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

Dear Administrator Regan:

Petition to EPA Administrator Regan on Cars & Trucks Standards

The undersigned national and state nursing organizations and individual nurses thank the U.S. Environmental Protection Agency for the opportunity to comment on the proposed standards to further reduce harmful air pollution emissions from light-duty and medium-duty vehicles starting with model year 2027 and the proposal to revise existing standards to reduce greenhouse gas (GHG) emissions from heavy-duty vehicles in model year 2027 and set new, more stringent standards for model years 2028 through 2032.

As organizations representing nurses across the country, we are dedicated to advancing actions that promote health, reduce adverse health outcomes and healthcare costs, and improve quality of life for those who live in the U.S. Our organizations thank EPA for finalizing robust clean car standards through model year 2026 and for taking the important next steps to finalize stricter clean car and truck standards through model year 2027 and beyond. The transportation sector is the largest source of greenhouse gasses[1] and the fastest growing emitter of GHG emissions in the United States. Therefore, we urge EPA to finalize the strongest possible clean car and truck standards in order to: dramatically reduce greenhouse gasses and other harmful pollution from light-, medium-and heavy-duty vehicles, protect health, and drive a rapid transition to zero emissions vehicles.

Climate change is a health emergency that poses serious threats to the health and lives of everyone residing in our nation. Climate change negatively impacts health in many different ways – including longer and more severe heat seasons; more frequent and intense wildfires and flooding; worsening air pollution; an increased risk from water-borne and vector-borne diseases; increased risks to mental health; and more. Certain groups experience greater risks, including children, older adults, low-wealth communities, communities of color, pregnant people, and people living with chronic diseases. When poor air quality due to vehicle emissions coincides with climate-related risks, such as extreme heat or ground-level ozone, adverse health effects are further amplified, affecting productivity, physical and mental well-being. By finalizing the strongest possible clean car standards for cars and trucks, EPA will help communities, who often are more exposed to air pollution and the hardest hit by effects of climate change, align with the Biden Administration's environmental justice goals, and put the U.S on track to meet our Paris Climate Agreement goals.

Additionally, gasoline and diesel-powered vehicles produce numerous pollutants beyond carbon pollution that directly harm health, including particulate matter, nitrogen oxides, and volatile organic compounds. The transportation sector accounts for more than 55% of NOx emissions in the U.S.[2] As of 2020, medium- and heavy-duty vehicles represent about 6% of vehicles on the

[1] https://www.epa.gov/transportation-air-pollution-and-climate-change/carbon-pollution-transportation

[2] https://www.epa.gov/transportation-air-pollution-and-climate-change/smog-soot-and-other-air-pollution-transportation

road, but generate 59% of NOx emissions and 55% of the particle pollution.[3] People exposed to air pollution experience health harms, such as asthma attacks, respiratory and cardiovascular harm, heart attacks, strokes, and premature death. A 2022 Health Effects Institute panel special report on health effects of traffic-related air pollution found a high level of confidence that strong connections exist between traffic-related air pollution and early death due to cardiovascular diseases. The panel also found a strong link with lung cancer mortality, asthma onset in children and adults, and acute lower respiratory infections in children.[4] EPA estimates that 72 million people live near truck freight routes[5], with residents of these communities more likely to be people of color and having lower incomes. Strong long-term cleaner car and truck standards will benefit the health of all across the U.S., particularly communities disproportionately impacted by traffic pollution.

A report from the American Lung Association found that if the nation were to reach 100 percent sales of zero-emission passenger cars by 2035 and of heavy-duty trucks by 2040, and shifted to non-combustion electricity generation by 2035, it would save 110,000 lives and deliver $1.2 trillion in public health benefits by 2050.[6] Another report by the American Lung Association, describing the health benefits of a nationwide transition to zero-emission heavy-duty transportation and a transition to clean, non-combustion energy by 2050, in counties with major truck routes, would result in up to: $735 billion in cumulative health benefits, 66,800 avoided deaths, 1.75 million avoided asthma attacks, and 8.5 million avoided lost workdays.[7]

In regard to heavy duty vehicles specifically, we urge EPA to move quickly and finalize the strongest possible cleaner trucks standards by the end of the year in order to continue to address the climate crisis. Federal and manufacturer investments and state ACT adoption all support EPA going further than what is currently proposed. Therefore, the ACT adoption standards need to be included as the strongest of the alternatives proposed by the EPA. We are also encouraging EPA to require tighter limits on diesel vehicles generally to ensure investments in increasingly cleaner manufacturing and ultimately a transition to zero pollution vehicles.

The Biden Administration has an opportunity to protect public health, reduce dangerous air pollution and help fight climate change with strong clean car and truck standards. Our organizations urge EPA to move as quickly as possible to enact the strongest possible standards that will reduce car and light truck GHG emissions 75% by 2030, putting the country on a path to a 100% zero-emission new vehicle sales target by 2035. The undersigned state and national organizations will continue to stress the urgency and necessity for making gas and diesel vehicles cleaner and more efficient. We appreciate EPA's effort and progress on the current proposed standards for cars and trucks and encourage the Agency to continue the pace of safeguard advancements required by public health and the climate crisis.

Sincerely,

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[3] https://www.lung.org/media/press-releases/new-report-transition-to-zero-emission-trucks-cou

[4]https://www.healtheffects.org/publication/traffic-related-air-pollution-critical-review-literature-emissions-exposure-and-health

[5]https://www.epa.gov/newsreleases/epa-proposes-stronger-standards-heavy-duty-vehicles-promote-clean-air-protect

[6] https://www.lung.org/clean-air/electric-vehicle-report

[7] https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report.pdf