

**Testimony of Erik White
on Behalf of the National Association of Clean Air Agencies
Before the California Air Resources Board
on the Proposed Heavy-Duty Engine and Vehicle
Omnibus Regulation and Associated Amendments**

August 27, 2020

Good afternoon Madam Chair and Members of the Board. I am Erik White, Air Pollution Control Officer for Placer County. However, I speak to you today in my capacity as Co-Chair of the Mobile Sources and Fuels Committee of the National Association of Clean Air Agencies.

NACAA strongly supports CARB's proposed HD Omnibus Regulation and approval of this action by the Board today, and we applaud CARB for, once again, leading the way on important programs to reduce emissions from mobile sources.

NACAA recognizes the critical need for this action in California. We also recognize that there is a clear and profound need for significant NO_x reductions from heavy-duty trucks and engines *nationwide*. More than one third of the U.S. population lives in areas of the country designated nonattainment for the health-based NAAQS for ozone, particulate matter or both, and many others live in areas just on the cusp of nonattainment.

In the absence of a more stringent national highway heavy-duty NO_x standard, these areas will find themselves unable to address emissions from one of their largest sources, likely delaying their attainment, or driving them into nonattainment. As such, NACAA strongly supports swift establishment of a single national highway heavy-duty truck and engine program that mirrors today's proposal, including at least a 90-percent reduction in NO_x from current in-use levels as soon as possible and other components that ensure such reductions are realized over a vehicle's full useful life.

The recent delay in federal action on the Cleaner Trucks Initiative makes prompt approval and implementation of CARB's regulation even more important. With the timing of federal standards now uncertain, many states are likely to consider adopting CARB's regulation under Section 177 of the CAA. Considering this, we request that CARB continue

to work in close collaboration with EPA to achieve a single national program that preserves all the features and benefits of the California program in order to maximize them nationwide.

Once again, NACAA strongly supports staff's proposal and urges that the Board approve this program today. Thank you for this opportunity to speak.