

EPA Hearing on Proposed Heavy-Duty Vehicle Pollution Standards

Testimony of Andy Su for Environmental Defense Fund – April 13, 2022

Hello, my name is Andy Su. I'm speaking for the Environmental Defense Fund. Thank you for the opportunity to testify today. EDF supports EPA's proposal to strengthen the heavy-duty vehicle emissions standards and respectfully urges the agency to further strengthen the proposal in key respects. I'd like to focus my comments on the urgency in setting protective standards that achieve deep reductions in pollution from diesel vehicles and that ensure greater pollution reductions through the deployment of zero-emission technologies. Near-term emissions reductions are vital to mitigating the effects of climate change and to public health, especially the health of low-income communities and communities of color disproportionately impacted by transportation air pollution. Standards that ensure greater deployment of ZEVs are also critically important to provide a strong foundation for future Phase 3 standards that achieve 100% ZEV sales by 2035.

There is an overwhelming amount of data that supports the feasibility of significant near-term deployment of ZEVs. A recent study by Roush for EDF found that by 2027, many electrified class 4- 7 work trucks, class 8 short-haul trucks, and school and transit buses will be less expensive on both a first cost and total cost of ownership basis compared to their internal combustion engine counterparts. Major manufacturers have made significant investments to transitioning to ZEV freight trucks and buses, and truck fleets across the country are making significant commitments to electric heavy-duty trucks.

Accordingly, we urge EPA to ensure its standards help to achieve 80% ZEVs for new school and transit buses by MY 2029, which will protect America's children and transit riders and mobilize the billions of dollars invested in buses through the Bipartisan Infrastructure Law. To protect the millions of people afflicted by freight pollution we similarly encourage EPA to ensure its standards achieve 40% ZEV sales by 2029 for new Classes 4-7 Vehicles and Class 8 Short-Haul Trucks.

EDF also urges EPA to adopt the strongest possible NOx standards that achieve reductions consistent with the reductions that will be achieved by California's NOx Omnibus rule. Protective NOx standards must be designed to prevent backsliding on diesel truck emissions, and in particular, strengthen the approach in the proposal by ensuring that any ZEV credits do not result in higher-polluting diesel vehicles.

According to a 2021 report from MJ Bradley, eliminating tailpipe pollution from heavy-duty vehicle segments most ready for early deployment of ZEVs, would deliver significant public health benefits – including up to 1,500 fewer premature deaths, 1,400 fewer hospital visits, and 890,000 incidents of exacerbated respiratory conditions and lost or restricted workdays annually.

Deploying zero-emitting heavy-duty vehicles is critical to reach our health and climate goals. We urge EPA to move forward swiftly with standards that protect human health and the environment for all people and all communities, by reducing harmful diesel pollution and ensuring greater deployment of ZEVs, actions that will save money for truckers and fleets, strengthen our energy security, and help to support and grow jobs. Thank you.