U.S. Environmental Protection Agency Hearing on
Reconsideration of Final Determination of Mid-term Evaluation of
Greenhouse Gas Emissions Standards for MY 2022-2025 Light-duty Vehicles;
MY 2021 Greenhouse Gas Emissions Standards

Docket No. EPA-HQ- OAR-2015-0827

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Good afternoon. My name is Janice Nolen and I am the Assistant Vice President for National Policy for the American Lung Association. The American Lung Association celebrates our 113th anniversary this year. We have fought for public health against some of the nation's most dangerous challenges, beginning with tuberculosis and influenza, then tobacco and, for more than fifty years, harmful air pollution. We speak up for millions of Americans with lung diseases who need healthy air to breathe.

I appreciate the opportunity today to explain the support of the American Lung Association for the greenhouse gas standards EPA adopted for light duty vehicles for model years 2022-2025 and to urge that EPA support the final determination made in January 2017 that they are appropriate. As well, the Lung Association urges EPA to recognize that the 2021 standards also remain appropriate and should be implemented. We will submit more detailed comments in writing.

Federal and state vehicle emissions standards adopted in 2012 were carefully researched, negotiated and are being achieved ahead of schedule.[1] EPA correctly recognized in the January finding that these standards continue to be achievable. After widely gathering evidence, completing in-depth research and analysis and providing extensive opportunity to provide comments during all of which all stakeholders – including the auto industry – were deeply involved, EPA wisely concluded that these standards should remain in place. These standards reflect the urgent action needed to protect public health against climate change and an ongoing dependence on fossil fuels for passenger transportation.

Currently, EPA's air pollution records document that millions of Americans experience air that is unhealthy to breathe.[2] Vehicle fuels and emissions contribute substantially to climate pollution that exacerbates air pollution challenges and amplifies many other threats to public health. Transportation sources produced more than one quarter of the nation's greenhouse gas emissions (27 percent) in 2015. EPA data show that the transportation sector increased those emissions more since 1990 than any other sector.[3]

Released in 2016, the *Impacts of Climate Change on Human Health in the United States: A Scientific Assessment* provided the most recent summary of the research outlining these risks to the United States. This grim summary of risks to human health launches the report:

> Climate change is a significant threat to the health of the American people. The impacts of human-induced climate change are increasing nationwide. Rising greenhouse gas concentrations result in increases in temperature, changes in precipitation, increases in the frequency and intensity of some extreme weather events, and rising sea levels. These climate change impacts endanger our health by affecting our food and water sources, the air we breathe, the weather we experience, and our interactions with the built and natural environments. As the climate continues to change, the risks to human health continue to grow. [4]

We have front page examples of those impacts now. The massive flooding in Houston that led to toxic air emissions from damaged industrial sources has made the news. At the same time, our citizens in Montana, Oregon, Idaho and California—just to name some of the hardest hit states—have suffered weeks of high levels of deadly particulate matter in widespread wildfire smoke.

For the 24.6 million Americans who have asthma, including the 6.2 million children with this disease, for the 11.4 million people with chronic obstructive pulmonary disease, such events literally threaten their ability to breathe.

The American Lung Association urges EPA to recognize the need to use every available tool to reduce greenhouse gas emissions and limit the impact of climate change on our nation's health. The standards already in place and readily achievable are tools too valuable to lose.

Thank you for the opportunity to provide comments today.

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[1] U.S. Environmental Protection Agency. 2016. Light-Duty Automotive Technology, Carbon Dioxide Emissions and Fuel Economy Trends: 1975 Through 2016. EPA-420-S-16-001; Union of Concerned Scientists. 2015. Tomorrow's Clean Vehicles Today. Available at http://ucsusa.org/cleanvehiclestoday.

[2] U.S. Environmental Protection Agency. Nonattainment Areas for Criteria Pollutants (Green Book). Updated June 20, 2017. Available at https://www.epa.gov/green-book.

[3] U.S. EPA. 2017. Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2015. EPA 430-P-17-001. Accessed at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2015

[4] US GCRP, 2016. The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment. Crimmins A, Balbus J, Gamble JL, Beard CB, et al. Eds. U.S. Global Change Research Program, Washington DC. http://dx.doi.org/10.7930/J0R49NQX