



## Testimony of Kenneth Fletcher, Director of Advocacy, on the proposed SAFE Vehicle Rule

September 25, 2018

Dearborn, MI

Thank you for the opportunity to testify. My name is Kenneth Fletcher and I am the Director of Advocacy with the American Lung Association in Michigan.

We oppose the proposed rule to roll back the existing vehicle emissions standard that currently are set to help reduce carbon pollution from cars, light trucks and SUVs. Carbon pollution contributes to climate change and, as a nation, we need the existing standards to help us tackle that growing problem.

Climate change is not an abstract threat waiting on us decades away. Ask the millions of North Carolinians who are struggling to even fully understand the impact that Florence has had on their lives. Or the millions living with the windblown smoke from the forest fires in the west. 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 change. The protection of public health is crucial, and we support policies that safeguard health and improve health outcomes. This proposal would threaten our communities, our health and our future.

U.S. EPA, NHTSA and California carefully researched and negotiated existing federal and state standards with significant public and stakeholder input before they were adopted. These standards reduce pollution and improve mileage. Not only that, but the industry has been meeting them ahead of schedule in a cost-effective manner.

The existing standards reflect the urgent action needed to protect public health against climate change health impacts. Millions of Americans face greater risk from these threats, including children, older adults, people with chronic lung diseases like asthma, people with cardiovascular diseases and even healthy adults who work or exercise outdoors. As we've witnessed with the recent flooding and wildfires, low income individuals and some racial and ethnic groups often suffer more from these impacts as well because of where they live and their lack of resources to respond. We need the nation to maintain these existing standards to better protect them.

By contrast, not only would the proposed standards weaken the protections against climate change, they would require the nation to consume an additional half million barrels of oil a day.<sup>1</sup> That is bad news for communities already hit hard by the extraction, transportation and refining of petroleum products.<sup>2</sup> Those communities will face increased risk from more carcinogens and other toxic emissions, as well as increased risk of unhealthy ozone and particle pollution.

Michigan needs these steps to reduce climate change to protect our health. EPA's own assessment<sup>3</sup> of the impact of climate change on our state warns that we face many risks.

We risk people dying from increased heat waves that will burden many of our neighbors who lack air conditioning.

We risk flooding from increased rainfall that could result not only in damage to homes and businesses, but also in sewage overflowing onto the shores of Lake Michigan, as happened in 2014.

Southeastern Michigan still has too much unhealthy ozone pollution, which causes premature deaths, and puts children and adults with asthma at risk of hospitalization and missed work and school. A warmer climate makes cleaning up the air even harder. We need every tool available to us to protect the health of our nearly 1.2 million children, and especially, the more than 105,000 of them with asthma.

Warmer winters are likely to shorten the season for recreational activities like ice fishing, skiing, and snowmobiling.

We also oppose the proposal to revoke the authority the Clean Air Act gives to California and other states to protect our citizens' health. That rollback is not acceptable. Thirteen states plus the District of Columbia have adopted state 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. State authority must not be preempted.

To protect our communities and the public, we must significantly reduce greenhouse gases from all sources. We urge EPA and NHTSA to withdraw this proposed rule, and instead work in cooperation with California to implement the existing greenhouse gas emissions standards and stay the course on federal rules to improve fuel economy. Our nation's health depends on these decisions.

Thank you.

Sincerely,



Kenneth Fletcher  
Director of Advocacy  
American Lung Association in Michigan

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<sup>1</sup> 83 Federal Register 42986.

<sup>2</sup> 83 Federal Register 43323-43335 CARB, June 2018.

<sup>3</sup> U.S. Environmental Protection Agency. [What Climate Change Means to Michigan](#). August 2016. EPA-430-F-16-024.

