Thank you for the opportunity to provide comment on Regulation Number 20, Low Emission Vehicle Program. We are resubmitting our comments attached.

JoAnna Strother
Director, Advocacy – AZ, CO, NM, OK, TX, UT | Western Division
American Lung Association
O: 602-429-0002 | C: 812-205-1505
Lung HelpLine: 1.800.LUNG.USA
Lung.org | JoAnna.Strother@Lung.org

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The Colorado Air Quality Control Commission

Re: Regulation Number 20, Low Emission Vehicle Program

The American Lung Association in Colorado supports the adoption of low-emission vehicle (LEV) standards to ensure Colorado residents enjoy the strongest possible public health protections against harmful vehicle emissions and the air pollution they produce. As the federal government takes steps to weaken our national vehicle emissions programs, adopting stronger vehicle standards provides assurances that our residents will be protected to the greatest extent possible under the Clean Air Act – even if the federal standards move backwards.

We particularly appreciate the Governor’s Executive Order recognizing the need to maintain strong limits on greenhouse gas emissions from vehicles in our state. As we have already seen this year, the changing climate is already harming the quality of the air we breathe. Colorado suffered thousands of acres of wildfires this year; those wildfires consumed forests and private lands suffering extensive drought driven by climate change. The smoke plumes from those wildfires worsened the air our families and neighbors breathe for hundreds of miles away.

Studies have linked air pollution like that coming from wildfires to a significant rise in hospital admissions for respiratory disease and cardiovascular disease, emergency room visits related to asthma, asthma attacks, absences from school due to respiratory conditions, and premature deaths.

We believe these standards are not an option, but a necessity to protecting public health today and for future generations. While we continue to make significant progress in cleaning up our air, air pollution continues to affect our children, the elderly and hundreds of thousands of Colorado children and adults living with
asthma, heart and lung disease and other chronic health conditions that are harmed by pollution.

EPA recently designated all of seven counties--Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson-- as nonattainment under the 2015 ozone standard, as well as portions of Larimer and Weld Counties. The hotter temperatures we have seen each year makes it harder for us to clean up that ozone pollution. Continued reduction of vehicle emissions provides another tool to help us meet that standard.

Because of the need to better protect our citizens, the Lung Association supports the strongest possible vehicle emission standards as critical to our mission to improve lung health and prevent lung disease. We urge the state to adopt ZEV standards as well, to provide the greatest protection for our citizens.

The people of Colorado need every tool available to protect them from polluted air and to fight the changing climate that threatens the progress we have made. The American Lung Association stands ready to work with you to ensure clean air for all.

Thank you for the opportunity to provide comment.

Ellen Penrod
Executive Director
American Lung Association in Colorado