



Concise Explanatory Statement Chapter 173-423 WAC, Clean Vehicles Program

Summary of Rulemaking and Response to Comments

Washington State Department of Ecology

Olympia, Washington

October 2025, Publication 25-14-075

Publication Information

This document is available on the Department of Ecology's website at:
<https://apps.ecology.wa.gov/publications/summarypages/2514075.html>

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ADA Accessibility

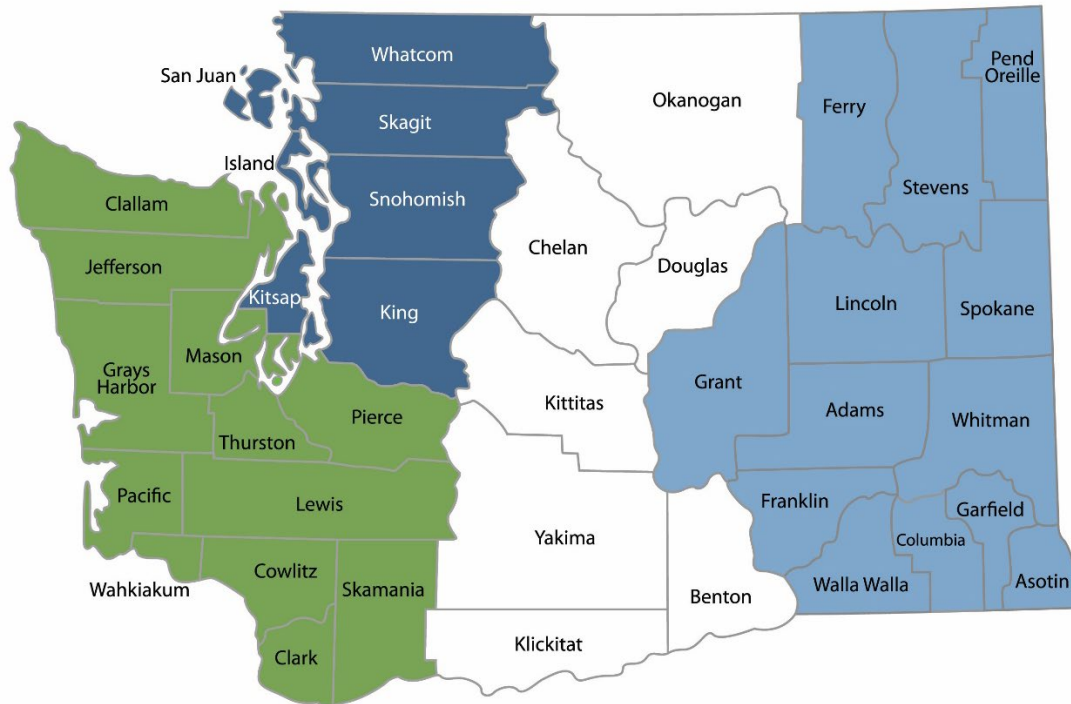
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¹ <http://www.ecology.wa.gov/contact>

Department of Ecology's Regional Offices

Map of Counties Served



Southwest Region
360-407-6300

Northwest Region
206-594-0000

Central Region
509-575-2490

Eastern Region
509-329-3400

Region	Counties served	Mailing Address	Phone
Southwest	Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Mason, Lewis, Pacific, Pierce, Skamania, Thurston, Wahkiakum	PO Box 47775 Olympia, WA 98504	360-407-6300
Northwest	Island, King, Kitsap, San Juan, Skagit, Snohomish, Whatcom	PO Box 330316 Shoreline, WA 98133	206-594-0000
Central	Benton, Chelan, Douglas, Kittitas, Klickitat, Okanogan, Yakima	1250 W Alder St Union Gap, WA 98903	509-575-2490
Eastern	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Spokane, Stevens, Walla Walla, Whitman	4601 N Monroe Spokane, WA 99205	509-329-3400
Headquarters	Across Washington	PO Box 46700 Olympia, WA 98504	360-407-6000

Concise Explanatory Statement

Chapter 173-423 WAC Clean Vehicles Program

Climate Pollution Reduction Program
Washington State Department of Ecology
Olympia, WA

October 2025 | Publication 25-14-075



DEPARTMENT OF
ECOLOGY
State of Washington

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Abbreviations and Acronyms

APA	Administrative Procedure Act
ACT	Advanced Clean Trucks
CARB	California Air Resources Board
CES	Concise Explanatory Statement
CETA	Clean Energy Transformation Act
CFR	Code of Federal Regulations
ECY	Ecology
EJ	Environmental Justice
EPA	Environmental Protection Agency
FCEV	Hydrogen Fuel Cell Electric Vehicle
GHG	Greenhouse Gases
ICE	Internal Combustion Engine
IRP	Integrated Resource Plans
MHDV	Medium- and Heavy- Duty Vehicles
MT	Metric Tons
NEVI	National Electric Vehicle Infrastructure
NHTSA	National Highway Traffic Safety Administration
Omnibus	Heavy-Duty Low NO _x Omnibus
PHEV	Plug-in Hybrid Electric Vehicles
RCW	Revised Code of Washington
UTC	Utilities and Transportation Commission
WAC	Washington Administrative Code
WAZIP	Washington Zero-Emission Incentive Program
WSDOT	Washington State Department of Transportation
ZEV	Zero Emission Vehicles

Introduction

The purpose of a Concise Explanatory Statement is to:

- Meet the Administrative Procedure Act (APA) requirements for agencies to prepare a Concise Explanatory Statement (RCW 34.05.325).
- Provide reasons for adopting the rule.
- Describe any differences between the proposed rule and the adopted rule.
- Provide Ecology's response to public comments.

This Concise Explanatory Statement provides information on The Washington State Department of Ecology's (Ecology) rule adoption for:

Title:	Clean Vehicles Program
WAC Chapter(s):	Chapter 173-423 WAC
Adopted date:	October 16, 2025
Effective date:	November 16, 2025

To see more information related to this rulemaking or other Ecology rulemakings please visit our website: <https://ecology.wa.gov/About-us/How-we-operate/Laws-rules-rulemaking>.

Organization of this Document

Ecology accepted formal public comments on the rule proposal from May 15, 2025 through July 3, 2025. During this public comment period, formal comments were accepted through our online public comment tool, by mail, by email, and by testimony provided at the public hearings. Ecology held two virtual public hearings on this rule proposal. Comments made during the public hearings are treated the same as written comments. We received 816 total comment submissions.

In this document, we have organized the comments into the following categories:

1. Comments supporting amendments
2. Comments citing program flexibility
3. Comments on technological readiness
4. Comments containing economic considerations
5. Comments citing increasing gas taxes
6. Comments citing lack of public charging and hydrogen refueling infrastructure
7. Comments on process and policy concerns: Following California
8. Comments of general opposition
9. Comments outside of the scope of the rulemaking

To see how Ecology responded to your comments, please locate your name or organization in the List of Commenters table beginning on page 4. In the adjacent columns, the commenter should find their comment code as well as the category in which the response to their comment can be found in the Concise Explanatory Statement.

Reasons for Adopting the Rule

Ecology is adopting amendments to our Clean Vehicles Program Rule (Chapter 173-423 WAC) that will incorporate changes to the Advanced Clean Trucks and Heavy-Duty Low NO_x Omnibus regulations adopted by the California Air Resources Board (CARB). As required by [RCW 70A.30.010](#), Ecology must maintain with California's motor vehicle emissions standards. These regulations are an essential policy tool for addressing climate change and improving air quality in Washington.

These amendments respond to industry concerns by easing compliance requirements for the heaviest vehicles. They also streamline implementation and maintain consistency with state and federal laws. The Advanced Clean Trucks program applies to medium- and heavy-duty engine and vehicle manufacturers. It requires manufacturers to gradually sell more new zero-emission models in Washington through model year 2035 and provides flexibility to manufacturers by allowing the purchase credits from other manufacturers to meet this requirement thereby offering manufacturers choice in which models to transition to zero-emissions technology. The Heavy-Duty Low NO_x Omnibus regulation applies to heavy-duty internal combustion engine manufacturers and requires heavy-duty vehicles sold in Washington meet more protective air quality standards, particularly on oxides of nitrogen and particulate matter, starting in model year 2026.

Differences Between the Proposed Rule and Adopted Rule

RCW 34.05.325(6)(a)(ii) requires Ecology to describe the differences between the text of the proposed rule as published in the Washington State Register and the text of the rule as adopted, other than editing changes, stating the reasons for the differences.

There are no differences between the proposed rule filed on May 15, 2025 and the adopted rule filed on October 16, 2025.

List of Commenters

Submission Code	First Name	Last Name	Affiliation	Response
I-1	Tim	Gamber		Comments on process and policy concerns: Following California
I-2	Jeremy	Miller		Comments containing economic considerations
I-3	Bonnie	Blessing-Earle		Comments supporting amendments
I-4	DIESEL	NOLAN		Comments on process and policy concerns: Following California; Comments on technological readiness
I-5	Jerry	Kurtz		Comments containing economic considerations
I-6	Linda	Ellsworth		Comments supporting amendments
I-7	Suzanne	Crawford-O'Brien		Comments supporting amendments
I-8	Michaela	Barrett		Comments supporting amendments
I-9	BONNIE	GODBILLE		Comments supporting amendments
I-10	Amy	Mower		Comments supporting amendments
I-11	Sally	Neary		Comments supporting amendments

I-12	Charles	Michel		Comments supporting amendments
I-13	Carol	Michel		Comments supporting amendments
I-14	James	McKeever		Comments supporting amendments
I-15	Sara	Bhakti		Comments supporting amendments
I-16				Comments supporting amendments
I-17	Don	Worley		Comments supporting amendments
I-18	John	Simanton		Comments supporting amendments
I-19	Mary Ellen	Smith		Comments supporting amendments
I-20	Sara	Burgess		Comments supporting amendments
I-21	jean	kent		Comments supporting amendments
I-22	Steven	Gary		Comments supporting amendments
I-23	Anne	McDuffie		Comments supporting amendments
I-24	Kathy	Dawson		Comments supporting amendments
I-25	Michelle	Fairow		Comments supporting amendments
I-26	Jonel	Stahr		Comments supporting amendments
I-27	Morgan	Crosby		Comments supporting amendments
I-28	Kimberly	Leeper		Comments supporting amendments

I-29	Amy	Waterman		Comments supporting amendments
I-30	Virgene	Link-New		Comments supporting amendments
I-31	L	D		Comments supporting amendments
I-32	Felicity	Devlin		Comments supporting amendments
I-33	Elena	Rumiantseva		Comments supporting amendments
I-34	Cheryl	Speer		Comments supporting amendments
I-35	Erika	Harris		Comments supporting amendments
I-36	Gail	Gosney-Wrede		Comments supporting amendments
I-37	Kate	Lunceford		Comments supporting amendments
I-38	Nancy Enz	Lill		Comments supporting amendments
I-39	JOHN	LAMBERT		Comments supporting amendments
I-40	Dorothy	Jordan		Comments supporting amendments
I-41	Philip	Bebbington		Comments supporting amendments
I-42	Jonathan	Betz-Zall		Comments supporting amendments
I-43	Mary Lou	Johnson		Comments supporting amendments
I-44	Tom	Craighead		Comments supporting amendments
I-45	JENNIFER	VINING		Comments supporting amendments

