

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 AMY GOLDSMITH, CLEAN WATER ACTION

BLOCK 9, DAY 2 OF 2

Goldsmith. Amy, you may now unmute, and please state your name and affiliation for the record.

MS. GOLDSMITH: Thank you. My name is Amy Goldsmith. I'm the New Jersey state director for Clean Water Action. I serve on the -- as a steering committee member of the Coalition for Healthy Ports. We are a member of the Moving Forward Network. Clean Water Action is submitting these comments to urge the EPA to go further than currently proposed in setting new emission limits and transition (AUDIO MALFUNCTION) communities living near railyards and train corridors.

Unfortunately, the rule does not go far enough in other areas. The most stringent option in the proposal only sets 50 percent by 2023 sales goals for zero-emission vehicles. EPA should require a hundred percent by 2035 in the final rule. Proven commercial, viable, and rapidly-emerging technologies in the market have led both industry and states, including New Jersey where I live, to set higher projection numbers for zero-emission vehicles on the road. The EPA should lead, not follow, behind. Every day a truck is allowed to be purchased, it means another 10-plus years it will be on the road. Unlike wine, pollution controls on a diesel truck do not get better with age.

The EPA should also adopt rules that set specific truck conversion requirements to zero emissions in communities already overburdened. The proposed rules should be modified to

guarantee mandatory emission reductions, prioritized funding here, and convert heavy-duty diesel to zero emissions faster, particularly where the use is concentrated. This should be done in direct coordination with EJ communities and frontline workers.

Additionally, the EPA should establish a scrap metal program to prevent the resale, migration, and increased density of dirty diesel in overburdened communities, prioritize emission freight conversions for Class 7 and 8 heavy-duty trucks, particularly short-haul drayage, because these are some of the oldest and most polluting trucks in our state, concentrated in ports-adjacent and fence-line communities as well as routes to warehouses and distribution centers.

You should conduct environmental justice and public health analysis to ensure systems are in place to protect our most vulnerable and chronically exposed to heavy-duty diesel, and develop a multi-pollutant standard that regulates not just greenhouse gases but also nitrous oxide particulate matter and help prevent false solutions, like natural gas, from being considered a zero-emission option, which it is not.

Finally, we are concerned that the public comment period is too short, only 50 days. We ask EPA to extend the comment period to at least 60 days. Thank you for this opportunity to speak.