

VIA ELECTRONIC SUBMISSION

August 2, 2022

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Attn: Docket ID Nos. EPA-HQ-OAR-2022-0332, EPA-HQ-OAR-2022-0331, and EPA-HQ-OAR-2022-0330

RE: California State Motor Vehicle Pollution Control Standards; “Omnibus” LowNOx Regulation; Advanced Clean Trucks; Requests for Waiver of Preemption; Opportunity for Public Hearing and Public Comment

On behalf of the undersigned groups and the concerned Washington residents that we represent, we urge the EPA to approve California’s three Clean Air Act waiver requests in full and without delay, allowing states to enforce more stringent heavy-duty vehicle standards that will protect public health and help alleviate local air pollution challenges.

Washington is one of 6 states that have adopted the Advanced Clean Trucks rule and the Department of Ecology is currently working to adopt the Heavy Duty Omnibus Low NOx rule this year. Since the national medium- and heavy-duty vehicle emission standards are less stringent, Washington must be able to enforce the ACT and HDO rules to meet our greenhouse gas emission reduction goals and to address the number one source of dangerous air and climate pollutants in Washington and the nation. Granting the waivers for these rules will protect public health, stimulate the economy, and enable states to mitigate the twin crises of air pollution and climate change.

The ACT and HDO regulations are crucial in the fight against toxic diesel pollution in Washington that disproportionately harms frontline communities. The transportation sector is responsible for [nearly 45 percent](#) of Washington’s greenhouse gas emissions – more than any other sector. Within this sector medium- and heavy-duty vehicles (MHDVs) have an outsized impact on emissions of both greenhouse gasses and criteria pollutants that are hazardous for human health. With the impending climate crisis and poor air quality affecting residents’ health, transportation pollution must be addressed directly – and urgently. The Evergreen State must be able to enforce the ACT and Low NOx rules to save lives and meet our [state greenhouse gas emission limits](#), which require that we **halve** climate pollution by 2030.

MHDVs are responsible for [59 percent of nitrogen oxides \(NOx\) and 53 percent](#) of particulate matter (PM) emitted by on-road vehicles. Both of these pollutants are hazardous for human health as they are associated with increased respiratory and cardiac illnesses. NOx and PM tend to have heightened impacts on communities of color and low-income communities that are more likely to be located near

freight hubs and trucking corridors. Having the ability to enforce the ACT rule would significantly improve air quality, especially in urban areas and along transportation corridors. [A report by MJ Bradley and Associates](#) found that, by 2050, the ACT rule and HDO rule will reduce MHDV NOx emissions by 88 percent and PM emissions by 43 percent in Washington. This will avoid 152,909 respiratory illnesses among Washingtonians and result in roughly \$2.9 billion in public health benefits by 2050.

The human health and climate impacts of diesel pollution demonstrate the magnitude of this problem and why it is imperative that states have the ability to enforce stronger vehicle emission standards. The [latest IPCC report](#) says we are running out of time to take bold action on the climate crisis that impacts us all, and especially those in frontline communities. In Washington, an estimated [1,100 people](#) die annually due to air pollution, which is compounded by climate impacts, such as wildfire smoke and deadly heat waves. We are working hard to pass and implement policy that will cut climate and air pollution—but when it comes to vehicle emissions, we need California’s regulations.

In addition to their substantial public health benefits, these rules are rooted in extensive research, analysis, and stakeholder outreach. Consequently, they are cost-effective and technologically feasible, and consistent with Section 202(a) of the federal Clean Air Act.

It is critical to Washington’s public health and economy that the EPA follow decades-long precedent and fully approve the waiver requests for California’s Heavy-Duty Program, specifically the three waiver requests for the Heavy-Duty Low NOx Omnibus Rule, the Advanced Clean Trucks, Zero Emission Airport Shuttle, and Zero-Emission Power Train Certification Regulations, and the Heavy-Duty Emission Warranty Regulation amendments. Therefore, we urge you to fully grant California’s current waiver requests as soon as possible.

Thank you for your consideration.

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