

As Prepared for Delivery

Comments of Laura Kate Bender
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On

The National Highway Traffic Safety Administration Proposed Rule:
Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and
Light Trucks,
Docket ID No. NHTSA-2021-0053

Hello. I'm Laura Kate Bender, National Assistant Vice President for Healthy Air at the American Lung Association. Thank you for your time today.

In order to fulfill our mission of saving lives by improving lung health and preventing lung disease, the Lung Association puts a high priority on pushing for policies that drive a nationwide transition to zero-emission vehicles. NHTSA's proposal is a critical step toward that zero emission future.

As you've heard from my colleague, we urge NHTSA to finalize a rule that achieves benefits at least as strong as those in Alternative 3 of the proposal. We need you to maximize the long-term health benefits of the rule. We also urge you to avoid including in the final rule any loopholes or credit schemes that mean benefits on paper don't become reality, because that would lead to health harms that could have been avoided. And we urge you to complete the rulemaking in a timely manner to ensure they're implemented in time for model year 2024.

Today I'd like to highlight the breadth of the support of the health community for improving fuel efficiency for vehicles and driving progress toward zero-emission transportation nationwide. Climate change is a health emergency. Millions of Americans – likely including many of you on the line today – have firsthand experience with the health impacts of climate change. This summer, much of the country had days with unhealthy levels of particle pollution due to wildfire smoke – even people thousands of miles from the fires. Hot days also often mean high levels of unhealthy ozone pollution, or smog.

Indoor air quality takes a hit too, as anyone knows who's dealt with mold in their home when cleaning out from a flood after a major storm.

Plus, the people with lung disease that our organization serves are hit hard when they have to evacuate, or lose power, or don't have access to their usual medical care team because of a climate-related disaster. And that's not to mention the long list of health harms from climate change that impact other parts of the body, from more Lyme disease to less nutritious food to the mental toll of dealing with these impacts.

We hear about these impacts from the nurses, physicians and other health professionals we work with. They're seeing them firsthand. That's why health and medical organizations are so committed to cleaning up the pollution that causes climate change.

The health community has been rallying support for cleaner cars for years. In 2017, the Lung Association led a letter to NHTSA and EPA signed by more than 700 medical and health

professionals from across the nation urging both agencies to implement strong state and federal advanced clean car regulations to protect public health.

In 2018, we joined more than 90 national, state and local health and medical organizations in commenting against the SAFE rule rollback.

Earlier this year, the Lung Association and 13 other national health and medical organizations, including the American Public Health Association and the American Psychological Association, sent a letter to President Biden calling on him to set the strongest possible vehicle standards to protect public health. We called on the administration to act urgently to ensure the same or better emissions reductions scheduled to be achieved under the Obama-era standards, and then set stronger standards through at least model year 2030.

And just last month, a robust contingent of the health community submitted comments to NHTSA and EPA in support of state authority to set stronger cleaner cars standards, including 28 national, state and local health and medical organizations and dozens of health professionals.

Climate change is a health emergency, but also a health opportunity. That's why the health community supports cleaning up our nation's vehicles – because it not only addresses climate change, but also provides immediate benefits to health by eliminating tailpipe pollution. The nation urgently needs to reduce fossil fuel consumption and greenhouse gases from transportation to avoid the worst health impacts of climate change. A nationwide transition to zero-emission vehicles has the potential to provide immediate benefits to health and equity. We call on you to drive that transition with this rulemaking and future ones.