



Dear National Climate Advisor Zaidi, Secretary Buttigieg, Secretary Granholm, and Administrator Regan:

Our national freight system is electrifying, and we must ensure its success – with a focus on ambition, supporting good quality jobs, and safeguarding communities that have faced dirty air and climate risk for too long. But success takes coordination, and the window is closing as federal funds continue to flow and the Administration works to finalize carbon pollution standards for trucks in the coming months.

We are therefore writing to urge the White House to support immediate, strong action to:

1. finalize a strong truck rule
2. make clear that federal funds will be coordinated to drive infrastructure deployment in ways that cut pollution fastest for the communities that need it most to support the rule, and
3. lock in this progress with a National Strategy for Freight Electrification that can channel efforts, investments, and collaboration going forward.

A whole of government approach is needed because our current freight system threatens communities with deadly air pollution, relies on outdated fossil-fuel vehicles, and threatens the climate. An electrified system, in contrast, promises to dramatically improve air quality, cut climate pollution, enhance public health outcomes, and accelerate battery and fuel cell technologies that can balance the power grid, along with training and deploying the union electrician workforce needed as the economy electrifies. We propose the following plan:

First, the Administration should work with the Environmental Protection Agency (EPA) to strengthen its proposed “Phase 3” carbon pollution standards for trucks. Those standards currently are projected to result in companies choosing to electrify barely

more than a third of new trucks sold by the mid-2030s and flat-line there.^[1] In contrast, our competitors in the European Union intend to electrify 80% of new sales by 2040, California has secured a deal with manufacturers to reach 100% electric sales by 2036, and other leading states are following suit.^[2] The federal rule must send a strong investment signal to keep us competitive, meet the Clean Air Act's public health mandates, and protect communities. It should ramp up to meet the moment.

Second, the Administration should ensure its funds are coordinated to support an ambitious rule. Billions are on the table, and we need to spend them right. At the Departments of Energy (DOE) and Transportation (DOT), and the Joint Office, the National Electric Vehicle Infrastructure (NEVI) program can support truck charging deployment, and the DOE's Loan Programs Office is also well-placed to provide billions in loan guarantees to support this effort (and, perhaps, to allow the use of plugged-in vehicles as virtual power plants to provide profitable grid services). DOT's Alternative Fuels Corridor and Charging and Fueling Infrastructure Discretionary Grant programs can further align funds and prioritization.

As a result of the Infrastructure Investment and Jobs Act (IIJA), funds provided through DOT's Congestion Mitigation and Air Quality Management program can now be spent on "the purchase of medium- or heavy-duty zero emission vehicles and related charging equipment." The EPA's Clean Heavy-Duty Vehicle Program, Diesel Emissions Reduction Act, Clean Ports Program, and Climate Pollution Reduction Grants, also offer billions to deploy zero emission heavy-duty vehicles. Section 13403 of the Inflation Reduction Act (IRA) provides HD-ZEV customers with a \$40,000 clean commercial vehicle tax credit. And several provisions of the IRA and IIJA are poised to provide billions of dollars to promote clean hydrogen infrastructure, which can support fuel cell electric vehicles as an additional option for certain long-haul fleets.

States, utilities, and the private sector can add to these funds if offered clear guidance on deployment pathways and priorities. But these programs need to be aligned by a central and urgent vision to secure the opportunity at hand. Moreover, the White House can use its convening power to ensure utilities, ports, and local governments are ready to use these funds in a smart way.

Smart spending begins with developing the skilled workforce needed to install hundreds of thousands of chargers to support an ambitious rule, ensure charging infrastructure is built safely, and ensure workers benefit from the massive transition underway. That means ensuring that work done with federal funds is done by workers trained by the Electric Vehicle Infrastructure Training Program (EVITP) – a federally-recognized non-profit and comprehensive program that has demonstrated success in growing the available workforce of experienced electricians needed to build out our nation's charging infrastructure. We must create not just a charging network but also durable, good quality jobs for trained electricians who can deliver and maintain reliable and safe infrastructure while supporting their families and communities.

Near-term coordination of this sort would produce meaningful results. The bulk of the nation's trucking fleet serves a limited number of ports and freight facilities. Thus, focused initial investments at the largest of these facilities —which are concentrated in Southern California, the Texas Triangle, the Northeast Corridor, and the Great Lakes Region — can bear substantial results by reaching a large portion of the nation's fleet. Funding assurances, paired with commitments by local actors to prioritize infrastructure installation, would further bolster EPA's confidence as it works to strengthen its standards and drive manufacturer confidence that infrastructure will be available.

The Administration should also increase federal financial support for the deployment of charging infrastructure by increasing access to the IRA's 30C tax credit by defining eligible census tracts as recommended by NRDC, the Alliance for Automotive Innovation, American Council on Renewable Energy (ACORE), Ample, CalSTART, ChargePoint, Clean Energy Works, Earthjustice, Elders Climate Action, Electrification Coalition, EDF, EV Charging for All, EVBox, Forth Mobility, GreenLatinos, IBEW, International Parking & Mobility Institute, Itselectric, League of Conservation Voters, National Association of Convenience Stores, National Consumer Law Center, NATSO: Representing America's Travel Plazas and Truck Stops, Navistar, Plug in America, Rivian, Sierra Club, SIGMA: America's Leading Fuel Marketers, TeraWatt, Transportation for America, UCS, and Volvo Group North America.

Third, the Administration must embed these near term steps in a medium-term effort to create a real vision for a comprehensive electrification pathway for industry, workers, and communities. Such a National Strategy for Freight Electrification, developed through a public process in the next year, would outline key strategies for electrifying the full system over time (including regulatory and incentive programs), ensure that key actors from utilities to unions to communities are at the table, and help the government act comprehensively to build a zero pollution, reliable, and union-built supply chain.

The President has been clear that climate action is a core tool in building America's economy, making it fairer, and serving communities that have too long been left out. This effort would realize that vision in the freight system at the core of our economy. We urge you to act fast to increase regulatory ambition on trucking and align funds to support it, and engage the public in crafting a clear National Strategy for Freight Electrification. Thank you for your swift efforts.

Sincerely,

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[1] See, e.g., <https://theicct.org/us-and-eu-proposals-zev-truck-and-bus-fleets-sept23/>.

[2] See

<https://ww2.arb.ca.gov/news/carb-and-truck-and-engine-manufacturers-announce-unprecedented-partnership-meet-clean-air>.