

Congress of the United States
House of Representatives
Washington, DC 20515-1501

May 23, 2024

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

Dear Administrator Regan,

We write to urge you to withdraw the final rule entitled “Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3” that was published in the Federal Register on April 22, 2024, by the Environmental Protection Agency (EPA).¹ Additionally, we want to highlight the cost that this rule will place on average Americans and the burden it will have on farmers and businesses across the country.

This final rule, which encompasses heavy-duty vehicles ranging from delivery trucks and school buses to tractors and semis, would disrupt the heavy-duty truck industry by forcing the broad adoption of heavy-duty zero emission vehicles on an extremely aggressive timeline, despite these vehicles currently being less than 1% of sales. According to a [recent study](#), it would cost nearly \$1 trillion in infrastructure investment alone to fully electrify the U.S. commercial fleet, which does not include the expense of purchasing new semis.² Additionally, the cost for an electric semi-truck averages over \$400,000 while a comparable diesel Class 8 truck costs around \$180,000 – meaning electric trucks cost an average of 122% more than a normal semi.³

Our farmers and agricultural industry will be especially hurt by this new mandate. According to the latest agriculture census by the U.S. Department of Agriculture, there are 3,161,820 trucks (including pickups) on over 1.4 million farms and 3,784,743 tractors on over 1.5 million farms that would see higher equipment costs and tighter margins due to this misguided rule.⁴ These numbers also do not account for the small, independent truckers, trucking companies, and truck dealerships throughout the U.S. that will be impacted. Not only would this rule harm consumers, but it would also exacerbate consolidation by effectively forcing our small trucking companies out of business that cannot afford this hasty transition to electric or hydrogen powered trucks.

¹ <https://www.govinfo.gov/content/pkg/FR-2024-04-22/pdf/2024-06809.pdf>

² https://www.cleanfreightcoalition.org/sites/default/files/2024-03/RB%20Study%20Report_final%5B111225%5D.pdf

³ <https://theicct.org/cost-electric-semi-feb22/>

⁴ https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_US/usv1.pdf

It is abundantly clear that the average American will be strapped with higher grocery prices and utility costs from this regulation. In the same report mentioned above, it estimated that utilities would need to invest \$370 billion to upgrade their grid networks to meet the demands of just commercial vehicles – this excludes estimates of how expensive it will be for the average American and utility company to meet the demands of your de facto EV mandate.⁵

Businesses will also be hindered as they are forced to make necessary investments in their operations, facilities, and employee training. This unaffordable and unachievable regulation will leave rural communities with grid capacity challenges and limited range versus comparable diesel vehicles. When regulations are rushed and the impacts on the economy are not sufficiently considered, business closures and job losses will result.

This de facto mandate does not consider the realities of the commercial zero-emission vehicle (ZEV) marketplace or consider the ability for rural America to purchase these vehicles. Trucks must be affordable and reliable otherwise the intended benefits will not be realized. This rule will harm our families and businesses, increases our gas prices, and makes us more dependent on foreign supply chains – particularly China.

Therefore, we urge you to withdraw your final rule that is both unrealistic and burdensome. This rule will only further increase costs for American families, businesses, and rural communities while fueling more inflation. We need to give Americans a choice in the cars and trucks that they drive, and affordability and performance for the trucking industry is paramount.

cc. President Joseph R. Biden

Sincerely,

[[SIGNATURES]]

⁵ <https://www.cnn.com/2024/03/20/climate/epa-biden-electric-cars/index.html>