

**Comments of Dan Reich**

**Putting your health at risk; proposed testimony related to the Light Duty Vehicles Rule  
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My name is Dan Reich and I was an Assistant Regional Counsel at EPA Region 9 in San Francisco for 27 years under three Republican and two Democratic administrations. Prior to that I served as a trial attorney with the US Department of Justice. After 33 years of federal service, I retired in April 2017. I am currently a member of the Environmental Protection Network, an organization that includes former EPA career employees and political appointees working to preserve the nation's bipartisan progress toward clean air, water, land and climate protection.

I now wear a mask when hiking near home in the Bay area because I regularly experience faintness and shortness of breath from the smoke blown in from massive California wildfires. I read an article in The Fresno Bee which stated that in Fresno the PM 2.5 concentrations (ultra fine particles that can lodge in your lungs) are typically 5 to 10 micrograms/cubic meter. During July 2018, Fresno experienced PM 2.5 concentrations up to 60 micrograms/cubic meter from wildfire smoke.

What does this have to do with the proposed rule we are here to discuss today, which is sadly mischaracterized as the SAFE Vehicles Rule (hereafter the Light-Duty Vehicles Rule) for passenger cars and light trucks? Let me connect the dots as to how this rule rolls back progress to clean up emissions from cars and is directly tied to the air pollution you are breathing in Fresno.

By way of background, the current EPA deleted the following from its website: "Greenhouse gases (GHGs) trap heat and make the planet warmer. Human activities are responsible for almost all of the increase in GHGs in the atmosphere over the last 150 years....Rising global average temperature is associated with widespread changes in weather patterns. Scientific studies indicate that extreme weather events such as heat waves and large storms are likely to become more frequent or more intense with human-induced climate change."

We are already witnessing effects from the warming of the planet: 5,581 recent California wildfires have destroyed approximately 1.4 million acres and killed civilians and firefighters. These statistics don't capture the increase in asthma attacks and mortality associated with the health effects from the smoke. In the face of these and other climate-fueled disasters such as Hurricane Harvey – which dropped 60 inches of rainfall in Texas in 6 days, killing 68 people and resulting in \$125 billion in damage.

How does the Light Duty Vehicles Rule relate to global warming and the smoke you have been breathing? It is pretty simple, although again one must refer to further deleted information from the current EPA website. The transportation sector (including cars and trucks) generates the

largest share of GHGs. Of the 28% of GHGs generated, 60% are from light-duty vehicles. The proposed rule rolls back the corporate average fuel economy (CAFE) standards for model years 2021 through 2026 by maintaining the 2020 CAFE standards. The existing regulation that provides for further technological advances to reduce the emissions of GHGs and other pollutants is being abandoned.

As a private citizen, you should look at this rule in terms of what it means to your everyday life. More GHGs means inhaling more smoke. Do you care if air quality deteriorates so you can no longer enjoy the outdoors? Do you mind inhaling noxious fumes from motor vehicles during your commute? Does it matter if you can no longer afford property insurance because the risk of natural disasters has increased dramatically? What value do you place on your health and that of your family?

Keep it simple...sometimes you need to change your behavior to improve your quality of life, i.e., get some exercise to improve your health. It is the same with the government. You see that people are suffering from floods, fires, etc. Your statutory mission is "to protect human health and the environment." Then you try to take steps to prevent future fires, rebuilding infrastructures from floods, etc. But it also means trying to reduce GHGs by increasing fuel efficiency in motor vehicles so that these climate-related events do not get worse. Instead, EPA is walking away from what its career scientists are saying and its mission.

I worked for three Republican and two Democratic administrations. I always felt proud to work for the US Environmental Protection Agency...until recently. I know it is not easy, but I am here today because these are important times for the survival of EPA, and for EPA to continue to do its job of protecting your health and the health of our environment.