

As Prepared for Delivery

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On

The U.S. Environmental Protection Agency
Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles—Phase 3
Docket ID No. EPA–HQ–OAR–2022– 0985
May 2, 2023

Good morning, I am Paul Billings – (P A U L B I L L I N G S), National Senior Vice President of Public Policy at the American Lung Association. The American Lung Association strongly supports the cleanup of pollution from heavy duty vehicles. We urge EPA to finalize the rule this year - 2023.

Thank you, EPA for conducting this hearing.

Climate change poses a disproportionate burden on people of color and low-income communities, as does air pollution. Our most recent State of the Air report continues to document this burden showing that people of color are 3.7 times more likely than white people to live in a county with three failing grades for ozone, annual and daily particle pollution. Climate change is making air quality worse in many communities and transportation is the largest source of greenhouse gas pollution. The need to address greenhouse gas pollution from trucks is urgent.

EPA's analysis shows seventy-two million people live near truck routes, and this puts their health at risk. They are more likely to be people of color and those with lower incomes. Cleaning up trucks is an urgent environmental justice issue.

Last spring, the American Lung Association released the [Zeroing in on Healthy Air](#) report that showed the enormous public health and climate benefits of a transition to zero-emission vehicles powered by a clean, non-combustion renewable electricity grid. We found that over the next 30 years 110,000 premature deaths could be avoided.

The follow-on report “[Delivering Clean Air](#)” found that the transition to zero-emission heavy-duty trucks and clean, non-combustion energy by 2050 in counties with major truck routes would result in up to \$735 billion in cumulative health benefits and 66,800 avoided deaths. Cleaning up trucks is a lifesaver.

Because the enormous toll truck pollution places on the health of the public and the planet, the American Lung Association supports the most stringent heavy duty vehicle greenhouse gas emissions standards. We encourage the EPA to at least match California’s Advanced Clean Trucks program, which would ensure a greater share of heavy-duty vehicles are zero-emission.

Finally, I’d like to briefly note the American Lung Association’s support for the proposal to revise EPA’s regulations addressing preemption of state regulation of locomotives. State authority to address locomotive pollution is critical to protect public health. Locomotives are a major source of pollution that adversely impacts the health of people living in communities near railyards and railroads. We urge EPA to finalize this provision this year, too.

In conclusion, this proposal is a positive step forward. We urge EPA to finalize the strongest final rule in 2023.

Thank you.