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Anne Arnold
U.S. Environmental Protection Agency
EPA New England Regional Office
Office of Ecosystem Protection
Air Quality Planning Unit
5 Post Office Square—Suite 100
(Mail code OEPO5-2)
Boston, MA 02109-3912

[Submitted via email to: arnold.anne@epa.gov]

**Re: Support for Proposed Approval of 2015
Maine State Implementation Plan;
Docket: EPA-R01-OAR-2013-0089**

Dear Ms. Arnold:

The American Lung Association submits these public comments in support of the proposed action by the United States Environmental Protection Agency (EPA) to approve Maine's 2015 State Implementation Plan (SIP). We thank the EPA for proposing this action that will advance clean air goals and for the opportunity to provide public comment.

Maine's updated SIP provides ongoing assurances that all residents can look forward to cleaner air and fewer health burdens caused by unhealthy air pollution. According to the Maine Center for Disease Control & Prevention, our state has some of the highest rates of asthma in the United States with approximately 150,000 Maine residents living with asthma today.¹ Many more face increased risk of respiratory and cardiovascular health impacts due polluted air and proximity to roadways and other major sources of pollution, meaning that the updated SIP is especially important to our residents. Numerous scientific studies document the health harms of unhealthy air including lung cancer, worsening asthma attacks, heart attacks, strokes and even early death.^{2,3} Every cleaner car and reduction in diesel engine pollution as envisioned in the updated SIP advances the cause of clean air for all.

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The American Lung Association supports this EPA proposal as an important next step in Clean Air Act implementation that continues to deliver real public health benefits to residents here and across the nation. The American Lung Association's 2017 *State of the Air* report echoes EPA's own findings that clean air programs developed under the Clean Air Act are working to save lives and protect public health and that each year more progress is being made.^{4, 5} By approving Maine's SIP, EPA is continuing long-standing commitments to protecting public health that are the bedrock of the Clean Air Act.

As noted in the EPA's Proposed Rule, a key element of Maine's SIP is acting on State authority under Section 177 of the Clean Air Act to update and strengthen Maine standards to reflect the most recent amendments to California's more protective motor vehicle emission standards and the Zero Emission Vehicle (ZEV) program (per Sec. 209 of the CAA and prior EPA waiver approval).⁶ Maine's updated SIP advances public's health protections against ozone-forming pollutants, fine particles and carbon pollution. Consumers also have clearer information as to the environmental benefits or impacts of their vehicle choices as the result of new emission labeling requirements, as well assurance that aftermarket catalytic converters comply with emissions standards.

In addition to the updates to the passenger vehicle emission and ZEV programs, Maine's SIP also moves forward to reduce the impacts of diesel emissions from heavy-duty trucks and associated diesel-powered auxiliary power units. Together, these updates in the SIP will provide greater protections against mobile sources of air pollution, including carcinogenic diesel particles. We endorse approving these actions in furtherance of the Clean Air Act goals to improve and protect public health, our environment and to safeguard our future.

In closing, the American Lung Association supports the proposed EPA action to approve Maine's SIP revisions as a critical step in maintaining progress toward clean air and improved lung health for all residents. Thank you for the opportunity to submit our comments. If you should need further information, please contact Paul Billings 202-785-3355 Paul.Billings@Lung.org.

Sincerely,



Harold P. Wimmer
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¹ Maine Center for Disease Control & Prevention. *Asthma in Maine: A Data Brief for Health Professionals*. 2016.

www.maine.gov/dhhs/mecdc/population-health/mat/information-and-publications/2014%20Factsheets/Statewide_factsheet%202-8-16.pdf

² American Lung Association. *State of the Air 2017*. (pp. 32-47).

<http://www.lung.org/assets/documents/healthy-air/state-of-the-air/state-of-the-air-2017.pdf>



³ Health Effects Institute. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. Jan. 2010. <https://www.healtheffects.org/system/files/SR17Traffic%20Review.pdf>

⁴ American Lung Association. *Ibid*.

⁵ US EPA. Air Trends: Air Quality National Summary. 2017. <https://www.epa.gov/air-trends/air-quality-national-summary>

⁶ US EPA. Federal Register Notice EPA-R01-OAR-2013-0089. June 23, 2017. www.federalregister.gov/documents/2017/06/23/2017-13059/air-plan-approval-me-new-motor-vehicle-emission-standards

