

As Prepared for Delivery
Comments of Laura Kate Bender
National Assistant Vice President, Healthy Air
American Lung Association
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, my name is Laura Kate Bender and I'm the national assistant vice president for healthy air at the American Lung Association. Our mission is to save lives by improving lung health and preventing lung disease. My colleagues and I are each highlighting different points throughout this hearing on the health need to reduce emissions from heavy-duty vehicles. I'll use my time today to highlight the support of the health community for a nationwide transition to zero-emission trucks and buses.

I'll start by thanking you for holding today's hearing and for the excellent signup process leading up to it. The quick availability of the signup form, the fact that it included all the information needed to testify in one place, and the fact that speakers didn't have to register a week in advance all made it easier for people to speak. We particularly know that the medical and health professionals the Lung Association works with have challenging schedules, and this hearing process made things easier. We appreciate it.

The Lung Association works in coalition with national health organizations representing many of the populations at greater risk from vehicle pollution, including babies and kids, people with heart disease, environmental justice populations and people with lung disease. For years, including in the most recent EPA rulemakings on trucks, we've highlighted the urgent need to clean up diesel trucks and buses to protect health.

The Lung Association applauded EPA's final rules to reduce nitrogen oxides from heavy-duty vehicles last year. And throughout that rulemaking, health voices called for you to not only finalize the strongest possible NOx rules, but also to set the next round of standards to truly drive a nationwide transition to clean trucks and buses. Hundreds of health professionals from 35 states signed comments to that effect. 12 national health and medical organizations said in our comments:

"The shift to zero-emission trucks will yield major clean air and climate benefits and provide much-needed relief to communities most directly affected by trucking pollution today... EPA must move quickly to establish a clear and direct pathway to the full transition to zero-emission trucks in the near term."

We deeply appreciate EPA proposing this rule to do that. We strongly support EPA setting Phase 3 greenhouse gas standards for heavy-duty vehicles, and urge you to make the rule even stronger. We appreciate EPA's consideration of more stringent alternative proposals and urge the agency to finalize one of these more protective options into law in 2023.

We're calling for these standards to hew as closely as possible to the Advanced Clean Trucks rules in place in many states, and, if possible, to go even further. In comments in support of EPA granting California's clean trucks waiver to run its ACT program, my colleague noted:

“We recognize that without strong state and national standards for cutting pollution from the trucking sector, California simply cannot meet health-protective clean air standards. We also know that without EPA taking strong actions on trucking emissions in conjunction with the California rules, California will also fail to attain clean air standards.”

The transition to zero-emission vehicles is happening and we need EPA to match the work of the states leading the charge. That transition offers a real opportunity for improvements for public health and environmental justice. And people will celebrate it.

As I noted in a previous hearing on this topic: That’s because people get it. They get that trucks and buses powered by diesel are making their families sick. Ensuring that no neighborhood has to bear a pollution burden of a nearby highway, port, or distribution center will save lives, reduce illness and help address the urgent health crisis of climate change. Thank you.