

**Surbhi Sarang, Environmental Defense Fund Testimony for EPA hearing on
Proposed Rule: Repeal of Emission Requirements for Glider Vehicles, Glider
Engines, and Glider Kits
December 4, 2017**

My name is Surbhi Sarang, and I am a legal fellow at the Environmental Defense Fund. Thank you for the opportunity to testify here today in support of upholding the emissions standards for glider vehicles. Repealing these standards would be deeply damaging to human health and the environment. In particular, the repeal would especially threaten the health of environmental justice communities that face disproportionately high flows of truck traffic and air pollution, as well as vulnerable children.

Last year, as a fellow in the environmental justice program at New York Lawyers for the Public Interest, I worked with environmental justice communities in the South Bronx who were severely burdened by truck traffic through their neighborhoods. Not only do multiple highways run through the South Bronx, but it is also the site of the Hunts Point Food Market, which supplies 60% of New York City's food.

The food market brings a staggering number of trucks to the area, and each day 15,000 trucks travel through Hunts Point.¹ After exiting the highway, many of these trucks use local roads that run through residential areas to get to the food market.² This brings dirty tailpipes right to homes in the community, where people live and children play outside.

Pollution from these trucks has a huge impact on the Hunts Point community, which experiences some of the highest rates of asthma in the country. A survey of the Hunts Point and Longwood neighborhoods shows that the rate of child asthma hospitalization is 88 per 10,000 children, which is twice the New York City-wide rate.³ This area is 76% Hispanic and 43% of residents live below the poverty line.

Controlling emissions from glider vehicles is essential to addressing these health disparities and bringing relief to Hunts Point and other environmental justice communities that are overburdened with truck pollution. Without this safeguard, EPA has found that glider trucks emit up to 40 times the amount of pollution of modern trucks, and that these superpolluting glider trucks could represent 5% of the truck fleet in 2025. Imagine if 5% of the 15,000 trucks that travel through Hunts Point every day were highly polluting glider vehicles instead of modern, properly controlled vehicles. It would be the pollution equivalent of having 30,000 more trucks come through the neighborhood every day.

EPA should be fighting to ensure clean air for all communities, not rolling back protections. EPA itself acknowledged in the proposed repeal rule that the new standards for glider vehicles would have lowered ambient concentrations of particulate matter—also known as soot—and directly benefited children.

¹ NYCEDC, Hunts Point Vision Plan, <https://www.nycedc.com/project/hunts-point-peninsula>.

² City of New York, The Sheridan Expressway Study (2013), http://www1.nyc.gov/assets/planning/download/pdf/plans-studies/sheridan-hunts-point/final_full_report.pdf.

³ NYC Health, Community Health Profiles 2015: Bronc Community District 2: Hunts Point and Longwood (2015), <https://www1.nyc.gov/assets/doh/downloads/pdf/data/2015chp-bx2.pdf>.

It's important to keep in mind that this is just one piece of a broad rollback of essential public health protections. In fact, the gliders rollback is just one of twelve actions that Scott Pruitt's Administration has identified that if allowed to go forward would result in significant harm to children's health.

These actions include the proposal to repeal the Clean Power Plan, the proposal to stay New Source Performance Standards for the oil and gas industry, EPA's denial of the Chlorpyrifos pesticide ban, the delay of the Certification of Pesticide Applicators rule, EPA's reconsideration of the Coal Ash Waste Rule, the postponement of new effluent limitations and pretreatment standards for the steam electric power sector, EPA's review of the 2017 and later model year light-duty vehicle greenhouse gas emissions and fuel economy standards, EPA's review of the Mercury and Air Toxics Standards, the stay of standards of performance for municipal solid waste landfills, EPA's review of state Regional Haze Plans, and the delay of compliance dates for the Formaldehyde Emission Standards for Composite Wood Products rule.⁴

EPA in all of these actions has noted that these rules would have taken significant steps to protect children from environmental harms. In many instances the impacts of withdrawing and delaying these rules is also felt most keenly by environmental justice communities such as the Hunts Point community. All communities and all children deserve to live in healthy environments, and EPA should carefully consider the impact of this proposed repeal on such communities.

It is especially alarming that Administrator Pruitt proposed to repeal the emissions standards for gliders before EPA's own study on pollution from glider vehicles was available, while citing to a Tennessee Tech unsubstantiated study, financially supported by Fitzgerald Glider Kits, which stands to benefit significantly from the repeal of this rule. EPA's duty is to carefully weigh and consider relevant evidence and to base its decisions on sound scientific findings. The agency's own study reveals that glider vehicles produce significantly higher levels of pollutants than modern trucks. This information must be given its due weight, and it is deeply troubling that Administrator Pruitt moved ahead with his proposal before this important testing was complete.

EPA's actions have very real consequences for communities, even though they may not have the resources to participate in this process. It is EPA's job to protect Americans from harmful pollution and thus we ask that the emissions standards for glider vehicles be maintained.

Thank you for the opportunity to speak.

⁴ Molly Rauch, 12 Ways Scott Pruitt's EPA Threatens Children's Health – In the Agency's Own Words, Moms Clean Air Force Blog (Nov. 27, 2017), <http://www.momscleanairforce.org/12-ways-pruitts-epa-threatens-childrens-health/>.