

As Prepared for Delivery  
Comments of Bryan Burton  
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On  
The U.S. Environmental Protection Agency  
California Waiver Hearing: Advanced Clean Trucks, Omnibus Low NOx, and HD  
Emission Warranty Regulations

June 29, 2022

Good morning – My name is Bryan Burton, Advocacy Manager for Healthy Air with the American Lung Association speaking in strong support of the US Environmental Protection Agency granting California these cleaner truck waivers without delay to implement these critical public health policies.

Heavy-duty trucks are the largest mobile source of nitrogen oxides, which can react in the atmosphere to form harmful pollutants like ozone and particulate matter. The National Association of Clean Air Agencies has determined that federal heavy duty truck standards are not sufficiently health-protective.

Truly, 75% of all goods are moved in the United States by heavy duty truck traffic.

The COVID-19 pandemic has transformed personal shopping behavior, accelerating the shift from in-store shopping for products and services to ordering them online. This has increased demand for fast, personalized delivery service and has resulted in a rising number of delivery trucks and vans on neighborhood streets, supported by a proliferation of warehouses, and distribution centers.

Unfortunately, the health burden for e-commerce-related pollution tends to disproportionately impact disadvantaged communities despite consuming a smaller share of the consumer goods.

U.S. EPA estimates that 72 million Americans live along major truck freight routes, and notes that they are more likely to be people of color and have lower incomes.

The Lung Association's Zeroing in on Healthy Air report calculates potential public health benefits for Pennsylvania of nearly \$87 billion dollars from a transition to zero-emission cars, trucks and electricity, which the California Clean Truck Standards help drive toward. This also translates into preventing nearly 8,000 premature deaths, the third most in the nation. Creating certainty diesel emission reductions is crucial to the improving the health of all Pennsylvanians.

Pennsylvania is home to well over one billion square feet of distribution and warehouse space with much more currently under construction or in the planning phase.

Geographically speaking, a truck driving 8 hours out of Pennsylvania can reach territory where over 150 million Americans live. This is important for two reasons: it's attractive for trucking companies to locate

here leading to industry concentration. Also, were dirty standards to persist, PA trucks would contribute pollution to more than one third of the national population.

The keystone state is home to the third most tractor trailer drivers in the nation behind only California and Texas with over 88,000 employees representing more than 1.5% of Pennsylvania's total workforce.

In March EPA correctly allowed waivers for 16 states, including Pennsylvania, to adopt the California Advanced Clean Cars rule.

It's vital that EPA approve the waivers to allow multiple states to adopt these rules to ensure residents of mid-Atlantic states can be protected with more health-protective standards. The EPA's action on these waivers can further this growing adoption of these lifesaving rules.

Again, we call on US EPA to grant these waivers immediately so that California and the states can move forward with these life-saving rules and more communities have access to clean, healthy air every day.