



**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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**GRAHAM MCCAHAN**

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**Public Hearing  
Chicago, Illinois  
*April 29, 2013***

On behalf of Environmental Defense Fund, our more than 750,000 members nationwide, and our members here in Chicago, in Illinois, and in the Great Lakes region, 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 provide billions of dollars in public health benefits—all for about a penny a gallon of cleaner gasoline.

Motor Vehicles Contribute to Unhealthy Air

More than 131 million people—about 42 percent of our nation—still suffer from air pollution levels that are too often dangerous to breathe. And nearly 4 in 10 U.S. residents live in areas with unhealthy levels of ozone pollution.<sup>i</sup> Much of that pollution comes from our cars.

Americans depend heavily on our passenger vehicles. There are more than 7 million passenger cars and light trucks registered in Illinois alone.<sup>ii</sup> Almost 90 percent of us use personal vehicles every day for travel. Luckily today's cars are far cleaner and more efficient than vehicles of decades past – thanks to the Environmental Protection Agency's clean air leadership.

But our 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, or smog. Ozone pollution reduces lung function, aggravates asthma and other chronic lung diseases, causes heart attacks, and can lead to premature death.

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, is associated with serious adverse human health impacts, including premature death; respiratory disease; and cardiovascular disease such as heart attacks, strokes, and heart disease.

More than 9 million people in the Chicago area are exposed to ozone and particulate concentrations that exceed national health-based standards.<sup>iii</sup> And Chicago ranks in the top-20 most polluted cities in the nation for particulates.<sup>iv</sup>

More than 50 million people live, work, and go to school in close proximity to high-traffic roadways with gasoline vehicles accounting for more than 50 percent of near-road concentrations of some criteria and toxic pollutants. In Illinois, more than 32,000 children attend schools that are within 200 meters of a major road.<sup>v</sup> Minorities and low income Americans often bear an especially heavy burden from the high pollution concentrations near major roads. Indeed, many neighborhoods here in Chicago are close to a major expressway – South Chicago, Englewood, Little Village, Pilsen, Garfield Park, Austin, and Logan Square.

## Strengthening Our Clean Air Protections Against Harmful Particulates and Smog-Forming Pollution

The vital importance of cleaner air for those communities and others across the nation is why I'm here today 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 communities here in Chicago and across Illinois, will see *immediate* and significant reductions in smog-forming NOx emissions because all of our vehicles – not just new ones – will be burning cleaner fuel. And EPA estimates those reductions could be significant enough to bring ozone concentrations in some hard hit communities across the nation 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 as compared to today's fleet of vehicles. According to EPA analysis, the particulate reductions from our passenger vehicles will result in declines in particulate air concentrations in cities across the nation – again helping some reach levels below the health-based standard as early as 2017.

## Profound Public Health Benefits

The human health benefits of this proposal are profound. 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. carried out for the International Council

for Clean Transportation, and an economic analysis conducted by Navigant Economics for the Emissions Control Technology Association.

### Broad Support for a Clean Air Vision

The Tier 3 “systems approach” of establishing protective and complementary standards for cleaner cars and fuels is supported by doctors, mothers, the nation’s clean air officials, autoworkers, health groups, consumers and the public because of the significant health benefits.

And the economic benefits have garnered support by the auto and emissions control industries. In addition to providing cleaner air, the Tier 3 program would complement the historic fuel economy and greenhouse gas standards for passenger vehicles in providing long term regulatory certainty for the U.S. auto industry. Timely finalization of the Tier 3 program will drive investment and development of emissions control technology and allow manufacturers to efficiently align technology upgrades.

These cost-effective standards have broad support and should not be delayed.

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In conclusion, Environmental Defense Fund is proud to join the millions of Americans 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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<sup>i</sup> American Lung Association, *State of the Air*, 2013.

<sup>ii</sup> Illinois Secretary of State website, Vehicle Services FAQ. Available at: <http://www.cyberdriveillinois.com/departments/vehicles/faq.html> (last accessed April 18, 2013).

<sup>iii</sup> EPA, Summary Nonattainment Area Population Exposure Report, As of December 14, 2012. Available at: <http://www.epa.gov/oaqps001/greenbk/popexp.html> (last accessed April 18, 2013).

<sup>iv</sup> American Lung Association, *State of the Air*, 2013.

<sup>v</sup> EPA excel spreadsheet, “Schools Near Roads Analysis for the Tier 3 NPRM Docket.” Docket ID No. EPA-HQ-OAR-2011-0135-0488. Last accessed April 18, 2013.