



**ZERO EMISSION
TRANSPORTATION
ASSOCIATION**

January 18, 2022

Tuana Phillips

Environmental Protection Agency
Office of Air and Radiation
1200 Pennsylvania NW,
Washington, DC 20460

Re: Executive Order 12866 Control of Air Pollution From New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards

Dear Ms. Phillips:

The Zero Emission Transportation Association (ZETA) writes to you to signal its strong support of more stringent rulemaking on heavy-duty emissions by EPA to reduce surface-level pollution and improve public health. ZETA is an industry-backed coalition of 65 member companies spanning the electric vehicle (EV) supply chain advocating for 100% EV sales by 2030. The transportation sector accounts for one-third of all emissions in the United States, with the heavy-duty vehicle (HDV) segment being the second-largest contributor of the transportation sector's total emissions at 23%.¹ Our coalition is mindful of this outsized impact and is uniquely prepared to work with you on meaningful, zero-emission solutions.

On August 5, 2021, the EPA announced its "Clean Trucks Plan" to reduce GHG emissions and other harmful air pollutants from heavy-duty vehicles (HDVs). This plan includes a series of rulemakings over the next three years. Starting with model year (MY) 2027, this proposed rulemaking is a critical step toward removing these high-polluting vehicles from the roads. Disproportionately high emissions of CO₂, PM_{2.5}, and NO_x from internal-combustion engine (ICE) HDVs contribute to long-term respiratory, cognitive, and autoimmune impairment, in addition to adverse climate impacts.² More stringent fuel efficiency standards can decrease HDV pollution and their related impacts by encouraging the adoption of electric alternatives to ICE vehicles.

Increased Model Availability Favors Adoption of More Stringent Standards

The current trajectory of the EV market lends well to stricter emissions standards for HDVs. More stringent standards will incentivize all auto manufacturers to produce more EVs—rather than strive to make inherently inefficient ICEs marginally better. There are 26 heavy-duty electric vehicle (HDEV) models currently available, with an additional 29 models planned by 2023.³ The standard HDV travels an average of 148 miles per day, and HDEVs currently on the market can readily achieve that range.⁴ Today, there are long-haul ICE tractors only capable of traveling an average of 218 miles, whereas newer electric truck models capable of traveling longer distances (370 miles) are expected to be on the market by the fall of this year. HDEVs are increasingly meeting the performance requirements of the trucking industry and

¹ <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1012ON0.pdf>

² <https://www.epa.gov/greenvehicles/archives-fast-facts-us-transportation-sector-greenhouse-gas-emissions>

³ <https://globaldrivetozero.org/tools/zero-emission-technology-inventory/>

⁴ <https://www.edf.org/sites/default/files/documents/EDFMHDEVFeasibilityReport22jul21.pdf>

of various other HDV applications, and EPA should expect HDEVs to be a viable alternative to ICE HDVs by the application of the first rulemaking for MY 2027.

Opportunity to Improve Equity for Frontline Communities

This proposed rulemaking is particularly important for underserved communities, whose proximity to transportation corridors leaves them particularly vulnerable to HDV pollution.⁵ Residents of these frontline communities tend to be lower-income, people of color, or sometimes both. For that reason, a more exacting emissions standard is crucial to addressing systemic environmental concerns in these communities and to further President Biden's goals of environmental justice.

Environmental and Public Health Benefits

EPA's Phase 2 Program reflected the benefits of strict emissions standards for HDVs by achieving a 10% reduction in GHG emissions.⁶ However, improving these standards will further drive HDV electrification, which in turn will provide environmental benefits like reduced surface-level pollution, less ground-ozone depletion, and less acid rain.⁷ Several states are adopting targeted HDV legislation that can serve as a useful guideline for EPA's rulemaking. California, in particular, has led the country in its efforts to reduce heavy-duty emissions by adopting the Advanced Clean Trucks rule in 2021, which requires a growing number of new medium- and heavy-duty trucks to be zero-emission after 2025.⁸ The resulting air quality improvements will deliver an estimated \$8.9 billion in public health benefits for the state between 2020 and 2040 and will prevent 943 premature deaths each year.⁹ If EPA adopts similar standards for HDVs at a national level, the U.S. will likely see the estimated public health and environmental benefits of California's plan on a much larger scale.

Conclusion

To achieve the United States' emissions reduction goals and improve public health, ZETA recommends adopting a more stringent heavy-duty truck emissions rule. There is no way for the United States to meet its climate targets without electrifying the transportation sector. By following these recommendations, EPA will help achieve the Administration's goal to repair the public health and environmental inequities present in our transportation system and improve the lives of all Americans.

Sincerely,



Joe Britton
Executive Director
Zero Emission Transportation Association

⁵ https://evhybridnoire.com/wp-content/uploads/2021/11/EVHybridNoire_-_Policy-Paper.pdf.

⁶ <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100P7NL.PDF?Dockey=P100P7NL.PDF>

⁷ <https://www.epa.gov/dera/learn-about-impacts-diesel-exhaust-and-diesel-emissions-reduction-act-dera>

⁸ https://www.atlasevhub.com/weekly_digest/the-advance-of-the-act/

⁹ <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2019/act2019/30dayattc.pdf>.