

# Congress of the United States

Washington, DC 20515

July 2, 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).<sup>1</sup> 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.<sup>2</sup> 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.<sup>3</sup>

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.<sup>4</sup> 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.

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 on light-duty, passenger vehicles.<sup>5</sup>

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.

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

<sup>2</sup> [https://www.cleanfreightcoalition.org/sites/default/files/2024-03/RB%20Study%20Report\\_final%5B111225%5D.pdf](https://www.cleanfreightcoalition.org/sites/default/files/2024-03/RB%20Study%20Report_final%5B111225%5D.pdf)

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

<sup>4</sup> [https://www.nass.usda.gov/Publications/AgCensus/2022/Full\\_Report/Volume\\_1\\_Chapter\\_1\\_US/usv1.pdf](https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_1_US/usv1.pdf)

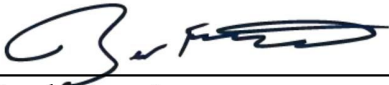
<sup>5</sup> <https://www.cnn.com/2024/03/20/climate/epa-biden-electric-cars/index.html>

This de facto mandate does not consider the realities of the commercial zero-emission vehicle (ZEV) marketplace or consider the ability for small businesses in rural America to purchase and operate 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,



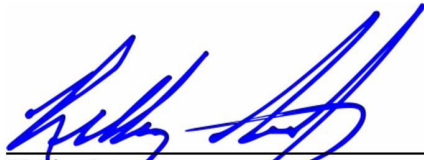
Randy Feenstra  
Member of Congress



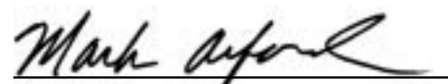
Mike Crapo  
United States Senator



Ralph Norman  
Member of Congress



Kelly Armstrong  
Member of Congress



Mark Alford  
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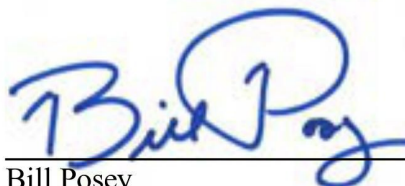
James E. Risch  
United States Senator



Charles E. Grassley  
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Dusty Johnson  
Member of Congress



Bill Posey  
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Roger W. Marshall, M.D.  
United States Senator



Pete Ricketts  
United States Senator



Cynthia M. Lummis  
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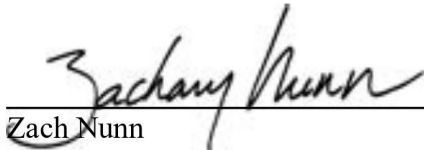
Aaron Bean  
Member of Congress



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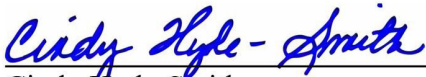
Dan Meuser  
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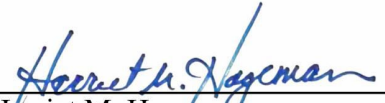
Brett Guthrie  
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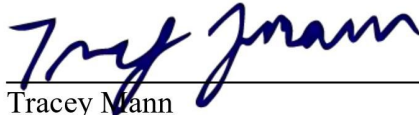
RICH MCCORMICK, MD, MBA  
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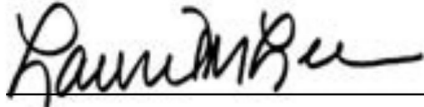
Jake LaTurner  
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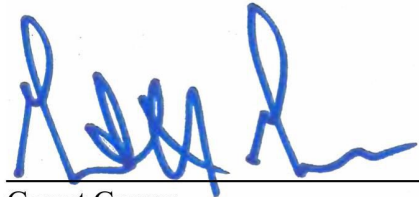
Tracey Mann  
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Stephanie Bice  
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Marcus J. Molinaro  
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Mike Braun  
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Lauren Boebert  
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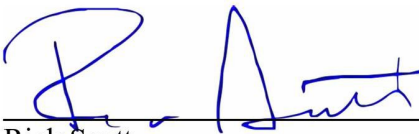
Pete Stauber  
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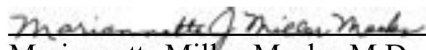
John R. Moolenaar  
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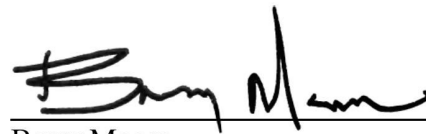
Brian Babin, D.D.S.  
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Rick Scott  
United States Senator



