

BICEP Members:

Adobe
Akamai Technologies
Annie's Inc.
Autodesk, Inc.
Aveda
Avocado Green Brands
Ball Corporation
Ben & Jerry's
Biogen
BlueCross Blue Shield of Massachusetts
Burns & McDonnell
Burton Snowboards
Burt's Bees
Clif Bar
CommonSpirit
Danone N.A.
DoorDash
DSM
eBay Inc.
Eileen Fisher
Etsy
Fetzer Vineyards
Gap Inc.
General Mills
Grove Collaborative
Hackensack Meridian Health
Hannon Armstrong
Happy Family Organics
HP, Inc.
IKEA
Impossible Foods
Indigo Agriculture
JLL
Kaiser Permanente
KB Home
L Brands
L'Oréal
Levi Strauss & Co.
LinkedIn
Logitech
Lyft
Mars Incorporated
Mass Brigham General
McDonald's
Microsoft
Nature's Path Foods
Nestlé
New Belgium Brewing
Nike
NortonLifeLock
Novartis
Outdoor Industry Association
Owens Corning
Palisades Tahoe
Patagonia
PayPal
Portland Trail Blazers
REI
Salesforce
SFO
Seventh Generation
Siemens
Sierra Nevada
Snowsports Industries America
Starbucks
Stonyfield Farm
The North Face
Tiffany & Co.
Timberland
Unilever
VF Corporation
Vail Resorts
Vulcan, Inc.
Workday
Worthington Industries

May 16, 2022

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue,
N.W. Washington, D.C. 20450

Re: Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards; Docket ID No. EPA-HQ-OAR-2019-0055.

Dear Administrator Regan,

On behalf of the Ceres BICEP (Business for Innovative Climate and Energy Policy) Network - a coalition of 75 major employers across the United States – I am writing to urge you to strengthen the proposed heavy-duty truck standards.

BICEP Network members are committed to ambitious climate action, advocating for stronger climate and clean energy policies at the state and federal levels in the U.S. Our members see reducing greenhouse gas (GHG) emissions by transitioning to zero-emission medium- and heavy-duty vehicles (MHDVs) as a major economic opportunity. They recognize that zero-emission vehicles (ZEVs) bring significant economic and environmental benefits, including operational cost savings, improved air quality, and GHG reductions. However, while BICEP members are working to do their part as individual companies, strong standards are necessary to ensure the widespread availability of clean trucks in the U.S., as well as to drive the economies of scale that will reduce costs and accelerate the necessary transition to electrification.

Strong truck standards are also necessary to ensure that we meet climate goals. A recent [ICCT analysis](#) found that a target of 100% zero-emission sales of medium- and heavy-duty trucks (MHDVs) by 2040 would be consistent with limiting warming to less than 2°C (although higher sales would be necessary to limit warming to 1.5°C). The GHG standards should ensure a trajectory consistent with 100% ZEV MHDV sales by 2040 *at the latest*, and 50% ZEV MHDV sales by 2030. In addition, in order to prevent increased emissions, EPA should preserve the Phase 2 stringency requirements for ICE vehicles and phase out advanced technology credit multipliers as soon as feasible. Finally, a recent Ceres [analysis](#) concluded that, while shifting to electric vehicles increasingly makes economic sense for manufacturers and suppliers, as well as fleet owners and shippers, a federal ZEV mandate and fleet



purchasing requirements, similar to California's Advanced Clean Truck (ACT)¹ and Advanced Clean Fleet (ACF) standards, will be necessary to accelerate this transition at the rate and scale necessary to meet climate goals, and to ensure the global competitiveness of the U.S. truck industry. Accordingly, we urge you to adopt a ZEV mandate consistent with the targets outlined above.

Importantly, given that MHDVs are the largest source of nitrogen oxides (NOx) in the transportation sector, it is critical to strengthen the proposed NOx standards. Disadvantaged communities, located near highways, ports and distribution centers, have long borne the brunt of negative health and air quality impacts from truck pollution, and it is necessary to reduce this pollution as quickly as possible during the transition to electrification (which in turn, will have additional health benefits). Accordingly, EPA should adopt a strengthened Option 1, requiring a 90% reduction in NOx by 2027, and phase out advanced technology credit multipliers for NOx as soon as feasible.

Thus, on behalf of the companies in the BICEP network, I urge EPA to strengthen the proposed standards, which are not sufficiently stringent to accelerate the cost-effective deployment of electric commercial trucks at the necessary rate and scale, are inconsistent with climate goals, and fail to adequately reduce air pollution in disadvantaged communities. Finally, given the urgency of the climate crisis, and of remedying longstanding negative health impacts in disadvantaged communities, we urge EPA to finalize the standards this year.

Thank you for your consideration of these comments.

Sincerely,

Anne L. Kelly
Vice President Government Relations,
On behalf of Business for Innovative Climate and Energy Policy (BICEP)

The Ceres BICEP Network comprises influential companies advocating for stronger climate and clean energy policies at the state and federal level in the U.S. As powerful champions of the accelerated transition to a low-carbon economy, Ceres BICEP Network members have weighed in when it has mattered most. For more information on the Ceres BICEP Network, visit www.ceres.org/BICEP.

For additional information, please contact Carol Lee Rawn, Senior Director, Transportation at Ceres (rawn@ceres.org).

¹ The ACT has drawn significant business and investor [support](#).

cc:

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

Ali Zaidi, Deputy National Climate Advisor
White House Office of Domestic Climate Policy

Austin Brown, Sr. Director for Transportation Emissions
White House Office of Domestic Climate Policy

Jennifer Granholm, Secretary
U.S. Department of Energy

Tarek Shah, Chief of Staff
U.S. Department of Energy

Jerimiah Baumann, Deputy Chief of Staff
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Sarah Dunham, Director
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