



March 31, 2025

Her Excellency Maura Healey, Governor  
Office of the Governor  
State House, Room 280  
Boston Massachusetts 02133

Honorable Ronald Mariano, Speaker  
Office of the Speaker of the House  
State House, Room 356  
Boston, Massachusetts 02133

Mr. Matthew Gorzkowicz, Secretary  
Executive Office of Admin. & Finance  
State House, Room 373  
Boston, Massachusetts 02133

Honorable Aaron Michlewitz, Chair  
House Committee on Ways and Means  
State House, Room 243  
Boston, Massachusetts 02133

Honorable Karen Spilka, Senate President  
Office of the Senate President  
State House, Room 332  
Boston, Massachusetts 02133

Honorable Michael Rodrigues, Chair  
Senate Committee on Ways and Means  
State House, Room 212  
Boston, Massachusetts 02133

Dear Governor Healey, Senate President Spilka, Speaker Mariano, Chair Michlewitz, Chair Rodrigues and Secretary Gorzkowicz:

Representing end-users of medium- and heavy-duty trucks throughout the Commonwealth, we write to seek your support for delaying the Advanced Clean Truck (ACT) and Heavy-Duty Omnibus (HDO) rules in the fiscal year 2026 budget. Due to a lack of technological advances, increased costs and a lack of needed electric infrastructure necessary to support them, these two rules have already caused the free fall of the sale of medium- and heavy-duty trucks while stagnating our efforts to reduce emissions from the transportation sector in the Commonwealth. From a budgeting perspective, these rules are also costing the Commonwealth a significant reduction of tax revenue through lost sales and excise taxes.

Our organizations recognize the importance of reducing emissions in the transportation sector. For a significant number of years, the industries we represent have taken measures to reduce emissions in our business practices, facilities and truck fleets – whether through the construction of energy efficient buildings or the use of clean diesel and alternative fuel vehicles. To this last point, medium and heavy-duty trucks are essential for numerous operations, including but not limited to food distribution, manufacturing, passenger transport, construction, fuel delivery, forestry services, water treatment operations, waste collection, towing, landscaping, school transportation, snow removal and retail sales, that our organizations' members provide every day.

Unfortunately, the Commonwealth's recent implementation of the Advanced Clean Truck (ACT) rule has adversely impacted our ability to acquire sorely needed medium and heavy trucks. While these state regulations stipulate an increasing percentage of zero-emission vehicle (ZEV) truck sales starting in Model Year 2025 and stronger NOx standards effective January 1, 2026, the necessary technology and infrastructure are not yet in place to support these initiatives. Notwithstanding the significant shortage of the electric infrastructure necessary to charge them, medium and heavy-duty electric trucks remain prohibitively expensive even with their reduced capacity. Further, assuming enough electric trucks were somehow sold to meet the ACT standard, the fact remains that there exist few, if any, HDO compliant diesel trucks to purchase now or in the foreseeable future. In short, these regulations are simply ahead of technology advancements, the necessary infrastructure to support it and manufacturing capacity.

As local media have highlighted<sup>1</sup>, the recent implementation of the ACT rule has essentially stopped the sale of new medium- and heavy-duty trucks throughout the Commonwealth. Not only does this mean that thousands of cleaner, safer trucks are not replacing older, dirtier trucks in the public and private sectors, but we are losing sales tax revenue from the same decline. Using current estimates from the decimated truck market in Massachusetts, we have already lost millions in tax revenue that could be otherwise used to fund a wide variety of important government programs during the fiscal year 2026 budget cycle.

Without the requested delay, the Commonwealth, its municipalities and the industries we represent risk suffering unintended negative consequences, including reduced tax revenues and the increased retention of older, more polluting trucks. Therefore, to effectively advance our emission reduction goals and prevent potential harm to our economy and infrastructure, we respectfully request your support for including language to delay the implementation of the ACT and HDO rules within fiscal year 2026 budget.

We appreciate your attention to this important issue and look forward to further discussions on how to achieve our shared environmental and economic objectives.

Sincerely,

28 Freight/ Freight Courier  
Advantage Truck Group  
Apple Trailer Rentals  
Associated Industries of Massachusetts  
Associated Subcontractors of Massachusetts  
American Trucking Association  
Ballard Trucks  
Beer Distributors of Massachusetts  
Cape Cod Landscape Association  
Commonwealth Waste Transportation  
Construction Industries of Massachusetts  
Goulet Trucking  
Insurance Marketing Agencies  
Jandris Block  
JP Noonan  
Kenworth NE  
Massachusetts Energy Marketers Association  
Massachusetts Forest Alliance  
Maine Motor Transport Association  
Massachusetts Concrete & Aggregate Producers Association

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<sup>1</sup> See “EV rule halts Mass. truck sales, but green groups say manufacturers are dragging feet”, [MassLive](#), February 24, 2025; “The technology just has not kept up’: Truck sales in Mass. are at a standstill over new EV requirements”, [Boston Globe](#), February 19, 2025; “Heavy duty truck dealers say new electric vehicle requirement in Massachusetts is hurting sales”, [WBZ/CBS](#), February 20, 2025; “25 Investigates: New state regs force sales of electric trucks that ‘do not exist’”, [Fox25](#), January 19, 2025.

Massachusetts Arborists Association  
Massachusetts Association of Landscape Professionals  
Massachusetts State Automobile Dealers Association  
Massachusetts Chemistry & Technology Alliance, Inc.  
Massachusetts Concrete & Aggregate Producers Association  
Massachusetts Food Association  
Massachusetts Propane Association  
Massachusetts Retail Lumber Dealers Association  
Motor Transport Association of Connecticut  
Massachusetts Water Works Association  
National Federation of Independent Business  
National Waste and Recycling Association  
New England Bus Association  
New England Concrete Manufacturers Association  
New England Convenience Store & Energy Marketers Association  
New England Livery Association  
New England Sports Field Management Association  
Northeast Great Dane  
One Energy Transport  
Propane Gas Association of New England  
Regency Transportation  
Retailers Association of Massachusetts  
Rhode Island Trucking Association  
Rich's Transportation  
RV Industry Association  
Salvoni Transportation  
School Transportation Association of Massachusetts  
Spinning Wheels Express  
Statewide Towing Association, Inc.  
The PETE Store  
Trucking Association of Massachusetts  
Trucking Association of New York  
Truck Rental and Leasing Association  
UPS  
Utility Contractors Association of New England, Inc.  
WL French  
Wyson Trucking

cc:

Ms. Rebecca Tepper, Secretary  
Massachusetts Executive Office of Energy and Environmental Affairs

Ms. Bonnie Heiple, Commissioner  
Massachusetts Department of Environmental Protection