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Statement of Paul G. Billings

On behalf of the

American Lung Association

RE: Tier 3 Motor Vehicle Emissions and Fuel Standards Program
Docket ID NO. EPA-HQ-OAR-2011-0135

April 24, 2013

Good morning, I am Paul Billings, Senior Vice President of Advocacy and Education at the American Lung Association. On behalf of the nearly 34 million Americans suffering from chronic lung disease, I urge the U.S. Environmental Protection Agency to adopt final the Tier 3 Motor Vehicle Emissions and Fuel Standards Program by the end of this year.

Released earlier today our annual “State of the Air” Report shows 132 million people currently living in counties with unhealthy levels of air pollution – areas that get failing grades.

Today you will hear from some who will question the benefits of more protective standards or widely exaggerate costs. We have heard these outlandish claims for decades and each time such claims were proved false and their underlying analyses flawed.

EPA’s job is clear. Set cleaner gasoline and vehicle standards to protect the public health, especially the most vulnerable – our children, older adults, and those with chronic lung and heart disease.

The Clean Air Act grants EPA the authority to set standards for vehicles and fuels to reduce air pollution that threatens public health. Section 211 (c)(1)(A) of the Clean Air Act, grants the EPA Administrator the authority to limit sulfur in gasoline which reduces the efficiency of emissions control technologies and leads to greater tailpipe emissions. When pollution from motor vehicles endangers public health, section 202 of the Clean Air Act requires the EPA Administrator to take necessary action.

Although we have made progress in the U.S. towards healthier air, the air we breathe is still making millions of Americans sick. Pollution from motor vehicles is a major contributor to ozone and particulate matter. These pollutants trigger asthma attacks, worsen existing conditions such as chronic obstructive pulmonary disease and diabetes, harms heart and lung health and can lead to early death.

As the American Lung Association noted in our recently released report, “A Penny for Prevention: The Case for Cleaner

Gasoline and Vehicle Standards,” the health benefits of this systems approach to fuels and vehicles are significant. Cleaner gasoline will provide immediate air pollution reductions by cutting tailpipe pollution from existing vehicles, while improved vehicle standards will ensure automakers continue to develop and sell new, cleaner-burning vehicles.

Our analysis estimates that by 2030, these standards under consideration today will prevent more than 2,500 premature deaths and more than 15,000 asthma attacks each year. The standards will also provide up to \$22 billion in economic and health benefits annually by 2030, and increase our productivity by preventing more than 3.3 million days missed at work and school each year by 2030. These benefits are conservative estimates as our analysis only considered the eastern half of the U.S. The actual benefits of cleaner gasoline and vehicle standards will be much higher once fully implemented across the entire U.S.

As reported by the Health Effects Institute in 2010, near-roadway exposure to traffic pollution is high and affects a larger population than previously thought. Their analysis showed a causal relationship between traffic-related air pollution exposure and asthma exacerbations in children. HEI reports that 30-45 percent of people living in large North American cities live within 300-500 meters of a highway or major road, zones that are most heavily impacted by traffic pollution.

To reduce exposure to a toxic brew of traffic-related air pollutants including particulate matter, we encourage the U.S. EPA to set the tightest tailpipe standards for non-methane organic gases (NMOG) and nitrogen oxides (NOX), and for particulate matter, and the lowest possible downstream cap for sulfur. We will submit detailed specific comments to strengthen the proposal in writing.

My wife and I are blessed to have two active and healthy daughters --soccer, lacrosse and track are their competitive sports. Like every parent, every individual who breathes, I care deeply about the quality of the air that my family and I breathe. Last year, my daughter was diagnosed with exercise-induced asthma. Her high school is adjacent to I-495 the Capital Beltway, air pollution from vehicles and the resulting smog and soot are real and direct threat to her and her teammates' health. In my wife's fifth grade class, there are too many children with asthma. We must protect all children whose lungs are still developing and all the vulnerable populations from air pollution.

The American Lung Association applauds the U.S. EPA's effort to cut life-threatening tailpipe pollution through the long-awaited cleaner gasoline and vehicle standards. To save lives and protect public health, these standards must be finalized no later than the end of this year. Thank you for the opportunity to speak in support of these critical safeguards.