

U.S. Environmental Protection Agency Hearing on  
Reconsideration of Final Determination of Mid-term Evaluation of  
Greenhouse Gas Emissions Standards for MY 2022-2025 Light-duty Vehicles;  
MY 2021 Greenhouse Gas Emissions Standards  
Docket No. EPA-HQ- OAR-2015-0827

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Good morning, I am Paul Billings, National Senior Vice President of Advocacy at the American Lung Association. The American Lung Association is the nation's oldest voluntary health organization. Through research, advocacy and education, we work in communities across the nation to save lives by preventing lung disease and promoting lung health.

Last December, we provided comments to the U.S. Environmental Protection Agency on the proposed determination where we supported the "conclusion that the model year 2022-2025 light-duty greenhouse gas standards remain appropriate under the Clean Air Act." EPA affirmed that conclusion with the final determination in January. We reiterate our support for that conclusion today.

Clean car standards are important for public health and a vital step to fight climate change.

The transportation sector is the single largest contributor of carbon pollution in the United States. From the extraction of fuel, to the end of the tailpipe, motor vehicles also remain a major contributor to ozone and particle pollution that threaten the health of millions of Americans. This pollution leads to cough, wheezing and shortness of breath, even in healthy adults. It can cause asthma attacks, cardiovascular disease and even premature death.

We agree with other speakers today that this review by the U.S. Environmental Protection Agency and the National Highway Traffic Safety Administration is unnecessary and redundant with the review that was completed earlier this year.

The public is looking to EPA for protections from pollution that threatens health. Instead, we hear talk about reducing "uncertainty."

My question is uncertainty for whom?

Emissions from motor vehicles form ozone and particle pollution. Vehicles produce carbon pollution that drives climate change. Climate change worsens air pollution.

Changing the car standards won't reduce uncertainty for parents who are worried about the unhealthy air days that endanger the health of their child with asthma. *Will she have another asthma attack that will send her to the hospital? Or when a child is having an attack, will she be able to get her breathing under control?*

Weakening the clean car standards won't remove parents' uncertainty. It just means that they'll likely face more days ahead when their child's health is uncertain.

Climate change is can make storms and extreme weather events worse.

In the Caribbean and in Florida, there is tremendous uncertainty about Hurricane Irma -- uncertainty about where the storm will hit, uncertainty about its impact.

The extreme impact of Harvey has created uncertainty for millions who are dealing with the floods and the ongoing risk from sewage, chemicals, mold and other lung health hazards, as they clean up from flooding. It has created uncertainty for thousands of people who had to flee their homes. It has created uncertainty about the near and long term impacts on health.

Weakening clean car standards won't reduce the uncertainty of those impacted by hurricanes. It just increases the risk of more horrific storms that make their future uncertain.

Climate change makes droughts longer and more intense. Hot dry conditions lead to wildfires.

From California to Montana and across 6 additional western states, wildfires are raging, threatening homes, property and human health. Millions more are breathing air pollution from the fires. There is tremendous uncertainty about these fires and their impact on communities.

Weakening clean car standards won't reduce the uncertainty of those drought-stricken communities facing wildfires and code purple air pollution. It means more communities stare at the barren hills wondering what their future holds, or peer through the haze wondering if and when these events will finally end.

Today's hearing is about creating more uncertainty. We say stop, reduce the uncertainty, protect public health and maintain the standards.

We oppose reopening the 2021 standards. We support the current 2022-2025 standards. These clean car standards remain appropriate and achievable.

Thank you.