

As Prepared for Delivery
Comments of Bryan Burton
National Manager of Advocacy 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 2, 2023

Good afternoon, I am Bryan Burton, Advocacy Manager for Healthy Air at the American Lung Association. The American Lung Association strongly supports the cleanup of pollution from heavy duty vehicles. My predominant goal in addressing you today is to make clear the crucial role that heavy trucks play in polluting America's air. Diesel engine emissions are one of the largest components of not just transportation sector emissions, but overall emissions across the nation. Medium- and heavy-duty vehicles represent approximately six percent of the on-road fleet as of 2020 but generate 59 percent of ozone- and particle-forming NOx emissions and 55 percent of the particle pollution. Reducing GHGs from heavy duty vehicles will drive reductions in these other pollutants at the same time, improving the lung health of all Americans. We urge EPA to adopt the most stringent provisions included in this rule and finalize the rule in the current calendar year.

In my home state of Pennsylvania there is a high proportion of these trucks and busses and a greater than average number of annual miles driven. In addition to greenhouse gasses which worsen and accelerate the negative effects of climate change, heavy duty vehicles also emit other pollutants like fine particulate matter (PM2.5), and nitrogen oxides (NOx) which is a precursor of ozone, also a greenhouse gas. A warmer climate has the increased effect of creating conditions for the formation of ozone. These pollutants can wreak havoc on the respiratory systems of all Pennsylvanians but especially our millions of vulnerable persons and people of color or living in poverty.

In the Philadelphia region alone, more than 2.2 million residents live in communities with failing grades for ozone according to the 2023 American Lung Association State of the Air Report. As one of the busiest transportation corridors in America, the intense impacts of truck pollution are perhaps nowhere more evident than South Central Pennsylvania. The proliferation of warehouse distribution centers and the concentration of major highways and railyards have brought some of the nation's worst air pollution along the previously rural Harrisburg-Lancaster-Reading routes.

Despite making tremendous strides in cleaning up their industrial sector, the Pittsburgh still ranks in the top 15 nationally for soot pollution. Allegheny County is a powerful and tragic example of how over 300,000 people of color and those living in poverty must daily face life threatening pollution for trucks originating from and bound for states outside of Pennsylvania. Vehicle emissions do not respect state borders. The American Lung Association's Delivering Clean Air Report has identified \$50 billion dollars in health benefits for Pennsylvania through 2050 with a transition to zero emission trucks and power generation. These financial savings have real effects on real people with the avoidance of 4,581 premature deaths, 88,000 fewer asthma attacks and 432,000 fewer missed days of work.

While the EPA and Biden administration have taken many steps since 2021 to curb air pollution, only by adopting the most stringent GHG regulations proposed can the transportation sector continue its drive to deliver the economic and health benefits outlined by multiple American Lung Association reports. We urge EPA to finalize the rule this year - 2023.