WASHINGTON TRUCKING ASSOCIATIONS
ESTABLISHED IN 1922

November 5, 2025

Washington State Department of Ecology
300 Desmond Dr SE
Lacey, WA 98503

To Whom it May Concern:

On behalf of the Washington Trucking Associations (WTA), I am writing to share perspectives and seek collaboration on the critical issue of lowering transportation emissions, including the challenges and barriers faced by our industry. We appreciate the ongoing efforts of Washington's Ecology Department and look forward to engaging in constructive dialogue to foster a sustainable and efficient transportation sector in Washington.

New technologies, and new ways of converting existing equipment are evolving and capturing the attention of truck buyers and shippers in our state. The industry understands the goals of the state to meet a 2050 carbon neutral goal and fully believes we can achieve it. Many trucking companies have 2040 carbon neutrality goals they are working towards, which will ultimately benefit the overall progress for Washington State.

For the near-term Washington's trucking industry is challenged by the economic viability of electric trucks in the heavy truck sector undermined by:

- **Prohibitive Upfront Costs:** Electric heavy-duty trucks are significantly more expensive, up to three times the cost of a diesel truck.
- **Infrastructure Deficit:** A severe lack of public charging infrastructure for heavy trucks, coupled with challenges in installing private charging at leased properties, insufficient truck parking, and potential strain on local communities.
- **Insufficient Incentives:** Washington lacks impactful purchase incentives comparable to the mandates adopted from California, making ZEV adoption economically unfeasible for many.
- **Reduced Productivity & Increased Costs:** Heavier EV trucks (up to 10,000 lbs more) mean reduced cargo capacity, requiring more vehicles and increasing vehicle miles traveled (VMT) for the same freight volume, driving up operational costs. This can also necessitate 2-3 EVs to replace one diesel truck for round-the-clock operations.
- **Operational Inefficiency (Charging/Range):** Long charging times (up to 90 minutes for 200-mile range) for EVs versus quick diesel refueling (30 minutes for 1,500+ miles) create significant operational challenges, impacting Hours of Service (HOS) and driver utilization.
- **Competitive Disadvantage:** Customers are not demanding ZEVs, and the mandates place Washington businesses at a competitive disadvantage against out-of-state carriers not subject to the same regulations.

All that said, we appreciate the constructive dialogue with the Department of Ecology and other State Agency partners discussing the biggest challenges and immediate opportunities to focus our efforts to begin working toward a carbon neutral industry. WTA believes that several key areas can benefit from your attention and support.

Alternative Fuels – Biodiesel & Renewable Diesel:

The trucking industry has observed that renewable diesel (R99) is a direct drop-in fuel that requires no additives and has a lower gel point than ultra-low sulphur diesel (ULSD). R99 is known to reduce greenhouse gas (GHG) emissions from 60 – 75% and is known as an effective strategy to reduce diesel particulate matter (DPM).

While R99 has great benefits and is deployable today, problems continue to exist with the cost per gallon, blend consistency, and availability of R99 fuel.

R99, in the near term, is a strong alternative to fully electric trucks, considering it doesn't require operational changes and is a low-cost option to reduce carbon emissions requiring no significant infrastructure investments.

Recommendations:

- *Ensure statewide availability of R99 fuel.*
- *Incentivize the use of lower carbon fuels by ensuring favorable costs over regular diesel fuel.*
- *Prioritize cleaner diesel vehicles to deliver immediate carbon reductions with no need for disruptive infrastructure investments. It is synergistic with other carbon reduction strategies as it helps businesses invest in new vehicles while technology is still in flux.*

Focus on EV initiatives where it currently makes sense:

Electric vehicles (EVs) present a growing opportunity for class 2b through 6 commercial transport, offering potential benefits in reduced emissions and fuel costs for specific operations. Daily local routes with return to base operations or depot charging locations could be ideal for smaller commercial vehicle classes, especially those moving passengers or parcel delivery who don't have the same capacity or productivity concerns that exist for heavy cargo loads.

However, widespread adoption faces significant hurdles; current limitations with charging infrastructure pose challenges for many commercial applications. The higher upfront costs of EVs and the need for infrastructure investment, including charging stations and grid upgrades, further impact viability. Government incentives and technological advancements are crucial to overcome these barriers and unlock the full potential of EVs in this sector, as are longer term operating efficiency studies and more business-focused data regarding the actual useful life for this class of vehicle.

Recommendations:

- *Promote tactics to address charging and fueling infrastructure restrictions at leased properties.*
- *Guarantee timelines for utility installations to provide industry certainty in vehicle purchase decisions.*
- *Support new distribution center development projects with onsite commercial motor vehicle (CMV) charging, preferably fast charging or battery swapping to mitigate parking congestion.*
- *Address security concerns to ensure reliable operation of charging stations, to foster industry confidence in HDEV purchases.*

Critical Perspectives on Infrastructure and Policy:

To date, we haven't seen any comprehensive solutions from the state beyond timelines, nor have we seen concrete plans outlining how the costs or infrastructure for such transitions will be supported. From our industry standpoint, especially on the commercial side, this makes the transition difficult to justify without substantial investment or financial support from the state. If these policies proceed without such backing, many businesses and carriers might find it more feasible to consider relocating or dispatching from other states.

Additional Industry-Driven Solutions:

- Set reasonable goals for state and municipal agencies to transition their fleets to zero-emission vehicles.
- Use the power of technological innovation paired with robust Climate Commitment Act dollars to be "first in" as a state on new technologies. This has a two-fold impact by creating sharable lessons learned and best practices along with carbon emission reductions across the state.
- Provide preference to bidders on public works projects who demonstrate the capability to deploy zero or low-emission equipment, ensuring those projects utilize cleaner technology.

We believe that implementing these strategies can significantly accelerate our collective progress toward reducing transportation emissions while maintaining safety, reliability, and economic vitality.

Thank you for your ongoing commitment and partnership. We look forward to your response and the opportunity to collaborate more closely on these pressing issues.

Sincerely,

Sheri Call
President & CEO
Washington Trucking Associations