

U.S. Environmental Protection Agency  
EPA Docket Center  
OAR, Docket EPA–HQ–OAR–2022– 0829  
Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

July 5, 2023

Dear Administrator Regan,

As environmental, community, and health organizations, we call on you to take more aggressive action to clean up the gas-powered car and truck fleet that will be polluting our nation's air and communities for decades to come. EPA's latest round of emissions reductions standards, covering Model Years 2027 through 2032, focuses on the rise of zero-emission technologies, including electrification, and the growing number of electric vehicle (EV) models that already have or will soon enter the market. While electrification is undoubtedly an effective and important means of securing emissions reductions, there will also be tens of millions of gas guzzlers that will be sold before EVs become dominant. EPA's rule should focus on curbing emissions from these vehicles as well, as they fuel climate change and needlessly pollute low-income and communities of color.

More than one-third of Americans live in areas with failing grades for ozone or particulate pollution, and people of color are 3.7 times more likely than white people to live in a county with failing air quality.<sup>1</sup> Already at a disadvantage, these communities have the most to lose from emissions standards that do little to attack pollution from gas-powered cars and trucks. EPA should act in accordance with President Biden's recent recommitment to environmental justice and treat pollution from gas-powered vehicles as an urgent environmental justice issue.

EPA claims that technologies to improve gas-powered cars, pickups, and SUVs have already been widely implemented, and that electrification is therefore the most effective pathway to further emissions reductions.<sup>2</sup> The reality is more complicated. Many emissions control technologies are proven and cost-effective, yet manufacturers have dallied to implement them across their fleets. For example, turbocharged engines, which allow for more efficient engine design and operation, have been adopted in 80% of Ford's vehicles, but only in 37% of GM's fleet, 13% of Stellantis', and 3% of Toyota's.<sup>3</sup> Cylinder deactivation, which allows for use of only a portion of the engine when less power is needed, has also been adopted unevenly: it exists

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<sup>1</sup> American Lung Association, 2023 State of the Air Report, <https://www.lung.org/research/sota>.

<sup>2</sup> Proposed Rule: Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles, 88 Fed. Reg. 29,297 (May 5, 2023).

<sup>3</sup> EPA Automotive Trends Report 2022, ES-8, <https://www.epa.gov/system/files/documents/2022-12/420s22001.pdf>.

in 54% of GM's vehicles, but only 22% of Stellantis', 21% of Ford's, and 3% of Volkswagen's.<sup>4</sup> Some automakers continue to shrug their shoulders at proven emissions-reducing technologies.

EPA's actions make a huge difference in whether these powerful technologies are adopted across-the-board or whether some automakers will remain laggards. As EPA acknowledged for fuel injection technology, "one important driver for adoption. . . was increasingly stringent emissions standards."<sup>5</sup> EPA's past rulemakings caused significant overall improvements in the gas-powered fleet. Yet with the proposed rule, if automakers manage to achieve the EV targets, emissions reductions from their gas-powered cars and trucks are allowed to stall. Even worse, there is a risk that automakers will backslide on improvements to their gas-powered fleets, arguing that they need to profit from selling more gas-guzzling trucks and SUVs, while also claiming that the added emissions would be canceled out with increased EVs. That equation is unacceptable, and EPA must foresee and prevent it.

EPA's own data shows that multiple technologies exist to make the millions of gas-powered vehicles sold in the next decade much more efficient, from gasoline direct injection and continuously variable transmission to hybrid technologies. The fact that some automakers use some of these technologies some of the time shows EPA that it is possible for automakers to implement more of them consistently. In its final rule, EPA should model widespread adoption of these well-established technologies, and issue even more ambitious standards that hold automakers to the higher standards. At a minimum, this means strengthening the rule to account for annual improvements to the gas-powered light-duty fleet of *at least* 3.5%, as the International Council on Clean Transportation recommends.<sup>6</sup>

These changes would have immediate consequences on the criteria and carbon pollution that continues to poison vulnerable communities and populations. With the climate emergency worsening each day, and public health concerns adding cumulative stress to the lives of vulnerable Americans, there is no time for delay. The rise of EVs is promising but by itself will not guarantee a clean air future at the speed that science and justice require. We urge you to curb pollution from the gas-powered fleet in this critical rulemaking to help ensure a clean and just transportation future for all.

Sincerely,

198 methods

350 Bay Area

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<sup>4</sup> *Id.*

<sup>5</sup> EPA Automotive Trends Report 2022, p. 72, <https://www.epa.gov/system/files/documents/2022-12/420r22029.pdf>.

<sup>6</sup> Slowik, Peter & Miller, Josh, Aligning the U.S. Greenhouse Gas Standard for Cars and Light Trucks With the Paris Climate Agreement, International Council on Clean Transportation (Dec. 19, 2022), <https://theicct.org/us-ghg-standard-paris-agreement-dec22/>.

