

ENVIRONMENTAL DEFENSE FUND
STATEMENT ON
U.S. ENVIRONMENTAL PROTECTION AGENCY

"PROPOSED RULE – CONTROL OF AIR POLLUTION FROM MOTOR VEHICLES: TIER 3 MOTOR VEHICLE EMISSIONS AND FUEL STANDARDS"

EPA–HQ–OAR–2011-0135

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CAROLINE PAULSEN

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Public Hearing
Philadelphia, Pennsylvania
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On behalf of Environmental Defense Fund and our more than 750,000 members nationwide and the numerous here in the Keystone State, I sincerely thank you for the opportunity to testify today in support of these vital standards to reduce soot, smog, and toxic air pollution from our nation's fleet of passenger cars and trucks. These standards will prevent thousands of deaths each year, and will provide billions of dollars in public health benefits— all for about a penny a gallon.

Motor Vehicles Contribute to Unhealthy Air

Americans depend heavily on our passenger vehicles. There are more than 9 million passenger cars and light trucks registered in Pennsylvania.[i] Almost 90 percent of us use personal vehicles every day for travel. Fortunately, our cars are far cleaner and more efficient than the gas-guzzling, black smoke-spewing vehicles of decades past – thanks in large part to the Environmental Protection Agency's clean air leadership.

But today's passenger cars and trucks still remain the second largest emitters of nitrogen oxides (NOX) and volatile organic compounds (VOCs) in the U.S. - the primary pollutants that form ozone "smog." High ozone levels cause decreased lung function, aggravated asthma and are associated with premature death. Pennsylvania has five cities with ozone concentrations that exceed the national health-based standard and three of those cities are in the top-20 most polluted cities in the nation for ozone.[ii]

Our passenger vehicles also emit more than half of all carbon monoxide pollution and contribute significantly to particulate matter emissions and air toxics. Particulate pollution, or soot, has many harmful health impacts, including premature death. Eight major cities in Pennsylvania, home to millions of people, do not meet national ambient air quality standards for particulate matter – and Pittsburgh, Harrisburg and Philadelphia rank among the top-20 most polluted cities for particulates.[iii]

<u>Strengthening Our Clean Air Protections Against Dangerous Particulates and Smog-Forming Pollution</u>

The vital importance of cleaner air for our families, our communities and our nation is why I'm here today, joined by so many others, to support the Tier 3 proposal. And it's why EPA should finalize this important rule without delay.

The proposed standards would reduce sulfur levels in gasoline, allowing catalysts in new and existing vehicles to perform better. As a result of these cleaner fuel standards our nation, and the communities here in Pennsylvania, would see ***immediate*** reductions in smog-forming NOx emissions. And EPA estimates those reductions could be significant

enough to bring ozone concentrations in communities like Bucks County from levels above the health-based standard today, to levels below the health standard in 2017 – the first year of the Tier 3 program.

Additionally, the proposed tailpipe standards, which will require new engines to burn cleaner, are projected to reduce smog-forming pollutants by 80 percent and particulate pollution by 70 percent from today's fleet of vehicles. According to EPA analysis, the particulate reductions from our passenger vehicles will result in significant declines in air pollution concentrations in cities across this state, including Pittsburgh.

Profound Public Health Benefits

The human health benefits of this proposal are profound– that is why it is supported by the American Lung Association, the nation's air quality control officials, and millions of Americans. The emissions reductions will result in up to 2,400 fewer lives lost and will prevent 3,200 hospital visits and 22,000 asthma attacks – not in total, **but every year**. EPA estimates these health care savings could total up to $23 billion annually.

And the cost to achieve these vital health protections is only a penny a gallon for the cleaner gasoline. This estimate is based on several major studies including an EPA analysis, a technical analysis by MathPro, Inc. performed for the International Council for Clean Transportation, and an economic analysis by Navigant Economics conducted for the Emissions Control Technology Association.

A Clean Air Vision

The Tier 3 program provides a clear vision for healthier air today and a lasting clean air future for our children. The "systems approach" of establishing protective emission standards for cleaner cars and fuels, together, will drive investment and development of emissions control technology, allow manufacturers to efficiently align technology

upgrades and provide long term regulatory certainty for the U.S. auto industry – all while reducing the health burden on American families.

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In conclusion, Environmental Defense Fund is proud to join the auto manufacturers, the auto workers, the emissions control technology industry, the health experts, the environmental organizations, the state and local air pollution control agencies, the consumer groups, and the public who **all agree** that cleaner passenger cars and trucks are an important step forward for a healthier and stronger America. Thank you.

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[i] PA Department of Transportation, Report of Registrations, 2012. Available at: http://www.dmv.state.pa.us/stats/pennsylvaniaMotorVehicleRegs.shtml (last accessed April 17, 2013).
[ii] American Lung Association, *State of the Air*, 2012.
[iii] *Id.*