As Prepared for Delivery
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On
The U.S. Environmental Protection Agency
Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles
Docket ID EPA-HQ-OAR-2022-0829
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Good afternoon. My name is Bryan Burton, and I am the Advocacy Manager for Healthy Air at the American Lung Association. We urge EPA to adopt the rule with standards at least as stringent as Alternative #1 which would reduce the highest amount of greenhouse gases, such as CO2 and other pollutants.

In my home state of Pennsylvania over 130 million miles are driven annually. Transportation sources remain a leading contributor to both harmful air pollutants and greenhouse gases that cause climate change; passenger vehicles are a dominant source of greenhouse gases among transportation sources. Climate change makes wildfires and storms more frequent and intense. The airborne dust and mold that follow can exacerbate asthma and other chronic lung ailments. Other pollutants such at NOx and soot have been tied to many detrimental health effects including heart attacks, strokes and the onset of COPD. These negative health outcomes directly linked to traffic related emissions are most heavily borne by people of color and those living in poverty.

The American Lung Association's Zeroing in on Healthy Air report demonstrates that in Pennsylvania alone the health benefits through 2050 of a transition to zero emission transportation and power generation would amount to $87 billion. Broken down, the avoidance of 7,940 premature deaths, 148,000 asthma attacks and 735,000 lost days of work will primarily benefit inner-city communities and those living near heavy transportation corridors and ports. Historically, these neighborhoods have been populated by economically disadvantaged and non-white people. While the proposed rule does not call for a zero-emission standard by 2035, it would have a significant positive impact on greenhouse gases and several criteria pollutants as well as accelerating the adoption of zero-emission vehicles. Were EPA to finalize emissions limits that are at least as tight as Alternative 1 and to do so no later than the end of 2023, it would go a long way to addressing environmental justice in areas that suffered the worst burdens of air pollution.

The multi-pollutant proposed rule for light duty and medium duty vehicles benefits from its technical flexibility and the widespread commercial availability of the emission control technology necessary to ensure its feasibility within the stated time frame. However, transitioning to zero emission cars and light duty trucks offers the fastest and most efficient path toward reaching the goals of this regulation. The 2020 passenger vehicle fleet represented approximately 94 percent of the nation's on-road vehicles and generated approximately 69 percent of GHG emissions. Beginning the immediate transition to zero emission vehicles nationwide would produce an 8% reduction in Nitrogen Oxides and Volatile Organic Compounds by 9% by 2030. These two pollutants combine to form ground-level ozone which, if

breathed, can trigger a variety of health problems including chest pain, coughing, throat irritation, and worsened bronchitis and emphysema. Furthermore, this transition will benefit air quality by lowering fine particle levels by 10% and greenhouse gases by a whopping 18% in less than 10 years.

Finally, this rule is one among many that are needed to help the Biden administration meet their commitments under the Justice 40 executive order. Multiple studies show that people who have low incomes or are members of racial or ethnic groups bear a disproportionate burden of the health effects of air pollution from transportation. We urge you to protect the health of the most vulnerable and finalize emissions limits that are at least as stringent as Alternative 1 and to do so no later than this year. Thank you for your time.