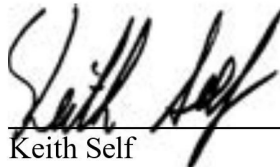
Mariannette Miller-Meeks, M.D.  
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Barry Moore  
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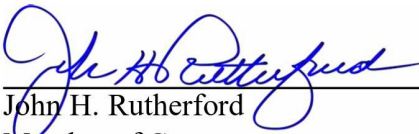
Gary J. Palmer  
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Kevin Hern  
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Guy Reschenthaler  
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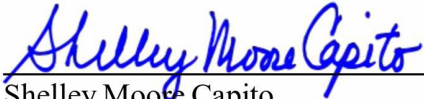
Mike Carey  
Member of Congress



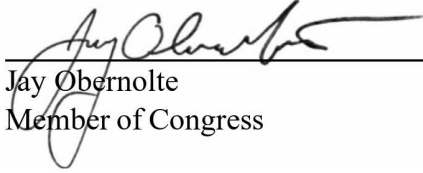
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Shelley Moore Capito  
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Earl L. "Buddy" Carter  
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Alex X. Mooney  
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Trent Kelly  
Member of Congress



C. Scott Franklin  
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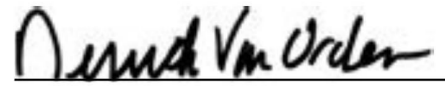
Ben Cline  
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Mike Collins  
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Mike Ezell  
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Derrick Van Orden  
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Michelle Fischbach  
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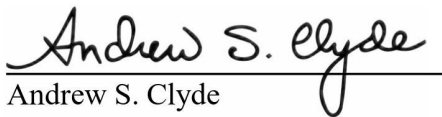
Adrian Smith  
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Eric Burlison  
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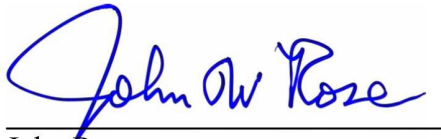
Glenn Grothman  
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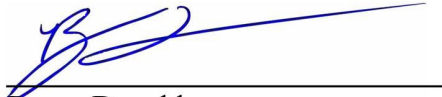
Andrew S. Clyde  
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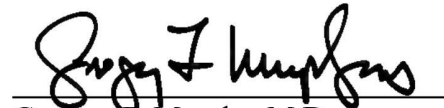
Ronny L. Jackson  
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John Rose  
Member of Congress



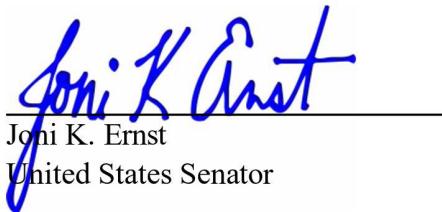
Byron Donalds  
Member of Congress



Gregory F. Murphy, M.D.  
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Mark E. Amodei  
Member of Congress



