

# Sheri Call

RE: The Washington Trucking Associations hereby submits the attached comments relating to the proposal that the Washington Department of Ecology has made to revise Washington's Clean Vehicles Program (Chapter 173-423 WAC).

## INDUSTRY CHALLENGES

Washington's trucking industry supports the continued development and deployment of viable, market-ready power technologies that reduce emissions while maintaining the safety, reliability, and efficiency of freight movement. Because trucking operations vary widely by route, cargo, geography, and duty cycle, no single technology is appropriate for every application. Public policy should promote innovation, infrastructure, and technology neutrality, allowing fleets to adopt the power solutions that best meet operational needs and deliver measurable environmental and economic benefits.

## FLEET REPORTING RULE MAY BE DUPLICATIVE

The Washington Department of Ecology's fleet reporting requirements impose a significant administrative burden on trucking companies by requiring the submission of information that is, in many cases, already maintained by state agencies. Before expanding these reporting requirements, the state should evaluate whether existing vehicle registration and licensing data maintained by the Department of Licensing and other agencies can be leveraged to reduce duplicative reporting. Regulatory programs should minimize unnecessary paperwork, streamline data collection, and avoid imposing avoidable compliance costs on employers. Ecology's fleet reporting rule was adopted to gather fleet information for planning purposes, but it already relies in part on vehicle registration records, raising questions about whether additional reporting could be consolidated or pre-populated using existing state data.

## CONTINUED COSTLY RULE MAKING

The Washington Department of Ecology should prioritize its limited staff time and taxpayer resources on implementing policies that are legally durable and tailored to Washington's needs, rather than continually revising state regulations to mirror California's vehicle emission standards. With California's clean truck regulations facing ongoing litigation, federal challenges, and significant legal uncertainty, Washington should avoid expending substantial resources on adopting and defending policies whose long-term viability remains in question.

## INDUSTRY COMMITMENT

The Washington Trucking Associations is committed to helping members navigate the transition to lower-emission freight transportation by serving as a trusted source of timely information, technical expertise, and policy engagement. WTA actively convenes industry, regulators, manufacturers, utilities, and other stakeholders to share emerging technologies, regulatory developments, funding opportunities, and operational best practices. Through education, advocacy, and collaboration, WTA equips motor carriers with the tools to make informed business decisions that align with their operational needs while supporting Washington's long-term transportation and climate objectives and we will continue to do so for the long haul.

Respectfully submitted,  
Sheri Call

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