

Angela Constantino

Subject: Concerns Regarding New Trucking Regulations and Their Business Impact

Please see attached uploaded file

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Clerk of the Board

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Subject: Concerns Regarding New Trucking Regulations and Their Business Impact

Dear Clerk of the Board:

I'm writing as a trucking professional who is deeply concerned about the growing list of regulations — particularly the aggressive push toward electric trucks — that are being imposed on our industry without consideration for economic and operational realities.

Simply put, the **cost and efficiency of transitioning to electric trucks is completely out of touch with how this business actually works.**

Electric trucks are significantly more expensive than diesel — in many cases, double or triple the price — and the infrastructure to support them is nowhere near where it needs to be. Charging stations are limited, charging times are long, battery range is inadequate for long-haul routes, and grid reliability is already stretched in many parts of the state.

Even where charging stations are available, the **charging time for a heavy-duty electric truck can range from 1.5 to 5 hours**, depending on the battery size and charger type. That kind of downtime is **unrealistic for most trucking operations**, especially when we're working under tight delivery windows and federal Hours of Service limits. Unlike diesel fueling, which takes about 10–15 minutes, this kind of downtime is unrealistic for most trucking operations that rely on tight schedules and federal Hours of Service regulations.

Additionally, if costs continue to rise for truckers due to expensive equipment purchases and extended charging times, those increased expenses will inevitably be passed down the supply chain. This will cause higher prices for goods and services across the state, directly impacting everyday consumers. From groceries to retail products, Californians will feel the financial strain caused by these increased transportation costs. We urge regulators to

carefully consider these economic consequences before implementing policies that significantly raise operating costs without viable support.

Meanwhile, small operators like myself are being told to comply with sweeping zero-emission mandates while facing no real support, limited financial assistance, and insufficient infrastructure to make these changes feasible.

The idea of electric trucks being a drop-in replacement for diesel in the near term is **not only unrealistic — it's borderline irresponsible** from a business and supply chain standpoint.

Here's what we need:

1. A **realistic compliance timeline** that reflects the current limits of electric truck technology, battery range, charging availability, and grid readiness — especially for rural, regional, and long-haul routes.
2. **Expanded financial assistance** and tax incentives for small and independent operators to offset the high upfront costs of zero-emission trucks.
3. **Alternative compliance options**, such as the use of renewable diesel, hybrid models, or phased retrofit solutions, until electric infrastructure is viable statewide.
4. **Clear and consistent rulemaking** — with enough lead time, stability in requirements, and no last-minute changes that make it impossible for businesses to plan ahead.
5. **Engagement with real trucking professionals** — including owner-operators, small fleets, and mechanics — in all rulemaking and implementation phases.
6. **A balanced approach to environmental policy** that protects the planet *and* the livelihoods of the people actually moving the goods.
7. **Acknowledgment that downtime for charging (1.5–5 hours)** is not logistically or economically feasible for time-sensitive freight operations.

Our industry is not resistant to change — but we are resistant to mandates that ignore the financial, operational, and logistical realities of trucking. We urge you to step back, listen, and work with us — not around us — before implementing policies that could push more businesses out of the industry entirely.

Thank you for your time and consideration.