

July 1, 2013

Acting Administrator Robert Perciasepe
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
Mail Code 2822T
1200 Pennsylvania Ave, NW
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RE: Docket ID No. EPA-HQ-OAR-2011-0135, Tier 3 Vehicle Emission and Fuel Standards Program

We write in support of the U.S. Environmental Protection Agency's (EPA) proposed cleaner gasoline and vehicle standards. As physicians, nurses, scientists and medical and health professionals we understand the risk for serious health impacts millions of Americans face every day as a result of unhealthy air. The proposed Tier 3 Motor Vehicle Emissions and Fuel Standards, will significantly reduce ozone and particle pollution that is harmful to both heart and lung health and can even lead to early death. It is, thus, a public health imperative that EPA adopt strong new standards no later than December 31, 2013.

Cars, light trucks, and SUVs are still a major source of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOCs) that are harmful and also lead to the formation of ground-level ozone and particle pollution. Ozone acts as a powerful respiratory irritant, causing inflammation of lung tissue, premature death, shortness of breath, wheezing, increased susceptibility to respiratory infections, risk of asthma, and need for medical treatment and hospitalization. Exposure to particle pollution has also been linked to diminished lung function, asthma attacks, increased risk of dying from lung cancer, increased risk of death from cardiovascular disease and increased risk of lower birth weight and infant mortality.

We know the burden of air pollution is not equal. Children, whose lungs continue to grow into adolescence, face a higher risk from the effects of air pollution. For our patients with existing diseases such as asthma, heart disease, chronic obstructive pulmonary disease (COPD) and diabetes, air pollution can increase the burden they face every day. Additionally, adults 65 and older whose bodies are less able to defend against the effects of air pollution, are placed under greater strain.

Traffic-related air pollution may be more harmful and affecting more Americans than previously thought. A recent review by the Health Effects Institute (HEI) finds that up to 45 percent of the North American population lives, goes to work and school within 300-500 meters of a major roadway. The HEI review identifies these zones as the most heavily impacted by traffic pollution. The review also concluded that traffic pollution can be linked to the onset of childhood asthma. With nearly 159 million Americans breathing unhealthy air, we need to use every tool available to reduce air pollution.

A cleaner gasoline standard that reduces sulfur in gasoline to 10 parts per million will clean up existing vehicles by enabling emissions reduction technologies to function more efficiently.

Cleaner gasoline alone will have an immediate effect by reducing NO_x emissions from the existing fleet: the pollution equivalent of removing 33 million cars off the road. Combined with new tailpipe emissions standards, the proposed program will save thousands of lives each year, prevent tens of thousands of asthma attacks, and reduce the number of emergency room visits and hospitalizations.

Cleaner gasoline and vehicle standards are urgently needed. The EPA should adopt new standards that will reduce the toll of death and disease from cars, lights trucks and SUVs no later than the end of this year.

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