I-46	Ann	Dawson		Comments supporting amendments
I-47	Mary	Solum		Comments supporting amendments
I-48	Susan	Pitiger		Comments supporting amendments
I-49	Jadie	Hwang		Comments supporting amendments
I-50	barbara	Sardarov		Comments supporting amendments
I-51	Susan	Moskwa		Comments supporting amendments
I-52	Jeanne	Ripp		Comments supporting amendments
I-53	Mollie	Grow		Comments supporting amendments
I-54	David	Robison		Comments supporting amendments
I-55	Maureen	Canny		Comments supporting amendments
I-56	Karen	Bray		Comments supporting amendments
I-57	Stefanie	Schweer		Comments supporting amendments
I-58	Michael	Hoffman		Comments supporting amendments
I-59	Randi	Aiken		Comments supporting amendments
I-60	Evelyn	Bittner		Comments supporting amendments
I-61	James	Little		Comments supporting amendments
I-62	William	Justis		Comments supporting amendments

I-63	Stephen	Sundquist		Comments supporting amendments
I-64	Drew	Goodrich		Comments supporting amendments
I-65	Paul	Bryant		Comments supporting amendments
I-66	Marian	Wineman		Comments supporting amendments
I-67	Heather	Pens		Comments supporting amendments
I-68	Jean	Walters		Comments supporting amendments
I-69	Betty	McNiel		Comments supporting amendments
I-70	Ross	Hunt		Comments supporting amendments
I-71	Rosemary	Moore		Comments supporting amendments
I-72	Susan	Kane		Comments supporting amendments
I-73	Kelli	Wright		Comments supporting amendments
I-74	Chris	Covert-Bowlds		Comments supporting amendments
I-75	Terri	Cole		Comments supporting amendments
I-76	Jeanne	Poirier		Comments supporting amendments
I-77	Brandon	Bowersox-Johnson		Comments supporting amendments
I-78	JeanM	Avery		Comments supporting amendments
I-79	Laurie	Rubin		Comments supporting amendments

I-80	Kelly	OHanley		Comments supporting amendments
I-81	Sharon	Sollenberger		Comments supporting amendments
I-82	Frank	Marre		Comments supporting amendments
I-83	Carolyn	Boatsman		Comments supporting amendments
I-84				Comments supporting amendments
I-85	Joe	Chasse		Comments supporting amendments
I-86	Linda	V.		Comments supporting amendments
I-87	Lori	Stefano		Comments supporting amendments
I-88	Leslie	Ferriel		Comments supporting amendments
I-89	Polly	Freeman		Comments supporting amendments
I-90	Alan	Ness		Comments supporting amendments
I-91	Derek	Benedict		Comments supporting amendments
I-92	Amy	Kiba		Comments supporting amendments
I-93	Jerry	Erwin		Comments of general opposition; Comments on technological readiness
I-94	Carrie	Parks		Comments supporting amendments
I-95	Sean	Edmison		Comments supporting amendments

I-96	John	Wellman		Comments supporting amendments
I-97	Brie	Gyncild		Comments supporting amendments
I-98	Jim	Byrne		Comments supporting amendments
I-99	Eric	Flodstrom		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-100	John	Birnel		Comments supporting amendments
I-101	Andrea	Chin		Comments supporting amendments
I-102	Susan	Baker		Comments supporting amendments
I-103	Susan	Ratner		Comments supporting amendments
I-104	Roxanne	Thayer		Comments supporting amendments; Comments citing program flexibility
I-105	Amy	Kiba		Comments supporting amendments
I-106	Robert	Young		Comments supporting amendments
I-107	Pat	Archer		Comments supporting amendments
I-108	Kathryn	Harlan		Comments supporting amendments
I-109	Rosemary	Sikes		Comments supporting amendments

I-110	matthew	Dean		Comments supporting amendments
I-111	Meridian	Green		Comments supporting amendments
I-112	Amy	Whitham		Comments supporting amendments
I-113	priscilla	martinez		Comments supporting amendments
I-114	Wendy	Feltham		Comments supporting amendments
I-115	Tara	Demers		Comments supporting amendments
I-116	Ryan	Crompton		Comments supporting amendments
I-117	Lucille	Smith		Comments supporting amendments
I-118	Wendy	Ellison		Comments supporting amendments
I-119	Felipe	Morales		Comments supporting amendments
I-120	Annie	Carenbauer		Comments supporting amendments
I-121	Jeanie	Bein		Comments supporting amendments
I-122	Jennifer	Woodbridge		Comments supporting amendments
I-123	Evelyn	Bittner		Comments supporting amendments
I-124	Meredith	Arksey		Comments supporting amendments
I-125	David	Jones		Comments supporting amendments
I-126	Paul	Muldoon		Comments of general opposition

I-127	Tracy	Ouellette		Comments supporting amendments
I-128	Ashley	Deasy		Comments supporting amendments
I-129	Walther	Soeldner		Comments supporting amendments
I-130	Wesley	Andrews		Comments supporting amendments
I-131	john	zey		Comments supporting amendments
I-132	diane	marks		Comments supporting amendments
I-133	Callie	LeVina		Comments supporting amendments
I-134	Virginia M.	Haver		Comments supporting amendments
I-135	Nancy	Vandenberg		Comments supporting amendments
I-136	Barbara	Menne		Comments supporting amendments
I-137	Kristin	Penn		Comments supporting amendments
I-138	Talia	Tupling		Comments supporting amendments
I-139	Jean	Kroll		Comments supporting amendments
I-140	Zachary	Duckworth		Comments supporting amendments
I-141	Jeffrey	Collins		Comments supporting amendments
I-142	Lori	Raisch		Comments supporting amendments
I-143	Garrett	Tatsumi		Comments supporting amendments

I-144	Janelle	Gauthier		Comments supporting amendments
I-145	Maureen	Hicks		Comments supporting amendments
I-146	Amanda Sue	Rudisill		Comments supporting amendments
I-147	Denise	Daliego-Pierce		Comments supporting amendments
I-148	Catherine	Carey		Comments supporting amendments
I-149	Joyce	Kilmer		Comments supporting amendments
I-150	Joseph	Piecuch		Comments supporting amendments
I-151	Laurie	Kerr		Comments supporting amendments
I-152	Jennifer	Kinghorn		Comments supporting amendments
I-153	Jim	Byrne		Comments supporting amendments
I-154	Patricia	Page		Comments supporting amendments
I-155	w	williams		Comments supporting amendments
I-156	Karen	Caton		Comments supporting amendments
I-157	HOLLY	crowley		Comments containing economic considerations; Comments on technological readiness
I-158	Lucille	Smith		Comments supporting amendments
I-159	Susan	Taylor		Comments supporting amendments

I-160	Heather	Lange-Wilson		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
I-161	Heather	Wilson		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
I-162	Kathleen	Bender		Comments supporting amendments
I-163	aida	amirul		Comments supporting amendments
I-164	Meridian	Green		Comments supporting amendments
I-165	Jared	Howe		Comments supporting amendments; Comments citing program flexibility
I-166	Mike	Ellison		Comments supporting amendments
I-167	Thomas	Kraemer		Comments supporting amendments
I-168	Elizah	DeMartini		Comments supporting amendments
I-169	Assaf	Oron		Comments supporting amendments

I-170	James	Little		Comments supporting amendments
I-171	Sarah	Mikkelborg		Comments supporting amendments
I-172	Coleen	Anderson		Comments supporting amendments
I-173	Chris	Covert-Bowlds		Comments supporting amendments
I-174	Teresa	Myers		Comments supporting amendments
I-175	Kara	Harvin		Comments supporting amendments
I-176				Comments supporting amendments
I-177	Donna	Albert		Comments supporting amendments
I-178	Jadie	Hwang		Comments supporting amendments
I-179	Carl	Olson		Comments supporting amendments
I-180	Kathy	sugarman		Comments supporting amendments
I-181	Zachary	Pullin		Comments supporting amendments
I-182	Halleli	Zacher		Comments supporting amendments
I-183	Lauren	Flottorp		Comments supporting amendments
I-184	Milo	Rusnak		Comments supporting amendments
I-185	Andronetta	Douglass		Comments supporting amendments
I-186	J.	Bricker		Comments supporting amendments

I-187	Richard	Stern		Comments supporting amendments
I-188	Sara	Bhakti		Comments supporting amendments
I-189	Nelia	Swayze		Comments supporting amendments
I-190	Cat	Eberhart		Comments supporting amendments
I-191	Matt	Hohensee		Comments supporting amendments
I-192	Arthur	Ungar		Comments supporting amendments
I-193	Wendy	Krauss		Comments supporting amendments
I-194	john	nurius		Comments supporting amendments
I-195	Chayanika	Das		Comments supporting amendments
I-196	Jared	Howe		Comments supporting amendments
I-197	Heather	Millar		Comments supporting amendments
I-198	Ellen	Storm		Comments supporting amendments
I-199	Tom	Craighead		Comments supporting amendments
I-200	Noah	Ehler		Comments supporting amendments
I-201	Dorothy	Jordan		Comments supporting amendments
I-202	Amanda	Dickinson		Comments supporting amendments
I-203	Lorraine	Hartmann		Comments supporting amendments

I-204	Evelyn	Bittner		Comments supporting amendments
I-205	Mark	Hollinrake		Comments supporting amendments
I-206	Donald	Miller		Comments supporting amendments
I-207	M'Lou	Christ		Comments supporting amendments
I-208	Gail	Atkins		Comments supporting amendments
I-209	Patricia	Waterston		Comments supporting amendments
I-210	Sandra	Ciske		Comments supporting amendments
I-211	Sally	Neary		Comments supporting amendments
I-212	Betsy	Schultz		Comments supporting amendments
I-213	Celeste	Maris		Comments supporting amendments
I-214	Cathy	Craft		Comments supporting amendments
I-215	Mark	Blitzer		Comments supporting amendments
I-216	Noel	Allen		Comments supporting amendments
I-217	PETER	FELS		Comments supporting amendments
I-218	Craig	Kleber		Comments supporting amendments
I-219	Patrick	Conn		Comments supporting amendments
I-220	Liisa	Kellems		Comments supporting amendments

I-221	Meralina	Morales		Comments supporting amendments
I-222	Emily	Willoughby		Comments supporting amendments
I-223	Roger	Clark		Comments supporting amendments
I-224	Anonymous			Comments supporting amendments
I-225	Susan	Shouse		Comments supporting amendments
I-226	James	Gayden		Comments supporting amendments
I-227	LUCINDA	BROUWER		Comments supporting amendments
I-228	Kevin	Jones		Comments supporting amendments
I-229	Rachel	Roberts		Comments supporting amendments
I-230	Barbara	Harper		Comments supporting amendments
I-231	Deborah	Kaye		Comments supporting amendments
I-232	Ronald	Kaufman		Comments supporting amendments
I-233	Stephen	Rosenman		Comments supporting amendments
I-234	richard	Kolber		Comments supporting amendments
I-235	Ashley	Podplesky		Comments supporting amendments
I-236	Valerie	Wade		Comments supporting amendments
I-237	Gayle	Austin		Comments supporting amendments

