

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
GREENHOUSE GAS EMISSIONS STANDARDS FOR HEAVY-DUTY VEHICLES - PHASE 3

NOTICE OF PROPOSED RULEMAKING

PUBLIC HEARING, MAY 2-3, 2023

TESTIMONY OF BRANDON BUCHANAN, AMERICAN BUS ASSOCIATION

BLOCK 4, DAY 1 OF 2

MS. THOMPSON: Thank you for your comment. The next speaker will be Brandon Buchanan. You may now unmute, and please state your name and affiliation for the record.

MR. BUCHANAN: Yes. Good afternoon. My name is Brandon Buchanan. I'm with the American Bus Association. I am the director of regulatory affairs based here in Washington, D.C. Thank you for the opportunity to speak to you all today and appreciate you having an open forum to collect comments. We do hope that you will be able to extend the comment period beyond the June 16th date to ensure kind of meaningful participation and a wholesale ability to comment from the public.

We do also want to thank you for the flexible approach and exchange that we had with your Agency on the engine -- recent heavy-duty engine emissions rule, and we do thank you very much for listening to us and adopting a de-rate schedule that we think is very workable. We hope to see similar exchange and discussion on Greenhouse Gas Phase 3.

We do have some concerns over the expansion and development of new standards kind of without taking into account and evaluating the newly-developed standards and their impact. We also share the concerns of some of our friends at the Engine Manufacturers Association in reopening the 2022 -- excuse me -- 2027 Model Year to look at those standards as well that were already a part of the most recent rulemaking.

We also have some concerns about assumptions over fleet composition and the adoption of specific technologies when the technology hasn't yet been proven in all operational capacities, and the infrastructure has not yet demonstrated to be capable of supporting our operational realities, and also the capacities planned by this proposal. In addition to concerns about technology and the infrastructure, we also have very specific concerns about the added weight that some of those technologies will bring to our vehicles and over-the-road buses, and the potential safety concerns if operating ranges and reliability are impacted by these new technologies.

We hope that efficiencies can be recognized in this plan, particularly before modes of transportation that remove other passenger vehicles from the road, such as motor coaches, transit buses, and school buses. It is of our -- in our interest and it is of interest to us that locomotives, planes, and ships are kind of more of a limited focus of this proposal. Lastly, we hope that incentives will be -- continue to be added to encourage future adoption of proven technologies. Currently there's very limited federal or state incentives for private over-the-road or motorcoach companies, whereas new zero-emission and alternate fuel-powered equipment are generally 3 to 4 times the current cost and, again, bring added weight concerns as well.

We hope that the EPA will continue to be lead on the development of environmental standards, and we look forward to leading the charge in harmonizing all the different environmental standards so we have one set of standards across the nation. Thank you very much for your time.