

NESCAUM'S TESTIMONY ON EPA'S PROPOSED GREENHOUSE GAS EMISSIONS STANDARDS FOR HEAVY-DUTY VEHICLES – PHASE 3

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My name is Elaine O'Grady, and I am the Clean Transportation Policy and Program Director at the Northeast States for Coordinated Air Use Management (NESCAUM). NESCAUM is the regional association of state air quality agencies in the six New England states plus New York and New Jersey. Our members have the primary responsibility in their states for implementing clean air programs that achieve the public health and environmental protection goals of the federal Clean Air Act and state climate goals.

NESCAUM commends EPA for its efforts to develop the proposed Phase 3 greenhouse gas (GHG) emission standards for heavy-duty vehicles. The transportation sector is the largest source of GHG emissions in the nation and a major source of air pollutants that harm public health. The proposed standards have the potential to substantially reduce heavy-duty truck GHG and criteria pollutant emissions. EPA's proposed action is an important step toward delivering on the administration's Blueprint for Transportation Decarbonization. The Blueprint calls for 30% of new medium- and heavy-duty truck sales to be ZEVs by 2030 and 100% by 2040. In addition, the criteria pollutant emission benefits that will be realized from the rule will help address the increased public health risk in communities located near heavy truck traffic.

Through the Multi-State ZEV Task Force, NESCAUM is working with the signatories to the Medium-and Heavy-Duty Zero-Emission Vehicle Memorandum of Understanding, including 17 states, the District of Columbia, and Quebec, to prepare for a zero-emission future. In 2022, the Task Force released a [Multi-State Medium- and Heavy-Duty ZEV Action Plan](#) with recommendations for state policymakers to support the rapid, equitable, and widespread electrification of trucks and buses. The ZEV Task Force states are actively working on implementing these recommendations. For instance, eight states have adopted the Advanced Clean Trucks regulation, which requires 40 to 75 percent of new truck and bus sales to be zero-emission by 2035, and other states are expected to follow. The ZEV Task Force states are also coordinating with national labs, NGOs, utilities, and the private sector to develop fast charging infrastructure along highway corridors; assessing system capacity and preparing for grid upgrades to support this infrastructure; establishing vehicle and infrastructure incentive programs; identifying workforce development and training needs; and conducting community air monitoring programs.

State efforts such as the ones I have just described will go a long way in accelerating zero-emission technologies, but they must be accompanied by stringent federal truck GHG regulations

to ensure the nation's fleet moves toward zero emissions. EPA's proposal is an important step in developing such standards.

Finally, NESCAUM welcomes EPA's proposal to revise its regulations addressing preemption of state regulation of locomotives to more closely align with language in the Clean Air Act.

We will be providing more detail on these issues in NESCAUM's written comments on the proposal.

Thank you.