

August 23, 2023

Katie Dykes

Commissioner

Connecticut Department of Energy and Environmental Protection

Via electronic mail: deep.mobilesources@ct.gov cc: Katie.Dykes@ct.gov

RE: Support for Connecticut's adoption of the Advanced Clean Truck and Heavy-Duty Low NOx Omnibus regulations

Dear Commissioner Dykes,

We, the undersigned environmental, environmental justice, labor, social justice, clean energy, sustainability and transportation groups, write to you today to express our strong support for Connecticut's adoption of the Advanced Clean Trucks (ACT) and Heavy-Duty Low Nitrogen Oxide (NOx) Omnibus (HDO) regulations before the end of 2023.

To cut harmful air pollution and meet Connecticut's goal of reducing greenhouse gas (GHG) emissions by [75-85 percent below 2001 levels by 2050](#), Connecticut must adopt the ACT and HDO rules as quickly as possible. If adopted this year, the ACT rule will gradually increase the percentage of zero-emission medium- and heavy-duty vehicle sales to 30 to 50 percent zero-emission by 2030 and 40 to 75 percent by 2035. Zero-emission medium, and heavy-duty vehicles do not release tailpipe pollution, and will result in cleaner, healthier air, and reduced greenhouse gas emissions. While the ACT rule works year-over-year to gradually increase the supply of zero-emission trucks and buses, diesel trucks and buses will continue to be sold in Connecticut. The HDO rule would ensure that diesel vehicles sold during the transition to zero-emission vehicles are as clean as possible by limiting toxic air pollution from these diesel trucks and buses and requiring that new diesel trucks reduce their NOx emissions 90% by 2027. Together, the ACT and HDO regulations will result in crucial public health, environmental, and economic benefits for Connecticut residents. It is vital for Connecticut to adopt the ACT and HDO rules this year to avoid missing a model year and the associated public health, environmental, and economic benefits.

The ACT and HDO rules will deliver significant public health benefits to Connecticut residents.

The transportation sector, including trucks and buses, is a major source of air pollution and disproportionately contributes to NOx, carbon dioxide (CO2), and particulate matter (PM2.5). [Recent analysis](#) shows that while medium and heavy-duty vehicles are only 6% of the vehicles on the road in Connecticut, they emit 25% of the greenhouse gas emissions, 53% of the NOx emissions, and 45% of the PM2.5 emissions. Connecticut also has a [persistent ozone pollution problem](#) and recent projections show that NOx emissions from diesel trucks and buses will soon be the largest contributor to dangerous ozone pollution. Diesel-powered trucks and buses also emit harmful organic compounds; diesel exhaust is a known carcinogen, and it has been found to cause adverse health impacts including lung cancer and worsening of chronic heart and lung diseases, such as asthma. These pollutants harm public health, especially in low-income communities and communities of color. For example, years of discriminatory

land use and transportation policies have resulted in Asian-American, Black, and Latino communities being disproportionately burdened with PM2.5 air pollution from vehicles.

[Recent analysis](#) by the American Lung Association found that by adopting ACT, Connecticut can see \$10.5 billion in cumulative health benefits between 2020-2050, avoid 963 premature deaths, 21,402 asthma attacks, and 111,710 lost work days. By adopting both the ACT and Heavy-Duty Omnibus (HDO) regulations, Connecticut can [reduce](#) NOx by 86%, PM2.5 by 27%, avoid 102 hospital visits, and prevent 104 premature deaths. Adopting regulatory programs like ACT was noted as “one of the most effective tools available” to accelerate zero-emission health benefits in the [Multi-State Medium- and Heavy-Duty Action Plan](#) issued by the Northeast States Coordinated Air Use Management (NESCAUM) in July 2022.

The ACT and HDO rules will put Connecticut back on track to reach its emission reduction goals.

According to Connecticut’s Department of Energy & Environmental Protections recent Greenhouse Gas (GHG) Emissions inventory, the transportation sector accounts for [approximately 39%](#) of the state’s total emission profile and remains the largest emitter. Connecticut is not on track to meet the [29% reduction](#) of emissions in this sector that the Governor’s Council on Climate Change determined is crucial to meet the Global Warming Solutions Act 2030 goal. However, by implementing the ACT and HDO medium-and heavy-duty vehicle standards, Connecticut can reduce annual GHG emissions by [1.48 million metric tons](#) by 2040. According to a recent analysis conducted by the [International Council of Clean Transportation \(ICCT\)](#), Connecticut has the potential to achieve significant reductions in NOx (20,520 tons), PM2.5 (126 tons), and CO2 (MMT) emissions between 2020 and 2050 by implementing ACT and HDO measures. The ACT and HDO rules are Connecticut’s best available tools for delivering much needed climate benefits.

The ACT rule will support in-state business and attract investments in Connecticut.

Zero-emission trucks and buses are increasingly cost competitive with fossil fuel alternatives due to substantial fuel and maintenance cost savings, which is why [major companies, employers, and investors support](#) the ACT rule. According to a study done by Roush Industries, [some trucks and buses](#) may be on par with diesel vehicles on an upfront cost basis as soon as 2027. Moreover, the rules can stimulate the creation of high-quality zero-emission manufacturing and charging installation jobs in our state. Deferring consideration and implementation of ACT rule in Connecticut risks hindering the advancement of the market for zero-emission medium- and heavy-duty vehicles. Deploying ACT and HDO would help CT’s [economy](#) by saving \$1.2 billion in health-related savings, \$467 million in annual net societal benefits in 2050, and \$4.3 billion in net cumulative societal benefits. If Connecticut doesn’t adopt these rules, we could lose out on the clean energy economy emerging in other states and the associated economic benefits.

For all these reasons, we strongly support the adoption of the ACT and HDO regulations. **Please adopt the ACT and HDO rules before the end of 2023 to clean up our local air, improve public health, bolster our economy, and reduce climate-harming greenhouse gas emissions. With each year that Connecticut delays adopting ACT and HDO, the state misses another model year of the program and the subsequent public health, environmental, and economic benefits.**

Signed,

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