

Testimony of Liz Scott
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EPA Public Hearing on “Proposed Rule: Amendments and Nonconformance Penalties for
Model Year 2027 and Later Heavy-Duty Highway Engines and Amendments to Inducement
Provisions for SCR-Equipped Diesel Engines”

Docket ID EPA-HQ-OAR-2026-0728

As prepared for delivery

Hello and thank you for the opportunity to speak with you today. My name is Liz Scott and I am the Senior Director of Nationwide Clean Air Advocacy at the American Lung Association. I’m here today to urge EPA to withdraw this proposed rule that will threaten communities across the country with preventable death and disease due to truck traffic pollution.

The American Lung Association proudly stood up alongside EPA staff on a cold December morning in 2022 to celebrate the announcement of the rule that’s now being rolled back. The final clean trucks rule set stronger emissions standards to reduce pollution from heavy-duty vehicles and engines, and built in stronger protections to ensure those benefits would be realized in the real world. The standards rely on readily available technology and upon full implementation is expected to reduce NOx emissions from diesel-powered vehicles by 47% in 2045 and prevent up to 2,900 premature deaths annually as well as \$29 billion in net public health benefits.

Now, the EPA is proposing to cut the legs out from under the standards by rolling back key provisions that ensure trucks are operated and maintained to deliver emission reductions. Trucks like semis can operate on roads for a very long time. Ensuring that the engines are covered by warranties for a longer length of time and mileage helps ensure that pollution control technologies are well-maintained and operating as intended. EPA’s own analysis highlights that shortening the warranty timeline means that trucks could operate with faulty pollution control technology, subjecting communities to tens of thousands of tons of avoidable smog- and soot-forming NOx pollution annually.

Additionally, sticking to the pattern from other recent EPA rulemakings, EPA did not conduct air quality modeling for this proposal. The Regulatory Impact Analysis (RIA) goes on to say that instead of detailing for the public how this rollback will directly impact health, it instead shows a qualitative description of all the ways the different pollutants that make up truck traffic pollution impact human health.

While we appreciate the acknowledgement of health impacts of NO_x, particulate matter and ozone pollution, it does not erase the fact the EPA continues to hide the math for the public on what the impacts of this rollback will be on communities across the country.

We urge the EPA to withdraw this proposal that, again and along with other recent proposed rollbacks, runs contrary to the EPA's mission of protecting human health.