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Mr. Flynn:

CALSTART is pleased to offer its strong endorsement of the Multi-State Medium- and Heavy-Duty Zero-Emission Vehicles Draft Action Plan. The corresponding Memorandum of Understanding (MOU), now signed by 17 U.S. states, the District of Columbia, and the Province of Quebec, commits more than 35% of the U.S. truck market to rapidly decarbonize with 30% of truck sales to be zero-emission by 2030 and 100% of sales by 2050. The Action Plan provides participating jurisdictions with the policy building blocks and equity principles to put these aggressive targets within reach.

Despite constituting just 10% of vehicles in the United States, medium- and heavy-duty vehicles (MHDVs) contribute disproportionately to greenhouse gas emissions (28%) and nitrogen oxide emissions that adversely impact human health (45%).¹ What is more, these emissions burden disadvantaged communities significantly more than affluent areas; in New York City, areas with >30% of residents below the federal poverty line are exposed to 1.7x the amount of fine diesel particulate matter from trucks and buses as areas with <10% of residents in poverty. The health impact is even more pronounced, with the disparity in emergency department visits attributable to asthma at 9.4x.²

The Action Plan presents MOU jurisdictions with more than 60 recommendations to unlock the development of conducive markets for MHDV electrification and to encourage participating states to coordinate. We commend NESCAUM and the Task Force states for developing a comprehensive menu of policy recommendations informed by best practices and recognize the need for an all-hands-on-deck approach to market activation.

To achieve the MOU targets will require coordinated action by governments, fleets, manufacturers, suppliers, utilities, and more. With six states already having introduced manufacturer sales requirements under the Advanced Clean Trucks program,³ there is already considerable momentum among MOU jurisdictions to use regulatory tools to codify the future emissions performance of trucking technology. Even where these

¹ Union of Concerned Scientists (2019). Ready for Work.
<https://www.ucsusa.org/sites/default/files/2019-12/ReadyforWorkFullReport.pdf>

² Kheirbek I, Haney J, Douglas S, Ito K, Matte T (2016). The contribution of motor vehicle emissions to ambient fine particulate matter public health impacts in New York City: a health burden assessment. Environmental Health.
<https://ehjournal.biomedcentral.com/articles/10.1186/s12940-016-0172-6>

³ California, Massachusetts, New Jersey, New York, Oregon, and Washington have all adopted ACT as of May 2022. Connecticut passed enabling legislation (SB4) in late April 2022.

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regulations are being introduced, an ecosystem of policies, incentives, and investments is critical to ensure that a robust market can take shape.

By and large, we are highly supportive of the recommendations included in the draft Action Plan and eagerly anticipate the opportunity to work with participating jurisdictions to implement select recommendations. In our view, a well-functioning MHD ZEV ecosystem must consist of the following elements, at a minimum: corresponding manufacturer (sales) and fleet (purchase) regulations; robust and stable multi-year purchase incentives; widely accessible utility “make-ready” infrastructure investment programs; and flexible, affordable utility rate designs for commercial zero-emission vehicle customers. In conjunction, these elements provide clarity regarding the share of zero-emission vehicle sales while bringing about the necessary conditions for zero-emission technologies to compete with incumbent diesel technologies on a total cost of ownership basis in the near term. Scaling up ZEV deployments now will also expedite the development of a viable secondary ZEV market, which we believe to be critical for achieving mass-market adoption by fleet operators. With a more significant empirical track-record of ZEV deployments and the economics are competitive, private sector financing will be more readily accessible to enable large-scale ZEV deployment even while first costs remain elevated.⁴

Of course, each jurisdiction must navigate its own context and there is no one-size-fits-all solution—this is why it is imperative that states remain engaged to identify a course of action that sequences selected recommendations. The publication of the completed Action Plan is the starting line rather than the endpoint.

We look forward to the release of the final Action Plan and to supporting participating jurisdictions in building ecosystems for MHD ZEV dominance.

Sincerely,

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⁴ Gurman, R (2021). Taking Commercial Fleet Electrification to Scale: Financing Barriers and Solutions. <https://globaldrivetozero.org/publication/taking-commercial-fleet-electrification-to-scale-financing-barriers-and-solutions/>