

As Prepared for Delivery
Comments of Jo Gardias
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On
The U.S. Environmental Protection Agency
California Advanced Clean Fleets Waiver
Docket ID No. EPA-HQ-OAR-2023-0589
August 14, 2024

Good morning. My name is Jo Gardias and I'm a Manager for Clean Air at the American Lung Association working with dozens of states eligible under the Clean Air Act to adopt and implement clean vehicle standards. We urge EPA to approve the clean air waiver for the Advanced Clean Fleets rule.

The American Lung Association is the oldest voluntary public health association in the United States, working to save lives by improving lung health through research, education and advocacy.

Too many people live with unhealthy levels of air pollution. The American Lung Association's 2024 "[State of the Air](#)" report found that nearly 4 in 10 people live in places with unhealthy levels of air pollution.

Air pollution affects the health of everyone, by causing both cardiovascular and respiratory emergencies that can lead to emergency room visits or hospitalizations. This is especially true for children, seniors, and people with pre-existing conditions.

California and many states have adopted programs that increase clean vehicles in on-road transportation fleets, with a focus on curbing pollution from medium- and heavy-duty vehicles. This is because despite making up less than 6% of on-road fleets, medium- and heavy-duty vehicles make up more than half of NOx and particle pollution, according to the Lung Association's "[Delivering Clean Air](#)" report.

California's waivers have enabled flexibility for other states in addressing air pollutants. For the past decade under the authority in the Clean Air Act, California and 11 other states have chosen to adopt vehicle emission standards that reduce air pollution and increase the availability of non-polluting trucks and passenger vehicles through the Advanced Clean Cars II and Advanced Clean Truck standards. For states that have adopted both or either standard, the demand-side provisions in ACF give states the choice to complement their manufacturer standards, providing them with a tool to strength their air pollution and public health benefits.

California and other qualifying states should have the choice to adopt Advanced Clean Fleets as a tool to secure the health benefits from our existing standards and achieve clean air without delay.

The transition to zero-emission vehicles will be especially beneficial to states seeking alternative tools to improve air quality in communities hit by numerous sources of air pollution and provide additional choices for achieving Attainment status with the Clean Air Act.

Lastly, I urge EPA to approve California's waiver for the ACF rule without delay and approve the seven other pending programs to ensure California and other states can meet federal clean air standards.