

April 11, 2022

Jed Mandel, President  
Truck & Engine Manufacturers Association  
333 West Wacker Drive, Suite 810  
Chicago, IL 60606

Dear Mr. Mandel,

In the effort to protect environmental justice communities, curb the air pollution and climate crises, and ensure urgently needed fuel savings for truckers and fleets, we are writing to urge the Truck and Engine Manufacturers Association (EMA) and its members to commit to rapidly increasing production of zero-emission heavy-duty trucks and buses and cleaning up combustion engines consistent with reductions that will be achieved by the Low NOx Omnibus rule, which are needed by states across the U.S. For years, EMA and certain member companies have undermined the adoption of protective emissions standards.<sup>1</sup> This harmful lobbying has resulted in trucks continuing to emit more toxic diesel pollution, which plays an outsized role in creating and perpetuating environmental injustice and imposes a disproportionate health and climate burden on Black, Indigenous, and People of Color (BIPOC) communities. Together we can and must change this reality.

EMA and these members must recognize this moment of opportunity, seize the technological solutions that are available, and take a bold leadership role in the transition to zero-emission trucks and buses, which do not release tailpipe pollution. We're strongly urging EMA to join us in pushing for stronger clean truck rules that will rapidly maximize the public health benefits for the communities that need them most. We're interested in meeting with you soon to discuss this opportunity.

Diesel trucks and buses are major contributors to NOx emissions, a potent precursor to the formation of ground-level ozone pollution, and fine particulate matter, which affect the health and well-being of millions of people in the United States. Freight corridors such as certain highways, ports and railyards, warehouses, distribution centers, and truck stops are predominantly located in low-income communities and communities of color that are affected by the cumulative impact of air pollution from multiple mobile, commercial, and industrial sources. Eliminating emissions from medium- and heavy-duty vehicles, especially through a rapid transition to zero-emission trucks and buses, is essential for making strides toward desperately needed cleaner air in these communities and a safer climate.

Many of our organizations are advocating for a more stringent federal heavy-duty truck rule and for additional states to adopt the Advanced Clean Trucks (ACT) and the Heavy-Duty Low NOx

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<sup>1</sup> <https://www.arb.ca.gov/lists/com-attach/98-act2019-ATNQZlxsBW8HXgU0.pdf>  
<https://www.arb.ca.gov/lists/com-attach/4197-act2019-WixROFA9AidROARb.pdf>  
<https://www.nj.gov/dep/njpact/docs/comments/ema-omnibus-20200910am.pdf>  
<https://www.reginfo.gov/public/do/viewEO12866Meeting?viewRule=true&rin=2060-AU41&meetingId=105823&acronym=2060-EPA/OAR>

Omnibus rules in addition to federal incentives and grants to promote the manufacturing and purchasing of zero emissions trucks and buses. It's vital to chart a path to eliminating tailpipe pollution as quickly as possible and at the same time significantly reduce NOx emissions from new diesel vehicles that will be sold leading up to a total transition to zero-emission vehicles.

Unfortunately, EMA has continuously pushed to weaken, delay, or block truck policies at the state and federal levels at the expense of our health – including the health of truck drivers. EMA members have met with government officials, testified, and submitted comments aimed at evading critical life-saving truck standards. In its opposition to policies requiring truck makers to sell zero-emission vehicles, EMA has repeatedly underscored the need for policies requiring fleets to also transition to zero-emission vehicles. Such a policy – the Advanced Clean Fleets Rule – is going through the regulatory process at the California Air Resources Board. This rule, which is complementary to the ACT, would establish a fleet requirement and spur demand for zero-emission trucks and should be finalized in 2023. However, EMA has not demonstrated support for this important policy.

We urge EMA to stop casting doubt on the viability of the NOx and zero-emission truck rules adopted by California, Oregon, Washington, New Jersey, New York, Massachusetts and under consideration by several other states and play a more constructive role in the ongoing rulemakings. Both rules have undergone years of rigorous research proving their feasibility and ensuring that we cut harmful emissions, protect the health of communities across the country, tackle the climate crisis, and create good jobs for a stronger economy. In fact, when CARB developed the ACT Rule it utilized EMA's Market Segment Analysis Sales Projections to help set the sales targets in the rule<sup>2</sup>.

