



August 12, 2026

Gopika Patwa
Department of Ecology
Climate Pollution Reduction Program
300 Desmond Drive SE
Lacey, WA 98503

RE: Chapter 173-423 WAC - Clean Vehicle Program Rulemaking

Dear Gopika Patwa,

We appreciate the Department of Ecology's continued work on updating *Chapter 173-423 WAC – Clean Vehicle Program* and welcome the opportunity to provide comments on the proposed rule. We support Ecology's efforts to preserve emissions standards that provide cleaner vehicles, improve air quality, and reduce pollution-related health impacts across Washington. The proposed amendments are an important step toward maintaining these benefits in the face of ongoing federal uncertainty.

Transportation remains the leading source of emissions in the state and nationwide, and Washington has shown leadership in implementing vehicle emissions standards that provide stronger health protection than baseline federal standards. Despite the decades of clean air leadership and progress, Washingtonians continue to face some of the nation's most difficult air pollution challenges. According to our "State of the Air" 2026 report, the Seattle –Tacoma metro area ranked eighth worst in the nation for short-term particle pollution, and King, Okanogan, Pierce, and Snohomish, Spokane, Stevens and Yakima counties received failing grades for particle pollution. King County also earned a failing grade for unhealthy ozone pollution days in the report. These pollutants trigger asthma attacks, worsen other respiratory symptoms and diseases, can lead to heart attacks and premature death.

Air pollution affects everyone, but it is particularly damaging to those near railyards, ports, warehouses, freeways, distribution centers and other transportation hubs. The *Clean Vehicle Program* is an essential tool for reducing harmful pollution from cars, heavy-duty trucks, ferries, and other transportation sources. Cleaner vehicles can improve air quality and help reduce health impacts of air pollution including lung disease, heart disease, and premature death especially in areas most impacted by air pollution.

Maintaining Vehicle Emission Protections: We support Ecology's proposal to incorporate alternative California vehicle emissions standards into Washington's *Clean Vehicles Program*. The proposed amendments establish a practical framework that allows Washington to preserve

strong vehicle emissions protections in the face of ongoing federal uncertainty and legal challenges affecting more health-protective vehicle standards. By establishing alternative standards and compliance pathways, Ecology helps ensure continued implementation of Washington's Clean Vehicles Program while providing regulated entities a clear path forward.

Continuation of Fleet Reporting: We appreciate Ecology's continued commitment to fleet reporting and enhanced data collection. Robust fleet reporting is critical to understanding vehicle operations and identifying patterns that contribute to transportation-related pollution. Collecting additional years of data and expanding reporting requirements will provide valuable insight into vehicle activity across Washington and help inform future policy development and clean transportation infrastructure planning. Improved data can help ensure state resources are directed where they will have the greatest impact.

We encourage Ecology to move forward with the adoption of these updates to the Clean Vehicles Program. The proposed amendments help preserve important air quality and public health benefits while providing a clear framework for continued implementation. Thank you for your continued commitment to protecting the health of Washington communities.

Sincerely,



Carrie Nyssen
Senior Director | Advocacy