

William Phillips

Thank you for the opportunity to comment on the proposed revisions to Chapter 173-423, Washingtons Clean Vehicles Program rule.

Adopting amendments to Advanced Clean Cars (ACC) and Advanced Clean Cars II (ACC II) will allow Washington to have a backstop in place to protect against increased on-road pollution pending federal litigation. The adoption of Californias 2010 medium- and heavy-duty in-use vehicle standards is also a strategic backstop if litigation fails to defend against the federal administrations illegal actions.

The expanded fleet reporting requirements proposed will further support Washingtons continued movement forward on transportation. Ultimately, stronger vehicle emission standards and better fleet reporting will protect 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.

While adopting these older standards establishes a degree of protection if federal actions limit enforcement, Washingtons current Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Low-NOx omnibus standards offer far greater protections for Washingtonians. Stricter requirements for tailpipe emissions and requirements for zero-emission vehicle sales ensure greater progress on air pollution reduction and our greenhouse gas emissions limits, advancing both climate and public health goals. If the ongoing litigation succeeds in proving the illegality of recent federal actions, the current, more protective standards should be reinstated as quickly as possible.

Thank you for your consideration, and for your work to establish standards that protect Washingtons environmental and public health.