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August 4, 2022

Governor Roy Cooper  
 c/o Eric Fletcher  
 Office of the Governor  
 20301 Mail Service Center  
 Raleigh, NC 27699-0301

Dear Governor Cooper,

The undersigned organizations write to express our united interest in the adoption of the Advanced Clean Trucks Rule in North Carolina. Adopting this Rule will bring necessary health, climate, and economic benefits to North Carolinians, reduce the State’s dependence on oil, and solidify the State’s status as a leader in clean transportation. Each of the undersigned organizations views this as a top priority for climate action and urges your administration to take swift action to advance the Rule.

As you know, transportation is the largest source of climate change-inducing greenhouse gas emissions in North Carolina, representing roughly 36% of the State’s emissions.<sup>1</sup> We

<sup>1</sup> N.C. Dep’t of Env’t Qual., North Carolina Greenhouse Gas Inventory (1990-2030) 5 (Jan. 2022), <https://deq.nc.gov/media/27070/download?attachment>.

commend your administration’s action to address this problem by prioritizing clean transportation through Executive Order 246, which recognized in particular a need to transition medium- and heavy-duty vehicles to zero-emission vehicles.<sup>2</sup> The Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding, which North Carolina signed in 2020, also recognized the importance of reducing greenhouse gas emissions by targeting medium- and heavy-duty vehicle traffic and committed North Carolina to fostering a market for zero-emission versions of such vehicles.<sup>3</sup> Consistent with the environmental justice commitments expressed in Executive Order 246, the Memorandum places special emphasis on the need to accelerate the transition to zero-emission versions of these vehicles in disadvantaged communities that have historically shouldered a greater burden from air pollution.<sup>4</sup>

Through these actions, North Carolina has identified itself as a leader in its commitment to reducing greenhouse gas emissions and promoting environmental justice by committing to clean transportation; adopting the Advanced Clean Trucks Rule would solidify that status.

The undersigned groups see adoption of the Advanced Clean Trucks Rule as a top priority for North Carolina. The rule targets pollution from medium- and heavy-duty vehicles, which generate an outsized share of pollution from transportation. These trucks are only 6.5% of the vehicles on the road in North Carolina, yet they contribute almost 34.5% of transportation greenhouse gas emissions, 71.2% of pollution from nitrogen oxides, and 54.57% of direct fine particulate matter pollution.<sup>5</sup> The Rule requires manufacturers to ensure that zero-emission vehicles—rather than heavily polluting, diesel-fueled trucks—comprise an increasing percentage of sales of medium- and heavy-duty vehicles over time. We were pleased to share with your staff an analysis from RTI International, which demonstrates that the Advanced Clean Trucks Rule will substantially decrease harmful emissions from medium- and heavy-duty vehicles in North Carolina, including emissions of nitrogen oxides, fine particulate matter, and greenhouse gases.<sup>6</sup> By reducing greenhouse gases, the Rule will target a major driver of climate change and assist North Carolina in reaching the climate and clean transportation goals you set out in Executive Order 246.

The pollution reduction that the Advanced Clean Trucks Rule provides will also bring health benefits to North Carolina by reducing emissions of pollutants associated with negative health outcomes. Reducing levels of pollutants like nitrogen oxides and fine particulate matter in the air is associated with reduced incidences of mortality, infant mortality, non-fatal heart attacks, cardiovascular hospital admissions, emergency room visits for asthma, and lost workdays.<sup>7</sup> And because diesel traffic is a dominant driver of disparities in health outcomes

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<sup>2</sup> Exec. Order No. 246, North Carolina’s Transformation to a Clean, Equitable Economy (Jan. 7, 2022).

<sup>3</sup> Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding (signed by N.C. July 10, 2020), <https://www.nescaum.org/documents/mhdv-zev-mou-20220329.pdf/>.

<sup>4</sup> *Id.*; Exec. Order No. 246.

<sup>5</sup> U.S. Env’t Protection Agency, MOVES3: Latest Version of Motor Vehicle Emission Simulator (MOVES) (2021), <https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves> (as obtained on December 15, 2021).

<sup>6</sup> Jeffrey Petrusa et al., RTI International, *North Carolina Clean Transportation Study* 15-19 (Apr. 2022), <https://www.rti.org/publication/north-carolina-clean-transportation-study> (“RTI Report”).

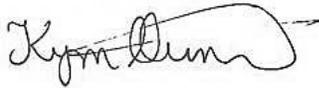
<sup>7</sup> *Id.* at 20.

associated with air pollution,<sup>8</sup> with disproportionate impact all too often in low-income communities and communities of color, targeting this source of pollution will further environmental justice.

The Advanced Clean Trucks Rule is also good for North Carolina’s economy. The Rule will encourage investment in clean transportation research, development, and manufacturing, spurring innovation and creating domestic jobs. Further, the analysis by RTI International shows that the Advanced Clean Trucks Rule would bring billions of dollars in cost savings to the State. Estimates of the monetized health and climate benefits of the Rule between 2020 and 2050 amount to well over \$100 billion, and potentially much higher.<sup>9</sup> Other types of benefits—such as fuel cost savings—will only add to this total in the coming decades.<sup>10</sup> Companies spanning a variety of sectors agree that adopting the Advanced Clean Trucks Rule is good business: A group of thirty major businesses, employers, investors, and business groups in the state—including Arrival, which recently established manufacturing operations in Charlotte, as well as Durham-based FlexGen—have expressed strong support for the Rule.<sup>11</sup>

In sum, we strongly support the adoption of the Advanced Clean Trucks Rule as a top priority for climate action in North Carolina.

Sincerely,



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<sup>8</sup> See, e.g., Mary Angeliqye G. Demetillo et al., *Space-Based Observational Constraints on NO<sub>2</sub> Air Pollution Inequality From Diesel Traffic in Major US Cities*, 48 *Geophysical Research Letters* (Aug. 2021), <https://agupubs.onlinelibrary.wiley.com/doi/10.1029/2021GL094333>.

<sup>9</sup> RTI Report at 21-23.

<sup>10</sup> *Id.* at 20-29.

<sup>11</sup> Letter from Thirty Business Entities to N.C. Governor Roy Cooper (June 3, 2022), [https://e2.org/wp-content/uploads/2022/06/Final\\_Joint-NC-ACT-Business-Support-Letter.pdf](https://e2.org/wp-content/uploads/2022/06/Final_Joint-NC-ACT-Business-Support-Letter.pdf).



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