

**As Prepared for Delivery**  
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The U.S. Environmental Protection Agency  
California Waiver Hearing: Advanced Clean Trucks, Omnibus Low NOx, and HD Emission Warranty  
Regulations

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Good morning, my name is Will Barrett, National Senior Director for Clean Air Advocacy with the American Lung Association. I'm based in Sacramento and participated in the California Air Resources Board rulemakings under discussion today.

As noted by my colleagues, our organization calls on US EPA to approve the waivers for this critical suite of California standards without delay to support improved air quality, reduce disparities in harmful pollution exposures and save the lives of thousands of Californians impacted by trucking pollution.

In 2020, the California Air Resources Board adopted pivotal clean air rules for heavy duty trucks. Throughout the years of public process, these policies had the strong support of over 20 health and medical organizations, including the Lung Association and organizations representing nurses, physicians, pediatricians and prenatal care providers, asthma care providers and many others throughout the state.

We recognize that without strong state and national standards for cutting pollution from the trucking sector, California simply cannot meet health-protective clean air standards. We also know that without EPA taking strong actions on trucking emissions in conjunction with the California rules, California will also fail to attain clean air standards. We cannot deliver clean, healthy air to communities throughout our state, and especially those most impacted by trucking emissions unless California implements these rules.

That is central to why we supported California exercising state authority under the Clean Air Act to protect our residents from extraordinary air pollution conditions. Specifically, we supported these trucking rules as they get to the heart of so many public health burdens and regional air pollution sources.

The heavy-duty trucking sector in California represents more than half of the on-road ozone- and particle forming emissions despite making up only 3 percent of all vehicles on California roads. This is a major source of California's ozone and particle pollution challenges that these rules address.

When we think of the benefits of these rules, we have to think about the trucks running through California's San Joaquin Valley communities like Stockton, Fresno and Bakersfield and along the trucking routes between the Southern California Ports and up to the sprawling warehouses in the Inland Empire. Many in these communities have been outspoken in their support for these rules in California because they are bearing the costs of thousands of combustion truck trips daily.

We know that those most impacted by trucking pollution will benefit significantly from the implementation of these measures that clean up trucking emissions and that this rule will spur the transition to a zero-emission trucking sector.

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 in California alone. We know that these benefits will be most important for communities most impacted by trucking emissions today, and that these benefits will grow as more states opt-in to these more health-protective standards.

The hallmarks of these rules are twofold – 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.

American Lung Association research highlights that the nationwide transition to zero-emission transportation and electricity, including medium- and heavy-duty vehicles, could yield over \$1.2 trillion in public health benefits cumulatively by 2050.

This includes 110,000 lives saved, nearly 3 million asthma attacks avoided and over 13 million lost workdays avoided due to cleaner air. This broad transition 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. We cannot afford to delay implementation of these lifesaving rules.

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 required to perform to stronger standards over their full useful life.

Again, we call on US EPA to grant these waivers immediately so that California and the states can move forward with these life-saving rules and more communities have access to clean, healthy air every day.