

January 17, 2024

President Joseph R. Biden  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

*Re: Proposed Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3*

Dear President Biden,

As states leading the nation's efforts to decarbonize the transportation sector and transition to cleaner vehicles, we strongly support a Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3 (HDV standards) rulemaking (EPA-HQ-OAR-2022-0985) that secures a cleaner, green future across America. This rule is critical in helping to achieve our shared goals to protect public health; advance environmental justice; spur technological innovation; economic growth and the creation of good-paying jobs; and address the climate crisis. That's why we're writing to urge EPA to finalize the strongest feasible HDV standards – without any further delay – no later than the first quarter of 2024.

**States like ours are making clean truck deployment feasible.** Eleven states have adopted the Advanced Clean Trucks standard,<sup>1</sup> representing 25% of the U.S. truck market.<sup>2</sup> Additionally, California's recent adoption of the Advanced Clean Fleets standard aims to realize 100% zero-emission medium- and heavy-duty vehicle sales by 2036 and facilitate the deployment of zero-emission technologies by truck fleets. Through the Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Memorandum of Understanding,<sup>3</sup> seventeen states and the District of Columbia have developed an action plan to support a self-sustaining market for these vehicles.<sup>4</sup> At least five states have committed to leading by example and requiring a 100% zero-emission heavy-duty vehicle (ZE HDV) conversion of their fleets and many more are financing incentive programs to offset the upfront costs of new ZE HDVs and charging infrastructure for fleet owners. States are also working with their utilities to expand investments in ZE HDV infrastructure and otherwise prepare for truck electrification. This is in addition to the billions in funding provided by the Bipartisan Infrastructure Law and the Inflation Reduction Act (IRA), including programs administered by EPA, that will further support ZE HDV deployment efforts.

Although states are leading decarbonization of this sector, these actions alone are not enough; strong federal HDV standards are needed.

**Strong rules protect public health and advance environmental justice.** The proposed rule would reduce more than 90,000 tons of harmful NO<sub>x</sub>, PM<sub>2.5</sub>, and hazardous air pollutant emissions through

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<sup>1</sup> California Air Resources Board, *States that have Adopted California's Vehicle Regulations*, <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/states-have-adopted-californias-vehicle-regulations>.

<sup>2</sup> National Automobile Dealers Association, *ATD Data 2022*, <https://www.nada.org/media/5008/download?inline>.

<sup>3</sup> NESCAUM, *Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding*, <https://www.nescaum.org/documents/mhdv-zev-mou-20220329.pdf>.

<sup>4</sup> NESCAUM, *Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Action Plan*, <https://www.nescaum.org/documents/multi-state-medium-and-heavy-duty-zev-action-plan-dual-page.pdf>.

2055, significantly improving public health across America. Importantly, finalizing and adopting stringent emissions standards is critical to advancing environmental justice and fulfilling the President's goals of addressing adverse health impacts and reducing harmful air pollutants in overburdened communities — including near ports, railyards, freight logistics hubs, highways, and freight corridors. The standards would also help states and territories meet National Ambient Air Quality Standards while preventing premature deaths, hospitalizations for cardiovascular illness, hospitalizations for respiratory illness, and emergency room visits, yielding as much as \$29 billion in health benefits through 2055 under the proposal.

**Clean trucks drive economic growth, job creation, and are increasingly affordable.** A strong federal rule would support economic opportunities and good-paying, family-sustaining jobs in a quickly emerging growth sector, while expanding access to cleaner vehicle technologies, and could yield \$500 billion in cumulative economic benefits through 2055. Recent electric truck investments generated an estimated 23,000 new manufacturing jobs that provide good pay and benefits for American families.<sup>5</sup> This job creation could accelerate under a strong federal rule and help satisfy strong market demand for these vehicles.

Compared to 2022, the number of electric trucks put into service grew by more than 500% in 2023,<sup>6</sup> and California met its Advanced Clean Truck sales targets two years ahead of schedule.<sup>7</sup> These accomplishments illustrate significant market demand from fleet owners for ZE HDVs. In addition, ZE HDVs are becoming more affordable to purchase and operate.<sup>8</sup> The Section 45W tax credits through IRA and other programs such as EPA's upcoming Clean Heavy-Duty Vehicle Program will only make ZE HDVs more accessible and affordable, and help them reach cost parity with their internal combustion engine equivalents sooner. These programs, in partnership with a strong federal rule, will increase choice in the marketplace for ZE HDVs that have a lower total cost of ownership and can better meet fleet owner needs.

