May 16, 2022

U.S. Environmental Protection Agency (EPA)
Office of Air and Radiation
Docket Center
Mail Code 28221T
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Proposed Rule on Control of Air Pollution from New Motor Vehicles:
Heavy-Duty Engine and Vehicle Standards (the "Proposal")
(EPA–HQ-OAR–2019–0055)

We are pleased to submit these comments on the above-referenced Proposal.[1]

We represent a cross-section of stakeholders that are developing, promoting, or investing in decarbonization approaches that can scale this decade, including two industry associations that represent companies that are producing low-carbon, renewable biofuels produced on American farms and with American workers, a venture capital firm that invests in companies that are commercializing disruptive advanced energy technologies that can reach significant scale and can have a material impact on greenhouse gas emissions, and a startup company that is developing technology to decarbonize long-haul trucking, agricultural equipment, and other offroad sectors at scale this decade by enabling compression-ignition trucks to operate on a low-carbon renewable fuel like ethanol.

We strongly support EPA's efforts to reduce emissions of nitrogen oxides (NOx) and greenhouse gases (GHGs) from our nation's heavy-duty engines and vehicles. We also strongly support the Biden administration's goal of reaching net zero GHG emissions by 2050.

We believe that EPA's Clean Trucks Plan, of which this Proposal is a critical component, is critical to helping states attain and maintain the National Ambient Air Quality Standard

[1] Please note that, unless defined otherwise herein, acronyms and defined terms used herein shall have the meanings ascribed to them in the Proposal. If you have any questions or would like additional information about the comments in this letter, please contact Rich Kassel at rkassel@ajw-inc.com.

for Ozone, to providing improved health to residents of disadvantaged communities that continue to be burdened by disproportionate levels of diesel pollution, and to ensuring that the heavy-duty engine and vehicle sector will play its part in helping our nation meet our critical climate goals.

We also believe that the Agency needs to embrace an innovation-driven, data-driven, "all-of-the-above" approach to achieve rapid decarbonization this decade. We are very concerned that EPA is proposing to provide technology-specific incentives to only two of the many technologies that are being developed to decarbonize the nation's trucks and buses, rather than continuing the fuel-neutral, technology-neutral, performance-based approach that has proven to be so successful for more than five decades of Clean Air Act mobile source regulations.

In the current Proposal, EPA is providing incentives that reward BEVs and FCEVs that are not available to other technologies or strategies that can achieve the same – or even greater – NOx or GHG emissions benefits when upstream and other indirect emissions are considered. Such an approach is likely to send market signals that will stifle innovation by companies that are developing non-BEV and non-FCEV decarbonization technologies, as well as reduce opportunities to increase the use of low-carbon, renewable, American-produced biofuels as part of the Clean Truck Plan's decarbonization strategy.

Instead of providing incentives that are limited to specific technologies, we urge EPA to establish fuel-neutral, technology-neutral, performance-based standards and incentives that will allow all effective technologies to be recognized for their contributions and that does not stifle innovation by companies that are developing non-BEV or non-FCEV technology solutions or biofuels-based decarbonization strategies.

In sum, meeting the Biden administration's "net zero by 2050" goal requires EPA to implement a regulatory model that will maximize the scale and cost-effectiveness of potential GHG emissions reductions that are possible across the entire heavy-duty sector over the coming critical decade and longer, regardless of the fuel, power source, or technology deployed.

We strongly encourage you to finalize the Proposal in a way that sends the right market signals and encourages data-driven innovation that is far more likely to result in greater and more cost-effective GHG emissions reductions than a technology-specific approach that rewards only two of the many decarbonization strategies being developed for the heavy-duty transportation sector.

Thank you for considering these comments.

Sincerely,

Clean Energy Ventures

ClearFlame Engine Technologies

Growth Energy

Renewable Fuels Association