

**Testimony of Tracy Babbidge  
on Behalf of the National Association of Clean Air Agencies  
Before the California Air Resources Board  
on the Proposed Advanced Clean Fleets Regulation**

**October 27, 2022**

Good afternoon Madam Chair and Members of the Board. I am Tracy Babbidge, Acting Deputy Commissioner of the Connecticut Department of Energy and Environmental Protection. Today I speak to you in my capacity as Co-Chair of the Mobile Sources and Fuels Committee of NACAA – the National Association of Clean Air Agencies. NACAA is the national, non-partisan, non-profit association of air pollution control agencies in 40 states, including 117 local air agencies, the District of Columbia and five territories. The air quality professionals in our member agencies have vast experience dedicated to improving air quality in the U.S. This testimony is based upon that experience. The views expressed do not represent the positions of every state and local air pollution control agency in the country.

NACAA supports CARB's proposed Advanced Clean Fleets Regulation and approval of this regulation by the Board, and we applaud CARB for, once again, leading the way on important mobile source programs that yield substantial emission reductions from key sectors and protect public health and the environment.

The ACF Regulation will pull ahead California's progress in fielding clean technology vehicles. It will help build supply chains and demonstrate early market scale toward lowering barriers to entry for fleets and incentive program administrators applying these technologies in other jurisdictions across the U.S., thus accelerating the emission reductions attainable from clean zero-emission medium- and heavy-duty vehicles. The breadth and regulatory certainty of the regulation is expected to diversify the already wide market-available range of zero-emission vehicle and body types, increasing selection and benefitting innovative fleets and their communities well beyond California. Effects such

as these are well aligned with NACAA's long-advocated goals for emission reductions from this mobile source sector.

Most recently, NACAA has strongly urged, and continues to urge, EPA to adopt, by the end of this year, a rigorous federal rule that aligns with CARB's Heavy-Duty Omnibus Regulation and takes effect beginning with the 2027 model year.

EPA's pending rule has the potential to be an effective first federal step on criteria pollutant emissions from trucks after more than 20 years of static standards. There are crucial needs for federal action on this EPA rule and for subsequent, increasingly more stringent rules for trucks. As large parts of the country fail to attain the health-based NAAQS, or teeter on the cusp of nonattainment, many state and local air agencies are left with few avenues to achieve the criteria pollutant emission reductions they sorely need, especially in disadvantaged communities. Without additional regulations, these trucks will continue to be one of the largest contributors to the national mobile source NO<sub>x</sub> inventory in 2028.

CARB's proposed ACF Regulation will immediately put in place another key step forward in addressing transportation-related emissions in California and allow other states, if they choose, to join California in adopting the final regulation or any of its four individual components. In addition, this regulation could serve as a solid template for EPA should it pursue a federal clean fleets rule.

In closing, NACAA, supports CARB's proposed ACF Regulation and expeditious approval by the Board. Further, we continue to support California's statutory authority under Clean Air Act Section 209 to adopt and enforce mobile source programs and the authority of other states across the nation, under Section 177 of the Act, to adopt and enforce their own locally beneficial programs based on CARB's standards.

Thank you for the opportunity to speak.