



National Tribal Air Association's (NTAA's)

Public Testimony

Regarding

U.S. EPA's Proposed Rule to "Control Air Pollution From New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards"

(Docket ID No. EPA-HQ-OAR-2019-0055)

EPA Public Hearing Testimony

April 14, 2022

1. Good morning and thank you for the opportunity to provide testimony on behalf of the National Tribal Air Association for the EPA's proposed "Clean Trucks Plan" to control air pollution from new heavy-duty vehicles. NTAA is a member-based organization that is an information conduit for 155 member Tribes, NTAA seeks to build consensus but does not represent the opinions of all Tribes. NTAA was founded by a resolution vote of the Annual Meeting of the National Congress of American Indians in 2002. NTAA is funded by a grant from the USEPA's Office of Air and Radiation. NTAA's mission is to advance air quality management policies and programs, consistent with the needs, interests, and unique legal status of American Indian Tribes and Alaska Natives.
2. The proposed rule and the administration's more inclusive "Clean Trucks Plan" is exceedingly important to the nation's sovereign Tribes where indigenous people are affected by breathing unhealthy air. For example, there are 81 Tribes within non-attainment designated airsheds where some Tribes are in areas of nonattainment for multiple criteria pollutants. These criteria pollutants cause exposure to ozone and fine particles and are found in the emissions from heavy duty trucks. As the USEPA has documented trucks, buses, and large engines generally, remain major contributors to these unacceptable conditions. Climate disruption caused by the burning of fossil fuels including diesel and petroleum, effects the quality of Tribal health and life.

3. NTAA has consistently encouraged the USEPA, Congress, and states to do more to protect the health of the NTAA member Tribes and quality of life by advancing air quality and reducing air pollution from both mobile and point sources. The federal government has a trust responsibility to Tribes and as part of that responsibility, EPA allocates 12.5 million for Tribes through the Clean Air Act to implement air quality programs. However, this is not enough to address all Tribal Air quality concerns, including pollution from mobile sources and climate change issues caused by greenhouse gas emissions.
4. NTAA recently conducted a baseline needs assessment of 169 Tribes and found that 80% of the Tribes agreed or strongly agree that insufficient air quality funding impacts their Tribe's capacity to prevent adverse health impacts, such as asthma, allergies, lung, and heart disease. Increased federal funding for Tribal air quality programs helps Tribes co-regulate air quality with their federal, state and local partners.
5. Despite stagnate funds, Tribes are doing their part to reduce emissions of the pollutants that are the focus of this rule. For example, 119 Tribes and Alaskan Native Villages have reduced diesel vehicle emissions from the VW settlement fund in the past 4 years and recently, more Tribes have secured funding from the USEPA's Tribal Diesel Emissions Reduction Act also known as the DERA grant program.
6. We, the National Tribal Air Association are encouraged by the USEPA's commitment expressed on March 7, 2022, that, "This proposed rule would ensure the heavy-duty vehicles and engines that drive American commerce and connect people across the country are AS CLEAN AS POSSIBLE..."
7. Yet "As Clean As Possible" for new vehicles in 2027, the focus of this rule, means recognizing continuously improving technologies, fuels, and transportation options. Active research and development programs at many institutions in the U.S. and abroad continue to redefine what is "possible." The NTAA asks that you fulfill your commitment of March 7, 2022, with improvements to this rule and the Clean Trucks Plan.
8. Finally, President Biden's Executive Order 14037 recognizes that "...the transportation sector has been a long-standing obstacle to advancing environmental justice." This proposed rule can help remove barriers for emissions-free mobility and transport for all by requiring that heavy-duty engines are "as clean as possible!"
9. Thank you for the opportunity to provide the National Tribal Air Association's testimony. The NTAA will be providing additional comments prior to the USEPA's comment deadline for this proposed rule. In addition to this comment letter published later, NTAA's policy papers, white papers, and frequent presentations are accessible to you in NTAA's on-line library at www.ntaatribalair.org.