Corporate Electric Vehicle Alliance

August 2, 2022

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Submitted electronically at www.regulations.gov


Dear Administrator Regan,

I write on behalf of the Corporate Electric Vehicle (EV) Alliance (the Alliance) – a coalition of 31 major companies and fleet operators that represent over $1.1 trillion in annual revenue and collectively own, lease, or operate more than 2.5 million fleet or networked vehicles in the United States. On behalf of this coalition, I am writing to urge you to grant California’s waiver requests under the Clean Air Act (CAA) for its Advanced Clean Trucks (ACT) regulation and its Heavy-Duty Engine and Vehicle Omnibus (HDO) Regulation.

Alliance members share a common goal of electrifying their on-road fleets and networked vehicles, and standards like ACT and HDO that expand the availability of suitable vehicle models while reducing the upfront cost of electric vehicles (EVs) through economies of scale are essential to this transition. In fact, over the next five years Alliance members plan to collectively procure more than 330,000 zero emission vehicles (ZEVs) in the U.S. market alone. Fleet electrification offers companies a suite of benefits including reducing emissions and meeting corporate climate goals, reducing financial risk from volatile fossil fuel prices, and lowering long-term vehicle maintenance costs. However, this transition will only be successful with support from policymakers, auto and truck manufacturers, and other key players in the auto/truck industry.

The lack of available EV models to meet diverse operational needs is a critical concern for fleets and requires action. Many Alliance members currently own, lease, or operate medium- and heavy-duty vehicles (MHDVs), and are serious about reducing emissions from their operation. MHDVs typically run on diesel fuel, the top source for criteria pollutants like nitrogen oxides (NOx) and PM2.5 that are most threatening to human health. These emissions disproportionately impact the health of traditionally low-income and BIPOC communities situated near fleet depots, major transportation corridors, distribution centers, and ports. Reducing NOx pollution and truck pollution overall will significantly decrease the number of respiratory and cardiovascular illnesses attributable to poor air quality and support a healthy economy. According to the American Lung Association’s 2022 State of the Air Report, a national shift to 100% zero emission passenger vehicles by 2035 and 100% medium- and heavy-duty trucks by 2040 would generate over $1.2 trillion in public health benefits between 2020 and 2050.

These waiver decisions are critical not only for California, but for many other states looking to adopt strong vehicle standards, enabling them to meet important air quality, public health, and climate goals.

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Already, six states, representing more than 20% of the MHDV market, have committed to adopting the ACT zero emission vehicle sales mandates, and more are considering adoption.

I urge EPA to grant California’s waiver requests and allow these regulations to move forward. Strong standards are essential to reducing harmful pollution and accelerating the deployment of electric trucks at the scale and rate necessary to meet both public health and climate goals.

Thank you for your consideration of our comments.

Sincerely,

Sara Forni
On behalf of the Corporate Electric Vehicle Alliance, led by Ceres Director of the Corporate Electric Vehicle Alliance

CC:

Gina McCarthy, National Climate Advisor
White House Office of Domestic Climate Policy

Ali Zaidi, Deputy National Climate Advisor
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Jennifer Granholm, Secretary
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