

Attorneys General of New York, Connecticut, Delaware, Maryland, Massachusetts, Maine, New Hampshire, North Carolina, Oregon, Rhode Island, Vermont, Washington and the District of Columbia and Corporation Counsels of the Cities of New York & Chicago

July 1, 2013

By electronic mail: A-and-R-Docket@epamail.epa.gov

Robert Perciasepe

Acting Administrator

U.S. Environmental Protection Agency

Air and Radiation Docket and Information Center

Mail Code 28221T

1200 Pennsylvania Ave., NW

Washington, DC 20460

Re: Proposed Tier 3 Motor Vehicle Emission and Fuel Standards

Dear Acting Administrator Perciasepe:

The undersigned attorneys general and corporation counsels write to express our strong support for the Environmental Protection Agency's proposed Tier 3 Motor Vehicle Emission and Fuel Standards, 78 Fed. Reg. 29,816 (May 21, 2013). The proposed standards, which are the product of an extensive stakeholder process including state and local governments, industry, and public health organizations, would result in substantial public health and economic benefits.

We have long fought to protect the health of our residents against harmful air pollution, such as smog (ozone) and soot (fine particulate matter). Despite our efforts and EPA's, there are more than 150 million people in the country experiencing unhealthy levels of air pollution. Because children, the elderly, and those with existing lung diseases are more at-risk from exposure to pollution, our most vulnerable residents often bear the brunt of the harm. Poor air quality causes an estimated 50,000 premature deaths each year, and costs from air pollution-related illnesses are estimated to be \$150 billion per year. Several of our cities are struggling to attain the national air quality standards for smog. In a troubling development, after many years of steady improvement, smog levels in cities such as Baltimore, Chicago, New York, Philadelphia, and Washington have stopped improving or even worsened in the last few years.

The Tier 3 standards would address a significant source of smog and soot: motor vehicle pollution. In the U.S., motor vehicles are responsible for a majority of nitrogen oxide emissions and about 30 percent of volatile organic compound emissions. These pollutants contribute to smog and soot pollution, which cause respiratory and heart disease.

By setting more stringent emission standards for new passenger cars and trucks and cutting the allowable sulfur content in gasoline, the Tier 3 standards would reduce nitrogen oxides and volatile organic compounds by 80 percent and particulate matter by 70 percent. These reductions would go a long way toward limiting the production of smog. As EPA

recognized, “[i]n the absence of additional controls, many areas will continue to have ambient ozone concentrations exceeding the NAAQS in the future.” 78 Fed. Reg. at 29,819.

As EPA found in its analysis of the proposed rule, the standards would achieve substantial public health benefits: preventing as many as 23,000 cases of respiratory illness in children, 22,000 asthma attacks and 2,400 premature deaths each year, as well as reducing risks to millions of Americans living exercising and working near major roads. According to the National Association of Clean Air Agencies, running today’s vehicle fleet on Tier 3 standard gasoline would cut emissions in an amount equivalent to taking 33 million vehicles off the road.

The Tier 3 standards would also benefit our economy. Automakers strongly support the standards, which would enable them to sell vehicles meeting California’s Low Emission Vehicle III standards in all 50 states and at the same time achieve EPA greenhouse gas emission standards for the model years 2017-25. EPA has estimated that the annual monetized health benefits of the standards will be between two and seven times the costs (\$8 billion - \$23 billion in benefits compared to \$3.4 billion in costs). Indeed, EPA concluded that “[t]he proposed fuel standards are projected to cost on average less than one cent per gallon of gasoline.” 78 Fed. Reg. at 29,827. The refinery upgrades necessary to meet the lower sulfur gasoline standards are expected to generate 24,500 installation jobs during the first three years of the program and 5,300 permanent jobs. Finally, by reducing the number of hospital admissions, emergency room visits and premature deaths associated with respiratory illnesses and heart attacks, the standards will also reduce health care costs.

As EPA aptly noted in the preamble to the proposed rule, “few other national strategies exist that would deliver the same magnitude of multi-pollutant reductions projected to result from the proposed Tier 3 standards.” 78 Fed. Reg. at 29,819. Therefore, we strongly support the adoption of the proposed Tier 3 standards and urge that they be finalized by the end of the year so that our States and cities may realize their benefits as soon as possible. Thank you for your consideration of our comments on this important matter.



Eric T. Schneiderman
Attorney General of New York



George C. Jepsen
Attorney General
State of Connecticut



Roy Cooper
Attorney General of North Carolina



Joseph R. Biden, III
Attorney General of Delaware



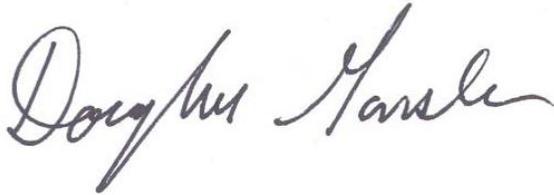
Ellen F. Rosenblum
Attorney General of Oregon



Janet T. Mills
Attorney General of Maine



Peter F. Kilmartin
Attorney General of Rhode Island



Douglas F. Gansler
Attorney General of Maryland



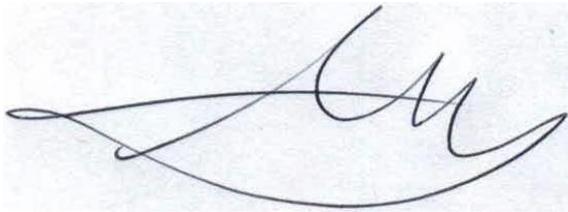
William H. Sorrell
Attorney General of Vermont



Martha Coakley
Attorney General of Massachusetts



Robert W. Ferguson
Attorney General of Washington



Joseph A. Foster
Attorney General of New Hampshire



Irvin Nathan
Attorney General of District of Columbia



Michael A. Cardozo
Corporation Counsel of New York City



Stephen R. Patton
Corporation Counsel of Chicago