

**U.S. Environmental Protection Agency and
National Highway Traffic Safety Administration Hearing
Docket No. EPA-HQ-OAR2018-0283; NHTSA-2018-0067.**

**Testimony of Will Barrett, Director, Advocacy, Clean Air
American Lung Association in California**

September 24, 2018

Good morning. I am Will Barrett, director of clean air advocacy for the American Lung Association in California.

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.

The American Lung Association is opposed to the proposals to roll back emission standards and to revoke California and state authority to adequately protect the health of our citizens against harmful pollution.

By design, the joint proposal would increase harmful pollutants, threaten public health and burden communities most impacted by the oil industry with more toxic pollution.

The proposal ignores that climate-driven impacts are negatively impacting public health across the nation by creating conditions for greater exposures to wildfire smoke and ozone pollution and associated impacts to respiratory and cardiovascular health.

The proposal ignores the extreme air pollution challenge facing California and threatens to abandon fifty years of Clean Air Act precedent allowing states to protect their citizens.

The Lung Association opposes the proposed rule to roll back the existing carbon pollution standards. Transportation represents the leading source of carbon pollution that contributes to climate change that must be aggressively reduced to protect public health.

With alarming frequency, we see American lives lost and communities decimated by hurricanes and flooding, wildfires and mudslides and other climate-related extremes. Overwhelming evidence shows that tragedies like these are much more common and more extreme because we have failed to do enough to curtail carbon pollution and other greenhouse gas emissions.

We cannot roll back the limited safeguards we have in place to fight climate. The protection of public health is crucial, and the American Lung Association supports the implementation of our current vehicle emission and efficiency standards, as well as California's more stringent standards.

The existing standards reflect the urgent action needed to protect public health against climate change health impacts.

U.S. EPA, NHTSA and California carefully researched and negotiated our existing standards with significant public and stakeholder input before they were adopted. These standards reduce pollution and improve mileage and the industry has been meeting them ahead of schedule in a cost-effective manner.

By contrast, not only would the proposed standards weaken the protections against climate change and associated air quality impacts, they would require the nation to consume an additional half million barrels of oil a day.

For communities already hit hard by the extraction, transportation and refining of petroleum products, this means more pollution.

In California, that means Richmond, Wilmington, Kern County and other communities will face increased risk from more carcinogens and other toxic emissions, as well as increased risk of unhealthy ozone and particle pollution.

The American Lung Association strongly opposes the proposal to revoke the authority the Clean Air Act gives to California and other states to protect our citizens' health. That roll back is not acceptable.

Under the Act, California has historically set stronger limits on vehicle emissions, and twelve states and the District of Columbia have followed California's lead, adopting those same standards.

This proposal departs from one of the most successful state and federal collaborations that has helped to ensure that these states have the cleanest vehicles for their residents. That authority must not change, and this proposal must not be allowed to interfere with State plans to achieve clean air standards through California's stronger emissions and zero emission technology programs.

To protect our communities and the public, we must significantly reduce greenhouse gases from all sources as quickly as possible.

The American Lung Association urges EPA and NHTSA to withdraw this proposed rule, and instead work in cooperation with California to implement the existing state and federal rules in support of public health.