I-238	Laurence	Franks		Comments supporting amendments
I-239	Nancy Enz	Lill		Comments supporting amendments
I-240	Larry	Leveen		Comments supporting amendments
I-241	Alan	Hardcastle		Comments supporting amendments
I-242	James	Owen		Comments supporting amendments
I-243	Brenda	Vanderloop		Comments supporting amendments
I-244	Gretchen	Garth		Comments supporting amendments
I-245	Jonah	Hister		Comments supporting amendments
I-246	PATRICIA	DORSEY		Comments supporting amendments
I-247	MARY	TEESDALE		Comments supporting amendments
I-248	Jim	Byrne		Comments supporting amendments
I-249	priscilla	martinez		Comments supporting amendments
I-250	Jean	Schwinberg		Comments supporting amendments
I-251	Daniel	Arnold		Comments supporting amendments
I-252	Lesley	Morgan		Comments supporting amendments
I-253	Michael	Brandes		Comments supporting amendments
I-254	Gary	Goldbaum		Comments supporting amendments

I-255	Lori	Erbs		Comments supporting amendments
I-256	Shary	B		Comments supporting amendments
I-257	Russell	Weisz		Comments supporting amendments
I-258	Michael	Siptroth		Comments supporting amendments
I-259	Carrie	Parks		Comments supporting amendments
I-260	Linda	Carroll		Comments supporting amendments
I-261	STACIE	CHARLEBOIS		Comments supporting amendments
I-262	Joanne	Watchie		Comments supporting amendments
I-263	Arnold	Strang		Comments supporting amendments
I-264	Jeffrey	Kaufman		Comments supporting amendments
I-265	Simone	Fonseca		Comments supporting amendments
I-266	Kari	Darvill-Coate		Comments supporting amendments
I-267	Alison	Inkley		Comments supporting amendments
I-268	Edward	Loosli		Comments supporting amendments
I-269	Thomas	Frenock		Comments supporting amendments
I-270	Betty	McCall		Comments supporting amendments
I-271	Sarah	Bell		Comments supporting amendments

I-272	Robert	Shwed		Comments supporting amendments
I-273	John	Hardy		Comments supporting amendments
I-274	Jonathan	Cardona		Comments of general opposition
I-275	Amy	Mower		Comments supporting amendments
I-276	Molly	Sutor		Comments supporting amendments
I-277	Lucy	Ostrander		Comments supporting amendments
I-278	Leslie	Johanson		Comments supporting amendments
I-279	Malcolm	Cumming		Comments supporting amendments
I-280	Noah	Ehler		Comments supporting amendments
I-281	Randi	Aiken		Comments supporting amendments
I-282	Harry	Gerecke		Comments supporting amendments
I-283	Helen	Rector		Comments supporting amendments
I-284	Kristy	Daniels		Comments supporting amendments
I-285	Robert	Schmelter		Comments supporting amendments
I-286	Anonymous			Comments supporting amendments
I-287	Steven	Uyenishi		Comments supporting amendments
I-288	Judith	Downey		Comments supporting amendments

I-289	Peter	Viavant		Comments supporting amendments
I-290	Teresa	Dix		Comments supporting amendments
I-291	Roman	Stadtler		Comments supporting amendments
I-292	Sarah	M		Comments supporting amendments
I-293	Wendy	Krakauer		Comments supporting amendments
I-294	Susan	Morales		Comments supporting amendments
I-295	W Thomas	Soeldner		Comments supporting amendments
I-296	Kyle	Maloney		Comments supporting amendments
I-297	Misty	Speck		Comments supporting amendments
I-298	Paul	Fior		Comments supporting amendments
I-299	Laura	Sheehan		Comments supporting amendments
I-300	steve	williams		Comments supporting amendments
I-301	Wally	Bubelis		Comments supporting amendments
I-302	Laureen	Elizabeth		Comments supporting amendments
I-303	Rachel	Bjork		Comments supporting amendments
I-304	Daniel	Henling		Comments supporting amendments
I-305	Steven	Meyer		Comments supporting amendments

I-306	Alice	Pfister		Comments supporting amendments
I-307	Terry	Rice		Comments supporting amendments
I-308	Ashley	Deasy		Comments supporting amendments
I-309	Patti	Miller-Crowley		Comments supporting amendments
I-310	Jeffry	Steele		Comments supporting amendments
I-311	Ronna	Scott		Comments supporting amendments
I-312	Serena	Donnelly		Comments supporting amendments
I-313	Kathryn	Harlan		Comments supporting amendments
I-314	Robert	Young		Comments supporting amendments
I-315	Virgene	Link-New		Comments supporting amendments
I-316	Steven	Smith		Comments supporting amendments
I-317	Sue	Lepore		Comments supporting amendments
I-318	Nancy	Rasmussen		Comments supporting amendments
I-319	Alan	Carey		Comments supporting amendments
I-320	Nancy	Johnson		Comments supporting amendments
I-321	Susan	Baker		Comments supporting amendments
I-322	Barbara	Sanborn		Comments supporting amendments

I-323	Ellen	Madsen		Comments supporting amendments
I-324	Stephen A	Johnson		Comments supporting amendments
I-325	Don	Steinke		Comments supporting amendments
I-326	Brandie	Deal		Comments supporting amendments
I-327	Jean	Pauley		Comments supporting amendments
I-328	Bobbee	Murr		Comments supporting amendments
I-329	Peter	Kowalczyk		Comments supporting amendments
I-330	Hannah	Taylor		Comments supporting amendments
I-331	priscilla	martinez		Comments supporting amendments
I-332	Lori	Erbs		Comments supporting amendments
I-333	Christina	Billingsley		Comments supporting amendments
I-334	Sean	Edmison		Comments supporting amendments
I-335	Joshua	Watson		Comments supporting amendments
I-336	Dana	Hendricks		Comments supporting amendments
I-337	Joelle	Robinson		Comments supporting amendments
I-338	Susan	Kane		Comments supporting amendments
I-339	Rich	Voget		Comments supporting amendments;

				Comments citing program flexibility
I-342	Wendy	Ellison		Comments supporting amendments
I-343	Virginia	Lohr		Comments supporting amendments
I-345	Betsy	Newnum		Comments supporting amendments
I-346	Sara	Cate		Comments supporting amendments
I-347	Rachel	Roberts		Comments supporting amendments
I-349	Arthur	Baines		Comments supporting amendments
I-350	Colleen	Anderson		Comments supporting amendments
I-351	Gregg	Brown		Comments supporting amendments; Comments citing program flexibility
I-352	Ross	Hunt		Comments supporting amendments
I-353	Mona	Howe		Comments supporting amendments
I-354	Arvia	Morris		Comments supporting amendments
I-355	Donna	Albert		Comments supporting amendments
I-356	H. Lehman	Holder Jr.		Comments supporting amendments
I-357	Steven	Yanoff		Comments supporting amendments
I-358	Michael	Willig		Comments supporting amendments
I-359	Christi	Sutphin		Comments supporting amendments

I-360	Danielle	Rowland		Comments supporting amendments
I-361	Yaya	Johnson		Comments supporting amendments
I-362	Kelly	OHanley		Comments supporting amendments
I-363	Janet	Hada		Comments supporting amendments
I-364	Alexandra	Harmon		Comments supporting amendments
I-365	Jessica	Schiffman		Comments supporting amendments
I-366	Arlene	Brown		Comments supporting amendments
I-367	Suzanne	Phillips		Comments supporting amendments
I-368	Theresa	Hudgins		Comments supporting amendments
I-369	Barbara	Menne		Comments supporting amendments
I-370	Lauren	Redfield		Comments supporting amendments
I-371	WILLIAM	CRIMBRING		Comments supporting amendments
I-372	Yonit	Yogev		Comments supporting amendments
I-373	Devon	Kellogg		Comments supporting amendments
I-374	Diane	Marks		Comments supporting amendments
I-375	Linda	Avinger		Comments supporting amendments
I-376	Rebecca	Canright		Comments supporting amendments

I-377	Nancy	Helget		Comments supporting amendments
I-378	Olen	Hunter		Comments on technological readiness
I-379	Mikki	King		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
I-380	Shelly	Vallem		Comments supporting amendments
I-381	Michele	Lounsbury Griffin		Comments supporting amendments
I-382	Steve	Gordon		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
I-383	Jon	Conley		Comments containing economic considerations
I-384	Andrew	Stevens		Comments of general opposition
I-385	Jason	McFadden		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments on

				technological readiness
I-386	Joshua	Sternberg		Comments on technological readiness
I-387	Hannah	Paukstis		Comments supporting amendments
I-388	Christi	Sutphin		Comments supporting amendments
I-389	Linda	Avinger		Comments supporting amendments
I-390	Tracie	Stringer		Comments of general opposition
I-391	chris	delong		Comments of general opposition
I-392	Michelle	Wade		Comments containing economic considerations
I-393	John	Crowley		Comments containing economic considerations
I-394	David	Flood		Comments on process and policy concerns: Following California
I-395	Sandra	Roubal		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
I-396	Linda	Walsh		Comments containing economic considerations
I-397	Robert	Reyna		Comments containing economic considerations
I-398	Dana	Nichols		Comments containing

				economic considerations
I-399	Jeff	Pack		Comments containing economic considerations
I-400	Linnea	Comstock		Comments containing economic considerations
I-401	Charlotte	Turpin		Comments of general opposition
I-402	Heidi	Redfield		Comments containing economic considerations
I-403	Arne	C.		Comments of general opposition; Comments on process and policy concerns: Following California
I-404	Daniel	Renfrow		Comments containing economic considerations
I-405	Rand	Riness		Comments of general opposition; Comments on technological readiness
I-406	James	Iuliano		Comments of general opposition
I-407	Daniel	Hodun		Comments containing economic considerations
I-408	Ian	Hathaway		Comments of general opposition
I-409	Shawn	Anderson		Comments of general opposition
I-410	Dan	Adams		Comments containing economic considerations; Comments on technological readiness

I-411	Marion	Hughes		Comments of general opposition; Comments on technological readiness
I-412	George	Prudden		Comments on technological readiness
I-413	Tina	Vidrine		Comments containing economic considerations
I-414	Michael	Spring		Comments on process and policy concerns: Following California
I-415	Tim	Walters		Comments containing economic considerations
I-416	Jonathan	Haynie		Comments containing economic considerations
I-417	Kenneth	Zirinsky		Comments supporting amendments
I-418				Comments containing economic considerations
I-419	Derek	Benedict		Comments supporting amendments
I-420	Whitney	Raab		Comments of general opposition
I-421	Jamie	Keiser		Comments of general opposition; Comments on process and policy concerns: Following California; Comments on technological readiness
I-422	Elis	Taylor		Comments containing

				economic considerations
I-423	Pablo	R		Comments on technological readiness
I-424	Suzanne	Phillips		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-425				Comments containing economic considerations
I-426	Brian	Greenhalgh		Comments containing economic considerations
I-427	Chris	Ray		Comments containing economic considerations
I-428	Pam	Fisher		Comments on process and policy concerns: Following California
I-429	Aaron	Reed		Comments of general opposition
I-430	donald	martin		Comments on process and policy concerns: Following California
I-431	SYDNEY	WISSEL		Comments containing economic considerations
I-432	Fritzie	Wolfe		Comments of general opposition; Comments on process and policy concerns: Following California

I-433	Norman	Dick		Comments supporting amendments
I-434	Bob	Droll		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-435	AJ			Comments of general opposition; Comments on process and policy concerns: Following California
I-436	Dennis	Brand		Comments of general opposition
I-437	Mark	Frey		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-438	John	Gera		Comments on process and policy concerns: Following California
I-439	John	Smistad		Comments containing economic considerations
I-440	Richard	Cole		Comments of general opposition; Comments on process and policy concerns: Following California
I-441	Jeff	Sieck		Comments on process and policy concerns:

