



**Statement of
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**to the
National Highway Traffic Safety Administration
Regarding its proposal of September 3, 2021 for the
Corporate Average Fuel Economy Standards
for Model Years 2024-2026 Passenger Cars and Light Trucks**

NHTSA Docket ID No. NHTSA-2021-0053

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I thank the reviewers and policymakers at NHTSA for their work.

I am Kevin Stewart and I serve as director of environmental health, advocacy and public policy for the American Lung Association. We are dedicated to the mission of saving lives by preventing lung disease and promoting lung health. We have been working to protect people from ambient air pollution since the middle of the last century.

I write on behalf of the American Lung Association in the Mid-Atlantic, covering Delaware, the District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia. I represent not only the millions of people there who suffer from chronic lung disease, but also the tens of million others who desire to breathe clean air and so protect their good health.

According to the American Lung Association's most recent State of the Air report, in just this service area, not a mere handful but 20 counties, home to 13 million people, accounting for one third of that region's population, earned failing grades for ozone smog, even under a weak standard that has long been recognized by scientific and medical consensus—including by EPA's own Clean Air Science Advisory Committee—as inadequate to protect public health. And a clear majority of these counties averaged at least five days a year when ozone levels were recognized as high enough under the current standard to pose clear risks for people in large sensitive groups in the population—children and seniors as well as people with chronic lung and heart disease—risks severe enough to send people to emergency rooms and hospitals.

Despite many years of improvement in emissions and efficiency standards for vehicles and fuels, we in the mid-Atlantic still face a serious problem: Transportation-related air pollution, including significant contributions from light-duty vehicles, continues to be a major source of both greenhouse gases and ambient air pollution.

According to the most recent emission inventories, *highway vehicles alone* account for about 17% of the Mid-Atlantic's contributions to volatile organic compounds, and for fully 39%—the largest share for any emissions tier—for nitrogen oxides, the primary driving precursor of ozone formation in the Mid-Atlantic.

With respect specifically to climate change, according to the Pennsylvania Climate Impacts Assessment and Climate Action Plan 2021 (prepared by the Pennsylvania Department of Environmental Protection with professional assistance and available via <https://www.dep.pa.gov/citizens/climate/Pages/PA-Climate-Action-Plan.aspx>):

- Not only does the transportation sector contribute 24% of the Commonwealth's 2018 inventory of greenhouse gas emissions, but reducing vehicle miles traveled combined with increasing fuel efficiency is expected to have the lowest—in fact, *the most negative* cost per ton (-\$448.43 per MTCO₂e)—of greenhouse gas emission reduction of 15 major strategies examined—yielding a *cost savings* compared to the social cost of carbon of \$116 per MTCO₂e in 2020.
- In contrast, the same report goes on to show how our collective failure to get ahead of the climate crisis will result in the following statewide changes by mid-century (2041-2070) on average relative to the actual 1971-2000 baseline:
 - Temperature increase of 5.9°F (3.3°C)
 - Increase in the number of days per year with very heavy precipitation are expected to increase 24% to 15.4.
 - Increase in the number of days per year when temperatures are expected to reach at least 90°F, up to 37 from 5.
- The report concludes that “Increasing average temperatures and more frequent and intense heat waves, flooding, and storm events can cause significant human health risks.” Examples of impacts relative to the Lung Association's mission include:
 - The effects of increased heat-related morbidity and mortality among people whose health is already compromised with chronic lung disease;
 - Reduced outdoor air quality (e.g., due to transport of wildfire smoke as well as to higher ground-level ozone and allergen levels);
 - Exposure of sensitive populations to mold infestations resulting from increased rainfall and flooding events.
 - Severe events such as major storms and wildfires made more likely by climate change can be extremely disruptive for people with lung disease, with impacts including:
 - potentially worse air quality
 - the need to evacuate a well-controlled home environment,

- inability to use treatments requiring electricity, and
- loss of continuity of access to care and care providers.

In short, climate change, to a significant part the result of greenhouse gas emissions released as a consequence of the transportation sector, is making these scenarios all the more likely. The needs for the strongest possible standards for clean, efficient cars in the short term, and to get firmly on track toward the clean electric vehicle market, implemented as soon as possible, could not be clearer and indeed, are already upon us.

Therefore, it is critical that NHTSA undertake the following steps:

- Regard Alternative 3 in the proposal as the *minimum* to be accomplished and ensure that the standards adopted are the strongest possible, thereby supporting a sustainable drive to effect a nationwide transition to zero-emission vehicles by 2035.
 - This would not only provide the greatest reductions in greenhouse gases, but
 - This would also result in the greatest health benefits and save the most lives.
- Act with urgency so that the standards can begin taking effect as soon as possible, and certainly in time to cover the model year 2024 fleet.
- Include requirements in the standards that will verify that the fuel efficiency advancements implemented under the standards will have real and significant positive impacts, not merely benefits only “on paper.”

Climate change constitutes an emergency for our nation and for the human race. It is long past time that our laws and policies reflect that fact.

Thank you for your serious consideration of this testimony.