

EPA HDV Standards comments

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Thank you for the opportunity to testify today. My name is Mary Greene and I am the senior policy counsel for Sustainability Policy at Consumer Reports. CR is very encouraged to see EPA strengthening emission standards for new heavy duty vehicles sold beginning in 2027. While this rule is a good start, the agency should go further and use this opportunity to make transformative changes in the transportation industry, requiring more stringent standards for both NOx pollution and greenhouse gas emissions that negatively impact communities across America. Such reductions will help the administration achieve its own goal of reducing NOx emissions and reducing greenhouse gas emissions economy-wide by 50% by 2030.

Heavy duty vehicles are the main vehicles used for transporting and delivering consumer goods across the country. As e-commerce rapidly expands, and as companies promise consumers faster and faster delivery, utilization of these vehicles is likely to grow. However, this reliance has costs in the form of increased air pollution and global warming emissions. Although heavy-duty vehicles make up a small portion of vehicles on US roads, they disproportionately contribute to greenhouse gas and NOx emissions, which pose serious and costly health and environmental risks. As my colleague, Dr. Quinta Warren will/has discuss/ed, these impacts disproportionately impact low income communities, and communities of color. As demand for consumer goods grows, so too will the impact of heavy duty vehicle emissions. For this reason EPA must enact the strongest standards possible to reduce NOx and GHG emissions.

Consumer Reports has the following recommendations:

First, for the NOx portion of the rule, EPA should at the very least adopt Option 1. Option 2 simply does not go far enough to reduce NOx pollution. However, we believe Option 1 should be strengthened to more closely align with California's Heavy Duty Omnibus Rule. To do so, standards should achieve a 90% reduction in NOx emissions over 2010 standards by 2027. These more stringent standards more accurately reflect "the greatest degree of emission reduction achievable through the application of technology available for the model year" as required by the Clean Air Act.

Second, the proposed GHG emission standards must be strengthened so as to accelerate the deployment of zero-emission electric trucks. Zero emission technology will be key to achieving a 50% reduction in GHG by 2030, and is the best solution to reducing NOx and climate pollution. Importantly, technology already exists to electrify many forms of heavy duty vehicles. For example, delivery vehicles that follow local routes and operating ranges, are ideal candidates for electrification. Currently the rule would do little, if anything to accelerate heavy-duty EV adoption. Already, States are leading the charge and implementing policies that would result in 3 times the number of heavy duty electric vehicles as the EPA rule. EPA should follow suit.

EPA should eliminate credits and multipliers to both the NOx and greenhouse gas portions of the rule as they will severely limit the effectiveness of this proposed rule. Finally, EPA should ensure that this rule is finalized by this year so that they can go into effect as soon as possible. Thank you very much for your time.