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Thank you for the opportunity to provide input on the Advanced Clean Trucks (ACT) rulemaking process currently underway. The trucking industry remains committed to supporting Washington's carbon neutrality goals by 2050 and has already invested billions in cleaner technologies. Over the past three decades, partnerships with the EPA and other regulatory bodies have led to the adoption of advanced clean diesel engines, which have reduced tailpipe emissions by 99%.

However, the ACT rule, modeled after California's CARB standards, presents significant challenges for Washington's unique economic and geographic landscape. While the intent to accelerate the transition to zero-emission vehicles (ZEVs) is commendable, the current structure of the ACT rule is not a workable or equitable strategy for much of the industry in our state.

Key Concerns:

Infrastructure Readiness: Washington lacks the widespread charging and fueling infrastructure necessary to support a large-scale transition to ZEVs, particularly for medium- and heavy-duty vehicles. Without significant and immediate investment in grid capacity and charging stations, especially in rural and industrial areas, the ACT rule risks creating logistical bottlenecks and operational disruptions.

Supply Chain and Dealer Constraints: Under the ACT framework, truck manufacturers are reportedly withholding deliveries of internal combustion engine (ICE) trucks unless a ZEV is sold first¹. This policy has already begun to impact Washington dealers and fleets, limiting access to essential vehicles and threatening supply chain resiliency.

Route Suitability and Technology Limitations: According to the Washington Trucking Associations, current ZEV technology is unsuitable for approximately 90% of existing freight routes in the state². This includes long-haul and mountainous routes where battery range, charging time, and payload capacity remain critical limitations.

Economic Impact on Fleets: The ACT rule imposes a one-size-fits-all mandate that does not account for the diverse operational needs of Washington's trucking sector. Many small and mid-sized fleets cannot absorb the high upfront costs of ZEVs or the infrastructure upgrades required to support them. This could lead to reduced fleet turnover, increased costs for consumers, and job losses in the transportation sector.

A More Viable Path Forward:

Rather than imposing rigid sales mandates, Washington should prioritize a flexible, technology-neutral approach that leverages existing clean diesel technologies and renewable fuels. By pairing the latest generation diesel engines with biofuels and renewable diesel, the industry can achieve immediate carbon reductions of over 75%—without the need for disruptive infrastructure overhauls.

We also support targeted electrification in sectors where it makes economic and operational sense

today—such as urban delivery fleets and short-haul applications—while continuing to invest in the infrastructure and innovation needed to make ZEVs viable across all segments in the future.

Conclusion:

We urge the Department of Ecology to reconsider the wholesale adoption of CARB's ACT rule in Washington. A more balanced, phased, and regionally tailored approach will better serve the state's environmental goals while preserving the economic vitality and resilience of its freight and logistics network.