				Following California
I-442	Tom	Curran		Comments on process and policy concerns: Following California
I-443	Patrick	Mahoney		Comments containing economic considerations
I-444	Cheryl	Ritzman		Comments on process and policy concerns: Following California; Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
I-445	Greg	Trujillo		Comments containing economic considerations
I-446	Cheryl	Janke		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-447	Sharon	Orvis		Comments containing economic considerations
I-448	Viola	Rosengren		Comments on process and policy concerns: Following California; Comments containing economic considerations

I-449	Daniel	Chavre		Comments of general opposition
I-450	Kristy	Wallen		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-451	Russell F	Inman Jr		Comments on process and policy concerns: Following California
I-452	Herald	Fodge		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-453	Arnold	Houg		Comments on process and policy concerns: Following California
I-454	Kelly	Craven		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-455	Michael	Brinkley		Comments on process and policy concerns: Following California
I-456	Teresa	Dechand		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California

I-457	April	Kendall		Comments containing economic considerations
I-458	Jessica	Clavadetscher		Comments containing economic considerations
I-459	DAVID	MATHEWS		Comments on process and policy concerns: Following California
I-460	Les	Poole		Comments of general opposition
I-461	Timothy	Parker		Comments of general opposition; Comments on process and policy concerns: Following California
I-462	Marilyn	Strange		Comments of general opposition; Comments on process and policy concerns: Following California
I-463	Amber	Timmerman		Comments of general opposition; Comments on process and policy concerns: Following California
I-464	Andy	Leitner		Comments on process and policy concerns: Following California
I-465	David	DeFord		Comments of general opposition; Comments on process and policy concerns: Following California

I-466	Elisa	Gross		Comments on process and policy concerns: Following California
I-467	Sands	McKinley		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-468	Sheryl	Armstrong		Comments citing increasing gas taxes; Comments of general opposition; Comments on process and policy concerns: Following California
I-469	kenneth	Hairston		Comments containing economic considerations
I-470	Matthew	Holm		Comments on process and policy concerns: Following California
I-471	Julie	Bourgoin		Comments on process and policy concerns: Following California
I-472	mary	skouras		Comments containing economic considerations
I-473	Russ	Rudolph		Comments of general opposition
I-474	David	Gaston		Comments of general opposition
I-475	Tom	LeClercq		Comments of general opposition
I-476	Kristi	Snow		Comments containing

				economic considerations
I-477	Kaj	Pedersen		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California; Comments containing economic considerations
I-478	SEDGIE	GINN		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-479	Michael	Gomez		Comments on process and policy concerns: Following California; Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
I-480	Shea	Craver		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-481	MICHAEL	WEST		Comments on process and policy concerns:

				Following California
I-482	Cagdas	Dirik		Comments of general opposition
I-483	Greg	Boyd		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California; Comments containing economic considerations
I-484	SUSAN	JORDAN		Comments of general opposition
I-485	Rod	Sebers		Comments citing increasing gas taxes
I-486	David	Speikers		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-487	Ed	Walker		Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments on technological readiness
I-488	Sue	Henifin		Comments of general opposition; Comments on process and policy concerns: Following California
I-489	Daniel	Wolf		Comments containing economic considerations
I-490	Earl	Williams		Comments outside of the

				scope of the rulemaking
I-491	Renay A	Bennett		Comments containing economic considerations
I-492	Frieda	Stephens		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-493	Donna M.	Rudiger		Comments on process and policy concerns: Following California
I-494	Scot	Stephens		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-495	Kay	Farrell		Comments containing economic considerations
I-496	Ray	Harrison		Comments containing economic considerations
I-497	Melanie	Middleton		Comments of general opposition
I-498	Nicholas	Backman		Comments on technological readiness
I-499	Kevin	Stich		Comments on technological readiness
I-500	Theresa	Arvila		Comments containing economic considerations
I-501	Michael	Kukes		Comments of general opposition;

				Comments on process and policy concerns: Following California
I-502	Brandon	Littlelight		Comments of general opposition; Comments on process and policy concerns: Following California
I-503	Patrick	Russell		Comments on process and policy concerns: Following California
I-504	Tim	Legree		Comments citing increasing gas taxes
I-505	Brian	Smith		Comments on technological readiness
I-506	Gary	Suderman		Comments on process and policy concerns: Following California
I-507	Ernest	Hood		Comments on process and policy concerns: Following California; Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
I-508	Timothy	Stumpf		Comments on process and policy concerns: Following California; Comments containing

				economic considerations
I-509	Janine	Roth		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-510	richard	ziegler		Comments containing economic considerations
I-511	Steve	Azaret		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-512	Dena	Petersen		Comments on process and policy concerns: Following California; Comments containing economic considerations; Comments on technological readiness
I-513	Richard	Mikita		Comments of general opposition; Comments on process and policy concerns: Following California
I-514	Angela	Blood		Comments containing economic considerations
I-515	Don	Fowler		Comments on process and policy concerns: Following California

I-516	John	McKinley		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-517	Gregory	Means		Comments containing economic considerations
I-518	DENNIS	WIEANDT		Comments citing increasing gas taxes
I-519	Rita	Peterson		Comments supporting amendments
I-520	Barbara	Anderson		Comments supporting amendments
I-521	Dennis	Dawes		Comments on process and policy concerns: Following California
I-522	Jeff	Brooks		Comments containing economic considerations
I-523	Ruth	Baron		Comments of general opposition
I-524	patrick	ohmann		Comments of general opposition; Comments on process and policy concerns: Following California
I-525	Russell	Stohl		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-526	Richard	Alexander		Comments on process and policy concerns: Following California

I-527	GREG	PARSONS		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-528	William	Thurn		Comments of general opposition
I-529	Paula	Norton		Comments on process and policy concerns: Following California
I-530	Judith	Anderson		Comments supporting amendments
I-531	HAROLD	BEATTY		Comments on process and policy concerns: Following California
I-532	Donald	Anders		Comments citing increasing gas taxes
I-533	Craig	Chase		Comments citing increasing gas taxes
I-534	Adam	Brown		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-535	Julie	Balmelli-Powe		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-536	Lauren	Sewell		Comments supporting amendments
I-537	Elly	Claus-McGahan		Comments supporting amendments

I-538	Bruce	Hilden		Comments of general opposition
I-539	Clff	Hanks		Comments of general opposition; Comments on process and policy concerns: Following California
I-540	Lois	Poppema		Comments on process and policy concerns: Following California
I-541	Daniel	Hurley		Comments containing economic considerations
I-542	Michael	Odenbrett		Comments of general opposition
I-543	DONALD	OLSON		Comments containing economic considerations
I-544	Nina	Busch		Comments of general opposition; Comments on process and policy concerns: Following California
I-545	Shane	Flom		Comments on process and policy concerns: Following California
I-546	Jon	Anderson		Comments containing economic considerations
I-547	hiji	Luetngen		Comments outside of the scope of the rulemaking
I-548	dua	Luetngen		Comments outside of the scope of the rulemaking

I-549	tilu	Luetngen		Comments outside of the scope of the rulemaking
I-550	Dallas	Burnworth		Comments on technological readiness
I-551	Emory	Watson		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-552	Jess	Robinson		Comments on process and policy concerns: Following California
I-553	kahiji			Comments outside of the scope of the rulemaking
I-554	kadua			Comments outside of the scope of the rulemaking
I-555	katilu			Comments outside of the scope of the rulemaking
I-556	bfgbhc	fhfgh		Comments outside of the scope of the rulemaking
I-557	fgsdfgsdfgdfsg			Comments outside of the scope of the rulemaking
I-558	56fghfghdhdfh			Comments outside of the scope of the rulemaking
I-559	dfgsdfgsdfg			Comments outside of the scope of the rulemaking

I-560	Pixie	Seeds		Comments on process and policy concerns: Following California
I-561	Pamela	Johnshoy		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California
I-562	Linda	Reynolds		Comments on process and policy concerns: Following California
I-563	Julianne	Renner		Comments outside of the scope of the rulemaking
I-564	Julianne	Renner		Comments outside of the scope of the rulemaking
I-565	yyyyyyyyyyyyyy			Comments outside of the scope of the rulemaking
I-566	fghdfghdfhjxxxxxxxx			Comments outside of the scope of the rulemaking
I-567	mmmmmmmmmmmmmm			Comments outside of the scope of the rulemaking
I-568	xxxxxxx			Comments outside of the scope of the rulemaking
I-569	Julianne	Renner		Comments outside of the scope of the rulemaking
I-570	Gary	Murrow		Comments on process and policy concerns:

				Following California
I-571	Beverly	Payne		Comments containing economic considerations
I-572	terry	simpson		Comments of general opposition; Comments on process and policy concerns: Following California
I-573	Terry	Kruschik		Comments citing increasing gas taxes
I-574	dfgdsfgg			Comments outside of the scope of the rulemaking
I-575	dfgdsgsdgsdfg			Comments outside of the scope of the rulemaking
I-576	sdfdsfsdf			Comments outside of the scope of the rulemaking
I-577	ffffffffffff			Comments outside of the scope of the rulemaking
I-578	Julianne	Renner		Comments outside of the scope of the rulemaking
I-579	Julianne	Renner		Comments outside of the scope of the rulemaking
I-580	Julianne	Renner		Comments outside of the scope of the rulemaking
I-581	Julianne	Renner		Comments outside of the

				scope of the rulemaking
I-582	Justin	Barker		Comments containing economic considerations
I-583	Antoinette	Soffes		Comments containing economic considerations
I-584				Comments outside of the scope of the rulemaking
I-585	Donald	Anders		Comments containing economic considerations
I-586	Margaret	Watt		Comments of general opposition; Comments on process and policy concerns: Following California
I-587	Tommy	Thombs		Comments on process and policy concerns: Following California
I-588	Carrie	Johnson		Comments of general opposition; Comments on process and policy concerns: Following California
I-589	Michael	Crumpacker		Comments citing increasing gas taxes; Comments containing economic considerations
I-590	Patricia	Elsbree		Comments of general opposition
I-591	Steve	Fowler		Comments on process and policy concerns:

				Following California
I-592	Isaac	Andrews		Comments containing economic considerations
I-593	Cindy	Ruggiero		Comments containing economic considerations
I-594	Earl	Hufnagel		Comments citing increasing gas taxes; Comments on process and policy concerns: Following California; Comments containing economic considerations
I-595	Donna	Kirkpatrick		Comments of general opposition; Comments on process and policy concerns: Following California
I-596	Jeffrey	Parrott		Comments on process and policy concerns: Following California; Comments containing economic considerations
I-597	Randall	Bearss		Comments containing economic considerations
I-598	Heidi	Limmer		Comments containing economic considerations
I-599	Donna	Kratofil		Comments containing economic considerations

I-600	Ingrid	Friedberg		Comments containing economic considerations
I-601	Jack	Coombe		Comments containing economic considerations
I-602	Anthony	Gomez		Comments containing economic considerations
I-603	Joan	Stevens		Comments containing economic considerations
I-604	Mike	Kinnaman		Comments containing economic considerations
I-605	Kari	Hertter		Comments containing economic considerations
I-606	Joan	Sanders		Comments containing economic considerations
I-607	Richard	Meadows		Comments containing economic considerations
I-608	Carrie	Daniel		Comments containing economic considerations
I-609	Belinda	Huntsman		Comments containing economic considerations
I-610	Robyn	Light		Comments containing economic considerations
I-611	Tammy	McQueeney		Comments containing economic considerations
I-612	Rich	Witman		Comments containing economic considerations

