



June 29, 2022

On behalf of the Sierra Club Connecticut Chapter and our more than 40,000 members and supporters in Connecticut, thank you for the opportunity to provide comments for EPA's Public Hearing for the waiver requests for California's Advanced Clean Trucks (ACT), Zero Emission Airport Shuttle, and Zero-Emission Power Train Certification Regulations; Omnibus Low NOx Regulation; and HD Emission Warranty Regulation.

The Sierra Club is committed to defending everyone's right to a healthy world by tackling the serious challenges of a warming climate and unprecedented levels of pollution. California's strong emission standards are critical to improved air quality in Connecticut. The Sierra Club Connecticut Chapter urges the EPA to approve California's waiver request swiftly and in full.

Transportation pollution in Connecticut is a serious problem for public health, environmental justice, and our climate. In New England, Connecticut has the dirtiest air and had the highest number of unhealthy air days recorded in 2021.¹ The transportation sector accounts for 37.4% of greenhouse gas emissions² in Connecticut and is a major source of ground level air pollutants that harm public health. The American Lung Association's 2022 State of the Air report found that 4 counties in Connecticut earned failing grades for ozone pollution; the other 4 counties received Ds and Cs.³

The public health impact of pollution from transportation is felt throughout Connecticut, but is disproportionately experienced by communities of color and low-income communities who are more likely to live in places with more exposure to air pollution, such as along highways and near industrial areas, ports. In Connecticut, a 2015 analysis found that approximately one in 10 middle and high school students statewide reported an episode of asthma or an asthma attack in the past year, with the highest prevalence among non-Hispanic Black students.⁴

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 PM emissions.⁵

In "An Assessment of Connecticut's Need to Adopt California's Medium and Heavy-Duty Vehicle Emission Standards"⁶, the Connecticut Department of Energy and Environmental Protection found that Connecticut would realize significant climate, environmental justice, public health, and air quality benefits by adopting California's standards. These include a carbon emissions reduction of over 350,000 tons per year; \$270 million dollars in avoided health care costs over the period of 2020-2040, and as much as \$1.4 billion by 2050 from NOx and PM emissions reductions.

¹<https://www.epa.gov/newsreleases/new-england-experienced-increase-number-unhealthy-air-quality-days-during-2021-ozone#:~:text=In%201983%2C%20New%20England%20had,the%20emissions%20that%20form%20ozone.>

² https://portal.ct.gov/-/media/DEEP/climatechange/GHG_Emissions_Inventory_2018.pdf

³ <https://www.lung.org/research/sota/city-rankings/states/connecticut>

⁴ https://ysph.yale.edu/yale-center-on-climate-change-and-health/policy-and-public-health-practice/ycchc%20air%20quality%20issue%20brief_412616_48542_v1.pdf

⁵ <https://www.ucsusa.org/sites/default/files/2021-11/southern-ne-clean-trucks-report.pdf>

⁶ https://portal.ct.gov/-/media/DEEP/air/mobile/MHD/MHD_Whitepaper_030822.pdf



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In 2022, the Connecticut General Assembly passed Public Act 22-25⁷ requiring the Connecticut Department of Energy and Environmental Protection to adopt California's medium and heavy duty regulations to realize these benefits in full.

For these reasons, we urge the EPA to approve California's waiver request in full.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut

⁷ <https://cga.ct.gov/2022/ACT/PA/PDF/2022PA-00025-R00SB-00004-PA.PDF>