



July 5, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Vehicle Emission Standards Docket ID No. EPA-HQ-OAR-2022-0829

Dear Administrator Regan:

On behalf of the undersigned health and medical organizations, we write to call on the United States Environmental Protection Agency's (EPA) to adopt the strongest possible standards to curb emissions from new passenger vehicles and spur the transition to zero-emission technologies. Health and medical organizations have long advocated for strong emissions standards as a crucial intervention to protect regional air quality, address disparities in pollution burdens and reduce the health impacts of the climate crisis.

We urge EPA to act in 2023 to finalize the most stringent possible standards for new vehicles to reduce and eliminate emissions that harm Americans' health.

The American Lung Association's most recent "State of the Air" report noted that approximately 120 million Americans live in communities impacted by unhealthy levels of ozone and/or particle pollution.¹ Exposure to air pollution can contribute to asthma attacks, heart attacks and stroke, lung cancer, low birthweight and premature birth, premature death and other health risks. Traffic pollution specifically is associated with premature death due to cardiovascular disease, lung cancer death, asthma onset in children and adults and other negative outcomes.² The burdens of air pollution are not equally shared: people of color make up the majority of those living in the communities with unhealthy air and a person of color in the United States is 3.7 times more likely to live in a community with the worst air pollution in the nation than a white person.

In addition to being a leading contributor to air pollution challenges, transportation is the leading source of climate pollution in the nation. The life-saving progress made to clean the air under the Clean Air Act is increasingly challenged by climate change impacts. Extreme heat, drought

¹ American Lung Association. State of the Air 2023. April 2023. www.lung.org/sota

² Health Effects Institute. "Systematic Review and Meta-analysis of Selected Health Effects of Long-Term Exposure to Traffic-Related Air Pollution." Special Report 23: 2022.

and catastrophic wildfire conditions and enhanced conditions for ozone formation increase pollution burdens and inequities. Climate impacts on health are far reaching beyond degraded air quality, including water quality, vector-borne diseases, mental health impacts, health issues from displacement and other risks.³ EPA must act to set the strongest possible multi-pollutant standards for new passenger vehicles that ensure cleaner combustion engines while spurring the rapid and widespread transition to zero-emission technologies needed to ensure cleaner air and a healthy climate.

Fortunately, the Inflation Reduction Act (IRA) and the Infrastructure Investment and Jobs Act (IIJA) provide for hundreds of billions in investment in cleaner vehicles, energy and infrastructure to accelerate the transition away from combustion to protect health across the nation. Further, seven states have so far adopted the Advanced Clean Cars II program (ACCI) that sets a 100 percent sales requirement by 2035. EPA's stronger standards through Model Year 2026 were strengthened to deliver a critical ramp to greater zero-emission technology pathways. Given these developments and the rapid growth in the zero-emission vehicle market, we view the proposed standards and stronger Alternative 1 as strong starting points for approving stringent standards in 2023.

Therefore, we recommend that EPA set multi-pollutant passenger vehicle standards for 2027 and later years that:

Build upon the more stringent Alternative 1 Greenhouse Gas Proposal

EPA's proposal includes a more stringent Alternative 1 that should be strengthened and adopted as the final rule. Alternative 1 provides for a more stringent standard of approximately 10 mg/mile of greater GHG emission reductions. This is a good start that should be strengthened further to achieve greater reductions in the later years of the program beyond 2030. The final rule should be based upon increasingly tighter standards beyond the 2030 timeframe to exceed the benefits of the proposed rule, but to also accelerate emission reductions in the later years of the rule. As noted above, a growing number of states have adopted the Advanced Clean Cars II program to establish a 100 percent zero-emission vehicle sales standard for model year 2035. EPA's proposal estimates that one technology pathway for compliance could see battery electric vehicles representing nearly 70 percent of new vehicle sales by 2032. Setting the Alternative 1 GHG standard in line with the states' pathway to 100 percent sales in 2035 would increase the benefits of the standard.

Better Control Fine Particles and Ozone-forming Air Pollutants from New Vehicles

EPA has taken an appropriate multi-pollutant approach to the standards to ensure the cleanup of ozone-forming emissions. To maximize the benefits of the rule, EPA should consider eliminating smog-forming certification levels for higher polluting light-medium vehicles over time. While the proposals intend to push fleet averages of smog-forming emissions down by 60 percent or more, there are still allowances for much higher emitting vehicles through the entirety of the rulemaking. We also encourage EPA to phase out higher-emitting certification levels to drive both fleet average and individual vehicle emissions lower over time.

EPA has proposed important reductions in fine particles from new vehicles across various testing cycle to better respond to — and control for — real-world driving conditions. The EPA standards are estimated to result in widespread use of gasoline particle filters to meet the

³ USGCRP. *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [Reidmiller, D.R., C.W. Avery, D.R. Easterling, K.E. Kunkel, K.L.M. Lewis, T.K. Maycock, and B.C. Stewart (eds.)]. 2018.

standards. Filters are currently standard equipment on some vehicle models sold in European and Chinese markets and should be the norm to control this carcinogenic pollutant on equivalent models sold in American communities. We support EPA's robust approach to controlling fine particle emissions from new engines and encourage EPA to consider accelerating the phase-in to require 100% of the new vehicle fleet in MY 2027 to use gasoline particle filters and set strong assurances for ongoing function and maintenance of these critical emission controls.

Reduce Emissions through 2035

EPA should set a course to emission controls out through the 2035 model year to address the ongoing need for cleaner combustion and increased certainty for zero-emission technologies. By capturing vehicle model years out to 2035 as an increasing number of states' ACCII standards have, EPA can ensure that the policies stay ahead of, rather than trail, zero-emission vehicle markets and automakers' announced combustion engine phaseouts to provide ongoing certainty in emission reductions.

Health Benefits of Zero-Emission Technologies

EPA's proposals note the significant clean air benefits of the proposed rule and illustrate the increased benefits of the stronger Alternative 1. The American Lung Association's recent "Driving to Clean Air" report highlighted that approaching a 100 percent zero-emission sales scenario by 2035, along with a non-combustion electricity generation grid, could result in major health benefits. The report found that the cumulative health benefits could reach \$978 billion by 2050, including nearly 90,000 premature deaths avoided, over 2 million asthma attacks avoided and more than 10 million lost workdays avoided due to cleaner air.⁴ EPA's analysis shows that a potential compliance pathway for the proposal could result in nearly 70 percent of new vehicle sales being battery electric vehicles by 2032. We call on EPA to continue the trajectory of a stronger Alternative 1 to include more stringent GHG standards through 2035.

In closing, we call on EPA to finalize the most health-protective standards possible in 2023 to ensure timely implementation of these new vehicle standards.

Signed,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American College of Physicians
American Lung Association
American Medical Association
American Public Health Association
American Thoracic Society
Asthma and Allergy Foundation of America
Children's Environmental Health Network
Climate Psychiatry Alliance
Health Care Without Harm
Medical Society Consortium on Climate and Health
National Association of Pediatric Nurse Practitioners
Physicians for Social Responsibility

⁴ American Lung Association. "Driving to Clean Air." June 2023. <https://www.lung.org/clean-air/electric-vehicle-report/driving-to-clean-air>