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

The U.S. Environmental Protection Agency's ("EPA") proposed rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026 ("proposed rule") is a start, but must be more ambitious if we are to combat the worst effects of climate change and ensure Americans have clean air as soon as possible.

The transportation sector is America's largest source of greenhouse gas emissions. Not only do greenhouse gas emissions contribute to climate change, they also cut short an estimated 58,000 lives each year¹. During a high pollution summer, children are 40% more likely to suffer an acute asthma attack². A 2019 study estimated that transportation emissions were associated with more than a quarter of U.S. deaths caused by fine particulate matter produced by human activities³.

Without strong action, air pollution from our cars and trucks will continue to rise and threaten our health with more asthma attacks, cancer, and other negative health outcomes. Stronger greenhouse gas emissions standards are better for our environment and public health.

The proposed rule is not as strong as the Obama-Biden standard and is riddled with loopholes and giveaways to automakers that undermine otherwise strong emissions reduction targets. The EPA itself has identified a far more effective rule ([Alternative #2](#)), which decreases emissions at a much more substantial rate. Cutting greenhouse gas emissions will have the added benefit of reducing air pollutants such as fine particulate matter. Reducing these co-emitted air pollutants improves both air quality and benefits human health. At a minimum, the EPA should reinstate the Obama-Biden era standards, but in order to effectively solve this climate crisis and to enhance public health, the EPA should adopt [Alternative #2](#).

Environment America consulted several doctors and public health experts and asked them why reducing automotive emissions is so important to preserving public health. Here's what they said:

Chrysan Cronin, DrPH, MPH, MS, Director and Associate Professor of Public Health, Muhlenberg College:

"It is imperative that the federal government take action to decrease auto emissions to minimize the effect of air pollution on human health. Children, the elderly, people of color and other vulnerable populations experience excess illness and death from air pollution associated with high automobile emissions. As climate change continues to cause a rise in temperature, an increase in the number of days exposed to ground level ozone can cause chest pain, coughing and throat irritation, and can lead to decreased lung function and cause chronic obstructive pulmonary disease."

Lisa Doggett, MD, President of Texas Physicians for Social Responsibility:

"Motor vehicle emissions are a major source of air pollution and climate change. The health consequences include increased rates of asthma, bronchitis, and other respiratory conditions, as well as higher risk of cancer and even premature death. Reducing vehicle emissions is a critical step to protect public health."

Robert Dubrow, MD, PhD, Professor of Epidemiology (Environmental Health), Faculty Director, Yale Center on Climate Change and Health, Yale School of Public Health:

"I strongly favor EPA's Alternative #2 over the base rule. To protect our health and the health of future generations, we need to reduce CO2 emissions with all deliberate speed. Climate change represents the greatest public health threat of the 21st century. Adverse health effects of climate change include illness and death due to more frequent and intense extreme weather events; water and food insecurity; transmission and spread of infectious diseases; diminished air quality; and adverse physical and mental health impacts on populations fleeing disruptions caused by climate change. At the same time, when we increase the efficiency of cars and light trucks to reduce CO2 emissions, we also reduce emissions of toxic air pollutants that can exacerbate asthma and can cause respiratory symptoms and disease, cardiovascular disease, and other harmful health effects. Thus, the climate and health benefits of making cars and light trucks more efficient go hand in hand."

Meilan Han, MD, MS, incoming Chief, Pulmonary & Critical Care, University of Michigan, author "Breathing Lessons: A Doctor's Guide to Lung Health":

"As a pulmonologist, I'm pleading with the Biden Administration to support the EPA's adoption of stricter emission standards (Alternative 2). In the middle of a respiratory pandemic, clean air is more vital than ever to the health and wellbeing of our citizens. Inflammation from air pollution not only increases risk of COVID-19 infection, but also contributes to a large number of health conditions from asthma to even cardiovascular disease. The damage to human health from air pollution has now been detected even in utero. We can no longer afford to be complacent."

Brita Lundberg, MD, Infectious Disease Specialist, Chair of the Board at Greater Boston Physicians for Social Responsibility:

"Cars and trucks that burn fossil fuels are a source of smog, soot, and toxic pollutants that EPA itself has pointed out damage human health through air pollution. EPA must institute stricter exhaust standards for a healthier population."

Marsha Wills-Karp, PhD, Anna M. Baetjer Professor of Environmental Health, Chair, Department of Environmental Health and Engineering, Johns Hopkins Bloomberg School of Public Health:

"Without question, reducing automobile emissions will save lives and improve the quality of life for millions."

1. "[Transform Transportation](#)," Arizona PIRG Education Fund, Frontier Group, Spring 2021.
2. "[2021 Asthma Capitals](#)," Asthma and Allergy Foundation of America, Spring 2021.
3. "[Fine-scale damage estimates of particulate matter air pollution reveal opportunities for location-specific mitigation of emissions](#)," Andrew L. Goodkind, Christopher W. Tessum, Jay S.

Coggins, Jason D. Hill, Julian D. Marshall, Proceedings of the National Academy of Sciences
Apr 2019, 116 (18) 8775-8780; DOI: 10.1073/pnas.1816102116