Joni K. Ernst  
United States Senator



John Barrasso, M.D.  
United States Senator



Gus M. Bilirakis  
Member of Congress

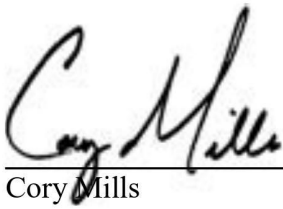


Dan Newhouse  
Member of Congress

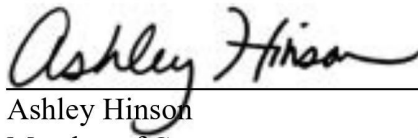


John Thune  
United States Senator

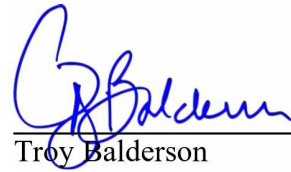




Cory Mills  
Member of Congress



Ashley Hinson  
Member of Congress



Troy Balderson  
Member of Congress



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Member of Congress



Mary E. Miller  
Member of Congress



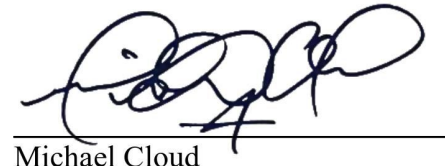
Dan Sullivan  
United States Senator



Barry Loudermilk  
Member of Congress



Michael V. Lawler  
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Michael Cloud  
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Ron Estes  
Member of Congress



Ann Wagner  
Member of Congress



Mike Rounds  
United States Senator



Mike Bost  
Member of Congress



Pete Sessions  
Member of Congress



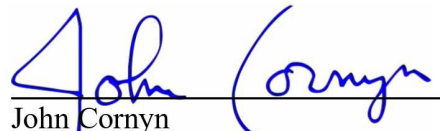
Jodey C. Arrington  
Member of Congress





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Jim Banks  
Member of Congress




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John Cornyn  
United States Senator



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Clay Higgins  
Member of Congress



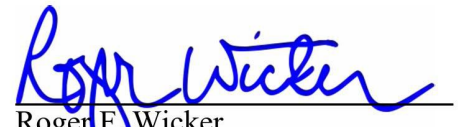
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John Hoeven  
United States Senator




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Elise M. Stefanik  
Member of Congress




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Roger F. Wicker  
United States Senator



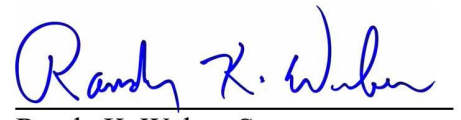
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Brandon Williams  
Member of Congress




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David Rouzer  
Member of Congress



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Randy K. Weber, Sr.  
Member of Congress



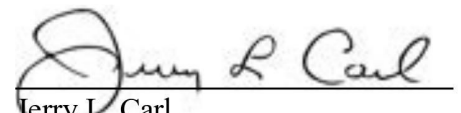
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Austin Scott  
Member of Congress



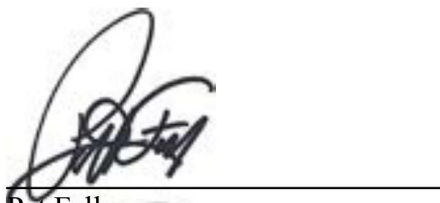
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Roger Williams  
Member of Congress



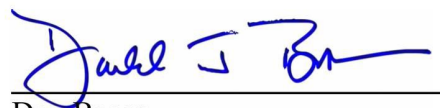
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Jerry L. Carl  
Member of Congress



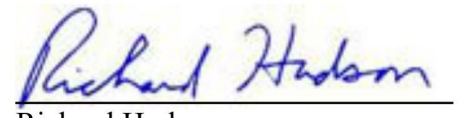
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Pat Fallon  
Member of Congress



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Don Bacon  
Member of Congress

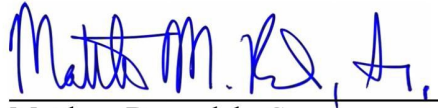


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Richard Hudson  
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Ted Budd  
United States Senator



