas emissions and major contributor to harmful air pollution that affects communities across the state. The health burdens of vehicle pollution are not shared equally. Communities located near freight corridors, ports, and high-traffic areas face disproportionate exposure to diesel exhaust and other harmful pollutants. Ecology's [research has documented](#) that overburdened communities across Washington experience higher rates of cardiovascular disease, asthma, and life expectancy gaps compared to state averages. In the Puget Sound region specifically, diesel particulate matter has been identified as the [single largest driver](#) of cancer risk in communities near major freight corridors and ports. Moving Washington toward zero-emission transportation is essential to addressing these harms and meeting the state's climate commitments.

We support Ecology's continued leadership on the Clean Vehicles Program during a period of significant federal uncertainty. The current draft rule takes meaningful steps to provide regulatory clarity, including by clarifying that pre-Omnibus provisions remain applicable while federal litigation over waiver approvals is resolved. We also support Ecology's plan to require regular fleet reporting, which will give the state critical data on the composition of Washington's vehicle fleet and help inform future transportation policy and infrastructure planning.

We recognize that this draft rule reflects the realities of a constrained regulatory moment, and that it differs in several respects from earlier versions of the rulemaking. It does not incorporate California's proposed updates to align with the Advanced Clean Trucks and Omnibus standards, and the exemption structure has been modified from prior drafts. We view this rule as an important step in an ongoing process, and we remain committed to working with Ecology toward a more ambitious rule as legal and regulatory conditions allow. State leadership on clean transportation is more important than ever given ongoing federal rollbacks, and we look forward to continuing to engage with Ecology as this work advances.

Organizations adding their signatures to this letter may wish to include additional specific comments on the rulemaking, and we encourage Ecology to consider those perspectives alongside this general expression of support.

Thank you for the opportunity to provide feedback and for your continued work on clean transportation in Washington. We look forward to supporting this effort.

Respectfully,

Leah Missik  
Washington Legislative Director  
**Climate Solution**

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