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Gopika Patwa
Department of Ecology
Rulemaking Lead
Olympia, WA 98504-7600

Submitted online via: <https://ecology.commentinput.com/?id=7CWPchHjR>

Re: Chapter 173-423 WAC Clean Vehicles Program Rulemaking: Comment Period

Dear Ms. Patwa and Department of Ecology vehicle emissions standards staff:

Thank you for the opportunity to comment on amendments to [Chapter 173-423 WAC](#), Washington's Clean Vehicles Program rule. Washington's low- and zero-emission vehicle standards are powerful regulatory tools to increase the sale of zero-emission vehicles over time.

Confronting climate change and reducing emissions from the transportation sector are top priorities in King County's newly adopted 2025 Strategic Climate Action Plan (SCAP). The 2025 SCAP is a five-year blueprint for County climate action. It sets ambitious targets to reduce emissions by half by 2030, lead with climate justice, and prepares for the impacts of climate change. King County's 2025 SCAP charts a vision for connected communities that are more compact and walkable, served by transit and zero-emission vehicles, collectively reducing GHG emissions and improving air quality and public health.

Transportation is the largest source of greenhouse gas emissions in King County, and in Washington State, and we must take urgent and immediate action to lower emissions from that sector. King County's analysis of pathways to achieve emission targets reveals implementation of the WA Vehicle Emission Standards as the policy measure with the largest potential to reduce transportation emissions through 2050. The 2025 SCAP commits to King County to support efforts to protect adopted State Advanced Clean Cars and Clean Trucks standards, and advocate for the adoption of additional zero-emission vehicle standards, including Advanced Clean Fleet rules.

As a co-petitioner alongside Washington, **King County strongly supports Washington's efforts in the active multistate coalition lawsuit to fight federal action to rescind State authority to regulate vehicle emission standards.** (See, *Commonwealth of Massachusetts v. EPA*, 26-1061, (D.C. Cir. Mar 19, 2026).) King County also appreciates the Department of Ecology's efforts to consider amendments that will maintain consistency with California regulations as directed per RCW 70A.30.010.

King County is a large fleet owner and has complied with fleet reporting to the State on alternative fuel and electric vehicle usage. King County is supportive of the Department of Ecology's efforts to assess utility grid infrastructure demands to support vehicle electrification.

King County appreciates the amendments to fleet reporting made in the draft rule that simplifies and offers flexibility for fleet owners. Nevertheless, the fleet reporting requirements as drafted will create duplicative and an administrative burden to King County. King County has the following recommendations related to updating fleet reporting requirements for large fleet owners:

- i. **Encourage the use of existing data reported to the WA Department of Licensing for high-level statewide planning purposes.** Encourage the State to explore the ability to develop high-level statewide estimates of power demand for fleets using a combination of vehicle and fueling type information from the Dept. of Licensing and default average vehicle usage information. Analysis based on state level data likely ensures greater consistency across the state, even if data for individual fleets or locations may be less precise.
- ii. **Allow fleet owners to report power demand estimates by site, if available, rather than requiring all specific data inputs.** King County encourages Ecology to provide flexibility for fleet owners to meet the requirement by providing this information if available, rather than require all fleet owners to supply all the underlying data inputs. King County has already developed preliminary estimates of power demand for several fleet sites. For example, King County has recently completed a multi-year consultant study to generate power demand estimates by facility to support charging infrastructure investments. It would be much more efficient and accurate to provide the results of these power demand feasibility studies, in place of vehicle specific data. This would avoid requiring all large fleet owners to provide detailed information on vehicle fuel usage, trips etc. King County can report on total fleet by vehicle type (light, medium, heavy) and percentage of vehicles that are electric. Detailed information on vehicle fuel usage by site is difficult and time consuming to gather and report.
- iii. **For “Fleet electrification planning”: Recommend Ecology allow large fleet owners to submit existing electrification plans to meet requirement rather than repackage the same information.** For example, King County is already preparing a U.S. DOT FTA-required Zero Emission Bus Implementation Plan for the bus fleet, as well as a zero-emission non-revenue implementation plan and electrification plan for each agency fleet user. King County is recommending that Ecology permit existing plans to be submitted in place of being required to transcribe and rewrite information already compiled and available.
- iv. **Recommend Ecology not require name and contact information of “responsible official” at each fleet facility.** Given King County’s large number of fleet locations, an inventory of supervisors by location will be challenging to keep current. King County would request that Ecology contact our government relations and sustainability staff on all data requests. This ensures that requests for information are coordinated and directed to the correct people.
- v. **Recommend Ecology omit requirement to report “typical destination” points and ‘usage pattern’ for vehicles within each group.** ‘Usage pattern’ is vague and does not apply well to King County’s fleet operations. Vehicle use is varied, diverse, and is not consistent across vehicle category. Vehicle use varies by category, by day, by work group, and by geographic area within the system. King County manages a large and diverse fleet across multiple agencies; it is difficult to identify typical destination points. Vehicles travel throughout the county. King County’s automated vehicle tracking data only retains data for 30 days and can be time-consuming to review. Additionally, vehicle assignments and usage patterns change over time.
- vi. **Vehicle Home Base: Recommend Ecology remove requirement to report fleet by facility. King County vehicles move to different facilities, making this challenging.** It could be useful to differentiate between vehicles maintained/fueled at King County facilities versus those that are assigned take home vehicles that are not fueled at a facility.
- vii. **Vehicles: Recommend Ecology request inventory of vehicles by class (Light, Medium and Heavy) – with definitions of categories rather than provide an inventory of each vehicle by body type, weight class and fuel type.** King County already uses the following vehicles categories for tracking: light-duty cars, light-duty SUVs, light-duty pickups, medium duty pickups, light-duty vans, medium-duty vans, heavy-duty trucks, heavy-duty buses, and police pursuit vehicles.

King County encourages Ecology to prioritize investment in technical assistance, regional EV planning, and cohort accelerator programs to facilitate EV adoption by large fleet owners in Washington. For example, King

County and other regional partners are supporting the Puget Sound Clean Air Agency's effort to develop a regional EV charging implementation roadmap. Washington State could support similar regional plans for other parts of the state, and/or fund plans for all counties or cities across the state. Another example is accelerator cohort programs where several property or fleet owners learn together from trusted messengers and peers who have successfully implemented EV charging. For example, several King County fleet managers participated in the Breaking Barriers Collaborative program and found it very useful to build capacity, develop shared understanding, and accelerate implementation. Investments in these types of technical assistance would be very valuable to large fleet owners.

Thank you for your continued partnership in furthering Washington State's emissions reductions goals. King County Metro would be happy to discuss these suggestions in greater detail.

Sincerely,
Signed by:

A handwritten signature in black ink that reads "DeAnna Martin". The signature is written in a cursive, flowing style.

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DeAnna Martin

Chief of Staff