**Clean trucks are better for the climate.** Transportation remains the largest source of greenhouse gas emissions nationwide, representing nearly 32% of net U.S. emissions.<sup>9</sup> Trucking alone accounts for over 7% of net U.S. emissions<sup>9</sup> while comprising only 5% of the nation's on-road fleet,<sup>10</sup> representing an outsized emissions impact per vehicle. With increased trucking expected through at least 2049,<sup>11</sup> finalizing strong standards now will ensure more of these trucking trips will be zero emission. With an expected emissions reduction of 1.8 billion metric tons through 2055, the proposal sets a strong floor that

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<sup>5</sup> Environmental Defense Fund, *U.S. Electric Vehicle Manufacturing Investments and Jobs: Characterizing the Impacts of the Inflation Reduction Act after 1 Year*, <https://www.edf.org/sites/default/files/2023-08/EDF%20WSP%20EV%20report%208-16-23%20FINAL%20FINAL.pdf>.

<sup>6</sup> Environmental Defense Fund, *Electric truck deployments by U.S. companies grew five times in 2023*, <https://blogs.edf.org/energyexchange/2023/12/13/electric-truck-deployments-by-u-s-companies-grew-five-times-in-2023/>.

<sup>7</sup> California Air Resources Board, *California meets its target for zero-emissions truck sales two years ahead of schedule*, <https://ww2.arb.ca.gov/news/california-meets-its-target-zero-emissions-truck-sales-two-years-ahead-schedule>.

<sup>8</sup> National Renewable Energy Laboratory, *Decarbonizing Medium- & Heavy-Duty On-Road Vehicles: Zero-Emission Vehicles Cost Analysis*, <https://www.nrel.gov/docs/fy22osti/82081.pdf>.

<sup>9</sup> U.S. EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990 – 2021* <https://www.epa.gov/system/files/documents/2023-04/US-GHG-Inventory-2023-Main-Text.pdf>.

<sup>10</sup> Table 3.5 of Oak Ridge National Laboratory, *Transportation Energy Data Book Edition 40*, [https://tedb.ornl.gov/wp-content/uploads/2022/03/TEDB\\_Ed\\_40.pdf](https://tedb.ornl.gov/wp-content/uploads/2022/03/TEDB_Ed_40.pdf).

<sup>11</sup> U.S. DOT Federal Highway Administration, *2023 FHWA Forecasts of Vehicle Miles Traveled (VMT)*, [https://www.fhwa.dot.gov/policyinformation/tables/vmt/vmt\\_forecast\\_sum.cfm](https://www.fhwa.dot.gov/policyinformation/tables/vmt/vmt_forecast_sum.cfm).

builds upon our state leadership and helps the U.S. stay on track in meeting its emissions reduction and zero-emission truck deployment commitments.

States are committed to doing our part to cut emissions throughout the transportation system and will continue to lead the nation in deploying ZE HDVs and ZE HDV infrastructure. We stand ready to support EPA's efforts to promptly finalize the strongest feasible HDV standards. These proposed standards would meaningfully reduce emissions from one of the largest sources of mobile emissions in the country and provide substantial public health, economic, and climate benefits while being a crucial step forward in advancing environmental justice for overburdened communities near major freight hubs and corridors.

We strongly urge EPA to finalize strong new HDV standards without delay, so together, we can maximize the benefits delivered to Americans in every state and territory.

Sincerely,

Steven S. Cliff, Ph.D., Executive Officer, California Air Resources Board

Trisha Oeth, Director, Colorado Department of Environmental Health and Protection

Will Toor, Executive Director, Colorado Energy Office

Katie Dykes, Commissioner, Connecticut Department of Energy & Environmental Protection

Melanie Loyzim, Commissioner, Maine Department of Environmental Protection

Serena C. McIlwain, Secretary, Maryland Department of the Environment

Shawn M. LaTourette, Commissioner, New Jersey Department of Environmental Protection

James C. Kenney, Cabinet Secretary, New Mexico Environment Department

Basil Seggos, Commissioner, New York State Department of Environmental Conservation

Terrence Gray, Director, Rhode Island Department of Environmental Management

Laura Watson, Director, Washington Department of Ecology

Cc: Michael Regan, Administrator, U.S. EPA

Ali Zaidi, Assistant to the President and National Climate Advisor, White House

Joseph Goffman, U.S. EPA Office of Air and Radiation