I-613	Frank	Kolb		Comments containing economic considerations
I-614	Chris	Hardy		Comments containing economic considerations
I-615	Kevin	Buck		Comments containing economic considerations
I-616	Tram	Bowen		Comments containing economic considerations
I-617	Brian	Fleetwood		Comments containing economic considerations
I-618	DEREK	HENDRICKSON		Comments containing economic considerations
I-619	PHILIP	MADDALOSSO		Comments containing economic considerations
I-620	Sheila	Juliano		Comments containing economic considerations
I-621	Michael	Dolan		Comments containing economic considerations
I-622	James	Norman, W		Comments containing economic considerations
I-623	Brian	Monk		Comments containing economic considerations
I-624	Janet	Skjonsby		Comments containing economic considerations
I-625	Bill	Ullrich		Comments containing economic considerations

I-626	Darren	DeLong		Comments containing economic considerations
I-627	Justin	Osborne		Comments containing economic considerations
I-628	Wayne	Stronk		Comments containing economic considerations
I-629	Gina	Carlson		Comments containing economic considerations
I-630	Anne	Hurley		Comments containing economic considerations
I-631	Paul	Luke		Comments containing economic considerations
I-632	Pamela	McCain		Comments containing economic considerations
I-633	Daniel	Dunkin		Comments containing economic considerations
I-634	Julie	Hiebert		Comments containing economic considerations
I-635	Kurt	Wilson		Comments containing economic considerations
I-636	Dan	Garber		Comments containing economic considerations
I-637	JEFFERY	Losey		Comments containing economic considerations
I-638	Jason	West		Comments containing economic considerations

I-639	Jake	Mayson		Comments containing economic considerations
I-640	Stacey	Dillon		Comments containing economic considerations
I-641	Justin	Nimick		Comments containing economic considerations
I-642	Todd	Lapinsky		Comments containing economic considerations
I-643	Steven	Lindsey		Comments containing economic considerations
I-644	Craig	Fletcher		Comments containing economic considerations
I-645	Jennifer	Anderson		Comments containing economic considerations
I-646	JOHN	FOX		Comments containing economic considerations
I-647	Kimberly	Christensen		Comments containing economic considerations
I-648	Dawn	Stephens		Comments containing economic considerations
I-649	Tracy	Doriot		Comments containing economic considerations
I-650	Kai	Fyrst		Comments containing economic considerations
I-651	Matt	Ward		Comments containing economic considerations

I-652	John	Fetterolf		Comments containing economic considerations
I-653	Joe	Slawter		Comments containing economic considerations
I-654	Jim	Selden		Comments containing economic considerations
I-655	Rick	Heeringa		Comments containing economic considerations
I-656	Joch	Louman		Comments containing economic considerations
I-657	Monte	Simpson		Comments containing economic considerations
I-658	Alma	Burchfield		Comments containing economic considerations
I-659	Jeff	Bailey		Comments containing economic considerations
I-660	Esther	Steege		Comments containing economic considerations
I-661	Philip	Metschan		Comments containing economic considerations
I-662	Lori	Caseber		Comments containing economic considerations
I-663	William	Schilperoort		Comments containing economic considerations
I-664	Greg	Senger		Comments containing economic considerations

I-665	Sandra	Hofer		Comments containing economic considerations
I-666	John	Dewitz		Comments containing economic considerations
I-667	Michelle	WICKETT		Comments containing economic considerations
I-668	Jennifer	Hanson		Comments containing economic considerations
I-669	Cheryl	Bloom		Comments containing economic considerations
I-670	Robert	Davis		Comments containing economic considerations
I-671	Robert	kiley		Comments containing economic considerations
I-672	Troy	Olsen		Comments containing economic considerations
I-673	Trudy	Bleiler		Comments containing economic considerations
I-674	Kirsten	St. Marie		Comments containing economic considerations
I-675	Bruce	Hilden		Comments containing economic considerations
I-676	Penny	Coffey		Comments containing economic considerations
I-677	Kevin	Ballard		Comments containing economic considerations

I-678	Roy	Golden		Comments containing economic considerations
I-679	William	Westcott		Comments containing economic considerations
I-680	Brian	Hill		Comments containing economic considerations
I-681	John	Cook		Comments containing economic considerations
I-682	Mark	Morris		Comments containing economic considerations
I-683	Ted	Clifton		Comments containing economic considerations
I-684	Jennifer	Ramsay		Comments containing economic considerations
I-685	Gary	Roberts		Comments containing economic considerations
I-686	Dennis	Swanson		Comments containing economic considerations
I-687	Robert	Zetterberg		Comments containing economic considerations
I-688	Jay	Hibma		Comments containing economic considerations
I-689	Joseph	Herr		Comments containing economic considerations
I-690	DEBORAH	HANNIG		Comments containing economic considerations

I-691	Stuart	Drebick		Comments containing economic considerations
I-692	Jeffrey S	Dye		Comments containing economic considerations
I-693	Kelly	Jensen		Comments containing economic considerations
I-694	John	Snider		Comments containing economic considerations
I-695	Alexa	Lee		Comments containing economic considerations
I-696	Susan	Streifel		Comments containing economic considerations
I-697	Dexter	Kalliainen		Comments containing economic considerations
I-698	Gerald	Whitmarsh		Comments containing economic considerations
I-699	William	Balcom		Comments containing economic considerations
I-700	Brodie	Heck		Comments containing economic considerations
I-701	Elvin	Feller		Comments containing economic considerations
I-702	Dallas	Burnworth		Comments containing economic considerations
I-703	Andy	ZUANICH		Comments containing economic considerations

I-704	Donna	Berg		Comments containing economic considerations
I-705	Ronald	Underhill		Comments containing economic considerations
I-706	Ray	Klein		Comments containing economic considerations
I-707	Evelyn	Rees		Comments containing economic considerations
I-708	Dianne	Peterson		Comments containing economic considerations
I-709	Ric	Pratt		Comments containing economic considerations
I-710	Wade	Kinsland		Comments containing economic considerations
I-711	Brian	Hill		Comments containing economic considerations
I-712	Samuel	Dickerson-Edgington		Comments containing economic considerations
I-713	Jennifer	Schneider		Comments containing economic considerations
I-714	Greg	Anderson		Comments containing economic considerations
I-715	James	Kane		Comments containing economic considerations
I-716	Robert	Birney		Comments containing economic considerations

I-717	Chris	Dixon		Comments containing economic considerations
I-718	Gary	Murrow		Comments containing economic considerations
I-719	Gina	Ennis		Comments containing economic considerations
I-720	Michele	Palisoc		Comments containing economic considerations
I-721	Gary	Carone		Comments containing economic considerations
I-722	Kevin	Stich		Comments containing economic considerations
I-723	Kevin	Gilman		Comments containing economic considerations
I-724	Matthew	Poole		Comments containing economic considerations
I-725	Linda	Eaton		Comments containing economic considerations
I-726	Michael	Mulholland		Comments containing economic considerations
I-727	Matthew	Lovell		Comments containing economic considerations
I-728	Lori	Mackenzie		Comments containing economic considerations
I-729	Neal	Padur		Comments containing economic considerations

I-730	Wayne	Keffer		Comments containing economic considerations
I-731	Deborah	Shearer		Comments containing economic considerations
I-732	Tim	Taaca SR		Comments containing economic considerations
I-733	Ron	Perkerewicz		Comments containing economic considerations
I-734	Karolyn	Ghosn		Comments containing economic considerations
I-735	Harolee	Fairley		Comments containing economic considerations
I-736	Elva	Schilperoort		Comments containing economic considerations
I-737	Thomas	Schilperoort		Comments containing economic considerations
I-738	Jennifer	Tennyson		Comments containing economic considerations
I-739	David	Weitzel		Comments containing economic considerations
I-740	Matt	Cutchin		Comments containing economic considerations
I-741	Michael	Touchette		Comments containing economic considerations
I-742	MARSHALL	MANGUM		Comments containing economic considerations

I-743	Ted	Hunt		Comments containing economic considerations
I-744	Travis	Bunke		Comments containing economic considerations
I-745	Stefanie	Hansen		Comments containing economic considerations
I-746	Joan	Prchal		Comments containing economic considerations
I-747	Sheryl	Rasmusson		Comments containing economic considerations
I-748	Rebekah	Williams		Comments containing economic considerations
I-749	Ryan	Likkel		Comments containing economic considerations
I-750	JOHN	ALLEN		Comments containing economic considerations
I-751	Greg	Laxton		Comments containing economic considerations
I-752	HARRY	HANSEN		Comments containing economic considerations
I-753	Heather	Strahl		Comments containing economic considerations
I-754	Jason	Strahl		Comments containing economic considerations
I-755	Jeffrey	Jones		Comments containing economic considerations

I-756	VJournal	Campbell Link		Comments containing economic considerations
I-757	Jeff	Caseber		Comments containing economic considerations
I-758	James	Twomey		Comments containing economic considerations
I-759	Kenneth	Sides		Comments containing economic considerations
I-760	Sonia	Majors		Comments containing economic considerations
I-761	Debra	Johnson		Comments containing economic considerations
I-762	Winona	Furgison		Comments containing economic considerations
I-763	Winona	Furgison		Comments containing economic considerations
I-764	Keith	Krenzler		Comments containing economic considerations
I-765	Ronnie	Johnson		Comments containing economic considerations
I-766	Gregory	McCarry		Comments containing economic considerations
I-767	Jodee	Huyler		Comments containing economic considerations
I-768	Brandon	Axthelm		Comments containing economic considerations

I-769	Nancy	Drew		Comments containing economic considerations
I-770	Edward	Rehder III		Comments containing economic considerations
I-771	Matt	Wagner		Comments containing economic considerations
I-772	Dan	Hawes		Comments containing economic considerations
I-773	Bob	Wright		Comments containing economic considerations
I-774	Jim	Jaquish		Comments containing economic considerations
I-775	William	McDowell		Comments containing economic considerations
I-776	Ken	Beulaurier		Comments containing economic considerations
OTH-1	Lucille	Smith		Comments supporting amendments
OTH-2	Abigail	Doerr	Washington Clean Vehicles Coalition	Comments supporting amendments
A-1	Christine	Cooley	Puget Sound Clean Air Agency	Comments supporting amendments; Comments citing program flexibility
A-2	Scott Menzies	Ministry	Earth Minisitry/WA Interfaith Power & Light	Comments supporting amendments
A-344	Christine	Cooley	Puget Sound Clean Air Agency	Comments supporting amendments;

				Comments citing program flexibility
A-345	Steve	Taylor	Cowlitz Cnty Public Utility District No. 1	Comments on process and policy concerns; Following California; Comments on technological readiness; Comments containing economic considerations
A-346	Jeffrey	Butera	City of Seattle - City Light	Comments on technological readiness
B-1	Daniel	Phillips	Budget & Johnsons's Towing	Comments containing economic considerations; Comments on technological readiness
B-2	UZEK	Susol	Stefanie Susol	Comments containing economic considerations
B-3	David	Wells	David Lee Wells	Comments containing economic considerations
B-4	Mansour	Masoudi	Emissol	Comments supporting amendments
B-348	Tom	Van Heeke	Rivian Automotive	Comments supporting amendments; Comments citing program flexibility
B-349	Matthew	Colvin	Tree Top	Comments containing economic considerations
B-350	Carmen	Smith	R L Smith Logging Inc	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing

				economic considerations; Comments on technological readiness
B-351	Patrick	Gendreau	Freightliner Northwest	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
B-352	Dan	Vander Pol	Oak Harbor Freight Lines	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations
B-353	Tom	Van Heeke	Rivian Automotive, LLC	Comments supporting amendments
B-354	Myrna Rak	Rak	SignMasters	Comments of general opposition
B-355	Russell	Hergert	Big Truck Enterprises LLC	Comments containing economic considerations;
B-356	Susan	Whealdon	Combined Carriers Co. dba Machine Carriers	Comments on process and policy concerns: Following California; Comments containing economic considerations; Comments on technological readiness
B-357	Andrew	Eades	Andrew Eades Ornamental Iron	Comments citing increasing gas taxes; Comments on process and policy concerns:

