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**Re:** Testimony for Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle  
Emission and Fuel Standards

**Docket ID No. EPA-HQ-OAR-2011-0135**

Thank you for the opportunity to provide comments on the proposed Tier 3 Motor Vehicle Emission and Fuel Standards. My name is Dr. Jalonne L. White-Newsome and I am a federal policy analyst with **WE ACT for Environmental Justice**, a 25-year old environmental justice organization with offices in Harlem, New York and Washington, DC. WE ACT's mission is to build healthy communities by assuring that people of color and/or low income participate meaningfully in the creation of sound and fair environmental health and protection policies and practices. The inception of our organization, in fact, was fueled by the battle for clean, healthy air in Northern Manhattan. In an effort to protect and address the health concerns related to air emissions from a sewage treatment plant that was plopped into the Harlem community, as well as the 6 diesel bus depots, 4 garbage truck depots and many other sources of pollution...WE ACT continues to educate, engage community residents, academic and health partners to demand that the protection of human health and welfare be afforded to all – despite the hue of your skin, the amount of money and resources in your pockets, and the zip code you happen to live in. Since 1988, we have had the opportunity to be that voice, not only in Harlem, but on the national stage to help influence the conversation around several domains of environmental work, with **clean air** always being a priority concern.

I'm sure you know that the residents of Harlem, NY and many other similar cities and towns across our great nation are not breathing the same air – some of clean, and some is pretty dirty. So as many organizations across the country are wrapping up their Earth Day celebrations, just yesterday, I was reminded of why we do the work we do.

I went to pick up my 4 and 6 year old from school yesterday, going through the usual motions of signing out my girls, saying HI to other Moms and Dads, when I noticed something different this time. As I peered behind the secretary's desk, a cute little girl, with two little pig-tails and beautiful bright eyes, caught my attention – first because she reminded me of my little one, but, more importantly in addition to her school uniform, she was wearing a breathing mask, connected to a small machine, receiving a breathing treatment. I think the secretary saw me looking with a concerned look on my face and I gave the



little girl a slight smile. I walked to my car, thinking about this young lady, and the many other children that I know that have to receive breathing treatments, or take medications, miss school, etc. to survive and try and live a kid's life. Due to no fault of their own – other than playing outside, going to school and living – their quality of life is compromised because of the state of the air they breathe. A child.

And then I thought about some of the senior citizens I have worked with, specifically in Detroit, Michigan, a part of Wayne County and one of the areas discussed in the rule documentation and I thought about my great Aunt, who is in her mid-80s that suffers with severe asthma, constantly having to be hospitalized because she has lived the majority of her life in various neighborhoods in Detroit, my hometown – unfortunately in areas that continue to be overwhelmed with multiple social stressors – crime, poverty, etc. – but also air toxins from both stationary and mobile sources that continue to negatively impact her health status.

So, this is personal to me for many reasons. First and foremost as a mom of two that could be genetically positioned to have some asthma challenges. As a public health researcher with a focus on children and seniors and other vulnerable populations that live in urban areas. As a practicing chemical engineer who spent several years working on promoting the use of alternative fuel vehicles in state governments to help reduce harmful emissions into the environment. And as a federal policy analyst – which is the reason I am here today – where my job and mission is to make sure that, wherever possible, an environmental justice perspective and consideration on policies and regulations on the Hill and beyond is interjected into these conversations. So, with all sincerity, **I congratulate you and your colleagues in the Office of Air and Radiation for proposing the Tier 3 Motor Vehicle emission and fuel standards.**

Instead of using the next couple of minutes to reiterate the statistics and facts that make up the proposed rule documentation, I would like to quickly share some thoughts on issues that really resonate for WE ACT and some of our colleagues in the environmental justice community broadly, with the common thread of health weaved through them: **urban air toxics, cumulative impacts, and climate change.**

### **Urban Air Toxics**

I'm sure you are aware of the Urban Air Toxics report that is supposed to be prepared for Congress per Section 112(k) of the Clean Air Act. Briefly, the purpose of this report was to provide an update on the strategies taken on by the EPA to address the cumulative health risks in urban areas, specifically around urban toxics. Unfortunately, the first report was issued back in 2000 but there has not been an update since then. From what I have heard, the EPA is working on getting this report out in the near future. I bring this report up because the Tier 3 rules proposed will work to address – over time – some of the air toxins identified in the urban air toxics strategy. It is so critical that we can document the levels of air toxins in our urban neighborhoods, but also quantify the health impacts of potential carcinogens in our ej communities. Having the data is the only way we can understand the present levels in our most compromised communities, and evaluate, over time, if the variety of programs and other mitigation efforts are actually working. So I hope, that in addition to these proposed standards, that the proper and adequate monitoring of our roadways, as well as refining the specificity of urban air toxics monitoring



and urban communities will be an issue that is addressed, so we can truly understand the exposure and, hopefully, the decrease in urban air toxins in the communities that are already disproportionately impacted.

### **Cumulative impacts**

Urban air toxics are a significant factor in cumulative risk assessment or ‘**Cumulative impacts**’ as those in the environmental justice community like to capture this ideal. Because pollution – whether it be air, waste, water - does not act in a silo. Consequently, we believe that in order to properly characterize and environmental justice community, the SUM of the exposures must be considered – together, and not just individual pollutants. I do believe that the word ‘cumulative impacts’ was mentioned in the proposed rule. And I simply want to offer a comment and suggestion. Keep in mind that the more stringent standards will work towards minimizing that burden on communities that are already compromised. So, if we can focus on making life better for the “most vulnerable”, I truly believe that more people will benefit, overall. Having the rules – soot rule, Tier 3 and others – work in parallel is great. My suggestion, however, is that in future analysis, a cumulative impacts strategy is employed. I know several of your colleagues are working to develop environmental justice guidance as well as guidance for preparing a cumulative risk assessment strategy so I would encourage you to potentially look into that work and how it can be integrated this time or in the next iteration of proposed rules.

### **Climate change**

And last but certainly not least, the importance of this rule on climate change. While the rule documentation specifically states that an increase or decrease in greenhouse gas emissions cannot be ascertained with certainty at this point because of the expected emissions increases in the refinery process to reduce the amount of sulfur in the fuel, what you are proposing here will ultimately, whether now or in the near future, reduce GHG emissions. As an engineer that worked in refineries and many other chemical facilities, I am confident that technology will advance accordingly so we can say - with confidence - that one day, there will be a net reduction in CO2 emissions and subsequently a net reduction in negative health impacts. That is why it is especially important that we take every step to improve our air quality, especially for those that suffer respiratory and cardiovascular challenges during extremely hot weather or periods of ‘heat waves’ that we will continue to experience more frequently due to our changing climate.

In conclusion, I was happy to read the section that addresses the obvious challenges of environmental justice communities in the air realm - elevated air toxins, the proximity to high-traffic roads and other multiple stressors and health risk factors that add to the social determinants of health. While we wait for the science and methodologies to catch up and determine a way to capture and document the associations between air pollution and health in locations with chronic physical and mental stressors, the proposed Tier 3 standards are one step forward to reducing the burden on environmental justice communities. We support your work, appreciate your effort, and as you filter through the many comments and considerations at this hearing and others, I hope that the face of the little girl reminds you that your work truly impacts the lives of those that are most precious to each and every one of us. Thank you.