

November 30, 2022

Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2022-0330, EPA-HQ-OAR-2022-0331, EPA-HQ-OAR-2022-0332

RE: California's Waiver Requests for the Advanced Clean Trucks, Zero-Emission Airport Shuttle, and Zero-Emission Power Train Certification regulations; Omnibus Low-NOx regulation; and Heavy-Duty Vehicle and Engine Emissions Warranty and Maintenance regulations.

Dear Administrator Regan:

On behalf of the 114 undersigned groups, we urge the EPA to promptly approve California's three Clean Air Act waiver requests in full, allowing states to enforce more stringent heavy-duty vehicle standards that will protect public health and help alleviate local air pollution challenges. Further delay could threaten states' ability to implement the first model year for the standards, which millions of residents are counting on.

Many of our groups have advocated for the Advanced Clean Trucks (ACT), the Heavy-Duty Omnibus (HDO) Low NOx, and the Zero-Emission Airport Shuttle regulations because they are the best and most cost-effective tools states currently have for slashing the toxic emissions from diesel trucks and buses. It is imperative that states have the ability to enforce stronger vehicle emission standards than those set by the federal government. Delaying implementation by even one year would hinder the ability of states to stay on track to meet air quality and climate commitments and create costly regulatory uncertainty to the industry.

Five states—Massachusetts, New Jersey, New York, Oregon, and Washington—have already successfully adopted California's ACT and/or Low-NOx rules. Six additional states—Colorado, Connecticut, Maine, Maryland, North Carolina, and Vermont—are considering adopting these rules, given the superior NOx reductions and pathway to zero-emission technologies offered by the California standards compared to the federal program.

The ACT and Low-NOx rules are critical for slashing diesel pollution. More than 40% of Americans—over 137 million people—live in areas that have received failing grades for unhealthy levels of ozone or particulate matter in their air.¹ Cleaner trucks are needed to address long standing air quality problems in communities located near trucking corridors and hubs, ports, and warehouses that are often disproportionately affected by diesel exhaust emissions and increased health burdens due to poor air quality.

¹ American Lung Association, State of the Air, at 11 (2022), [State of the Air 2022](#).

In addition to their substantial public health benefits, these rules are rooted in extensive research, analysis, and stakeholder outreach, confirming that they are cost-effective, technologically-feasible, and consistent with Section 202(a) of the federal Clean Air Act.

In conclusion, the undersigned groups urge the EPA to expeditiously approve CARB's waiver requests in full to advance state action to address air quality challenges from diesel truck pollution and spur zero-emission truck and bus adoption. The state agencies that have already adopted the California regulations did so recognizing the overwhelming support from their residents striving for the public health and climate benefits. It's time the EPA ensures that this commitment is realized.

Sincerely,

350 Salem Oregon
Acadia Center
Air Alliance Houston
Alabama Interfaith Power & Light
Alliance of Nurses for Healthy Environments
Amalgamated Transit Union
Arizona Climate Action Coalition
Ashford Clean Energy Task Force
Beyond Toxics
California Communities Against Toxics
California Electric Transportation Coalition
California Interfaith Power & Light
CALPIRG
CALSTART
Center for Energy Efficiency and Renewable Technologies
Center for Neighborhood Technology (CNT)
Central California Asthma Collaborative
Ceres
Chesapeake Climate Action Network
CHR, Inc
Clean Air Council
Clean Energy Works
Climate Action California
Climate Solutions
Coalition for Clean Air
Coalition for Clean Transportation
Conservation Law Foundation
Conservation Voters of Pennsylvania
Cully Air Action Team~CAAT
Denver NAACP Environmental Justice Committee
Douglas County Global Warming Coalition
Drive Electric RVA
Earthjustice

Ecology Center
EcoMadres
Elders Climate Action - Arizona Chapter
Electric Vehicle Club of Connecticut
Electrification Coalition
Empower Our Future
Environment America
Environment California
Environment New Jersey
Environmental Advocates NY
Environmental Defense Fund
Environmental Law & Policy Center
Environmental Protection Network
Evergreen Action
Faith Coalition for the Common Good
Fresh Energy
Green Energy Consumers Alliance
GreenLatinos
Healthy Air & Water Colorado
Illinois People's Action
Institute for Transportation and Development Policy (ITDP)
Interfaith Power and Light
Isles, Inc
Jersey Renews
League of Conservation Voters (LCV)
League of Women Voters of Wilmette
Little Manila Rising
Little Village Environmental Justice Organization
Locust Point Community Garden
Maryland League of Conservation Voters
MI Air MI Health
Mi Familia Vota
Michigan Environmental Council
MLC Climate Justice Wing
Mobilify Southwestern Pennsylvania
Moms Clean Air Force
Montgomery Countryside Alliance
Moving Forward Network
Neighbors for Clean Air
New Haven Climate Movement
New Jersey Future
New Jersey Policy Perspective
New Jersey Public Interest Research Group
New Jersey Work Environment Council
New York City Environmental Justice Alliance

New Yorkers for Clean Power
Newton EV Task Force, Newton, MA
NRDC
NW Energy Coalition
Oil and Gas Action Network
Oregon Environmental Council
PA Jewish Earth Alliance
PennFuture
Philadelphia Solar Energy Association
Policy Foundation of Maryland
Prosperity Works
Public Citizen
Regional Asthma Management and Prevention
Respiratory Health Association
ReVision Energy Inc.
Seventh Generation
Sierra Club
Southern Environmental Law Center
Southwest Energy Efficiency Project
SunCommon
The People's Justice Council
TinkerTry.com, LLC
Together Colorado Climate Justice Committee
Tri-state Transportation Campaign
U.S. PIRG
Union of Concerned Scientists
Unitarian Universalist Advocacy Network of Illinois
Vermont Clean Cities Coalition
Vermont Interfaith Power & Light
Vermont Public Interest Research Group
Virginia Clinicians for Climate Action
Washington Build Back Black Alliance
Watertown Faces Climate Change
Western Resource Advocates
Womxn from the Mountain
Zero Emission Transportation Association (ZETA)

CC: Ali Zaidi, White House National Climate Advisor
Austin Brown, Senior Director for Transportation Emissions, White House Office of Domestic Climate Policy