				Following California
B-358	frank	chambers	Northstar Woodworks Inc.	Comments on process and policy concerns: Following California; Comments containing economic considerations
B-359	Marc	Torre	Torre Refuse & Recycling Stevens County	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
B-360	Marc	Torre	Torre Refuse & Recycling Spokane County	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
B-361	Marc	Torre	Ada-Lin Waste Systems Inc.	Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
B-362	Curt	Burhenn	CLB Safety Compliance	Comments on process and policy

				concerns: Following California
B-363	Jacob	Bond	Collective Communities Property Management	Comments containing economic considerations
O-1	Don	Steinke	Climate Action of Southwest Washington	Comments supporting amendments
O-2	Martin	Gibbins	League of Women Voters of WA	Comments supporting amendments
O-3	Martin	Gibbins	League of Women Voters of Washington	Comments supporting amendments
O-4	Caitlin	Krenn	Washington Conservation Action	Comments supporting amendments; Comments citing program flexibility
O-5	Wes	Stewart	Sierra Club (Washington Chapter)	Comments supporting amendments; Comments citing program flexibility
O-340	Abigail	Doerr	Climate Solutions	Comments supporting amendments; Comments citing program flexibility
O-341	Chris	Covert-Bowlds	Washington Physicians for Social Responsibility Climate and Health Task Force	Comments supporting amendments
O-342	Sheri	Call	Washington Trucking Associations	Comments on process and policy concerns: Following California; Comments citing lack of public charging and hydrogen refueling infrastructure for

				heavy trucks; Comments containing economic considerations; Comments on technological readiness
O-343	Nicolas	Garcia	Washington Public Utility Districts Association	Comments on technological readiness
O-344	James	Hove	Climate Solutions	Comments supporting amendments
O-345	Ashli	Penner	Building Industry Association of Washington	Comments on process and policy concerns: Following California
O-346	Michael	Tunnell	American Trucking Associations	Comments on process and policy concerns: Following California
O-347	Jake	Jacoby	Truck Rental & Leasing Association	Comments on process and policy concerns: Following California; Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks; Comments containing economic considerations; Comments on technological readiness
O-348			Washington Refuse & Recycling Association	Comments containing economic considerations; Comments on technological readiness

O-349	Guillermo	Ortiz	Natural Resources Defense Council	Comments supporting amendments; Comments citing program flexibility
O-350	Caitlin	Krenn	Washington Conservation Action	Comments supporting amendments
O-351	Tim	Gould	Sierra Club	Comments supporting amendments

Response to Comments

Ecology announced this rulemaking on November 20, 2024. On May 15, 2025, following a series of virtual public meetings and an informal comment period, Ecology published a proposed rule for formal public comment. The public comment period occurred from May 15, 2025 to July 3, 2025. Public hearings were held on June 24, 2025 and June 25, 2025. This document responds to the public comments we received during the formal public comment period. Comments have been summarized for inclusion with Ecology's responses. You can view original comments in full at our online comment website. These comments remain available online for two years after the rule adoption date, and are maintained as part of the permanent rulemaking record.

1. Comments supporting amendments

Comment Summary: The commenters listed below expressed support for the Clean Vehicles Program and the amendments in this rulemaking process that support it.

Some commenters expressed support generally without providing further reasoning.

Many commenters expressed support for the program and the amendments being proposed because they are concerned about increasing greenhouse gas emissions from vehicles and their impact on the Earth's climate.

Additionally, many commenters also expressed support for the program and the amendments being proposed because they are concerned about the health impacts that result from vehicle emissions. Some commenters provided personal experiences of negative air quality, particularly in overburdened communities and/or communities near Washington's transportation corridors. These commenters also noted the health impacts that result from poor air quality, such as asthma, lung and heart diseases, cancer, and other illnesses, as well as the costs associated with these illnesses. The communities identified by commenters as being negatively impacted by poor air quality from vehicle emissions include: Yakima, Briarcrest, Seattle, Georgetown, South Park, West Seattle, Tacoma, Port of Seattle, SeaTac, Vancouver, Port of Olympia, and along transportation corridors in Clark County, Cowlitz County, and throughout Washington and neighboring states.

Commenters: I-3, I-6, I-7, I-8, I-9, I-10, I-11, I-12, I-13, I-14, I-15, I-16, I-17, I-18, I-19, I-20, I-21, I-22, I-23, I-24, I-25, I-26, I-27, I-28, I-29, I-30, I-31, I-32, I-33, I-34, I-35, I-36, I-37, I-38, I-39, I-40, I-41, I-42, I-43, I-44, I-45, I-46, I-47, I-48, I-49, I-50, I-51, I-52, I-53, I-54, I-55, I-56, I-57, I-58, I-59, I-60, I-61, I-62, I-63, I-64, I-65, I-66, I-67, I-68, I-69, I-70, I-71, I-72, I-73, I-74, I-75, I-76, I-77, I-78, I-79, I-80, I-81, I-82, I-83, I-84, I-85, I-86, I-87, I-88, I-89, I-90, I-91, I-92, I-94, I-95, I-96, I-97, I-98, I-100, I-101, I-102, I-103, I-104, I-105, I-106, I-107, I-108, I-109, I-110, I-111, I-113, I-112, I-114, I-115, I-116, I-117, I-118, I-119, I-120, I-121, I-122, I-123, I-124, I-125, I-127, I-128, I-129, I-130, I-131, I-132, I-133, I-134, I-135, I-136, I-137, I-138, I-139, I-140, I-141, I-142, I-143, I-144, I-145, I-146, I-147, I-148, I-149, I-150, I-151, I-152, I-153, I-154, I-155, I-156, I-158, I-159, I-162, I-163, I-164, I-165, I-166, I-167, I-168, I-169, I-170, I-171, I-172, I-173, I-174, I-175, I-176, I-177, I-178, I-179, I-180, I-181, I-182, I-183, I-

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Ecology Response: Thank you for your comments. Ecology appreciates the support for the Clean Vehicles Program and the newly adopted amendments. Ecology will continue to adopt CARB regulations by reference, as required by Chapter 70A.30 RCW.

Transportation is Washington’s largest source of greenhouse gas emissions (39%) and a major contributor of air pollution. According to the Washington Transportation Electrification Strategy, 9.4 million metric tons of carbon dioxide could be reduced annually by 2030 as a result of zero-emission vehicles. Advanced Clean Trucks, alone, is estimated to reduce 47 million metric tons of carbon dioxide emissions through 2050.²

Vehicle emissions contain NO_x and PM_{2.5}. These pollutants contribute to asthma and other breathing difficulties, premature deaths, and substantial health care costs for those suffering with air pollution related issues. By 2050, ACT is expected to reduce 47% of NO_x pollution and 73% of PM_{2.5} pollution from buses and large trucks, while Omnibus is estimated to reduce 35,640 tons of NO_x emissions by 2050.³ Overburdened communities with close proximity to heavy traffic roadways are most likely to experience the benefits of decreased vehicle emissions as a result of this rulemaking, as much of the air pollution in these communities originates from mobile sources.

2. Comments citing program flexibility

Comment Summary: These commenters supported the adoption of the amendments and particularly cited the additional flexibility offered to manufacturers as a reason to support this

² [wa-clean-trucks-report.pdf](#)

³ *ibid*

rulemaking. The commenters note that the adopted amendments consider manufacturers' concerns and allow for flexibility in compliance while still reducing vehicle emissions.

Commenters: I-104, I-165, I-339, I-351, A-1, A-344, B-348, O-4, O-5, O-340, O-349

Ecology Response: Thank you for your comments. The adopted amendments maintain vehicle emission reductions, but also consider manufacturers' concerns as well.

3. Comments on technological readiness

Comment Summary: These commenters expressed concerns with the technological readiness and availability of ZEV trucks, especially for certain use cases. They mentioned the limited range, charging speed, reduced payload, and other technical limitations of electric trucks. Some commenters questioned EV performance in cold weather. A few commenters were concerned about electric vehicle fires and noted difficulty in extinguishing them. Additionally, some commenters claimed that EV batteries need to be replaced often and then landfilled because there are no recycling facilities. Some commenters suggested that hybrid vehicles or hydrogen fuel cell vehicles should be allowed under ACT. Finally, several commenters requested that electric utility fleet vehicles used for emergency line repair be exempted from Clean Vehicles Program regulations by editing WAC 173-423-060 to include language such as, "Utility vehicles directly used in emergency repair and restoration of electricity services".

Commenters: I-4, I-93, I-157, I-161, I-378, I-379, I-382, I-385, I-386, I-405, I-410, I-411, I-412, I-421, I-423, I-479, I-487, I-498, I-499, I-505, I-512, I-550, A-345, A-346, B-1, B-350, B-356, B-359, B-360, B-361, O-342, O-343, O-344, O-347, O-348,

Ecology Response: Thank you for your comments. Ecology recognizes commenters' concerns over the technological readiness of zero emission trucks. Continued improvements in driving range, battery technology, and the availability and speed of public and private charging infrastructure are beginning to make headway to address concerns about range. Increased ZEV production and technology advancements are expected to close the gap between the towing capabilities of electric trucks and gasoline- and diesel-powered trucks. Electric trucks are in the beginning stages of entering the mainstream vehicle market and many more vehicle models are expected to enter the market in the next few years. Improvements in battery density can further decrease the performance gap, and the rollout of public fast charging stations across Washington will further ease the convenience of refueling during trucking routes and other long-range work duty cycles.

Ecology's rules also allow the sale of new plug-in hybrid electric vehicles (PHEVs) as well as hydrogen fuel cell electric vehicles (FCEVs) throughout the program; both types of vehicles earn credits in ACT markets and up to 50% of compliance each year can be met by PHEVs with a certain amount of all-electric range (varies by weight class). Although currently limited in

availability, PHEVs and FCEVs provide another option for truckers who may need access to vehicles with long ranges and powerful towing capabilities.

With respect to vehicle fires, data shows EV fires to be rare compared to fires in gasoline- and diesel-powered vehicles. One caveat is that EV fires tend to burn longer and at a higher intensity, although this is being addressed through safer battery designs and new fire management techniques. Fire risks can be further mitigating by refraining from overcharging the battery and avoiding aftermarket repairs, which can place stress on the battery system. The National Highway Traffic Safety Administration (NHTSA) has also established the Battery Safety Initiative for Electric Vehicles to address safety risks related to EV batteries.

Regarding battery recycling, Ecology appreciates the concern of commenters about waste from the lithium-ion battery packs and the issue of recycling EV batteries. In the rare instance where an EV battery needs to be replaced, retired batteries can be reused, repurposed, recycled, or ultimately discarded in a hazardous waste landfill. Due to the multiple use cases for batteries, they are rarely completely disposed of. Private companies, automakers, and others offer EV recycling services at several facilities around the country. Recycling and reuse of batteries lowers the cost of battery repairs and provides a more sustainable supply of raw materials for manufacturers.

