



September 27, 2021

The Honorable Michael Regan
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Comment in re: Docket EPA-HQ-OAR-2021-0208

Dear Administrator Regan:

The undersigned health and medical organizations write to urge the United States Environmental Protection Agency (US EPA) to set the strongest possible standards to curb climate-forcing greenhouse gas (GHG) emissions from the light-duty vehicle sector. We call on US EPA to act now to revise the existing standards set by the previous administration, and to finalize model year 2023-2026 rules that aggressively respond to the immediate and generational threat climate change poses to public health and health equity.

The Biden Administration action to review and revise existing GHG standards for light-duty vehicles for model years 2023-2026 represents a crucial public health and equity opportunity. This rule must be finalized in 2021 so the rules will be implemented Model Year 2023. The American Lung Association's *State of the Air 2021* report made clear that more than 40 percent of all Americans - 135 million people - live in communities impacted by unhealthy air quality.¹ Exposures to poor air quality can result in a wide range of negative health outcomes including asthma attacks, worsening COPD, heart attacks and

¹ American Lung Association. *State of the Air 2021*. April 2021. www.lung.org/sota

strokes, lung cancer and premature death. Children, seniors, people of color and low-income communities are at far greater risk of harm from unhealthy air.

Transportation is the number one source of climate pollution in the United States and a leading source of our air quality challenges. Climate change driven by fossil fuel combustion is threatening decades of clean air progress made through US EPA, state, and local actions to reduce harmful emissions. Climate change is a health emergency, amplifying many present-day threats to public health, including extreme heat impacts, degraded air and water quality, and increased destruction and displacement due to wildfires, flooding and other extreme events, among many other tolls taken on Americans' physical and mental health. US EPA acknowledges the significant public health burdens posed by climate change, and that "scientific assessments continue to be released that further advance our understanding of the climate system and the impacts that GHGs have on public health and welfare both for current and future generations."² The revised standards must meet the climate challenge head-on and set the stage for future standards that transition the fleet to zero-emissions as rapidly as possible.

While US EPA has proposed increasing the stringency of the inadequate standards set by the previous administration, our organizations believe US EPA must establish a more stringent standard than has been proposed as the final rule. The final rule must require greater real-world GHG reductions and set a stronger pathway toward the full transition to zero-emission technologies. Therefore:

US EPA must select the more health-protective Alternative 2 as a starting point for the 2023-2026 standards. The US EPA proposal notes that an alternative proposal ("Alternative 2") would yield greater climate, health and societal benefits. US EPA estimates that Alternative 2 would reduce carbon dioxide emissions by 72 million metric tons, or nearly twice the EPA central proposal, during 2023-2026.³ As noted in the documentation, US EPA estimates that by 2050, Alternative 2 would result in approximately \$170 billion in health and other societal benefits (excluding fuel savings, which are valued at an additional \$290 billion), significantly higher than benefits outlined for US EPA's central proposal.⁴ Further, the regulatory impact assessment notes that Alternative 2 would reduce consumption of by 486 million barrels of oil more than the central proposal.⁵ For communities living at the fence line and downwind of refineries, every reduction counts. Alternative 2 must be the baseline for US EPA's final rule revision to maximize climate and health benefits and reduce burdens in highly impacted communities.

US EPA must ensure real-world emissions benefits. We call on US EPA to avoid excess credit schemes and loopholes that impact the total tons of benefits achieved by the rule. While Alternative 2 represents a more stringent standard, it includes various crediting provisions that would ultimately diminish the real-world GHG benefits and associated health and societal benefits. Alternative 2 includes fewer credits than the central proposal, but it would still offer a range of loopholes and credits that diminish the stringency of the rule. We urge US EPA to reduce credit options in the final rule to ensure real-world benefits and emission reductions occur as projected.

² US Environmental Protection Agency. Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards (Proposal) Federal Register. Vol. 86, No. 151. August 10, 2021 at pp. 43729-43731. <https://www.govinfo.gov/content/pkg/FR-2021-08-10/pdf/2021-16582.pdf>

³ US EPA Revised 2023 and Later Model Year Light Duty Vehicle GHG Emissions Standards. Regulatory Impact Analysis (RIA) at Tables 5-1 and 5-3. <https://www.epa.gov/system/files/documents/2021-08/420r21018.pdf>

⁴ US EPA (Proposal) at p. 43742.

⁵ US EPA. (RIA) at p. 5-9.

US EPA must secure a rapid transition to zero-emission technologies. US EPA's documentation provides a thorough discussion of the technological advances and investments, automaker announcements and state policy developments in pursuit of greater deployments of zero-emission vehicles (ZEVs) as called for by President Biden's August 5, 2021 Executive Order.⁶ This current proposal must be followed by much stronger limits on greenhouse gas emissions from light-duty vehicles through 2030 as well as stringent multi-pollutant standards for heavy-duty vehicles without delay. US EPA must move aggressively to set additional standards to accelerate ZEV deployment in the on- and off-road medium- and heavy-duty sectors.

However, US EPA should not rely solely on post-2026 rules to accelerate the transition to ZEVs when more stringent standards for 2023-2026 are needed to secure major health and climate benefits of non-combustion transportation.⁷ Adopting Alternative 2 with limits on excess credits and loopholes that diminish effectiveness of the rule will spur greater ZEV deployment across multiple platforms. We encourage US EPA to establish standards that position the nation for a smoother transition to zero-emission vehicles today.

The 2023-2026 standards are a critical steppingstone to climate and clean air benefits that are desperately needed in communities throughout the United States. We urge US EPA to finalize the rule this year so it will be implemented in Model Year 2023. US EPA must take full advantage of the opportunity to revise these standards and must set the course to a healthier, more sustainable future for all Americans.

Sincerely,

Allergy & Asthma Network
Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American Lung Association
American Public Health Association
American Psychological Association
American Thoracic Society
Association of Schools and Programs of Public Health
Asthma and Allergy Foundation of America
Children's Environmental Health Network
Climate for Health
Health Care Without Harm
Medical Society Consortium on Climate and Health
Medical Students for a Sustainable Future
National Association of Pediatric Nurse Practitioners
National Hispanic Medical Association

⁶ President Joseph R. Biden. Executive Order Executive Order on Strengthening American Leadership in Clean Cars and Trucks. August 5, 2021. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/08/05/executive-order-on-strengthening-american-leadership-in-clean-cars-and-trucks/>

⁷ The American Lung Association estimates that the transition to zero-emission transportation across multiple light-, medium- and heavy-duty vehicle platforms could yield \$72 billion in public health benefits and \$113 billion in global climate benefits annually in 2050. Road to Clean Air. September 2020. www.lung.org/ev

National League for Nursing
Public Health Institute