



August 11, 2025

Honorable Antonio F.D. Cabral, House Chair
Honorable Nick Collins, Senate Chair
Joint Committee on State Administration
State House, Room 466
Boston, Massachusetts 02133

Chair Cabral, Chair Collins, and Members of the Committee:

On behalf of the Transportation Association of Massachusetts (TAM) and our members who operate medium- and heavy-duty commercial vehicles throughout the Commonwealth, I write in strong support of House Bill 3406 / Senate Bill 2185, An Act Relative Responsibly Reducing Emissions from the Transportation Sector. While this legislation should be amended to reflect a more realistic timeline for transitioning to zero emissions medium- and heavy-duty (MHD) trucks, it is a good starting point for a conversation about ways in which the transportation sector can reduce emissions without simply trying to electrify everything at a time when a myriad of problems prevent the reasonable adoption of the same today.

As you know, Mass. Gen. Laws Ch. 111, §142K requires the Commonwealth to adopt the emissions standards established by the California Air Resources Board (CARB). Specifically, CARB approved the ACT rule in June 2020, which Massachusetts adopted in 2021. The ACT rule requires that manufacturers sell an increasing number of zero-emission medium- and heavy-duty vehicles (MHDs), greater than 8,500 pounds GVWR, from 2024 to 2035. In addition to adopting the ACT rule, Massachusetts has also adopted the heavy-duty omnibus rule (HDO), which aims to substantially reduce toxic air pollutants from heavy-duty vehicles. While the Healey-Driscoll Administration has delayed the implementation of the ACT and HDO rules to 2027 and 2026, respectively; subsequent action federal action – currently being challenged in court – eliminated CARB's waiver authorization for promulgating the ACT and HDO rules.

With that in mind, TAM supports the implementation of technology and practices that will reduce and, eventually, eliminate emissions from the transportation sector. Unfortunately, technology and infrastructure improvements have not kept pace with the concept of emissions reduction as envisioned by the ACT/HDO rules.

Unless we work together – without committing to only one type of emissions reduction technology - the shared goal of significantly reducing emissions by industry, government,

and advocates will fail – largely due to major logistical and technological roadblocks outside of our control. Further, if we do not take a coordinated approach – or if zero-emission mandates are pushed too aggressively, too soon, on a poorly thought-out plan – there will be significant implications that may actually work to keep older, dirtier MHD trucks on the road. To that end, we strongly encourage the Committee to use HB3406 / SB2185 as a foundation for a broader, more flexible strategy to reduce transportation emissions—one that goes beyond zero-emission mandates and embraces a full portfolio of solutions that can produce immediate results.

In addition to setting a reasonable delay to the implementation of the ACT, HDO or other similar mechanisms that simply try to prematurely mandate one emissions reduction strategy over all else, we should consider the opportunity for taking steps to reduce emissions now. To the aforementioned point, the following enhancements to the Commonwealth’s emissions strategy should be integrated into clean transportation planning – whether in in HB3406 / SB2185 or some other legislative vehicle:

- Leverage Cleaner Fuels Now Using Existing Engines. A substantial number of trucks on Massachusetts roads today are powered by diesel engines that predate the U.S. EPA’s 2010 emissions standards. These older engines are significantly more polluting than current clean diesel models. By promoting the use of renewable diesel and biodiesel, which can be used in existing engines without modifications, we can achieve immediate emissions reductions—regardless of vehicle age or drivetrain.
- Incentivize Replacement of Higher-Emitting Trucks. Older MHD trucks emit drastically more particulate matter (PM) and nitrogen oxides (NOx) than newer models. A 2026 Class 8 truck emits 99% less NOx and 95% less PM than its 2006 counterpart. TAM urges the Commonwealth to eliminate the sales and use tax on rolling stock, as done by 37 other states and establish a replacement grant program for older trucks, with requirements to retire or destroy high-emission engines to prevent resale elsewhere.
- Support Multiple Low-Emission Technologies. Electric trucks are an important part of the future, but they are not a one-size-fits-all solution. For many sectors—such as construction, long-haul trucking, and rural operations—battery electric vehicles are not yet viable due to cost, range, or infrastructure constraints. Cleaner alternatives that are already deployable today include clean diesel, hybrid electric and hydrogen fuel cell technology (for specialized duty cycles).
- Thoughtfully Expand Charging and Refueling Infrastructure. The buildout of clean fueling infrastructure must match real-world trucking operations. In addition to highway corridors, fueling and charging must be available at warehouses, manufacturing, logistics hubs and temporary work locations such as construction sites. As the upcoming, two-year update by the Electric Vehicle Infrastructure Coordinating Council (EVICC) will attest to, the Commonwealth has plenty of infrastructure work that remains to be completed.

- Implement a Phased Rollout of ZEVs Based on Feasibility. Massachusetts should pursue a phased, operationally feasible rollout of zero-emission vehicles / trucks (ZEVs), beginning with urban delivery fleets and service trucks with short, fixed routes. Longer-term applications (e.g., long-haul freight and vocational trucks) should follow once technology, infrastructure, and workforce readiness catch up. A “crawl-walk-run” model, paired with pilot projects and regional demonstration programs, will ensure success without disrupting essential industries.

The trucking industry shares a commitment to clean air, climate leadership, and sustainable transportation. House Bill 3406 / Senate Bill 2185 presents an opportunity to build a practical and inclusive emissions strategy—one that recognizes both the urgency of action and the complexity of implementation. Accordingly, until such time as the vehicle technology and the infrastructure to support these two rules are available, we should delay their implementation as contemplated under this legislation. Otherwise, we risk harming multiple industries throughout the Commonwealth while stagnating forward progress on further reducing emissions from medium- and heavy-duty trucks.

I appreciate your consideration of this important matter. If you have any questions or concerns, please do not hesitate to let me know.

Sincerely,

A handwritten signature in cursive script, reading "Kevin R. Weeks".

Kevin Weeks
Executive Director