

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 afternoon. My name is Laura Kate Bender and I am the director of advocacy of the American Lung Association's Healthy Air Campaign. The Lung Association's mission is to save lives by improving lung health and preventing lung disease, and our Healthy Air Campaign is an education and advocacy effort to protect public health from the impacts of outdoor air pollution. I appreciate the opportunity to provide testimony today in support of the current greenhouse gas standards for light duty vehicles for model years 2022-2025, as well as 2021.

Clean car standards have a strong track record of success in spurring the development of new technology that makes vehicles cleaner, Americans healthier, and our economy stronger. You have already heard from two of my colleagues today about the robust process that determined that the standards are appropriate and about the lung health impacts of air pollution and climate change. I'd like to share some of the work that our broad coalition of health and medical organizations has done to protect public health from these impacts.

In December 2016, our coalition of organizations submitted comments to EPA on the earlier proposed determination that the 2022-2025 standards remained appropriate. This group comprised 14 national health and medical organizations, including the American Public Health Association, the American Thoracic Society, the Asthma and Allergy Foundation of America, the Children's Environmental Health Network, and the National Association of County and City Health Officials, as well as 6 California health organizations.

Collectively, our organizations represent some of the people who are the most vulnerable to the impacts of climate change. This includes children, the elderly, and people with chronic conditions like respiratory and cardiovascular disease. On behalf of the communities we serve, our organizations are committed to reducing harmful air pollution from vehicles, including greenhouse gasses.

Additionally, earlier this summer, 18 national public health and medical organizations joined forces to release a Declaration on Climate Change and Health, which stated in part that "the health impacts of climate change demand immediate action" and that "the public health, disease advocacy and medical community are united in our efforts to protect the public from the risks of climate change."

And last year, more than 1300 health and medical professionals from all 50 states issued their own declaration, which stated in part that "communities across the nation are experiencing the health impacts of climate change, including exacerbated ozone and particulate air pollution, linked to asthma

attacks, cardiovascular disease and premature death; [and] extreme weather patterns, such as heat and severe storms, that cause droughts, wildfires and flooding that destabilizes communities, especially those least equipped to defend themselves.”

As a person with asthma, I already have firsthand experience with the health impacts of a day with high ozone or particulate levels. I consider myself fortunate that I have access to the medication I need to manage my symptoms on those days – although the news of the past couple weeks coming from the areas impacted by Hurricane Harvey illustrate how that may be in increased jeopardy in a world with more frequent and more intense weather disasters.

But being pregnant is an additional vulnerability, and this is the first time in my experience that it’s not only my own health that I’m responsible for. There are so many ways that vehicle pollution and climate change put my unborn son at risk.

Emerging research shows that exposure to ozone pollution during pregnancy can result in low birthweight, as well as likely harmful changes in lung function. Particle pollution has been linked to increased mortality in infants, and both pollutants can cause asthma attacks for children with asthma. In many parts of the country, climate change is already increasing the odds of unhealthy levels of these pollutants. And of course, more frequent and intense extreme weather events put babies at disproportionate risk.

There’s a lot I can control when it comes to giving my son a healthy start in life, but he is at the mercy of the air that I’m breathing. And when he’s born, his developing lungs will continue to be vulnerable to pollution in the air that I can’t do much to protect him from. Frankly, it dismays me to learn that at a time when the health impacts of climate change have never been clearer or more dire, EPA is considering weakening one of the most effective tools we have to protect the public.

On behalf of the not only the Lung Association, but also my growing family, I ask EPA to move forward with the current greenhouse gas standards for light duty vehicles for model years 2022-2025, as well as 2021. Our most vulnerable friends, neighbors, and family members depend on it. Thank you.