Thank you to those commenters who requested an exemption be included for utility vehicle types that engage in the emergency repair of utility lines. Ecology has not included this change in the current rulemaking, but will evaluate this request for possible future action. While there is an exemption for emergency vehicles in [WAC 173-423-060](#), the exemption does not currently extend to utility service vehicles.

4. Comments containing economic considerations

Comment Summary: These commenters expressed concerns about the cost of ACT and heavy-duty vehicle electrification in general. They point out that electrified options are not available for some vehicle use cases, such as tow trucks, and that when zero-emission (ZE) models are available for a certain use case, the vehicles can be considerably more expensive than an internal combustion engine (ICE) alternative. They believe that ACT will hurt Washington’s economy and the trucking industry in the state. Some commenters claimed that ZE trucks are so expensive and that due to the manufacturer ACT compliance strategy of rationing sales of ICE trucks, that no Class 8 trucks were sold in Washington in the first half of 2025. Some commenters also described ACT as a “ban” on diesel vehicles that requires fleets to purchase new trucks.

Commenters: I-2, I-5, I-99, I-157, I-160, I-161, I-379, I-382, I-383, I-392, I-393, I-395, I-396, I-397, I-398, I-399, I-400, I-402, I-404, I-407, I-410, I-413, I-415, I-416, I-418, I-422, I-424, I-425, I-426, I-427, I-431, I-434, I-437, I-439, I-443, I-444, I-445, I-446, I-447, I-448, I-450, I-452, I-454, I-457, I-458, I-467, I-469, I-472, I-476, I-477, I-478, I-479, I-480, I-483, I-486, I-489, I-491, I-492, I-494, I-495, I-496, I-500, I-507, I-508, I-509, I-510, I-512, I-514, I-517, I-

522, I-534, I-535, I-541, I-543, I-546, I-571, I-582, I-583, I-585, I-589, I-592, I-593, I-594, I-596, I-597, I-598, I-599, I-600, I-601, I-602, I-603, I-604, I-605, I-606, I-607, I-608, I-609, I-610, I-611, I-612, I-613, I-614, I-615, I-616, I-617, I-618, I-619, I-620, I-621, I-622, I-623, I-624, I-625, I-626, I-627, I-628, I-629, I-630, I-631, I-632, I-633, I-634, I-635, I-636, I-637, I-638, I-639, I-640, I-641, I-642, I-643, I-644, I-645, I-646, I-647, I-648, I-649, I-650, I-651, I-652, I-653, I-654, I-655, I-656, I-657, I-658, I-659, I-660, I-661, I-662, I-663, I-664, I-665, I-666, I-667, I-668, I-669, I-670, I-671, I-672, I-673, I-674, I-675, I-676, I-677, I-678, I-679, I-680, I-681, I-682, I-683, I-684, I-685, I-686, I-687, I-688, I-689, I-690, I-691, I-692, I-693, I-694, I-695, I-696, I-697, I-698, I-699, I-700, I-701, I-702, I-703, I-704, I-705, I-706, I-707, I-708, I-709, I-710, I-711, I-712, I-713, I-714, I-715, I-716, I-717, I-718, I-719, I-720, I-721, I-722, I-723, I-724, I-725, I-726, I-727, I-728, I-729, I-730, I-731, I-732, I-733, I-734, I-735, I-736, I-737, I-738, I-739, I-740, I-741, I-742, I-743, I-744, I-745, I-746, I-747, I-748, I-749, I-750, I-751, I-752, I-753, I-754, I-755, I-756, I-757, I-758, I-759, I-760, I-761, I-762, I-763, I-764, I-765, I-766, I-767, I-768, I-769, I-770, I-771, I-772, I-773, I-774, I-775, I-776, A-345, B-1, B-2, B-3, B-349, B-350, B-351, B-352, B-355, B-356, B-358, B-359, B-360, B-361, B-363, O-342, O-347, O-348,

Ecology Response: Thank you for your comments. Ecology acknowledges commenters' concerns about the price of zero-emission trucks compared with typical diesel trucks. Because Ecology must adopt the California rules per the Legislature's mandate in [RCW 70A.30.010](#) and lacks the authority to modify them due to consistency requirements under the federal Clean Air Act, considerations of affordability are outside the scope of this rulemaking. As there is heightened public interest in this topic, we provide the below information for transparency.

California's evaluation of ACT found the benefits outweigh the costs in an analysis of the emission benefits, climate benefits, health benefits, and economic costs and benefits. California expects the rule to result in a total savings of \$5.9 billion, with health benefits estimated to be an additional \$8.9 billion in savings. Similar analysis in Washington State found \$24.9 billion in net societal benefits through 2050.⁴

According to CALSTART's Zero-Emission Truck Inventory tool, over 192 models of ZE truck, van, and bus are available for sale in the US in 2025. Of those 192 vehicles, here are the following number of models available by vehicle segment:⁵

- Yard tractor: 13 models
- Heavy-duty truck: 24 models
- Medium-duty truck: 40 models
- Medium-duty step van: 20 models
- Cargo van: 20 models

⁴ [wa-clean-trucks-report.pdf](#)

⁵ [Global Commercial Drive To Zero Program — ZETI Data Explorer](#)

- Transit bus: 23 models (note: transit bus manufacturers are not regulated under ACT or Omnibus)
- Coach: 10 models
- Shuttle bus: 13 models
- School bus: 23 models
- 13 additional models in smaller categories

Vehicle price data is difficult to gather as it is highly variable dependent on the segment and specifications of the vehicle. However, a review of the literature suggests that ZE models are roughly 1.5 to 3 times the cost of a comparable ICE model in 2025, with Class 4 straight trucks being closest to their ICE counterparts and Class 6 straight trucks being the furthest.

Ecology has followed sales data and has not noted a slowdown in the medium- and heavy-duty vehicle market. According to data collected by Atlas EV Hub, Washington’s medium- and heavy-duty vehicle market – including ZE and ICE models – grew by 29% in 2024, while nationally the market grew 30%. Even with Washington’s zero-emission vehicle standards, the market grew at the same pace. While 2025 sales are only available through Q2, comparing Q1 and Q2 sales in 2024 and 2025 show that the market has continued to grow, at roughly 8-9% in both Washington State and nationwide.⁶

Finally, ACT is not a ban on any vehicle or powertrain nor does it require fleets to purchase ZE models of trucks. ACT does not completely phase out sales of gasoline- and diesel-powered trucks. For 2035 and beyond, the rule requires that new vehicle sales must be 55% ZEV for Class 2b-3 vehicles, 75% ZEV for Class 4-8 vehicles, and 40% ZEV for Class 7-8 tractors. The remaining sales can be gasoline- and diesel-powered vehicles. ACT also does not mandate electric vehicles; while battery-electric trucks are an option, hydrogen fuel cell and plug-in hybrid drivetrains also comply with the ZEV requirement. In fact, plug-in hybrids can make up 50% of the requirements in each year. Ecology is aware that above medium-duty, plug-in hybrid options do not exist for many duty cycles at this point in time, although manufacturers are aware of the flexibility in the regulation.

5. Comments citing increasing gas taxes

Comment Summary: These commenters incorrectly claimed the rule amendments would increase gas taxes and gas prices.

⁶ [EV Market Dashboard – Atlas EV Hub](#)

Commenters: I-456, I-468, I-477, I-483, I-485, I-504, I-511, I-516, I-518, I-525, I-527, I-532, I-533, I-551, I-561, I-573, I-589, I-594, B-357

Ecology Response: Thank you for your comments. The changes under consideration in this rulemaking do not regulate gasoline or diesel fuel taxes in any way.

6. Comments citing lack of public charging and hydrogen refueling infrastructure for heavy trucks

Comment Summary: These commenters were concerned with the lack of public charging infrastructure for heavy-duty trucks. Some mentioned that thieves steal the charging cables to recycle the copper, temporarily putting chargers out of service. They also are worried that the state's electric grid cannot handle the charging from electric trucks in the timeline required by the standards.

Commenters: I-160, I-161, I-379, I-382, I-385, I-395, I-444, I-479, I-487, I-507, B-350, B-351, B-352, B-359, B-360, B-361, O-342, O-347

Ecology Response Regarding Grid Impacts: Thank you for your comments. While Ecology recognizes commenters' concerns about grid impacts, enacting rules and strategies to meet anticipated charging loads is handled by electric utilities, the state Department of Commerce, and the state's Utilities and Transportation Commission (UTC) and are thus beyond the scope of Ecology regulations to reduce motor vehicle emissions. The paragraphs below provide a summary of policies governing resource planning and describe what utilities are doing to manage current and predicted EV loads.

State electric resource planning is governed by the Electric Utility Resource Plans law (Chapter [19.280 RCW](#)), which requires all state electric utilities to develop and update integrated resource plans (IRPs) on a biannual basis and make them available to the public. IRPs include future load forecasts (including the load from EV charging and hydrogen generation), identification of probable resource options to meet forecasted loads, and details on power costs and resource management. Other major electric utility policies include the Energy Independence Act (Chapter [19.285 RCW](#)), which sets targets for energy efficiency and use of renewable energy, and the Clean Energy Transformation Act (CETA) (Chapter [19.405 RCW](#)), which requires utilities to phase out the use of fossil fuels in their energy portfolio by 2045.

A review of recent IRPs issued by major Washington utilities shows that all IRPs considered future EV loads in long-term resource planning and included plans to address this additional demand. While these plans predate Ecology's rulemaking, any additional anticipated electric loads resulting from increased EV usage will be accounted for in utilities' subsequent reports.

In addition, state laws governing electric utilities allow for the creation of Electrification of Transportation Plans ([RCW 80.28.365](#)), which allows utilities regulated by the UTC (i.e., investor-owned utilities) to submit plans about "programs, services, or incentives to support

electrification of transportation” that can include assessments about the “impact of electrification on the utility’s load”.

While EV charging will likely add additional demand to the electric grid, such increases can be managed with demand management programs, efficiency gains, and the development of additional power sources. State utilities are making significant investments to bring additional clean electricity sources onto the grid, both to comply with CETA and meet Washingtonians’ energy needs over the upcoming decades. The use of demand response strategies and time of use rates will also minimize the impacts of EV charging the energy grid, while saving individuals and businesses money by programming vehicles to charge during low demand periods with cheaper electric rates. As a risk reduction measure, CETA also allows utilities to obtain short-term waivers of clean energy standards if needed to protect grid reliability.

Furthermore, although Ecology’s rulemaking will accelerate the ZEV transition, utilities have already been planning for this development for some time. Washington utilities have already needed to plan for increased load from EV charging, given that approximately 258,000 EVs (including 52,000 PHEVs) are already registered in Washington as of August 11th, 2025,⁷ and that ZEVs made up 20% of new vehicle sales in 2024.⁸ The 2021 Northwest Power Plan, for example, forecasts electric load from transportation increasing significantly over the next 20 years, but also notes that the electrification of light-duty cars, trucks, and vans “results in [a] cleaner and more efficient use of energy”.

Ecology Response Regarding Public Charging for MHDVs: Thank you for your comments. While Ecology recognizes commenters’ concerns with the availability of public infrastructure for charging and hydrogen refueling, these concerns are out of scope as the rulemaking is focused on amendments to Washington’s motor vehicle emission standards. However, below we collect information on zero-emission medium- and heavy-duty vehicle refueling and outline efforts state and local governments, utilities, and private industry are taking to build out infrastructure for these vehicles.

