May 16, 2022

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail code 1101A
Washington, DC 20460

Dear Administrator Regan:

In our shared effort to protect our residents from air pollution, advance environmental justice, and confront the climate crises, we urge the Environmental Protection Agency (EPA) to finalize the strongest possible heavy-duty vehicle requirements via the Clean Trucks Plan, now released as a Notice of Proposed Rulemaking (NPRM) Docket ID No. EPA-HQ-OAR-2019-0055.

As mayors, our cities are highly trafficked freight destinations for the movement of goods, and we are on the front lines of protecting the safety and well-being of our constituents.This long-overdue rule must benefit our communities. According to the American Lung Association's 2022 State of the Air report[1], approximately 40% of Americans—over 137 million people—are living in areas that received a grade of "F" for their air pollution. This is especially problematic for vulnerable populations such as children, the elderly, low-income families and communities of color. The Clean Air Act is clear in requiring EPA to set a standard not just protective for healthy individuals, but also of these vulnerable populations.

The heavy-duty rule must accelerate deployment of zero-emission vehicles in order to safeguard clean air and improve public health in our communities. Our residents cannot wait a decade for cleaner air. Thankfully, due to strong state and local action, the medium- and heavy-duty zero-emission truck market is growing. Today there are over 100 commercially available models of zero-emissions medium- and heavy-duty trucks and buses, with additional models expected to enter into production this year.[2] EPA has a critical role to play to ensure that zero-emission technologies for all types of trucks and buses are deployed in all communities.

The final rule should strengthen EPA's proposed Option 1 to set the expectation that at least 50 percent of sales should be zero-emission by 2030, and put the United States on track for all truck sales to be zero-emission by 2035. This target is aligned with the Moving Forward Network's[3] zero-emission truck recommendation, which was recently outlined in a letter urging the EPA to prioritize environmental justice by aggressively advancing zero-emission technology and solutions across the freight sector. As we advance our goals to transition to zero-emission trucks as quickly

[1] https://www.lung.org/research/sota/key-findings
[2] https://californiahvip.org/vehicles
[3] The Moving Forward Network (MFN) is a national network of organizations that center grassroots, frontline knowledge, expertise, and engagement with the communities across the US that bear negative impacts of the global freight transportation system. In collaboration with allies and partners, MFN identifies local solutions that call for community, industry, labor, government, and political action that advances equity, environmental justice, and a zero-emissions focused just transition.

as possible, EPA must ensure the remaining new diesel truck purchases operate as cleanly as possible to protect public health, especially in our most overburdened communities.

It is critical that EPA's truck rule:

- Provides pollution reduction that is at least as protective as the reductions that are codified in California's recent Heavy-Duty Omnibus Rule. This means, at a minimum, EPA should meet or exceed California's Heavy-Duty Omnibus program by setting a standard that achieves a greater than 90% reduction in NOx emissions by 2027.
- Builds on the successes of the Advanced Clean Trucks (ACT) rule adopted by six states, and sets the expectation that at least 50 percent of new truck sales should be zero-emission by 2030, putting the United States on track for all new truck sales to be zero-emission by 2035.
- Offers a unified national program that will provide needed equity and ensure cleaner air for all communities.

Smog and soot air pollution caused by trucks and buses are among the greatest threats to public health for the more than 45 million people in the U.S. living within 300 feet of a major roadway or transportation facility.[4] The pollution from diesel trucks disproportionately harms frontline communities near heavy vehicle traffic and trucking corridors - which by design tends to be low-income and communities of color - and leads to increased risk for cardiovascular disease, lung cancer, and other respiratory health illnesses. Recent studies show that diesel traffic is the largest source of nitrogen oxide disparity by race in the United States. Transitioning from combustion to zero-emission trucks is therefore one of our greatest opportunities to tackle both the climate crisis and environmental injustice.

Electric vehicle technology is here and it will be cost competitive with diesel over the lifetime of the vehicles starting in 2027. Zero-emission trucks produce substantial savings, even more than zero-emission cars due to reduced fuel and maintenance costs and more predictable maintenance schedules.[5] Municipalities will benefit from transitioning to zero-emission truck fleets based on truck operation and maintenance cost savings and from local job growth through the deployment of charging infrastructure.

Thank you for your consideration. There is no time to wait; there is a critical need for the EPA to take swift action moving towards a zero-emissions future in order to protect the health and safety of environmental justice communities. We are confident that you agree on the urgency of this issue and we urge you to finalize a strong rule.

Sincerely,

Mayor Timothy M. Keller
Albuquerque, NM

Mayor Christopher Taylor
Ann Arbor, MI

[4] https://www.epa.gov/air-research/research-near-roadway-and-other-near-source-air-pollution
[5] https://eta-publications.lbl.gov/sites/default/files/updated_5_final_ehdv_report_033121.pdf

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