



August 13, 2026

Gopika Patwa
Washington State Department of Ecology
Clean Vehicles Program
PO Box 47600
Olympia, WA 98504-7600

Re: Comments on the Proposed Amendments to Chapter 173-423 WAC

Dear Gopika Patwa:

The undersigned organizations appreciate the opportunity to provide comments on the proposed changes to the Clean Vehicles Program through Chapter 173-423 WAC.

Adopting amendments to Advanced Clean Cars (ACC) and Advanced Clean Cars II (ACC II), as well as components of California's 2010 medium- and heavy-duty vehicle in-use standards, will allow Washington to align with California's recently adopted amendments. Doing so will also clarify and confirm that these earlier-adopted regulations remain operative as a backstop to reduce on-road pollution while federal litigation on Washington's most recent emission standards remains pending. Strong vehicle emission standards are essential to protecting public health, resulting in fewer hospital visits and deaths each year, and fewer community members put at risk for cancer, asthma, heart disease, and other devastating ailments. These standards also promote affordable transportation and provide consumers with a wide range of clean vehicle options. If the ability to enforce Heavy-Duty Low NOx Omnibus becomes restricted, the sections of the California Code of Regulations Title 13 and Title 17 proposed for adoption can help safeguard Washington's air from regressive alternatives.

We support the changes listed above as important interim protections. While these older standards serve as a backstop if federal actions limit enforcement, the current Advanced Clean Cars II standards offer greater protections for Washingtonians. Stricter requirements for engine emissions and targets for zero-emission vehicle sales ensure greater progress toward Washington's greenhouse gas emission limits and air pollution reduction, advancing both

environmental and public health goals. If the ongoing litigation succeeds in proving the illegality of recent federal actions, the current, more protective standards will help achieve those important benefits.

We understand that Washington's ability to enforce current emission standards is dependent on the outcome of ongoing legal challenges. As these legal challenges continue, clarifying the ongoing applicability of fallback standards that align with California's recent ACC I and ACC II amendments and adopting California's requirements for medium- and heavy-duty vehicle in-use standards is a useful interim strategy for maintaining enforceable protections. We encourage the Department of Ecology to move forward with this strategy while continuing to advocate for the current standards that offer greater protections to Washington's environment and communities.

Finally, we strongly support the proposed fleet reporting requirements. Additional data will support carbon emission reduction efforts, including utility grid planning and transportation electrification grant programs, with greater accuracy. The fleet requirements will provide helpful information regardless of the outcome of federal litigation.

We appreciate Ecology's dedication to protecting Washington's air quality through maintaining strong vehicle emissions standards that address climate change, promote affordable transportation options, and keep our communities safe and healthy.

Sincerely,

Don Steinke
Climate Action of Southwest Washington

Logan Danzek
Policy Manager
Communities for a Healthy Bay

Victor Zertuche
Senior Attorney
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Kathy Harris
Director, Clean Vehicles,
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