

Hello, my name is Andy Su. I'm speaking on behalf of Environmental Defense Fund. Thank you for the opportunity to testify today. California's Heavy-Duty Omnibus Rule and Advanced Clean Truck Rule are critical health and climate protections, and it is important that EPA provides full, lasting, and durable effect to these life-saving standards. I'd like to focus my comments on the importance of the Omnibus and ACT rules which achieve deep reductions in pollution from new diesel vehicles and accelerate the transition to zero-emission heavy-duty vehicles. Near-term emissions reductions are vital to mitigating the effects of climate change and to public health, especially the health of low-income communities and communities of color disproportionately impacted by transportation air pollution.

150 million people live in counties with unhealthy levels of ozone or particle pollution, and many of the hardest hit communities are in California. The South Coast and San Joaquin Valley are the only two areas in the nation designated as "extreme" nonattainment for the federal health-based ozone standard and the San Joaquin Valley has the highest fine particulate levels in the nation.

72 million people live within 200 meters of a truck freight route, and people of color and those with lower incomes are more likely to live near truck routes. According to the American Lung Association, people of color are more than three and a half times more likely to breathe the most polluted air.

The subsequent health impacts of diesel trucks and buses is devastating – and follow broader trends of unequal burden. Studies have shown that communities near truck routes often experience elevated levels of NO₂ and black carbon which are associated with higher rates of cardiovascular events, asthma emergency room visits and hospitalizations, as well as adverse pregnancy outcomes.

These studies highlight the importance of the near-term emissions reductions that will result from the Omnibus and ACT rules. Omnibus, fully phased in by 2031, is expected to reduce harmful NO_x emissions in California by more than 23 tons per day – the equivalent of taking 16 million light-duty cars off the road in 2031. The resulting emissions reductions will lead to 3,900 avoided premature deaths and 3,150 avoided hospitalizations statewide over the life of the rule, and lead to estimated statewide health benefits of approximately \$36.8 billion. ACT is expected to prevent more than 900 premature deaths, save the state economy up to \$12 billion over the next 20 years and create thousands of new jobs by 2035.

A low NO_x rule that offers robust protection is a necessary complement to the Advanced Clean Trucks rule as these regulations can offer important cumulative benefits. For example, an ICCT report found that in New York State, emissions from medium- and heavy-duty vehicles are expected to grow significantly leading up to 2050. While the ACT and low NO_x rules independently can help reduce emissions, the combination of ACT and Heavy-Duty Omnibus standards would deliver the greatest NO_x benefits, equal to 46% below 2020 levels in 2050.

Already, we have seen a significant expansion of zero-emission model availability – a 625% increase since 2019 – likely driven in no small part by strong emissions standards that catalyze the market. The increasing economies of scale that come from an expanded market means that an already favorable total cost of ownership for many zero-emission vehicles compared to diesel alternatives will only make ZEVs more attractive; in addition, evidence points to upfront cost parity for several types of vehicles by 2027.

The bottom line? Strong consistent standards are necessary to ensure market certainty. These standards will continue to incentivize investment in clean and zero-emission technologies and help lead to economies of scale that will continue to bring down cost.

It is important that manufacturers lead in this transition to a zero-emitting future and not litigate in a manner that stalls progress and innovation.

Deploying clean and zero-emitting heavy-duty vehicles is critical to reach our health and climate goals. These standards will protect human health and the environment for all people and all communities, by reducing harmful diesel pollution and ensuring greater deployment of ZEVs, actions that will save money for truckers and fleets, and help to support and grow jobs. Thank you.