

Environmental Protection Agency
Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-In
Schedule for Light-Duty and Medium-Duty Vehicles

Testimony of Liz Scott
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As prepared for delivery

My name is Liz Scott and I'm the Senior Director for Nationwide Clean Air Advocacy at the American Lung Association. I'm speaking today to urge the EPA to withdraw this proposal and instead keep these lifesaving protections on the books with the original timeline.

For decades, the EPA has promulgated rules that limit pollution from vehicles. This is because the research showing the pollution coming from tailpipes is worthy of attention and cleanup. Analysis conducted by the Health Effects Institute has demonstrated that traffic pollution increases the risk for illnesses like asthma, as well as premature death due to heart disease and lung cancer.

Traffic pollution includes smog-forming nitrogen oxides and particulate matter. These particles can penetrate deep into the lungs and enter the bloodstream. Kids can face elevated health harms due to their still-forming respiratory system and their greater time spent outdoors. The harms that kids are facing was evident in the Lung Association's 2026 "State of the Air" report which found that nearly half of the nation's kids live in areas that received failing grades for either ozone pollution or short or long-term particle pollution. Exposure to traffic pollution can set kids up for a lifetime of increased healthcare needs.

The standards that this rule proposes to delay are estimated to avoid 3,700 new asthma cases and hundreds of premature deaths totaling \$13 billion in annual health benefits. For an agency whose number one pillar is to provide clean air for all, choosing to forego these benefits is counterproductive and is yet another example of the agency acting in contrast to its core mission.

We've seen a number of rules from the agency in recent months that fail to include any analysis on the health impacts. This proposal is no exception, with EPA saying that the agency "did not conduct any air quality modeling for the proposal." In the regulatory impact analysis accompanying the proposal, EPA says

"the emissions changes described...would also be associated with impacts to air quality and human health... the EPA did not monetize the health effects associated with emissions changes. The net benefits associated with this proposal are therefore the cost savings..."

The net benefits of the proposal are therefore the cost savings. The EPA is choosing to delay clean air protections that have demonstrated health benefits and the proposals are not even going to tell us what the health impacts are.

I urge the agency to abandon this delay and stick to the original timeline of these lifesaving standards.