

Testimony of Janice Nolen, Assistant Vice President, National Policy, American Lung Association

December 4, 2017

Docket ID No. EPA–HQ– OAR–2014–0827:

Proposed Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits

Docket ID No. EPA– HQ-OAR-2017-0355:

Proposed repeal of the Clean Power Plan.

Thank you for the opportunity to present comments today. I am Janice Nolen, Assistant Vice President, National Policy for the American Lung Association. The American Lung Association has fought for decades to ensure all Americans have healthy air to breathe. I wish to provide testimony today in opposition to two proposed actions now open for public comment and respectfully request that my comments be included in both dockets: the proposed repeal of the emission requirements for gliders, docket EPA–HQ– OAR–2014–0827 and the proposed repeal of the Clean Power Plan, docket No. EPA-HQ-OAR-2017-0355.

The American Lung Association strongly opposes the repeal of both these measures. Both steps severely threaten public health and would place many communities at much greater risk of harm. Both proposals violate direct mandates to EPA contained in the Clean Air Act. Both proposals disrespect the strong public support for cleaner air.

The proposed repeal of the emission requirements for glider vehicles, engines and kits marks a particularly egregious turn for the agency charged with protecting public health and the environment. Repealing these requirements literally creates a loophole that benefits one company while threatening the health and lives of Americans. The Clean Air Act clearly intended for EPA to regulate these new trucks—for that’s how they are marketed, and how they compete with other new trucks—with the same limitations on emissions that other truck manufacturers must meet. EPA must recognize that and follow the law.

If opened, this loophole will directly affect millions of Americans who live near or work on a major highway, forcing their continued exposure to the emissions from dirty diesel trucks. The Health Effects Institute estimated in 2010 that, roughly 45 percent of people in North America lived close enough to face serious health risk from traffic pollution, especially from diesel emissions. Studies show that traffic pollution causes asthma attacks in children, and may cause a wide range of other effects. Evidence warns that traffic pollution may cause premature death; may impair lung function; may cause the onset of childhood asthma; and increase the risk of cardiovascular harm. (1) In 2012, the World Health Organization (WHO) classified diesel exhaust as a carcinogen.(2)

EPA estimated that the existing limits on emissions from gliders in place would prevent 1600 premature deaths over the lifetime of the cleaner glider trucks sold in 2017. If EPA repeals the existing rule for glider trucks, each year’s new production will add hundreds and possibly thousands more lives at risk, simply to give an unfair and illegal loophole to a single company. That is wrong.

EPA’s proposal to repeal the Clean Power Plan would remove the nation’s best available tools to protect Americans from climate change. The widespread impacts of climate change, recognized in repeated studies and detailed analyses, have made page one news this year in warmer temperatures, multiple

extreme weather events and wildfires. We at the Lung Association worked to get information to the public about steps to take to protect themselves from these changes and to recover from them. For example, we worked with schools in Montana to protect their children and teachers from particulate matter from the wildfire smoke that literally came into their classrooms for weeks.

Increased particulate matter, PM2.5, emerges as a common threat in both the glider loophole and the proposed repeal of the Clean Power Plan. Both the existing rules would effectively reduce PM2.5 directly and indirectly. Those reductions in PM2.5 would have profound benefits for public health, as recognized in the existing rules. Repealing either would increase the risk that more particulate matter would cause more lung cancer and premature death, trigger asthma attacks, and cause heart attacks and strokes.(3)

Unfortunately, in the proposal to repeal the Clean Power Plan, EPA produced analyses that deliberately underestimate the benefits of reducing PM2.5 to lower the estimated economic impact of the reductions. We may see this approach repeated, so we want to clearly oppose this dangerous distortion of the health effects particulate matter.

EPA's analysis proposed artificial thresholds where EPA deliberately drew a line saying, in effect, "no one benefits from having PM2.5 levels below this level." That decision contradicts what science shows and what the WHO concluded—that no such threshold exists (4). Research shows that PM2.5 can and does harm health at levels well below the adopted standards and below levels monitored in communities in the U.S. today (5, 6, 7). EPA's decision achieved its desired purpose—to minimize the health outcomes and economic benefits of the cleaner air that would result from following the current Clean Power Plan. EPA must restore its recognition that the cleaner the air, the better is the health of our citizens.

We call on EPA to not to reopen the dirty diesel truck loophole or repeal the Clean Power Plan.

Thank you.

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2. International Agency for Research on Cancer, 2012. Press Statement. IARC: Diesel Engine Exhaust Carcinogenic https://www.iarc.fr/en/media-centre/pr/2012/pdfs/pr213_E.pdf.
3. U.S. EPA. Integrated Science Assessment for Particulate Matter (Final Report). U.S.IARC. Environmental Protection Agency, Washington, DC, EPA/600/R-08/139F, 2009. <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=216546>
4. World Health Organization (WHO) 2016. Ambient (Outdoor) Air Quality and Health. WHO Fact Sheet. Geneva, Switzerland. <http://www.who.int/mediacentre/factsheets/fs313/en/>
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6. Crouse DL, Peters PA, van Donkelaar A, Goldberg MS, Villeneuve PJ, Brion O, Khan S, Atari DO, Jerrett M, Pope CA, Brauer M, Brook JR, Martin RV, Stieb D, Burnett RT. (2012). Risk of Nonaccidental and Cardiovascular Mortality in Relation to Long-term Exposure to Low Concentrations of Fine Particulate Matter: A Canadian National Level Cohort Study. *Environ Health Perspect.* 2012 May;120(5):708-14.
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