

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 Oregon 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.

Oregon is one of 6 states that have adopted the Advanced Clean Trucks rule and as well as the Heavy Duty Omnibus Low NOx. Since the national medium- and heavy-duty vehicle emission standards are less stringent, Oregon 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 Oregon 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 Oregon that disproportionately harms frontline communities. While trucks, buses, and delivery vans, account for less than [10% of the vehicles on the road in Oregon, they are responsible for 70% of Oregon’s smog pollution \(NOx\), 64% of particulate matter \(PM\) emissions, and nearly half \(42%\)](#) of the State’s climate pollution from transportation. Both NOx and PM are hazardous for human health and associated with increased respiratory and cardiac illnesses. With the impending climate crisis and poor air quality affecting residents’ health, transportation pollution must be addressed directly – and urgently. **Oregon must be able to enforce the ACT and Low NOx rules to save lives and meet our State’s goal of 100 percent electric truck and bus sales by 2050.**

NOx and PM pollution 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 and HDO rule in Oregon

will result in \$21.2 billion in public health benefits, 84,000 avoided respiratory illnesses. Additionally, the rules will reduce greenhouse emissions in the state by 50 million metric tons, save fleet owners over \$1 billion annually and attract nearly \$87 million in investments through charging infrastructure annually. .

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 Oregon, air pollution through human activity was responsible for an estimated [107,000 premature deaths](#) in 2011, 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 Oregon’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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