

As Prepared for Delivery

Comments of Paul G. Billings
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On

The U.S. Environmental Protection Agency Proposed Rule to Revise Existing National GHG
Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026

Docket ID No. EPA-HQ-OAR-2021-0208.

Good morning, I am Paul Billings, National Senior Vice President of Public Policy at the American Lung Association. Thank you for the opportunity to speak to you this morning.

Air pollution is a major threat to public health and air pollution discriminates against Black and Brown communities and low-income communities. Air pollution causes tens of thousands of people to die prematurely each year in the United States, and motor vehicles are a leading source of the emissions that create ozone, or smog, and particle pollution.

Transportation is also the nation's leading contributor to climate change.

The American Lung Association's most recent "State of the Air" report found that more than 135 million people in the United States— more than 4 in 10 people - live in counties with unhealthy levels of air pollution. Our report also found that people of color are much more likely to live in counties with failing grades for air pollution than white Americans.

We know that people who live near roadways, oil and gas operations including refineries bear a disproportionate burden of air pollution, and that climate change is making that pollution worse. Let's me repeat this, climate change is making air quality worse.

My time is very short, so I want to make three brief points. We will provide detailed written comments prior to the deadline.

First: climate change is a health emergency. The Intergovernmental Panel on Climate Change found that the planet is on a path toward catastrophic destruction if we do not make serious cuts in our greenhouse gas emissions as soon as possible.

From deadly floods in Tennessee to wildfires in the West that destroy communities and blanket the continent with unhealthy particle pollution, no one can escape the lethal consequences and the urgent need to act. EPA must finalize this rulemaking this year in order to set stronger

tailpipe standards for Model Year 2023. Climate change is a health emergency, and the Biden Administration must respond with dispatch.

Second: EPA must maximize the real-world emissions reductions from this program. We are concerned about loopholes and credits that reduce the actual emission reductions from the vehicles on the road. EPA must not allow these credits to undermine the emissions reductions.

Third: EPA's own analysis points to a more protective alternative. Alternative 2 would provide more pollution reductions and more electric vehicles on the road by 2026. EPA estimates that Alternative 2 would result in significant present value net benefits of up to \$180 billion (annualized net benefits of up to billion to \$9.1 billion). Quoting from the NPRM, "The total benefits far exceed the total costs of the program."

As noted above, this is a health emergency and maximizing the pollution reductions is needed. We encourage EPA to pursue, at a minimum, the stringency laid out in Alternative 2, and remove excess crediting and loopholes that will work to reduce the real-world benefits of this more health-protective alternative.

In conclusion, climate change is a health emergency. EPA must maximize the pollution reductions, minimize the loopholes and finalize the rule this year to implement the regulations in model year 2023.