



ALLEGHENY COUNTY

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Hacker Testifies to Opposition of Safer Affordable Fuel-Efficient Vehicles Proposed Rule

PITTSBURGH – This morning, Health Department Director Dr. Karen Hacker testified before officials from the U.S. Environmental Protection Agency and the National Highway Traffic Safety Administration opposing the agency's proposed rule regarding Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks. Following is her testimony in its entirety:

Good morning. I am Dr. Karen Hacker, Director of the Allegheny County Health Department in Pittsburgh, Pennsylvania. Thank you for the opportunity to speak on this proposed regulation. The Allegheny County Health Department serves a county of over 1.2 million persons, providing and assuring a wide range of health and environmental services. The EPA authorizes the Allegheny County Health Department to enforce compliance with the Clean Air Act and other air laws.

I am here today to state emphatically that the Allegheny County Health Department strongly opposes the Safer Affordable Fuel-Efficient Vehicles Proposed Rule for Model Years 2021-2026 on behalf of all the residents we serve.

Here in Allegheny County, we recently met the national ozone standards for the second year in a row. However, we still have many challenges. Currently, Allegheny County remains out of compliance with the Clean Air Act for PM 2.5 and SO₂, and we know that our continued ozone progress is dependent on current EPA emission controls.

Today, we know mobile sources are contributing more and more to ozone levels. In our county, NO_x and VOC emissions from mobile sources are approximately half, and a third, respectively, of the total man-made contributions to ozone formation. Nationally, the transportation sector has surpassed the manufacturing and power generation sectors as the largest source of greenhouse gas (GHG) emissions in the nation. With climate change we expect ozone levels to rise; therefore, it is imperative that emission reductions continue for mobile sources. We cannot afford to backslide on this critical issue.

Ozone is known to trigger health problems, particularly for children, the elderly, and people with existing lung diseases. Only the EPA has the authority to control vehicular emissions. This rule change diminishes the most significant part of our ozone reduction strategy. We need the EPA to protect the public's health by supporting the national health-based ozone standard. This is an evidence-based standard well researched and shown to protect the public's health. We count on this rule – with its current standards and implementation dates – to meet air pollution and GHG reduction goals. The technologies are already available and cost-effective so there is no excuse. It is critical to retain the CAFE standards as set in 2012.

Finally, the Health Department strongly objects to the EPA and NHTSA proposal to withdraw California's waivers for GHG emission standards and state authority to adopt and enforce these programs. Studies performed in 2005/2006 show that the California program provided significantly higher levels of pollution reduction than the existing federal mobile source emission control program. As a result of the PA Clean Vehicles Program, PA vehicles are now subject to the California LEV III standards, and we have benefitted as a result. We urge the EPA to maintain the California waiver. Pittsburgh and Allegheny County cannot afford losing the additional protection provided by these standards.

Thank you.

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Karen Hacker, MD, MPH, Director

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