



**ENVIRONMENTAL DEFENSE FUND**

**STATEMENT ON**

**PROPOSED HEAVY-DUTY ENGINE AND VEHICLE OMNIBUS REGULATION**

**AND ASSOCIATED AMENDMENTS**

*Protecting Human Health and the Environment*

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**Chet France**

**Consultant to EDF**

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**California ARB Remote Meeting**

*August 27, 2020*

My name is Chet France and I am representing the Environmental Defense Fund, which has 600,000 members in California.

**More protective standards are needed for the communities disproportionately harmed by truck pollution**

EDF supports the proposed Omnibus rulemaking that will prevent nearly 3,900 deaths in California while providing over \$36 billion in health benefits. To meet the health-based ozone standards in the South Coast and Central Valley, significant reductions in NOx emissions from heavy-duty trucks are greatly needed. It is urgent to achieve NOx pollution reductions to protect communities near truck routes. As a study in Oakland has shown, emissions on I-880, a major truck route, are 50 to 100% higher than on nearby I-580, which prohibits heavy trucks. County health data show that people who grow up near the I-880 freeway have more asthma hospitalizations and live shorter lives than people who grow up near I-580. And the pollution from heavy-duty trucks disproportionately harms communities of color and disadvantaged populations who are more likely to live near heavy truck traffic.

**Proposed Standards are Feasible**

The ARB staff has provided a convincing assessment that the proposed NOx standards and supporting compliance requirements are feasible. EDF asks the Board to adopt the staff proposal, including the more protective standards, the new low load test cycle, warranty and useful life extensions and improved in-use tests. Taken together, these provisions are essential to assuring NOx emissions remain low for the truck's life.

### **Board should eliminate NOx credit trading provision**

EDF requests the Board make one change to the proposed regulation, and that is to eliminate the provision that allows diesel trucks to claim NOx credits based on zero emission trucks sold in compliance with the separate ACT rule. The provision will allow thousands of new diesel trucks to exceed the NOx emission standards and is essentially double counting. As a result, the credits will result in fewer emission reductions from the low NOx rule. The NOx standards are feasible without the use of NOx credits, and the credit provisions do not provide ample incentive for manufacturers to sell significantly more zero emission trucks than required by the ACT rule as has been suggested.

EDF respectfully asks you to approve these important proposed clean air protections, with the one important change regarding credits. Your action will deliver the maximum NOx emission reductions and health improvements possible, especially for those most vulnerable and those living near heavy truck traffic.

Thank you.