

February 15, 2022

The Honorable Jake Fey  
House Transportation Committee Chair

The Honorable Marko Liias  
Senate Transportation Committee Chair

Dear Representative Fey, Senator Liias and House and Senate Transportation Committee Members,

Thank you for your efforts to move Washington ahead in the path towards transportation decarbonization. We believe a transportation package is critical this year and our comments are intended to strengthen the climate and air quality benefits of this plan.

We agree with section 428 in SB 5974 that states “in order to meet the statewide greenhouse gas emissions limits in RCW 70A.45.020 and 70A.45.050, the state must drastically reduce vehicle greenhouse gas emissions. A critical strategy to meet those goals is transitioning to zero emissions vehicles.”

The State Energy plan calls for one million new electric vehicles on Washington’s roads by 2030 up from the current 107,000. Additionally, the state’s new ZEV sales mandate will require an increase in EV sales from the current level of 7% to 50% by 2028. Research from other states demonstrate that 50% of new electric vehicle purchasers do so because of incentives. A recent report released by Clean & Prosperous Washington<sup>[1]</sup> estimates a \$4,200 to \$13,400 gap in affordability for zero emission passenger cars and the exciting new SUVs and pickup trucks coming to market.

The State Energy plan also concluded that universal access to charging and fueling infrastructure is crucial for accelerating the pace of transportation decarbonization. The report cited above estimates an electric vehicle charging infrastructure gap of \$500 million to \$1.8 billion by 2030. Fuel cell electric powertrains scale advantageously to longer ranges and heavier cargo capacities while providing zero emission options to individuals who do not have access to charging infrastructure in or near their homes. As a result, hydrogen fueling infrastructure also plays an essential role in meeting the state’s decarbonization goals.

Putting together a plan for the next generation of investments in mobility certainly requires a great balancing act of various interests. In the arena of carbon reduction, and the expenditure plan of the more than 5 billion dollars in Climate Commitment Act funding, we do not believe the correct balance has been struck in the draft plan.

Supporting transit and active transportation to reduce vehicle miles traveled is part of the solution set. However, recent research by Climate Solutions concludes that even with the extensive reduction of vehicle miles traveled, over 90% of the carbon reduction and air quality benefits will come from vehicle electrification.<sup>[2]</sup>

The current Move Ahead Washington plan directs less than 16% of Climate Commitment Act funds to zero emission vehicles, and more than half of that is directed to Washington State Ferries. That leaves only 8% of Climate Commitment Act funding for passenger, commercial and freight zero-emission programs and infrastructure. Relying solely on Federal funding for infrastructure is insufficient to meet Washington’s needs.

We urge you to re-balance the expenditures of the Climate Commitment Act funding in your plan. Given that vehicle transition to zero emissions is projected to generate 90% of the greenhouse gas reduction, we urge you to direct more funding to those interventions. A minimum of 20% of CCA funds going to

zero emission vehicles (outside of ferries) would be a starting point for a more balanced approach to carbon reduction and air quality improvements. Funding for electric and hydrogen infrastructure, over and above Federal dollars, is also needed to reach our State’s decarbonization goals.

Another improvement would be to direct transit rolling stock purchases to zero emission vehicles. The draft plan directs \$1.85 billion toward capital and operating expenses for transit agencies with an explicit provision that “fuel type may not be a factor in the grant selection process.” We should ensure that expansion of transit service should not increase particulate pollution within overburdened communities.

Please re-balance the expenditures in the Climate Commitment Act’s Carbon Emissions Reduction Account (CERA) to more appropriately address our climate change crisis. This is a once-in-a-generation opportunity to bend our emission curve in the right direction.

Alliance for Automotive Innovation



American Honda



Center for Sustainable Energy (CSE)



ChargerHelp



ChargePoint



Clean & Prosperous WA



EVCS



EVgo



Enel X North America



EV Works



Flo



Ford Motor Company



Forth



FreeWire



GreenPower Motor Company



Nissan of North America



Noodoe



Pacific Mobility Group



Starline Luxury Coaches



Toyota Motor North America



TransWest



Volta



<sup>[1]</sup> <https://www.cleanprosperouswa.com/washingtons-decisive-decade/>

<sup>[2]</sup> <https://www.climatesolutions.org/resources/reports/transforming-our-transportation>