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Washington should not mandate a near-total transition to zero-emission vehicles by 2035 before at a minimum, the state has demonstrated that the necessary infrastructure and technology are practical for all Washington residents.

EVs can be an excellent choice for many people, but they are not yet a practical one-size-fits-all replacement for gasoline vehicles. Millions of Washington residents live in apartments, condos, or other housing where convenient overnight charging is unavailable or impractical. Public charging is not an equivalent substitute for charging at home, and building the necessary charging infrastructure at multifamily housing, workplaces, businesses, rural communities, and along highways statewide within the next decade is a tremendous undertaking.

Long-distance and remote travel present additional challenges. Charging availability, charging time, weather, elevation, payload, and towing can significantly affect an EV's practicality and range. I personally have multiple towing needs that take me over mountain passes and onto remote Forest Service roads, where charging infrastructure is nonexistent. My transportation needs are not unusual or unreasonable, yet a vehicle that is practical for a short urban commute is not an adequate replacement for my current vehicles.

The impact on the electrical grid also deserves much greater consideration. Electrifying a large portion of the vehicle fleet will create substantial new electrical demand and require significant investment in generation, transmission, distribution systems, and local infrastructure. I currently participate in PSE's FLEX program, which asks customers to reduce or shift electricity use during periods of high demand. The existence of programs like this demonstrates that managing peak electrical demand is already a real concern. The state should not assume that the additional demand created by widespread EV adoption will simply be absorbed by the existing system. High-demand events will place additional stress on the grid, while extended power outages raise legitimate concerns about transportation resilience. Gasoline vehicles carry their energy supply with them and can continue operating during an electrical outage; EVs ultimately depend on a functioning electrical system for replenishment.

The policy could also disproportionately affect people who cannot afford new EVs or whose transportation needs require long range, four-wheel drive, towing capability, or reliable access to remote areas. Restricting the supply of new gasoline vehicles could increase dependence on an already-important used gasoline-vehicle market and could encourage Washington residents to purchase vehicles in neighboring states.

There is also a fundamental fairness and competitiveness issue in imposing vehicle standards on Washington residents that are substantially more restrictive than the federal standards applicable in most of the country. Washington consumers and businesses should not be placed at a competitive disadvantage simply because they live in this state. If a vehicle is legal for sale under federal standards and is considered safe and appropriate for consumers elsewhere in the country, Washington should have to demonstrate a compelling reason why its residents should be prohibited from purchasing it. Creating substantially different requirements also creates incentives for consumers to shop across state lines rather than eliminating the underlying demand for those vehicles.

Most importantly, this policy restricts consumer choice by determining which technologies manufacturers may sell rather than allowing consumers and manufacturers to determine which technologies best meet their individual needs. The fact that consumers are not legally required to purchase an EV does not change the practical reality if the new gasoline vehicle they want is no longer available for purchase in Washington.

Washington should continue pursuing reductions in transportation emissions, but it should not prematurely mandate a particular technology before the infrastructure, electrical grid, emergency resilience, economics, and real-world practicality have been demonstrated statewide.

A better approach would be technology-neutral: allow manufacturers and consumers to determine whether battery-electric, plug-in hybrid, hydrogen, highly efficient combustion, or other technologies ultimately provide the best solutions in coordination with federal standards. This would allow technology and infrastructure to develop rather than forcing consumers into a single solution before it is demonstrably practical for everyone.