



Construction Industries of Massachusetts, Inc.



March 31, 2025

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

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

Honorable Ronald Mariano, Speaker
Office of the Speaker of the House
State House, Room 356
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 highlighted¹, 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

¹ 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