

August 25, 2020

Mary D. Nichols, Chair, and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments

Dear Chair Nichols and Honorable Board Members:

The Vermont Air Quality and Climate Division is pleased to submit comments to the California Air Resources Board (CARB) in support of the proposed Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments (HD Omnibus Regulation) announced on June 26, 2020 in the California Regulatory Notice Register (Notice File Number Z2020-0609-07).

Vermont strongly supports CARB's development of new more stringent engine emission standards, test procedures, and longer useful life and warranty periods that will reduce emissions of nitrogen oxides (NO_x) from heavy-duty engines. NO_x are a group of highly-reactive compounds that pose direct human health impacts, such as irritation of the respiratory tract, and the worsening or triggering of asthma.¹ These gases are also important precursor pollutants that undergo complex chemical reactions in the atmosphere to form other air pollutants of concern, such as fine particulate matter (PM_{2.5}) and ground-level ozone. NO_x also contributes to acid deposition and visibility impairment in Vermont. Diesel engines emit more than half of the mobile source-related NO_x emissions in Vermont each year.²

In addition, Vermont continues to strongly support California's statutory authority under the Clean Air Act (CAA) to adopt and enforce mobile source programs, and the authority of other states across the nation, under Section 177 of the CAA, to adopt and enforce CARB's standards.

Due to the importance of reducing NO_x emissions from heavy-duty engines, since 2008, Vermont has provided more than \$3.2 million in grants to Vermont schools, municipalities, and local businesses to reduce diesel emissions with federal Diesel Emissions Reduction Act

¹ U.S. EPA, "Basic Information about NO₂," <https://www.epa.gov/no2-pollution/basic-information-about-no2#Effects> (accessed August 20, 2020).

² U.S. EPA, "2017 National Emissions Inventory (NEI) Data," <https://www.epa.gov/air-emissions-inventories/2017-national-emissions-inventory-nei-data> (accessed August 20, 2020).

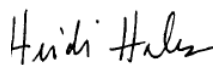
funding.³ Vermont's most recent effort to work to reduce heavy-duty engine emissions was in signing the Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding in July 2020 to accelerate the electrification of the medium- and heavy-duty bus and truck market. Additionally, in February 2020, Vermont submitted comments to the EPA on their Advance Notice of Proposed Rulemaking (ANPR) entitled *Control of Air Pollution from Motor Vehicles: Heavy-Duty Engine Standards* (85 Fed. Reg. 3306-3330) (January 21, 2020) that strongly encouraged and supported recommendations for new heavy-duty engine emissions standards, test procedures, and measures to ensure durability of emission control systems to reduce NOx emissions. Further, in 2016 Vermont joined other states and local air agencies to petition the EPA to adopt "ultra-low NOx" emission standards for highway heavy-duty trucks and engines.⁴ Reducing heavy-duty NOx emissions is a priority in Vermont, and we strongly support CARB's work to further reduce emissions from mobile sources in this sector.

Vermont is pleased by CARB's proposed extensions of regulatory useful life and warranty periods. This will not only ensure diesel engines will continue to be properly maintained, and achieve the emission standards they were certified to for a longer period of time, but also provides protection to the consumer by helping to ensure the quality of their investment.

In light of the recent announcement by EPA to delay their proposed rulemaking to update NOx emissions standards for heavy-duty trucks, it is even more important that CARB move forward with the adoption of its proposed HD Omnibus Regulation and continue collaborative efforts with EPA to establish a national low NOx program that retains all the elements of the CARB program.

Thank you for the opportunity to provide comments on this important regulation. We look forward to working with CARB on continued efforts to reduce NOx emissions from heavy-duty engines.

Sincerely,



Heidi Hales
Director, Vermont Air Quality and Climate Division

³ Vermont Department of Environmental Conservation, Air Quality & Climate Division, "Reducing Diesel Emissions: What Vermont is Doing," <https://dec.vermont.gov/air-quality/mobile-sources/diesel-emissions> (accessed August 20, 2020).

⁴ South Coast Air Quality Management District et al., "Petition to EPA for Rulemaking to Adopt Ultra-Low NOx Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines," June 3, 2016. Vermont joined the petition on July 11, 2016. The petition is posted at https://www.epa.gov/sites/production/files/2016-09/documents/petition_to_epa_ultra_low_nox_hd_trucks_and_engines.pdf (accessed August 20, 2020).