

**EPN Testimony on EPA's Proposed Rule and Related Materials
for Control of Air Pollution from New Motor Vehicles:
Heavy-Duty Engine and Vehicle Standards**

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My name is Michael Walsh, and a little over 40 years ago, I was the Deputy Assistant Administrator for Mobile Source Air Pollution Control. I am testifying on behalf of the Environmental Protection Network, a volunteer organization of over 550 former EPA employees and others concerned about public health and the environment.

During my years at EPA, I was proud to be associated with laying the groundwork for what has become and remains the strongest and most effective vehicle pollution control program in the world. I and others often point to the structure and historical practice of EPA's mobile source program as a primary model for other countries.

I'd like to first address EPA's nitrogen oxides (NO_x) proposal.

EPN recommends that EPA's decision be guided by the demonstrated need for very large NO_x reductions from the heavy-duty (HD) sector, especially for those populations living near major traffic areas. The goal should be to achieve the lowest feasible NO_x standard, which will provide California, other states, and disadvantaged communities the NO_x reductions they desperately need.

Electric vehicles (EVs) are clearly a critically important component of a multi-pollutant emissions control strategy. The HD sector is transitioning to EVs on its own, and progress is sure to accelerate given the immense public and private investments taking place. It is highly likely that most, if not all, of the EVs would still be produced without the proposed NO_x credits. EPA's proposed Zero-Emission Vehicle (ZEV) NO_x credits could cause a substantial increase in diesel emissions compared to what could and should be achieved, and EPN opposes them.

EPN also recommends that the greenhouse gas (GHG) proposal be significantly strengthened.

The proposal lacks any ambition whatsoever and reinforces that EPA is now the laggard in reducing HD GHGs rather than the leader. The recent Intergovernmental Panel on Climate Change (IPCC) Report makes clear that now is the time for strong action to address the climate crisis. EPA's proposal fails to step up to this challenge and is an important lost opportunity.

EPA properly includes EVs in its technology basis for setting the level of the revised GHG standards. The problem is EPA appears to aim at a level that does no more than codify business as usual and, in fact, likely underestimates near-term EV sales.

EPA should set standards that aim for very high ZEV penetration for school buses and urban transit buses by MY 2029. For delivery vans and short-haul tractors, EPA should aim for an aggressive but practical penetration rate by MY 2029, much more than proposed. More ambitious GHG standards will accelerate the introduction of zero-emissions technologies for all pollutants. Our written comments will provide more detailed information, such as the recent government-funded National Renewable Energy Laboratory

(NREL) report that ZEV sales could reach 42% of all medium-duty (MD)/HD trucks by 2030, reflecting lower combined vehicle purchase and operating costs.

In closing, EPN strongly recommends that EPA strengthen both the NO_x and GHG requirements in the Final Rule to maintain EPA leadership in improving air quality and public health and addressing the global climate crisis.