

## Comments at EPA Hearing on Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards

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Good morning, my name is Vijay Limaye, and I want to thank the EPA for organizing this public hearing. I'm trained as a PhD environmental epidemiologist and I'm a former EPA scientist. I work to better understand the harmful effects of air pollution and climate change on human health. At EPA, I worked on air pollution and health science. I'm now a Climate and Health scientist at NRDC, the Natural Resources Defense Council. I'm here today on behalf of NRDC's more than 3 million members and online activists who support our efforts to safeguard all Americans' right to clean air, clean water and a healthy planet.

This proposal comes at a critical moment. The recent comprehensive climate science assessment from the IPCC shows that fossil fuel pollution-- the burning of coal, oil, and gas-- is driving a rapid and widespread destabilization of our planet. According to that science, levels of carbon dioxide in the atmosphere haven't been this high in 2 million years. We are in dangerous uncharted territory in terms of the human experience because of our continuing reliance on dirty fossil fuels.

In this country, the transportation sector is the top contributor to climate pollution-- and the window of time for us to slow further warming and limit the likelihood of dangerous tipping points is quickly closing. This unprecedented moment demands strong action, which is why EPA should finalize a rule at least as stringent as Alternate 2, which would achieve more emissions reductions than the proposal.

Maximizing those pollution reductions is critical and urgent because the climate crisis is here and now, and it is fueling an escalating public health emergency and endangering people all across the US. It's contributing to more severe wildfires; exacerbating dangerous heat waves and drought, spiking levels of air pollution from ozone smog and wildfire smoke, and supercharging rainfall and flooding. If we continue down this path without cutting harmful emissions, climate hazards will only worsen in frequency, intensity, duration, and reach in the future and the costs of those hazards--which broke a new record just last year, according to federal data--will skyrocket out of control.

Climate hazards have profound consequences that are on vivid display right now, both in people's pain and suffering and in the costly need for medical care. These health costs are difficult to track and quantify, and so they are largely absent from public accounting of climate damages.<sup>1</sup> For that reason, the health-related cost savings of cutting climate pollution are not included in the accounting of benefits from the proposed rule being considered today. **Because of these missing savings, the reality is that the net benefits of a strong cars plan are even higher than those currently estimated by EPA.**

I led a peer-reviewed analysis<sup>2</sup> that estimated the health costs of ten climate-sensitive events across the US that occurred during just one recent year. Using public data and EPA valuation methods, we found

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<sup>1</sup> Limaye, Vijay S, Wendy Max, Juanita Constible, and Kim Knowlton. "Estimating the Costs of Inaction and the Economic Benefits of Addressing the Health Harms of Climate Change." *Health Affairs* 39, no. 12 (2020): 2098–2104. <https://doi.org/10.1377/hlthaff.2020.01109>.

<sup>2</sup> Limaye, Vijay S., Wendy Max, Juanita Constible, and Kim Knowlton. 2019. "Estimating the Health-Related Costs of 10 Climate-Sensitive U.S. Events During 2012." *GeoHealth* 3 (9): 245–65. <https://doi.org/10.1029/2019GH000202>.

that just those ten events inflicted huge health harms: about 900 deaths, 21,000 hospitalizations, and 18,000 emergency room visits and the total financial toll of those health harms was a staggering \$10 billion.

Our research shows that actions like EPA's proposal to achieve substantial climate pollution reductions today could reduce health costs triggered by the worsening climate crisis-- and simultaneously deliver cleaner air across the country, further benefiting public health.

NRDC urges EPA to finalize light duty vehicle standards that maximize climate pollution reductions, deliver cleaner air, and help to secure a safer and healthier future.