



Environmental Defense Fund

Virtual Public Hearing for Greenhouse Gas Emissions Standards
for Heavy-Duty Vehicles—Phase 3

Testimony by Eric Wriston

May 2-3, 2023

Hello, my name is Eric Wriston, and I am testifying on behalf of Environmental Defense Fund, a member organization with more than 2 million members. Thank you for the opportunity to testify.

Heavy-duty vehicles are responsible for more than half of the health-harming pollution and a quarter of the greenhouse gas emissions from the transportation sector. Protective final standards are critical to reducing that pollution and saving lives, especially in communities of color and low-income communities, which are exposed to a disproportionate amount of vehicle pollution.

EPA's proposal for heavy-duty vehicles is a critical step forward and we urge the agency to finalize protective standards that are consistent with and build from the proposal. In particular,

declining vehicle costs and the wide-spread benefits of ZEVs support strengthened standards that would help to deliver nationwide levels of ZEVs consistent with California's Advanced Clean Trucks rule. There are especially vital opportunities for EPA to strengthen standards for key segments, including tractor trailers and school buses. These standards must help to ensure we are on a path to zero tailpipe emissions from new vehicles by 2035.

The historic investments in the Inflation Reduction Act and Bipartisan Infrastructure Law have helped launch an American electric vehicle manufacturing renaissance, driving momentum for protective national safeguards. According to a new report by EDF and WSP USA, more than \$120 billion in investments and 143,000 new U.S. jobs have been announced in the last eight years, with more than 40 percent of those announcements since passage of the IRA. Analysis by Roush and ERM also shows that the tax credits in the IRA are dramatically accelerating purchase price parity for heavy-duty ZEVs, with most models considered reaching price parity immediately when manufactured at scale. In fact, some manufacturers and fleets have already made commitments exceeding the levels of ZEV deployment EPA projects in this rule.

States have also been leading the way. Colorado just became the 8th state to adopt California's Advanced Clean Trucks rule, which requires manufacturers to produce and sell certain percentages of new ZEVs and CARB recently approved the Advanced Clean Fleets rule, which requires fleets consist of an increasing percentage of ZEVs.

EPA's proposal is firmly supported by the investments and commitments made by manufacturers and fleets as well as state leadership and these features support even more protective standards

that help to ensure levels of ZEVs consistent with ACT nationwide. In particular, we urge EPA to strengthen its final standards for key segments. First, stronger standards for school buses will ensure our kids breathe cleaner air. Projections made by ERM anticipate IIJA and IRA grant programs alone will fund the sale of tens of thousands of additional zero emission buses. Second, we urge EPA to strengthen standards for class 8 tractor trailers given their outsized pollution contribution. A study from ERM found that, with IRA tax credits, day cabs will reach purchase price parity with diesel vehicles in 2027 and sleeper cabs in 2031 and several manufacturers already have (or are in the process of developing) zero-emitting solutions.

Finally, in order to fully realize the health, environmental and economic benefits of this proposal, we urge EPA to finalize the standards before the end of 2023.

Thank you for considering our views and for EPA's important work to reduce harmful pollution from heavy-duty vehicles.