



U.S. Environmental Protection Agency  
 1200 Pennsylvania Ave. NW  
 Washington, DC 20460

June 16, 2023

RE: Docket ID No. EPA-HQ-OAR-2022-0985; FRL-8952-01-OAR

To Whom it May Concern:

We appreciate the opportunity to comment on the Environmental Protection Agency’s (EPA) proposed rule for Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3. We urge this Administration to approve the strongest proposal that will accelerate our path to electric vehicles (EVs) in the heavy-duty (HD) sector, as our national security, public health, economic prosperity, leadership and global competitiveness is at stake.

We, the undersigned, represent businesses in support of the increased adoption of HD EVs. While the proposed Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3 does not require that vehicle manufacturers make EVs, the adoption of the strongest possible proposal would significantly limit the tailpipe pollution from these vehicles and force them to be cleaner, bringing the market for these dirty vehicles to the tipping point and thereby accelerating the adoption of clean EVs. The EPA forecasts that their proposed rule would lead to 35-57% of new sales of HD vehicles being zero-emission (electric) in 2032, depending on the vehicle type.

While recent key policies passed by Congress lay the foundation for our transition to an electric transportation future, the U.S. is still well behind Europe and China in EV adoption – particularly in the HD sector. Adoption of the strongest proposal will propel the U.S. forward once again into a leadership role. Moreover, adoption of the strongest proposal will significantly reduce greenhouse gas emissions. The EPA notes that the transportation sector is the largest source of greenhouse gas emissions, representing 27% of total greenhouse gas emissions; narrowing in to the transportation sector, heavy-

duty vehicles are the second largest contributor to greenhouse gas emissions, at 25%.<sup>1</sup> The EPA also notes that adoption of the strongest proposal could lead to \$12 billion in benefits due to reductions in energy security externalities caused by U.S. petroleum consumption and imports.<sup>2</sup>

Finally, and most importantly, adoption of the strongest proposal is the best way for improving public health, as cleaner electric HD vehicles on the road means a reduction of harmful pollutants from the tailpipes of diesel HD vehicles. These harmful pollutants particularly overburden low-income communities and communities of color.

We urge you to approve the strongest proposal that will accelerate our path to EVs in the HD sector. Although the rule will not take effect until model years 2027 and after, electric technology is ready now. By adopting the strongest proposal, a long-term signal will be in place that the future of transportation is electric.

Sincerely,

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<sup>1</sup> See page 25928 of the Environmental Protection Agency's (EPA) proposed rule for Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles-Phase 3 in the Federal Register: <https://www.govinfo.gov/content/pkg/FR-2023-04-27/pdf/2023-07955.pdf>

<sup>2</sup> Ibid, p. 25937.

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