The state’s Transportation Electrification Strategy identified that while infrastructure will be needed to support these vehicles, the majority of this infrastructure is expected to be at fleet depots and not be publicly available.⁹ Many duty cycles, or the routes and applications that vehicles are deployed to, already fit a model where the vehicle charges when it returns to base or at the locations it stops along its route. These vehicles will rely on public charging only in emergencies or other non-standard situations. The Advanced Clean Trucks standards were designed to only require zero-emission vehicle adoption through 2035 that could be met by these

⁷ [Electric Vehicle Population Counts | Data.WA | State of Washington](#)

⁸ Ecology data from manufacturer submissions of vehicle sales under optional ACT reporting for model year 2024

⁹ [Transportation Electrification Strategy \(TES\) – Washington State Department of Commerce](#)

types of vehicles (i.e., return-to-depot duty cycle vehicles).¹⁰ While some vehicles will rely on public charging, in particular long-haul Class 7-8 semi-trucks, 60% of new sales of these Class-7-8 semi-trucks may still be combustion engines in 2035, at the height of the requirements. The 40% that must be zero-emission are estimated to be regional-haul, short-haul, or drayage trucks that can rely on depot charging.

Despite this, there is still a need to build out public and semi-public, or shared, depot charging and hydrogen refueling infrastructure in Washington. To that effect, federal and state dollars are currently appropriated for this purpose. At WSDOT, the \$126 million Climate Commitment Act-funded WAZIP program will launch this fall and provide vehicle incentive vouchers and funding for infrastructure to support these vehicles. \$100 million from federal Charging and Fueling Infrastructure grants will build out public charging and hydrogen refueling stations along the entire length of I-5, from the Mexican border to the Canadian border. Washington will receive roughly \$20 million of these funds for two public charging stations and one hydrogen refueling station along Washington's length of this corridor. Recent amendments to the state's Clean Fuel Standard (Chapter 173-424 WAC) also expand the availability of "capacity credits" for zero-emission trucking infrastructure, which provide incentives for installing hydrogen refueling or electric charging equipment before vehicles begin using the site. The provision of immediate credits is intended to solve the "chicken or the egg" problem of clean trucking, in which fleet owners refrain from purchasing zero-emission vehicles due to a lack of refueling infrastructure and infrastructure operators delay building sites due to a lack of zero-emission trucks.

Washington was also able to unlock federal NEVI funding through a successful court case after funding was frozen by the current administration. That \$55 million will go to build public direct current fast charging along major transportation corridors in the state – while the primary purpose of this infrastructure is for light-duty passenger vehicles, smaller commercial vehicles such as pickups and delivery vans will be able to take advantage of this infrastructure as well. Finally, \$6.3 million in state dollars provided to the Northwest Seaport Alliance, alongside over \$1 million from the City of Seattle, are currently funding the first 19 zero-emission drayage trucks coming to the Ports of Seattle and Tacoma and their associated shared depot infrastructure, installed and managed by Zeem (note that some of the \$6.3 million remains unallocated and may support additional vehicles). Additional funding for this, up to \$55 million in total, was awarded by the federal government under the Biden administration but was frozen by the current administration and its future remains unclear. These investments are in line with the federal Zero-Emission Freight Corridor Strategy as well as the Northwest Seaport Alliance's Zero-Emission Drayage Roadmap.

Current public MHDV charging infrastructure is limited to a project at the Husky Terminal in the Port of Tacoma as well as a hydrogen refueling station in Douglas County, but there has been

¹⁰ [ACT FSOR](#)

significant private depot investment in supporting delivery van fleets at small businesses up through Amazon and other large corporations, as well as semi-truck charging at logistics fleets in the Seattle area. Numerous companies are exploring infrastructure opportunities in Washington currently, as evidenced by publicly available plans on their webpages.¹¹

7. Comments on process and policy concerns: Following California

Comment Summary: These commenters question why we are adopting rules from California. Several commenters mentioned “unelected bureaucrats” imposing these rules. Some believe we should develop our own vehicle emissions standards, rather than adopting rules from another state. They point out that other states are backing away from ACT and Omnibus commitments and suggest Washington should do so as well. Some suggested that recent federal action to revoke California’s waivers for these programs means that Washington should abandon this rulemaking and rescind the rules.

Commenters: I-1, I-4, I-99, I-394, I-403, I-414, I-421, I-424, I-428, I-430, I-432, I-434, I-435, I-437, I-438, I-440, I-441, I-442, I-444, I-446, I-448, I-450, I-451, I-452, I-453, I-454, I-455, I-456, I-459, I-461, I-462, I-463, I-464, I-465, I-466, I-467, I-468, I-470, I-471, I-477, I-478, I-479, I-480, I-481, I-483, I-486, I-488, I-492, I-493, I-494, I-501, I-502, I-503, I-506, I-507, I-508, I-509, I-511, I-512, I-513, I-515, I-516, I-521, I-524, I-525, I-526, I-527, I-529, I-531, I-533, I-534, I-539, I-540, I-544, I-545, I-551, I-552, I-560, I-561, I-562, I-570, I-572, I-586, I-587, I-588, I-591, I-594, I-595, I-596, A-345, B-356, B-357, B-358, B-362, O-342, O-347, O-345, O-346

Ecology Response: We appreciate you taking the time to comment. Under [Section 177 of the federal Clean Air Act](#), states can either follow federal emissions standards or adopt California’s more stringent standards, but they can’t create their own. In 2005, the Washington Legislature passed a law directing Ecology to implement California’s low-emission light-duty vehicle standards.

In 2020, the Legislature passed the Washington Motor Vehicle Emission Standards Law ([RCW 70A.30.010](#)), requiring Ecology to adopt and implement California’s zero-emission vehicle standards, as well as low- and zero-emission vehicle standards for medium- and heavy-duty vehicles. Accordingly, Ecology has adopted rules to implement four low- and zero-emission vehicle standards through the following regulations: Advanced Clean Cars, Advanced Clean Cars II, Heavy Duty Low-NO_x Omnibus, and Advanced Clean Trucks. In 2023, the state’s Transportation Electrification Strategy was released, identifying these policies as critical

¹¹ An example from WattEV: [Map of California Los Angeles County-WattEV-Locations-CRITICAL-PATHS-Media-Version Locations-NO-address.jpg \(768x852\)](#)

components of the state’s strategy to realize the greenhouse gas limits required in the Limiting Greenhouse Gas Emissions law ([RCW 70A.45.020](#)).

Washington’s lawmakers chose to follow California’s regulations because of their climate, environmental, and public health advantages over federal rules. Perhaps most importantly, in 2023, the state’s Transportation Electrification Strategy identified these policies as critical components of the state’s strategy to comply with the greenhouse gas limits set in the Limiting Greenhouse Gas Emissions law ([RCW 70A.45.020](#)). That law requires the state to reduce emissions over time, reaching “net zero” emissions by 2050. Over a dozen other states have also adopted California’s standards under Section 177 of the Clean Air Act.

The Motor Vehicle Emission Standards Law directs Ecology to “adopt rules to implement the motor vehicle emission standards of the state of California, including the zero- emission vehicle program” and to amend the rules from time to time to maintain consistency with California’s standards. While some commenters have noted that the federal government has passed a Congressional Review Act resolution attempting to revoke California’s waivers to enforce the ACT and Omnibus standards, waivers are not required for another state to adopt these regulations or their amendments. As Ecology is required to maintain consistency with California in Washington State law, we have accordingly continued this rulemaking as California-led litigation, that Washington is party to, decides the fate of the waivers.

With respect to the concerns about outsourcing rulemaking to an out-of-state administrative body: Ecology is adopting this rule in accordance with Washington state law, which was publicly considered and approved by Washington’s democratically elected representatives and is consistent with federal law.

Finally, several comments expressed discontent with California’s political leaders and public policies, which are unrelated to vehicle emission standards. These comments are outside the scope of this rulemaking.

8. Comments of general opposition

Comment Summary: These commenters expressed general opposition to adopting the proposed amendments to Chapter 173-423 WAC. Commenters expressed a range of general opinions displaying opposition to this rule, including skepticism of climate change and electric vehicles in general. Two commenters (I-126 and I-271) expressed concern for adopting the amendments because they suggest ACT should be more stringent. We responded to any specific issues or concerns raised by these commenters in the following sections; however, many of these commenters did not give specific reasoning for their opposition.

Commenters: I-93, I-126, I-271, I-274, I-384, I-390, I-391, I-401, I-403, I-405, I-406, I-408, I-409, I-411, I-420, I-421, I-429, I-432, I-435, I-436, I-440, I-449, I-460, I-461, I-462, I-463, I-

465, I-468, I-473, I-474, I-475, I-482, I-484, I-488, I-497, I-501, I-502, I-513, I-523, I-524, I-528, I-538, I-539, I-542, I-544, I-572, I-586, I-588, I-590, I-595, B-354

Ecology Response: Ecology thanks you for taking time to comment on this rule. We have read and noted your disagreement with this rulemaking. However, we are mandated to adopt the rule amendments to Advanced Clean Trucks and Heavy-Duty Low NO_x Omnibus by the Legislature in the Motor Vehicle Emission Standards Law ([RCW 70A.30.0102](#)). Adopting these rules will help the state reach its scientifically-driven greenhouse gas emission limits established in the Limiting Greenhouse Gas Emissions law ([RCW 70A.45.0203](#)), which require the state to reach net zero emissions by 2050.

It is critical that we take steps as soon as practical to reduce vehicle pollution, given that transportation is Washington's largest single source of greenhouse gas emissions. Greenhouse gases cause climate change which contributes to rising sea levels, increased wildfire frequency, and other harmful environmental and public health impacts. Adopting these amendments adds needed flexibility to the standards so that Washington can meet these environmental goals while giving the market time to adjust and produce ZEVs that will meet the needs of all of Washington's businesses.

If you have other specific concerns about this rule, see the other sections of this document which delve into specific aspects, issues, and concerns commenters have had with the proposed rule changes.

Ecology Response to Comments I-126 and I-271: Thank you for your comment – your concern with easing compliance is noted. These comments opposed the present rulemaking amendments because they suggest ACT should be more stringent. However, Ecology must remain consistent with California's regulations. Ecology estimated that prior to these amendments, given average sales data, roughly 183 zero-emission semi-trucks were required to be sold in Washington's market to meet ACT's model year 2026 requirements.

Using those 183 sales as a baseline, the changes in this rulemaking are estimated to lower zero-emission semi-truck sales requirements by 55 vehicles in 2026, to 128 zero-emission semi-trucks. This is based on an average of roughly 1,800 semi-truck sales annually, so those 55 vehicles represent 3% of annual sales.

Note that this analysis does not include credits carried over from prior years, which could be used to reduce compliance in 2026 as well (i.e., reduce the number of zero-emission semi-truck sales needed to remain in compliance). This analysis is offered as an illustrative example based on the requirements of the policy and the average sales reported to Ecology for prior model years.

9. Comments outside of the scope of the rulemaking

Comment Summary: Ecology received comments that we have classified as firmly and particularly out of scope. These comments are not relevant to this rulemaking, motor vehicles emission standards, or any other work conducted at Ecology.

Commenters: I-490, I-547, I-548, I-549, I-553, I-554, I-555, I-556, I-557, I-558, I-559, I-563, I-564, I-565, I-566, I-567, I-568, I-569, I-574, I-575, I-576, I-577, I-578, I-579, I-580, I-581, I-584

Ecology Response: These comments are not relevant to this rulemaking, motor vehicle emission standards, or any other work at Ecology.