August 2, 2022

U.S. Environmental Protection Agency
EPA West (Air Docket)
1200 Pennsylvania Ave. NW
Room B108, Mail Code 6102T
Washington, DC 20460

Submitted electronically at www.regulations.gov


To whom it may concern:

We represent thirty-four businesses and write in support of the Environmental Protection Agency (EPA) granting all three of the waivers requested under California’s “Heavy Duty Program” without delay. These policies will foster globally competitive components, vehicle, and infrastructure industries in the United States and will provide savings to fleets and companies like ours that use medium- and heavy-duty vehicles in their businesses.

The Advanced Clean Trucks (ACT) standard builds on progress made in zero-emission technology over the last several decades and the commercialization of these technologies in recent years. There are roughly 100 models of zero-emission medium- and heavy-duty vehicles available for purchase today, yet the ACT is needed to catalyze the market beyond the 2,000 zero-emission trucks that have been deployed nationally in the last five years.

In the six states that have adopted the ACT to date, roughly one million zero-emission Class 2b-8 vehicles are projected to be sold through 2035. These vehicles will provide significant cost savings for businesses in addition to contributing to climate and air quality goals. The ACT is estimated to provide $5.9 billion in net savings through 2040 in California alone due to lower fuel and maintenance costs. We expect additional states will adopt the ACT, particularly amongst the 18 states and District of Columbia that have already adopted California’s light-duty vehicle emission standards.

Despite the ACT’s acceleration to zero-emission vehicles, significant numbers of combustion engines will continue to be sold into the future, making the Heavy-Duty Omnibus (HDO) Rule critical to public health. The HDO will result in more than two times the reductions in NOx emissions as the ACT through 2050. In California, the HDO will result in $37 billion in health benefits on top of the $8.9 billion in health benefits provided by the ACT. These benefits will be most dramatically felt in communities near roads, ports, and transportation corridors where emissions are concentrated.
Formation and adoption of these policies in California involved a rigorous public process that many of us were directly involved in and lasted several years. There is ample precedent for California to implement these regulations under shorter timeframes than those provided by the Clean Air Act for federal standards. Section 202(a)(2) of the Clean Air Act, which EPA has consistently applied to waiver decisions for over 50 years, states that a California regulation shall take effect after a period that the Administrator finds necessary to permit the development and application of the requisite technology, considering the cost of compliance. Such findings are well demonstrated in the record developed by the California Air Resources Board.

Failure to grant or delaying the granting of these waivers would be a major setback for the clean vehicle industry. The policies under consideration will drive the economies of scale that will reduce costs and accelerate the necessary transition to clean vehicles. State standards for zero-emission truck sales are especially critical in the absence of federal action requiring the sale of these vehicles in the Clean Trucks Plan.

Medium- and heavy-duty vehicles represent one of the largest sources of global warming emissions and air pollution in the transportation sector, and their emissions are projected to materially increase in the years to come without policies such as the Advanced Clean Trucks and Heavy-Duty Omnibus standards. We urge EPA to grant all of the requested waivers so there is no delay in the transition to clean vehicles that our businesses are committed to achieving.

Sincerely,

Steven Koerner
Vice President of Policy
AMPLY Power

Clarence Tong
U.S. Federal Affairs and Policy
Arrival USA

John Davies
Senior Director, Brand Editorial and Sustainability
Avocado Green

Tim Sasseen
Director, Market Development and Public Relations, North America
Ballard Power Systems

Ruben Aronin
Director
California Business Alliance for a Clean Economy
Katie Toamrchio  
Senior Manager, Public Policy - Federal Agencies  
**ChargePoint**

Rachelle Wenger  
System Vice President, Public Policy and Advocacy Engagement  
**Dignity Health**

Mary Beth Gallagher  
Director of Engagement  
**Domini Impact Investments**

Hugh Welsh  
President  
**DSM North America**

Chris Baker  
Head of Enel X Way North America  
**Enel X Way North America**

Glenn Cook  
Founder and CEO  
**EVTransports**

Ahmed Aljuboori  
Investment Associate  
**Figure 8 Investment Strategies**

Cory Bullis  
Senior Public Affairs Manager  
**FLO EV Charging**

Danielle Jezienicki  
Senior Director, Sustainability  
**Grove Collaborative**

Gil Jenkins  
Vice President, Corporate Communications and Public Affairs  
**Hannon Armstrong**

Jason Quaranto  
Government Relations Specialist  
**Hyzon Motors**
Marcie Willard  
Promotions and Grants Manager  
**Lightning eMotors**

Alana Langdon  
Head, Government Affairs and Global Policy  
**Nikola Corporation**

Judy Byron  
Director  
**Northwest Coalition for Responsible Investment**

Jason Dake  
Vice President, Legal and Regulatory Affairs  
**Orange EV LLC**

Courtney Ehrlichman  
Head of Strategy  
**Panasonic Smart Mobility Office**

Patrick Hennigan  
Government Affairs Manager  
**PG&E Corporation**

Jarrett Stoltzfus  
Director of Government Relations and Public Policy  
**Proterra**

Chris Nevers  
Senior Director of Public Policy  
**Rivian**

Bee Shiraz  
Vice President of Revenue Management  
**SEA Electric LLC**

Francis Sherman  
Executive Director  
**Seventh Generation Interfaith Inc.**

Abby Campbell  
Senior Director and Head of Climate and Infrastructure Policy  
**Siemens**
Mandi McKay  
Director, Sustainability and Social Responsibility  
**Sierra Nevada Brewing Company**

Bryn Carey  
CEO  
**Ski Butlers**

David Schlosberg  
Vice President  
**TeraWatt Infrastructure, Inc.**

Joseph Mendelson  
Senior Counsel, Public Policy and Business Development  
**Tesla, Inc.**

Eric Zimmerman  
CEO  
**TripZero**

Stefani Grant  
Head of External Affairs  
**Unilever United States**

Marian Wineman  
President  
**WR Consulting, Inc.**