

As Prepared for Delivery
Comments of Mariela Ruacho
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On
The U.S. Environmental Protection Agency
California Advanced Clean Fleets Waiver
Docket ID No. EPA-HQ-OAR-2023-0589
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Hello, my name is Mariela Ruacho, I am the Senior Clean Air Advocacy Manager for the American Lung Association in California. I urge EPA to approve the clean air waiver for the Advanced Clean Fleets rule.

Transportation is a major source of air pollution in California. Although heavy-duty trucks account for less than 5 percent of the state's vehicle population, they emit the majority of smog-forming pollution in the state.

Our 2024 State of the Air report showed that six California cities rank in the top 10 lists for ozone and particle pollution and continue to have the worst air pollution challenges in the United States.

The ACF rule sets 100 percent zero-emission vehicle sale standard by 2036 and requires large fleets who have over 50 trucks to transition to zero-emission trucks. The rule also accelerates the transition of zero-emission of port fleets.

The ACF rule will help California meet federal clean air standards and climate goals. The rule is included in the state's 2022 Ozone State Implementation Plan as a critical program to reduce ozone-forming emissions.

California needs this rule to reduce over 146,000 tons of smog-forming emissions and over 6,800 tons of fine particles by 2050, resulting in the following health benefits in California of:

- \$26.5 billion in health benefits between 2024 to 2050
- Over 2,500 lives saved

In addition, the state has labeled diesel exhaust a toxic air contaminant that can cause cancer, this rule has the added benefit of reducing cancer causing air contaminants for frontline communities near ports, warehouses, railyards, and major trucking routes.

Because of the public health urgency of this rule, public health organizations were part of the process which included community meetings, workshops, and meetings with stakeholders, and CARB Board hearings.

Lastly, I stand with dozens of health organizations urging EPA to approve California's waiver for the ACF rule without delay and approve the seven other pending clean air programs to ensure healthier air for Californians as quickly as possible.