350 Colorado  
350 Conejo / San Fernando Valley  
350 Humboldt  
350 Ventura County Climate Hub  
Accelerate Neighborhood Climate Action  
Acterra: Action for a Healthy Planet  
Alabama Interfaith Power & Light  
Alliance of Nurses for Healthy  
Environments  
American Council for an Energy-Efficient  
Economy (ACEEE)  
American Resilience Project  
Animas Valley Institute  
Asthma and Allergy Foundation of America  
Audubon Society of Central Arkansas  
Berkshire Environmental Action Team  
BikeLoudPDX  
Breathe Easy Berkshires  
Breathe Project  
Brighter Green  
Bronx Jews for Climate Action  
Businesses for a Livable Climate  
California Nurses for Environmental Health  
and Justice  
Call to Action Colorado  
CASE Citizens Alliance for a Sustainable  
Englewood  
CatholicNetwork US  
Center for Biological Diversity  
Center for Neighborhood Technology  
(CNT)  
Change Begins With ME (Indivisible)  
Church Women United in New York State  
Citizens Coalition for a Safe Community  
Clean Energy Works  
Climate First: Replacing Oil & Gas  
(CFROG)  
Climate Hawks Vote  
CO Businesses for a Livable Climate  
Coalition for Clean Air  
Coltura  
Community Environmental Council  
Community for Sustainable Energy  
Community Health  
Conservation Law Foundation  
Don't Gas the Meadowlands Coalition  
Dream.org  
Earth Ethics, Inc.  
Ecology Center  
Elders Climate Action, NorCal & SoCal  
Chapters  
Electric Vehicle Association - East Bay  
Chapter  
Endangered Habitats League  
Endangered Species Coalition  
EVHybridNoire  
Extinction Rebellion, SF Bay  
Foundation Earth  
Friends of Casco Bay  
Friends of the Bitterroot  
GASP  
Generation180  
George Mason University Center for  
Climate Change Communication  
Georgia Stand-Up  
Geos Institute  
Greater New Orleans Housing Alliance  
GreenLatinos  
GRID Alternatives  
HealthyPlanet  
Howling For Wolves  
I-70 Citizens Advisory Group  
Indian Point Safe Energy Coalition  
Indigenous Environmental Network  
Indivisible Ambassadors  
Inspiration of Sedona  
Interfaith EarthKeepers  
International Marine Mammal Project of  
Earth Island Institute  
Intheshadowofthewolf

Lady Freethinker  
Larimer Alliance for Health, Safety and Environment  
Littleton Business Alliance  
Liveable Arlington  
Malach Consulting  
Mayfair Park Neighborhood Association Board  
Mental Health & Inclusion Ministries  
Mission Blue  
Mobilify Southwestern PA  
Montbello Neighborhood Improvement Association  
Mothers Out Front  
New Energy Economy  
New Mexico Climate Justice  
NJ State Industrial Union Council  
No Fracked Gas in Mass  
No More Freeways (Oregon)  
North American Climate, Conservation and Environment(NACCE)  
Ocean Conservation Research  
Oregon Environmental Council  
PA- Jewish Earth Alliance  
Pace Energy and Climate Center  
Peoples Climate Movement - NY  
Philadelphia Solar Energy Association  
Physicians for Social Responsibility Pennsylvania  
Premier Tech Solutions  
Prosperity Works  
PSR Arizona  
Public Citizen  
Public Lands Project  
PYM Eco-Justice Collaborative  
Quaker Action - Mid Atlantic Region  
RapidShift Network  
Redwood Alliance  
Resource Renewal Institute  
Responsible Alpha

RESTORE: The North Woods  
RGISC Inc dba Rio Grande International Study Center  
Sacramento Climate Coalition  
Santa Barbara Standing Rock Coalition  
Santa Cruz Climate Action Network  
Save EPA (former employees)  
Save Our Illinois Land  
Save the Pine Bush  
Seeding Sovereignty  
Sierra Club  
Small Business Alliance  
Social Justice Commission (Episcopal Diocese of Western Massachusetts)  
Southern Alliance for Clean Energy  
Southwest Organization for Sustainability  
Spirit of the Sun, Inc.  
Sustainable Upton  
System Change Not Climate Change  
Terra Advocati  
The Borneo Project  
The Earth Bill Network  
The Enviro Show  
The Green House Connection Center  
The Mind's Eye  
The People's Justice Council  
The Quantum Institute  
The Rewilding Institute  
Transition Sebastopol  
Unite North Metro Denver  
Voices for Progress  
Wall of Women  
WESPAC Foundation, Inc.  
West Berkeley Alliance for Clean Air and Safe Jobs  
Western Slope Businesses for a Livable Climate  
Womxn from the Mountain  
Working for Racial Equity