

**As Prepared for Delivery**

Comments of Shyamala S Rajan  
National Director of Policy for 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 3, 2023

Good morning, I am Dr. Shyamala Rajan – (SHYAMALA RAJAN), National Director of Policy for Healthy Air at the American Lung Association. The American Lung Association strongly supports this proposed rule to reduce greenhouse gas emissions from heavy-duty vehicles. We urge EPA to adopt the most stringent provisions included in this rule and finalize the rule in the current calendar year.

Accelerated climate change caused by anthropogenic emissions of greenhouse gases impacts public health in multiple direct and indirect ways. Setting the most stringent standard CO<sub>2</sub> emissions standards and their aggressive phase-in, and increasing adoptions of zero-emission vehicles, are all important and urgently needed actions to reduce greenhouse gas emissions from the heavy-duty mobile sector. Combustion-driven mobile sources, including heavy duty vehicles, are the biggest sources of conventional air pollutants like fine particulate matter (PM<sub>2.5</sub>), and also nitrogen oxides (NO<sub>x</sub>) which is a precursor of another air pollutant, ozone, which is also a greenhouse gas. Climate change also imposes a Climate Penalty on conventional air pollution. Climate-driven increases in the ambient levels of PM<sub>2.5</sub> and ozone contribute to additional mortality and morbidities. The proposed rule to reduce carbon emissions would thus offer co-benefits of reducing co-emitted air pollutants which contribute to numerous adverse health impacts.

I travel often to Naperville, a city in the western suburbs of Chicago, to visit my elderly mother. Irrespective of the time I land at either of the 2 area airports, or the highways I take to cross the 30 miles to get home, the roadways seem to be always locked in rush-hour traffic with heavy duty trucks clogging the route belching out thick black smoke. With no accessible public transportation connecting the suburbs to the airports and other areas in the city, visitors to the area along with daily commuters, including my family and friends, are obliged to breathe in the highly polluted air on interstate highways. The American Lung Association's recently released State of the Air Report for 2023 shows the Chicago-Naperville metro area to be among the top 25 most polluted regions of the country for both long-term PM<sub>2.5</sub> and ozone. The extremely

variable vehicle emissions inspection programs between states and even within a state add to the interstate traffic-related air pollution.

The American Lung Association's [Zeroing in on Healthy Air](#) report released last year and the follow-on report "[Delivering Clean Air](#)" showed enormous public health and climate benefits of transitioning to zero-emission vehicles powered by a clean, non-combustion renewable electricity grid with nearly \$735 billion in cumulative health benefits and 66,800 avoided deaths from such a transition in just heavy-duty transportation by 2050 in counties with major truck routes. This proposal is a positive step in saving lives by reducing GHG and co-pollutant emissions from heavy duty vehicles.

Thank you.