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Washington Department of Ecology
300 Desmond Drive SE
Lacey, WA, 98504

To whom it may concern,

On behalf of the Association of Washington Business (AWB) thank you for the opportunity to provide feedback on ZEVgreen and transportation electrification in Washington state. In the case of Advanced Clean Trucks (ACT), it is our belief that its implementation has and will continue to have major unintended consequences for most sectors inside our state.

Numerous studies have shown that with the need to charge an EV truck during the course of the day, they simply do not match the efficiency of conventional trucks which often will have no need to stop even once during a shift. Important to note that the majority of these studies have taken place in and around California ports, which has a significantly higher number of EV charging facilities relative to those available in Washington today.

At three times the price, EV truck prices dwarf the price of similar model conventional trucks. So not only will our transportation industry as a whole need a much larger fleet, but the fleet would be vastly more expensive. OEM's may be restricted in the number of conventional trucks they can sell. This will also drive up the cost of existing conventional trucks and force many operators to delay replacing older, less efficient vehicles.

This means that to meet today's shipping needs, with no growth, that we would see a major increase in total trucks in circulation on our streets and at charging stations, they would be delivering at a slower rate and causing greater congestion which then leads to greater emissions from conventional vehicles.

Washington does not currently have the infrastructure needed to comply with the model that ACT envisions. We hope there will be consideration to proposals from industry partners that can assist in meeting a transition to lower emissions without significant disruptions to WA's business community.

Sincerely,

Ken Short
Government Affairs Director