



310 D Street, NE
Washington, DC 20002
Phone: (202) 547-9359
Fax: (202) 547-9429
Email: cap@icta.org

**Testimony of Mark Briscoe, Campaign on Auto Pollution
EPA's Tier 2 Public Hearing
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Good afternoon. My name is Mark Briscoe, and I am speaking on behalf of the Campaign on Auto Pollution, a nonprofit grassroots and educational network of approximately 500 environmental and transportation activist organizations around the country. CAP is located in Washington, D.C., where we began this week by recording a couple of code-red ground-level ozone days.

First, CAP would like to commend Carol Browner and EPA for proposing a strong set of Tier 2 standards, which, if enacted, will result in dramatic reductions in air pollution and will provide a safer environment for all Americans and our children over the first two decades of the 21st century. We particularly applaud EPA's proposed reduction of the sulfur content of gasoline. Average sulfur concentrations of 30 parts per million, capped at 80 parts per million, are necessary for advanced pollution-fighting auto technologies to be effective. Public opinion surveys by the American Lung Association indicate that more than 80 percent of Americans would be willing to pay 2 cents more per gallon of reduced-sulfur gasoline if it would result in less air pollution than the high-sulfur gasoline now on the market. A majority of those polled would pay up to 5 cents per gallon more. It is crucial that low-sulfur gasoline be mandated nationwide. Americans are not stationary people. We travel from region to region around our country, often by automobile. Therefore, establishing high-sulfur and low-sulfur zones will not work, especially because high-sulfur gasoline does not merely cause immediate increases in emissions, but can permanently damage advanced pollution-control systems. For this reason also, the timing of requiring low-sulfur gasoline is critical. Retailers must be selling low-sulfur gasoline nationwide prior to 2004, when the first Tier 2-compliant vehicles hit the roads. It makes no sense to provide American consumers with low-emission vehicles if the systems effecting the reduction in pollution will be immediately poisoned by the fuel.

Secondly, CAP strongly supports EPA's decision to subject small and mid-size light trucks, including sport utility vehicles and minivans, to the same emissions standards as cars. These vehicles now account for nearly 50 percent of all new car sales, and have become the primary source of family transportation for many Americans. Technology already exists to make SUVs, minivans and light trucks as clean as other passenger cars, and nearly 90 percent of voters feel that all of these vehicles should meet the same pollution standards. While CAP is pleased that EPA has addressed the inequity of the pollution break given light trucks under current standards, we take strong exception to the loophole carved out in the Tier 2 proposal for the largest category of light trucks. These vehicles, including the Chevy Suburban, GMC

Yukon, and Land Rover Range Rover, comprise a growing segment of the new-car market. Automakers already reap tremendous profit margins from the sales of these high-polluting, low-gas-mileage vehicles. Allowing these vehicles to pollute at higher levels than other cars and light trucks until 2009 is essentially a federal incentive for automakers to make more of these monster trucks. Incentives for the production of electric, hybrid, or fuel-cell vehicles I can understand, but not for the manufacture of a gasoline-powered vehicle that gets 12 to 15 miles to the gallon. All SUVs, minivans, and other light trucks must be required to meet the same strict emissions standards as cars beginning in 2004.

This brings me to another loophole in the Tier 2 proposal. Bins number 6 and 7 permit cars to emit far too much nitrogen oxides and particulate matter. CAP strongly opposes these special exceptions that would promote diesel-fueled SUVs and other vehicles. We have grave concerns about the impact of diesel fumes on the environment and, particularly, on human health. Research indicates that diesel particles are highly toxic and a likely carcinogen; we feel that encouraging the introduction of more diesels spewing out high levels of NOx and particulate matter in order to boost fleet fuel efficiency averages is not a wise tradeoff. We have nothing against diesel, *per se*. If automakers can produce diesel engines able to meet the lower NOx and particulate matter emissions levels of gas-powered vehicles, we encourage them to do so. Until that time, however, EPA should not provide a "dirty diesel" break.

Now, I would like to say a few words about what the Tier 2 proposal ignores. American automakers have proven to be their own worst critics. Since the passage of the Clean Air Act, they have consistently complained that they would never be able to meet various emissions standards. Yet, they have consistently done so, and they will easily meet these proposed Tier 2 standards. Once they do so, technological advancements will not suddenly grind to a halt. There is no reason that tighter standards should not come into force as even less polluting technologies come into existence. The Tier 2 proposal should do more to allow for the implementation of tighter standards, beyond those presently under consideration.

Finally, I would like to point out that here on the East Coast we are in the midst of our first real heat wave of the season. Last year was the hottest on record worldwide, and indications are that the future will bring many additional dangerously hot days, as well as extreme weather events. It's time to get serious about global warming. The transportation sector contributes more than 30 percent of fossil-fuel related emissions of greenhouse gases, including CO₂, and almost two-thirds of the transportation emissions come from automobiles. A typical new car creates seven-and-a-half tons of CO₂ in a year, while a light truck releases more than 10 tons. CAP believes that any set of standards purporting to address automobile emissions is incomplete if it fails to account for CO₂. EPA should incorporate standards into the final Tier 2 regulations that would combat global warming by reducing the amount of CO₂ pollution created by cars and light-duty trucks.

Again, I would like to thank EPA for proposing a generally strong Tier 2 rule. Also, thank you for giving me this opportunity to testify in this forum on behalf of the Campaign on Auto Pollution. There's something very intimidating about Tier 2, steeped as it is in complex technological language and concepts. At CAP, our biggest challenge as a grassroots and educational network has been convincing people how important this proposal really is, and then explaining it to them in words that they can understand. In the end, however, it all boils down to one thing: the strength of the Tier 2 rule will largely determine the cleanliness of our air for the beginning of the next century. The air we breathe has a huge bearing on the health and quality of life of every American. In closing I simply ask EPA to ensure that the final Tier 2 rule is as strong as it can possibly be. Thank you.