



NGVAMERICA
Natural Gas Vehicles for America



July 13, 2021

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

Dear Administrator Regan:

We strongly and respectfully urge you to expeditiously complete the heavy-duty truck rulemaking assuring that NO_x emissions from the internal combustion engines that remain on the roads are further reduced. It is critically important for us that the Agency finalizes -- without delay by late 2022 -- a new national low-NO_x emission standard for heavy-duty trucks. This timeline will ensure that a new regulation will be effective in 2027 and align with the final step of the heavy-duty Phase 2 GHG standards.

The Agency committed in 2016¹ to revise the heavy-duty on-highway standards in response to a petition led by the South Coast Air Quality Management District (South Coast AQMD) and 18 other air, state environmental and non-profit organizations. During that same period, the heavy truck industry, including all the leading truck and engine manufacturers, asked the Agency to consider adopting an appropriate next-tier low-NO_x standard. Over the ensuing five-years, a larger coalition of governmental and industry organizations have coalesced in support of an

¹ *Petition to EPA for Rulemaking to Adopt Ultra-Low NO_x Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines, (June 2016)* -- <https://www.epa.gov/petitions/petition-epa-rulemaking-adopt-revised-nox-exhaust-emission-standards-highway-heavy-duty>

updated national standard for heavy-duty trucks. During this period, at the invitation of South Coast AQMD, the undersigned groups and organizations have had regular discussions to share views on the need for additional heavy-duty emissions regulations and policies that promote clean freight transport.

Heavy-duty trucks are the workhorses of our nation's economy and play a large role in efforts to improve air quality and meet the climate challenges our country faces. Americans depend on heavy-duty trucks to deliver almost 70 percent of the nation's freight tonnage. These trucks account for approximately 4 percent of vehicles on the road but contribute over 50 percent of (NO_x) emissions and 60 percent of the particulate matter emissions less than 2.5 microns in diameter (PM_{2.5}).²

Federal NO_x standards for new heavy trucks have remained the same since 2010. As of December 2020, approximately half of all commercial diesel trucks in operation, nationwide, were of the newest generation (2010 and later MY), making half the fleet now on the road of older generations of technology without benefit of full NO_x and PM emissions control technologies.³ Now is the time to capitalize on the evolution of cleaner heavy-duty truck technologies – and on opportunities for the transition of the commercial fleet to benefit from the full spectrum of advanced clean trucks, including ZEVs -- to capture opportunities for further emission reductions to reduce harmful air pollution affecting the frontline communities throughout the nation.

Finalizing the federal HD low-NO_x standards in 2022 and implementing these by 2027 would assist regions such as South Coast, New York, Denver, Houston, Chicago/Wisconsin and Dallas to reach attainment under the Clean Air Act. Just as important, a national truck standard will create market stability for American OEMs and related parts and equipment manufacturers contributing to the overall economic recovery from the COVID-19 pandemic. It is important to know there are significant points of consensus within the trucking industry (among manufacturers, suppliers, fleets and advocates) that align with the goals of policymakers and public agencies focused on advancing a responsible and inclusive clean air and environmental sustainability agenda, including incentivizing the purchase of advanced clean trucks, including ZEVs, and the buildout of necessary charging and fueling infrastructure.

² H. Christopher Frey. 2018. *Trends in Onroad Transportation Energy and Emissions*. *Journal of the Air & Waste Management Assoc.* Vol. 68, No. 6, 514–563, Table 1. --

<https://www.tandfonline.com/doi/full/10.1080/10962247.2018.1454357>

³ Analysis of Climate and Clean Air Benefits and Population of New Technology Diesel Engines in Heavy Duty on Highway Vehicles in U.S. (Diesel Technology Forum and Auto Forecast Solutions) June 2021

<https://www.dieselforum.org/news/nearly-half-of-u-s-commercial-trucks-now-powered-by-near-zero-emissions-diesel-technology-delivering-climate-and-clean-air-benefits>

The Honorable Michael Regan

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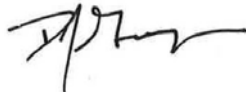
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Our organizations stand ready and willing to work with you to provide counsel, information, and expertise to help craft practical and forward-looking policies that will make a difference in reaching the clean-energy and clean-vehicle future our country wants and deserves.

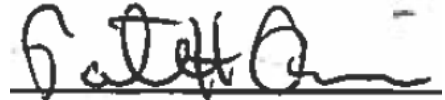
Sincerely,



Wayne Nasti
Executive Officer,
South Coast Air Quality
Management District



Daniel Gage
President,
NGV America



Patrick Quinn
Executive Director,
Advanced Engine Systems
Institute



Rasto Brezny
Executive Director,
Manufacturers of Emission
Controls Association



Lee Janger
Executive Director
Alliance for Vehicle
Efficiency

cc: Deputy Administrator Janet McCabe
Acting Assistant Administrator Joe Goffman
Deputy Assistant Administrator Alejandra Nunez, Mobile Sources
Director Elizabeth Adams, Region 9 OAR
Director Sarah Dunham, OTAQ
Director Karl Simon, Transportation and Climate
Director William Charmley, OTAQ