

Comments of Laura Kate Bender
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On
The U.S. Environmental Protection Agency
Control of Air Pollution From New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards
Notice of Proposed Rulemaking
Docket ID No. EPA–HQ–OAR– 2019–0055

April 12, 2022

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, and ways that the rule can go further to protect public health.

We urge EPA to maximize the health benefits of this proposal, finalize the strongest possible standards into law, and to do it this year. Between Options 1 and 2 in the proposal, Option 1 is more protective of health and should be strengthened even further. And we note that the alternative proposal would offer even more health benefits.

I'll use my time today to highlight the health imperative of cleaning up dirty trucks and buses.

Nitrogen oxides pose a serious health threat both immediately and as they react in the atmosphere. As soon as it comes out of the tailpipe, NOx can cause health harm, including airway inflammation, cough and wheezing, and a greater likelihood of asthma attacks, emergency department visits and hospital admission for people with lung disease.

NOx is also highly reactive, and it can form into particulate matter and ground-level ozone pollution. Ozone and PM are two of the most widespread dangerous air pollutants. Ozone can cause breathing problems, heart problems, and premature death. Long-term exposure can lead to permanently reduced lung function in children and may cause central nervous system, reproductive and developmental harm.

Particulate matter also causes asthma attacks, COPD exacerbations and premature death – including increased mortality in infants. And just like with ozone, long-term exposure, even at lower levels, is linked with increased risk of heart attacks, strokes, cognitive decline, and preterm birth and low birth weight. Particle pollution also causes cancer.

And of course, this rule isn't just about NOx, it's also a starting point for further reducing greenhouse gas emissions from trucks and buses. Climate change is a health emergency. The warming climate is already damaging lung health nationwide, from more frequent and intense wildfire smoke, to more unhealthy ozone days, to indoor air hazards in homes that have been flooded. We urge EPA to not only reach a 90% reduction in NOx pollution with this rule, but also to make the greenhouse gas provisions stronger.

Ultimately what the nation needs – and what our health requires – is a full transition to zero-emission trucks and buses. This rule is an important step on the way to what EPA must do next: set the next round of standards to drive a nationwide transition to zero-emission heavy-duty vehicles.

That transition offers a real opportunity for improvements for public health and environmental justice. And people will celebrate it.

In my time working for the Lung Association, truck pollution has come up again and again in conversations with volunteers and concerned people. A community leader in Southwest Virginia who led a charge to keep a new truck stop from going in right next to an elementary school. Another in the South Bronx who highlighted the expansion of grocery delivery warehouses in the community and the increased truck traffic it was bringing.

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. We call on EPA to maximize the benefits to public health of this rule, finalize it this year, and then move swiftly to drive a nationwide transition to zero-emission vehicles. Thank you.