



June 18, 2024

U.S. Environmental Protection Agency
 William J. Clinton Building
 1200 Pennsylvania Ave, NW
 Washington, DC 20460

Re: Support for California In-Use Off-Road Diesel Fueled Fleets Rule Authorization
 No. EPA-HQ- OAR-2023-0581

Dear Administrator Regan:

The undersigned California-based health and medical organizations urge the United States Environmental Protection Agency (EPA) to authorize California’s implementation of the In-Use Off-Road Diesel Fueled Fleets rule amendments adopted by the California Air Resources Board in 2022.

The transportation sector, including off-road engines, are major contributors to California’s air pollution. The American Lung Association’s 25th annual “State of the Air” report found that 98 percent of Californians live in communities impacted by unhealthy air, and California cities rank among the most polluted in the nation in terms of both ozone and particle pollution.

This pollution contributes to asthma attacks, heart attacks, strokes, lung cancer and premature death. Transportation, including off-road engines, continues to be the main contributor to California’s worst-in-the-nation ozone air pollution and a key contributor to carcinogenic diesel exhaust exposures. Diesel emissions are especially harmful, making residents more vulnerable to respiratory and cardiovascular illnesses.

Curbing emissions from off-road engines – especially the older, higher-emitting engines - plays an increasingly important role in meeting health-protective air quality and climate standards. NOx emissions from off-road engines today surpass emissions from on-road vehicles. This is why the off-road diesel rule amendments were included in California’s 2022 State Implementation Plan to meet national ambient air quality standards for ozone, with an expected contribution of 4 tons per day of NOx reductions. Cumulatively, this policy is estimated to reduce

statewide emissions from off-road diesel-fueled vehicles by approximately 31,000 tons of NOx and 2,700 tons of PM by 2038.¹

The rule amendments are estimated to generate \$5.7 billion in monetized public health benefits and save 571 lives between 2024 and 2038. This is achieved by adopting a phase-out schedule for the oldest and dirtiest off-road equipment, supporting zero-emission technology advancement, and adding cleaner technology requirements on new fleets in addition to ensuring better pollution controls in the future.

The amended rule package resulted from a robust public process and significant stakeholder engagement. The federal Clean Air Act provides California with the authority to enact more-health protective standards, and it requires EPA to authorize state standards that are at least as protective of public health as applicable Federal standards. We believe that the rule amendments respond to the urgent need to address California's air pollution challenges and meet the test for authorization.

Again, we urge the EPA to authorize California's Off-Road Diesel rule amendments to reduce diesel and smog-forming emissions. Also, we urge you to approve the additional seven pending waivers at EPA to ensure much-needed health benefits become reality.

Please contact William Barrett with the American Lung Association at William.Barrett@Lung.org for any additional information.

Sincerely,

Alliance of Nurses for Healthy Environments
American Lung Association
Asthma Coalition of Los Angeles County
Breathe California
California Nurses for Environmental Health and Justice
California Thoracic Society
Children Now
LifeLong Medical Care
Long Beach Alliance for Children with Asthma
Physicians for Social Responsibility/Sacramento
Public Health Advocates
Regional Asthma Management & Prevention
San Francisco Bay Physicians for Social Responsibility
St. John's Community Health

¹ California Air Resources Board. In-Use Off-Road Diesel-Fueled Fleets, p.12, Sept. 2022.
<https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/off-roaddiesel/isor.pdf>.