



# ENVIRONMENTAL LAW & POLICY CENTER

**Testimony of Susan Mudd**  
**Senior Policy Advocate, Environmental Law & Policy Center**  
Against the proposed revision to Tier 4 phase-in schedule  
for Light & Medium-duty vehicles.  
**June 3, 2026**

Good afternoon, I'm Susan Mudd, a Senior Policy Advocate at the Environmental Law & Policy Center, the Midwest's leading environmental legal advocacy and sustainability innovation organization. I appreciate the opportunity to testify.

The proposed revision to the Tier 4 phase-in schedule for light- and medium-duty vehicles is a step backward. These Clean Car standards are important to reducing emissions that harm public health, lowering driver costs and protecting communities. Thanks to CAA implementation and enforcement, air quality in the US has improved in the past several decades. These standards must NOT be delayed or otherwise rolled back.

Sadly, it appears EPA has lost sight of its reason for existence: protecting Americans' health and environment.

Vehicle emissions are a leading source of the fine particulate matter and smog-forming pollution directly linked to serious health problems, including asthma attacks, cardiovascular disease, and premature death, impacting communities across the Midwest states where ELPC works.

Chicago is at the US crossroads, with numerous interstate highways, and the largest concentration of intermodal facilities. So light and medium duty vehicle emissions matter.

In Chicago where I live, each summer EPA ozone standards are exceeded and we are advised against running and outdoor activities. There are days when I can't bike to work (my favorite activity). More importantly thousands of outdoor workers are regularly exposed to unhealthy levels of smog, and hundreds of thousands of children's summers are restricted when they need and should play outdoors .

According to ALA's 2026 State of the Air Report,

Chicago, southeast and eastern Wisconsin and St Louis areas have among the top 25 most unhealthy days due to ozone pollution;

and Indianapolis, Cleveland-Akron, Cincinnati, Kalamazoo all rank in the top 25 for year-round particle pollution.

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ELPC's [Air Quality Monitoring in Chicago report](#), based on years of community members mobile monitoring of pm 2.5 documented hotspots near highways. Microsoft Research's stationary monitors data showed that stronger EPA tailpipe standards or PM 2.5 would help many Chicagoans.

Last summer Open Air Chicago installed 277 monitors across the city. In its first 9 months of operating, all BEFORE SUMMER, 93% of the locations exceeded the annual pm 2.5 standard on 1/2 of the days. If this pattern continues Chicago will not meet the annual standard and public health will suffer.

IEPA already issued an air quality alert last week for the greater [Chicago](#) area, warning of expected unhealthy levels of [ozone](#) levels, urging the area's 9 million residents to limit prolonged outdoor activity.

As we head into summer when smog alerts become more frequent, limiting our ability to safely work, exercise, or spend time outdoors, EPA please focus on protecting Americans' freedom to breathe clean air

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