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Comments of Katherine Pruitt National Senior Director, Policy American Lung Association On The U.S. Environmental Protection Agency Greenhouse Gas Emission Standards for Heavy-Duty Vehicles Phase 3 Docket ID EPA-HQ-OAR-2022-0985

May 3, 2023

Good morning. My name is Katherine Pruitt – **KATHERINE PRUITT.** I am National Senior Director for Policy with the American Lung Association. I appreciate the opportunity to offer comments on EPA's proposed Greenhouse Gas Emission Standards for Heavy-Duty Vehicles.

The American Lung Association supports EPA setting Phase 3 greenhouse gas standards for heavy-duty vehicles this year, in 2023, and we urge you to make the rule even stronger. You have heard from some of my colleagues about other aspects of this rule. My comments today will focus on the health and climate benefits this rule would mean for school buses and for America's children.

The health and well-being of children in school has been a personal and professional priority for me for most of the nearly three decades I have been with the Lung Association. The Lung Association was an originating partner with EPA in the development of the *IAQ Tools for Schools* program, and I led my organization's creation of the *Asthma-friendly Schools initiative* several years later. Both of these venerable, proven-effective programs recognize the importance of reducing exposure to harmful emissions from diesel school buses to student health and achievement.

There are 480,000 school buses on the road nationwide, traveling 3.5 billion miles annually. About 95% of school buses are diesel powered. Diesel emissions contain a variety of toxics, including nitrogen oxides, particulate matter, benzene, and 1,3-butadiene. Diesel soot from school buses has been associated with reduced lung function and increased incidences of pneumonia in children. Exposure to diesel emissions can be especially harmful for children with asthma.

Some kids ride the school bus for hours a day. I've heard personal stories from teachers and families about children who leave home healthy and get to school sick. That affects their ability to be present and to learn during the school day.

These proposed emissions standards are designed to reduce greenhouse gases from vehicles, because addressing climate change is critical for protecting health. Transitioning to zero-emission heavy duty vehicles, including school buses, has the potential to eliminate millions of tons of greenhouse gas emissions every year. And as EPA has noted, this rule would also reduce other pollutants at the same time, including those diesel emissions that are making school children sick.

Communities want this change. Cleaning up trucks and buses makes sense to people.

This proposal is a positive step forward. We urge EPA to finalize the strongest final rule, no later than the end of 2023. Children, their families and communities will thank you.