



August 21, 20223

To: Katie Dykes, Commissioner, CT Department of Energy and Environmental Protection

From: Lori Brown, Executive Director, CT League of Conservation Voters

RE: COMMENTS IN SUPPORT OF THE ADVANCED CLEAN TRUCK AND HEAVY-DUTY LOW NOX OMNIBUS REGULATIONS

Dear Commissioner Dykes,

Connecticut has the worst air quality in the region, and tailpipe pollution from cars and trucks make up nearly 40% of greenhouse gas emissions. Transportation pollution in Connecticut is a serious problem for public health, environmental justice, and our climate.

The CT League of Conservation Voters strongly supports the Advanced Clean Trucks (ACT) and Heavy-Duty Low Nitrogen Oxide (NOx) Omnibus (HDO) regulations.

Our state must adopt these rules as quickly as possible to cut harmful air pollution and reduce greenhouse gas emissions. Connecticut is not on track to meet the emissions reduction goals mandated in the Global Warming Solutions Act. Implementing the ACT and HDO medium-and heavy-duty vehicle standards can reduce our annual greenhouse gas emissions by 1.48 million metric tons by 2040, but they must be adopted before the end of 2023.

Cleaning up these emissions is particularly important for the health of low- and moderate-income populations living in our dense urban communities and along the state's major transportation corridors. Diesel exhaust is a known carcinogen that can cause lung cancer, heart disease, and asthma. These vulnerable populations are disproportionately impacted by transportation related air pollution that causes poor air quality in these areas.

Zero-emission medium and heavy-duty vehicles will result in cleaner, healthier air, and reduce greenhouse gas emissions. The many benefits of adopting these standards in Connecticut are spelled out in a [fact sheet](#) prepared by the Union of Concerned Scientists.

Under the Clean Air Act that Congress passed in 1963, only California has the authority to adopt emissions standards that are different from federal standards. No state can adopt their own emissions standards. However, states like Connecticut can choose to adopt stronger standards by following what California has adopted.

Connecticut is now alongside Rhode Island, Maryland, New Jersey, and New Mexico in announcing its intention to adopt new standards. We need to join states such as Massachusetts, New York, and Vermont to create a regionally unified approach.

Opponents who argue that strong standards to reach our emissions targets are “too soon, too costly, unrealistic, or not desired by the public” are blind to the urgency of our climate crisis. The public—especially our younger citizens—are frustrated with our state’s lack of action. We join them in calling on DEEP and our state legislators to use every available tool to reduce greenhouse gas pollution and do their part to combat climate change.

The planning for these standards has been done over many years and the Connecticut legislature passed a law in 2022 to adopt the stronger rules. Furthermore, if the proposed regulations are adopted before the end of 2023, they will not take effect for two more years after that. There is plenty of time and no justification for further delay.

We also note that the technology needed to implement the stronger rules is well established and the world is moving in that direction. Electric vehicles are increasingly cost competitive and plans for expanding the infrastructure are underway with major federal funding. It is only the political will and the fossil fuel industry that pose the greatest obstacles to clean transportation.

Thank you for considering these comments in support of adopting the Advanced Clean Truck and Heavy-Duty Low NOx Omnibus Regulations.

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