Multiple studies support the consensus that zero-emission trucks produce substantial savings, even more than electric cars; zero-emission trucks have short (and shrinking) payback periods due to reduced fuel and maintenance costs and more predictable maintenance schedules.<sup>3</sup> A recent, in-depth total cost of ownership analysis by CARB found that starting today, zero-emission trucks save money for their owners in many cases.<sup>4</sup> By 2030, zero-emission trucks have superior cost savings compared to diesel in every category analyzed, including Class 8 long-haul. In addition, a team of GridLab, Energy Innovation, and UC Berkeley's Center for Environmental Public Policy found that electrifying the nation's car and truck sales by 2035 would create a net of 2 million jobs.<sup>5</sup> These benefits do not even account for the substantial health and climate savings associated with these shifts, many of which flow to disadvantaged communities who have borne the brunt of truck pollution for decades.

Zero-emission trucks are commercially available, will save truckers and fleets money, grow jobs, and are the single most effective solution for reducing freight emissions. This is why some of the

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<sup>2</sup> Feb 2019. CARB Public Workgroup Meeting. ACT Market Segment Analysis.

<https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/act-meetings-workshops>

<sup>3</sup> [https://eta-publications.lbl.gov/sites/default/files/updated\\_5\\_final\\_ehdv\\_report\\_033121.pdf](https://eta-publications.lbl.gov/sites/default/files/updated_5_final_ehdv_report_033121.pdf)

[http://blogs.edf.org/climate411/files/2022/02/EDF-MDHD-Electrification-v1.6\\_20220209.pdf](http://blogs.edf.org/climate411/files/2022/02/EDF-MDHD-Electrification-v1.6_20220209.pdf)

<sup>4</sup> [https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc\\_ADA.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-08/210909costdoc_ADA.pdf)

<sup>5</sup> <https://www.2035report.com/transportation/downloads>

country's largest fleets, such as UPS, FedEx, and IKEA, have committed to buying only zero-emission trucks in the coming years. According to a January 2022 Ceres study, members of the Corporate Electric Vehicle Alliance (which includes Amazon, DHL, Hertz, etc) are planning to acquire nearly 330,000 electric vehicles (class 1 to class 8) in the next 5 years.<sup>6</sup> Several EMA members, including Daimler, PACCAR, and Volvo, have made public commitments and significant investments to transition to zero-emission truck sales, but these companies' and EMA's opposition to state and federal pollution standards is undermining those commitments.<sup>7</sup> Due to the dire health impacts of truck pollution, we urge EMA to establish 2035 as its zero-emission target association-wide.

Adopting more protective standards at the federal and state levels is a critical opportunity to accelerate the adoption of zero-emission trucks and buses so we can meet our clean air and climate goals as quickly as possible. We urge EMA and members to join us in pushing for stronger clean heavy-duty vehicle standards that will help us rapidly achieve our air quality and climate goals. We would be very interested in scheduling a discussion with you at your earliest convenience to discuss these matters further.

Sincerely,

Center for Biological Diversity  
Chispa LCV  
Earthjustice  
Ecology Center  
Elders Climate Action  
Electric School Bus Newsletter  
Environmental Defense Fund  
EVHybridNoire  
GreenLatinos  
Hip Hop Caucus  
League of Conservation Voters (LCV)  
Moms Clean Air Force  
Natural Resources Defense Council  
Plug In America  
Public Citizen  
Sierra Club  
Southern Environmental Law Center  
Union of Concerned Scientists  
United Women in Faith

cc: [EMA Member Companies](#)

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<sup>6</sup><https://www.ceres.org/sites/default/files/reports/2022-01/Ceres%20Analysis%20New%20Corporate%20Electric%20Vehicle%20Alliance%20survey.pdf>

<sup>7</sup><https://www.reginfo.gov/public/do/viewEO12866Meeting?viewRule=true&rin=2060-AU41&meetingId=105823&acronym=2060-EPA/OAR>