

As Prepared for Delivery
Comments of Will Barrett
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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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My name is Will Barrett, I am the Senior Director for Nationwide Clean Air Advocacy with the American Lung Association based in Sacramento, CA.

The Advanced Clean Fleets regulation is a critical public health tool to address local, regional and global pollution impacts. We urge the EPA to approve this waiver without delay.

The ACF rule is a major component of California's needed transition to zero-emission vehicles, to ensure an ongoing signal is sent to maintain strong market momentum to fully non-polluting technologies.

More than a quarter of passenger vehicles and one out of six trucks sold are now zero-emission. The ACF rule points toward a longer-term transition to zero-emission sales, supplementing the scope of the Advanced Clean Trucks program now in place in the state – the waiver for that program was approved by EPA in 2022.

The significant gains made toward healthier trucking technologies are facilitated by programs like ACT and ACF. And these gains are bolstered by billions of dollars already invested in California grid readiness, heavy-duty charging and vehicle purchase incentives, and significant resources also available under Biden Administration actions on infrastructure and inflation reduction programs.

Approval of the ACF is critical to maintain this momentum toward healthier air – to meet clean air standards – but also in recognition that we're running behind on this critical policy. The program was scheduled to begin on January 1, 2024 with an early priority cleanup of California's fleet of old, dirty diesel trucks operating at ports. This is a critical element of the rule: To protect port-side communities and workers most impacted by diesel. As noted in a recent Los Angeles Times investigation into this element of the program:

“Since the start of the year, more than 1,200 trucks have obtained new registrations to move cargo at the ports of Los Angeles and Long Beach, according to data obtained by the Los Angeles Times. About 92% of the newly registered trucks had diesel-powered engines, which are known to emit cancer-causing particles and planet-warming carbon emissions.”

The federal Clean Air Act provides California with the authority to enact more-health protective standards and requires EPA to approve waivers for state standards that are at least as protective of public health as applicable Federal standards. The ACF waiver meets this test. EPA must approve the waiver and California must implement ACF without further delay.

We call on EPA to maintain this strong direction, support a decades-long practice of thoughtful review of California waivers and ensure that the benefits of this program are realized as quickly as possible, especially in communities most at risk due to combustion-based trucks.

