

**Testimony of
Erik C. White
National Association of Clean Air Agencies
Before the
U.S. Environmental Protection Agency
on the
Notice of Proposed Rulemaking
“Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3”
Docket ID No. EPA-HQ- OAR-2022-0985
May 2, 2023
Virtual Public Hearing**

Good morning. My name is Erik White and I am Director of the Placer County Air Pollution Control District in California. I am testifying on behalf of the National Association of Clean Air Agencies, for which I serve as Co-Chair of the Mobile Sources and Fuels Committee. NACAA is the national, nonpartisan, non-profit association of air pollution control agencies in 40 states, including 115 local air agencies, the District of Columbia and five territories. The air quality professionals in our member agencies have vast experience dedicated to advancing the equitable protection of clean air and public health in the U.S. This testimony is based upon that experience. The views expressed in this testimony do not represent the positions of every state and local air pollution control agency in the country.

NACAA has supported both EPA’s adoption in 2011 of the first phase of greenhouse gas emission standards for heavy-duty vehicles and engines, which took effect with model year 2014, and the agency’s 2016 adoption of the Phase 2 greenhouse gas standards, which took effect with model year 2021. We now welcome the Phase 3 proposal and the opportunity to further advance this important program in a way that optimally reflects the potential of technological innovation and the unprecedented financial incentives provided under the Bipartisan Infrastructure Law and Inflation Reduction Act, to best protect human health and our planet.

In NACAA’s January 15, 2021, transition paper to the Biden-Harris Administration, the association wrote, “Despite the technological and regulatory progress made over the past nearly 60 years, mobile sources continue to dominate emission inventories across the U.S. and are the largest contributing sector to GHG emissions. Our nation needs a strong sustainable transportation strategy. Top priority must be placed on new federal programs to continue to reduce emissions from the mobile source sector.” The proposed Phase 3 rule offers an opportunity for the federal government to take a robust step toward this goal and NACAA is optimistic that working with states, cities, counties and other stakeholders, EPA can finalize another phase of highway heavy-duty greenhouse gas emission standards that will protect and save lives, foster innovation, create prosperity and reduce the risks facing our climate. We appreciate the opportunity to participate today, as we continue to study the proposal – including provisions to revise regulations addressing preemption of state regulation of new locomotives and new engines used in locomotives – and will provide written comments by the close of the comment period.

Thank you.