



August 1, 2022

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

RE: EPA-HQ-OAR-2022-0330; EPA-HQ-OAR-2022-0331; EPA-HQ-OAR-2022-0332

Dear Administrator Regan:

The undersigned national, state and local health and medical organizations strongly support the U.S. Environmental Protection Agency granting California's three cleaner truck waivers without delay: Advanced Clean Trucks, Zero Emission Airport Shuttle, and Zero-Emission Power Train Certification; Heavy-duty Omnibus Low NOx; and Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions. Doing so is critical for the health of the patients and communities we serve.

As it has for more than five decades, the Clean Air Act recognizes the unique challenges facing the people of California when it comes to unhealthy air pollution. The law ensured that California could

continue enacting its own standards to regulate motor vehicle emissions, acknowledging the state's long history and continued need to protect its residents from harmful air pollution. To help California meet the compelling and extraordinary pollution conditions in the state, EPA must grant these waivers. Cutting emissions from trucking and other heavy-duty vehicles is vital to improving public health, reducing health disparities and reducing climate pollution from the trucking industry.

Cleaning up the heavy-duty vehicles sector is a health and environmental justice imperative. Transportation pollution is the dominant source of both climate pollution and smog-forming oxides of nitrogen. The trucking sector is a major source of regional air pollution that threatens health, despite trucks making up a small percentage of the on-road vehicle population. According to the American Lung Association's "[Zeroing in on Healthy Air](#)" report, a nationwide transition to zero-emission vehicles and electricity – including medium- and heavy-duty vehicles – would save 110,000 lives and deliver \$1.2 trillion in public health benefits over 30 years. This broad transition to zero-emission vehicles would help to prevent over 15,000 deaths and 440,000 asthma attacks in California, with health benefits reaching \$169 billion over the coming decades.

According to the US Environmental Protection Agency's recent [Transportation Pollution and Environmental Justice Fact Sheet](#), there are 72 million Americans living in close proximity to major trucking routes, and those people tend to be lower income people and people of color. These people are disproportionately impacted by pollution and therefore more likely to experience health impacts, such as respiratory and cardiovascular diseases.

California has adopted major regulations through robust public processes to address these harmful emissions. The California Low NOx Omnibus and Warranty rules and zero-emission vehicle rules like the Advanced Clean Truck standards will combine to save thousands of lives and generate tens of billions in public health benefits. We know that these benefits will be most important for communities most impacted by trucking emissions today.

The hallmarks of these rules are twofold: driving the transition to zero-emission technologies and requiring cleaner combustion engines with more durable emission controls. The emission benefits of zero-emission trucks are present throughout the lifetime of the vehicle. For combustion trucks, the requirements must be in place to ensure that the promised emissions reductions are maintained over the life of the vehicle. The warranty provision is critical to protecting the public from super-polluting trucks with failed emission controls. Combined, these rules will provide massive benefits to regional air quality and deliver cleaner, healthier air to environmental justice communities overburdened by truck traffic today.

The California rules also provide important direction to a zero-emission future in the heavy-duty sector by appropriately crediting only non-combustion technologies as zero-emission or near-zero emission for purposes of compliance. Regardless of fuel type, combustion technologies must become cleaner and demonstrate compliance with durability and warranty provisions, and ensure real-world benefits over the life of the vehicle.

We also note that strong standards in California deliver benefits nationwide in several ways. Other states can opt in to these standards to benefit health in their own states. Air pollution does not stop at state lines, and emissions prevented from California and other states with these stronger standards benefit health in surrounding areas. This is especially true for greenhouse gases. Finally, strong state-level standards drive demand for zero-emission vehicles.

The transition to zero-emission transportation is a crucial step in meeting clean air and climate standards, along with ensuring combustion vehicles are required to clean up and to perform to stronger standards over their full useful life. We urge EPA to grant the waivers without delay to ensure the air quality, public health and environmental justice benefits of these rules follow.

Signed,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics, California
American College of Physicians
American Lung Association
American Public Health Association
Asthma and Allergy Foundation of America
Asthma and Allergy Foundation of America, Alaska Chapter
Asthma and Allergy Foundation of America, New England Chapter
Asthma Coalition of Kern County
Asthma Coalition of Los Angeles County
Breathe Southern California
California Conference of Directors of Environmental Health
Center for Climate Change and Health
Children's Environmental Health Network
Climate for Health/ecoAmerica
Emphysema Foundation of America
Health Care Without Harm
Medical Society Consortium on Climate and Health
Medical Students for a Sustainable Future
Physicians for Social Responsibility
Physicians for Social Responsibility/Sacramento
Prevention Institute
Public Health Institute
Regional Asthma Management and Prevention (RAMP)
San Francisco Bay Physicians for Social Responsibility
St. John's Community Health