

**Statement of Kevin M. Stewart  
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**Before the  
United States Environmental Protection Agency (EPA)  
and National Highway Traffic Safety Administration (NHTSA)**

**Regarding their Joint Proposed Rule of August 24, 2018  
Under Docket ID Nos. EPA-HQ-OAR-2018-0283 and NHTSA-2018-0067**

**Pittsburgh, Pennsylvania  
September 26, 2018**

Good day. I thank EPA and NHTSA for the opportunity to testify.

I am Kevin Stewart and I serve as Director of Environmental Health for Advocacy and Public Policy with the American Lung Association. In addition to representing over a million people in the Commonwealth who suffer with chronic lung disease, I'm a Pennsylvanian and I have family members who fall into those groups at higher risk from air pollution.

The proposed rule is in direct opposition to protecting and improving public health. It is in direct opposition to fighting climate change. It is in direct opposition to cleaning up the air we breathe. The American Lung Association therefore must directly and strongly oppose the proposed rule.

The American Lung Association has championed past Federal efforts to set strong air quality and emission standards. Yet the proposed rule refuses to respect the scientific, public health and medical consensus. Ignoring these facts will not make them go away:

- Carbon pollution poses a current and growing threat to lung health and public safety.
- The changing climate threatens the health of Americans alive now and in future generations.
- Climate change is already affecting the health of people in our region.
- Many communities of color and low income face higher risks from climate change.
- Ozone, a serious respiratory irritant that can lead to asthma attacks, hospital admissions, and premature death, is likely to be worse here in Pennsylvania because of climate change than what it would otherwise be.

To expand:

- In Pennsylvania, climate change produces—and we are already witnessing—higher annual average precipitation, increased frequency of high rainfall events, and greater likelihood of extreme weather. Over the past century—not even including 2018—there has been a ten percent increase in annual precipitation in the Commonwealth.
- And sea levels are rising, affecting tidal zones such as on the Delaware River.
- Together, precipitation events and sea level rise mean that Pennsylvania will experience more inland and coastal flooding. Among all the consequences are many detrimental to lung health.
- Because of climate change, the number of excessive heat days is projected to increase. (Globally, since records have been kept (1880), the National Oceanic and Atmospheric Administration reports that the six warmest years were all among just the past ten.)
- Climate change increases risks of drought and wildfire. Poor air quality from such events in 2002 and 2016 were clearly observed in the Commonwealth. And just last month, pollution from the western wildfires was detected here.
- Increases in the severity and duration of the season for pollens such as ragweed would worsen symptoms for many with lung disease.
- Tick population establishment is projected to continue its increase in Pennsylvania. Many tick diseases are detrimental to lung health.

To amplify these concerns:

- Harvard’s Chan School of Public Health found statistically significant increases in mortality at levels *below* the current National Ambient Air Quality Standard (NAAQS) for fine particulate matter, and at levels *far below* the current ozone NAAQS, especially among minority and low-income populations.
- The EPA’s *own* Health Effects Subcommittee “fully supports EPA’s use of a no-threshold model to estimate the mortality reductions associated with reduced [particulate] exposure.”
- And as others are testifying today, many Pennsylvania counties *continue to have* difficulty achieving good air quality, even when measured against the current ozone NAAQS, a standard much weaker than what the medical community has called for for years.

What’s ironic in the context of the proposed rule is that this Administration is on record as recognizing, in the *Fourth National Climate Assessment*, that “Human activities are now the dominant cause of the observed trends in climate,” and that there is “no convincing alternative explanation.”

And yet, *by design*, the proposed rule would increase the fossil fuels burned, and would increase harmful air pollution, ranging from ozone smog to carbon pollution.

The federal and state vehicle emissions, efficiency and technology standards that were adopted in 2012 were rigorously researched and painstakingly negotiated with significant public and stakeholder input.

Not only would the proposal at hand needlessly, without rational basis, roll back the improvements we should expect in 2020-2026 and beyond, but it would also unjustifiably prevent California and those states that have chosen to protect their residents through an emission program stronger than the federal standards from doing so.

Pennsylvania is one of 14 jurisdictions that have joined California in adopting its cleanest vehicle technologies, all the more reason the Lung Association—and I as a Pennsylvanian—are here today to strongly oppose the proposed revocation of these life-saving and technology-advancing authorities.

### Conclusion

The American Lung Association urges EPA and NHTSA to protect the health of all Americans by rejecting the proposed rule and by maintaining the existing effective, appropriate and feasible cleaner cars standards, and by retaining states' authority to do better. Furthermore, we urge our state's decision makers, including Governor Wolf and DEP Secretary McDonnell, to speak out and to protect the Commonwealth's authority to continue to take more aggressive steps to protect our citizens from dirty air.

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