Matthew Rosendale, Sr.  
Member of Congress



Diana Harshbarger  
Member of Congress



Troy E. Nehls  
Member of Congress



JD Vance  
United States Senator



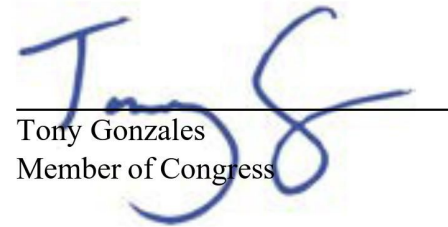
John Joyce  
Member of Congress



Marsha Blackburn  
United States Senator



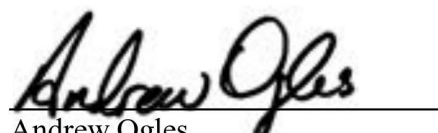
Lisa C. McClain  
Member of Congress



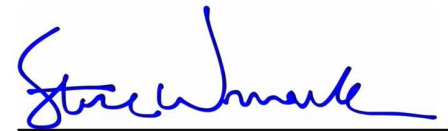
Tony Gonzales  
Member of Congress



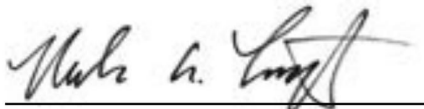
Max L. Miller  
Member of Congress



Andrew Ogles  
Member of Congress



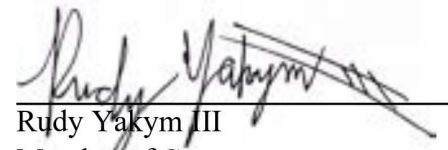
Steve Womack  
Member of Congress



Nicholas A. Langworthy  
Member of Congress



Glenn "GT" Thompson  
Member of Congress



Rudy Yakym III  
Member of Congress



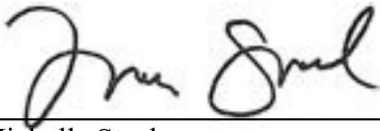
Lindsey O. Graham  
United States Senator



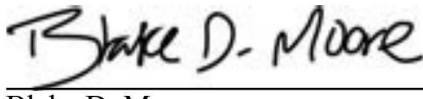
Cliff Bentz  
Member of Congress



Ken Calvert  
Member of Congress



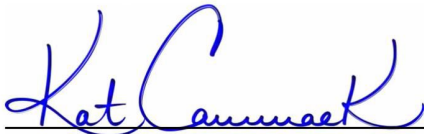
Michelle Steel  
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Blake D. Moore  
Member of Congress



Brad R. Wenstrup, D.P.M.  
Member of Congress



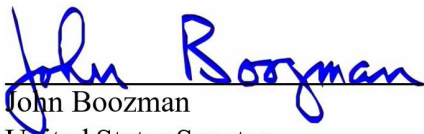
Kat Cammack  
Member of Congress



Bryan Steil  
Member of Congress



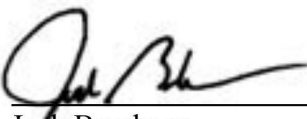
James Comer  
Member of Congress



John Boozman  
United States Senator



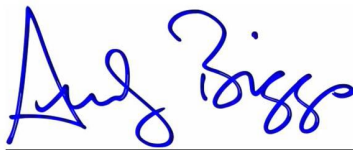
Elijah Crane  
Member of Congress



Josh Brecheen  
Member of Congress



Bruce Westerman  
Member of Congress



Andy Biggs  
Member of Congress



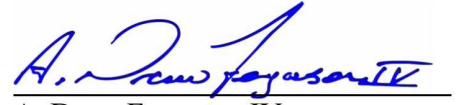
French Hill  
Member of Congress



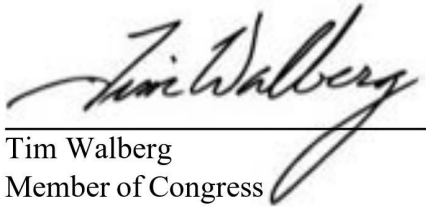
Dan Bishop  
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Sam Graves  
Member of Congress



A. Drew Ferguson IV  
Member of Congress



Tim Walberg  
Member of Congress



Mike Kelly  
Member of Congress



Larry Bucshon, M.D.  
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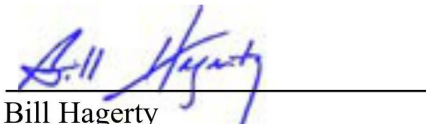
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Member of Congress




Katie Boyd Britt  
United States Senator



Tom Cotton  
United States Senator



Bill Hagerty  
United States Senator



Tim Scott  
United States Senator