Friday, April 21, 2023

RE: S.J.Res 11 on the EPA final rule entitled “Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards”

Dear Members of Congress:

On behalf of our millions of members and supporters, we, the 39 undersigned organizations, urge you to oppose S.J.Res.11/H.J.Res.53, a joint resolution aiming to cancel a crucial update to nitrogen oxides (NOx) emissions for heavy-duty vehicles beginning in model-year 2027. (Heavy-Duty Engine and Vehicle Standards (88 Fed. Reg. 4296)).

Heavy-duty trucks produce multiple types of harmful emissions, with NOx emissions and its associated co-pollutants responsible for the formation of harmful smog and soot (ozone and PM) pollution. It has been over 20 years since the last update to heavy-duty emission standards on NOx pollution, and an update is long overdue. This pollution is proven to be linked to public health harms, including premature death, respiratory illness (including bronchitis and childhood asthma), cardiovascular problems, and other adverse health impacts that lead to hospital admissions, emergency department visits, and the need for long-term healthcare.

Supporting any efforts to cancel this rule will have serious implications for public health. Countless people in the United States are affected by this type of pollution every day – especially the more than 72 million Americans who live within 200 meters of highways, ports, and other high-traffic truck-route areas. Heavy-duty vehicles represent only approximately six percent of the on-road fleet, but generate 59 percent of health-harming ozone- and NOx emissions. These vehicles are predicted to contribute 90% of this type of pollution by 2045 unless updated standards are implemented.¹

Freight truck pollution harms everyone but especially those who live near highways, ports, freight hubs, and other high-traffic areas that are often burdened by cumulative impacts of pollution. The EPA estimates these new, more protective NOx standards will keep more than 400,000 tons of pollution out of our air, prevent almost 3,000 deaths, and avert numerous hospitalizations and respiratory illnesses each year by 2045. The EPA also estimates the standards will benefit our economy through 78,000 fewer lost days of work, 1.1 million fewer lost school days for children, $200 billion in health-related benefits, and $29 billion in annual monetized net benefits.²

The rule provides manufacturers, fleet operators, and owner-operators with feasible compliance pathways for achieving these critically necessary pollution reductions. EPA has finalized new, modernized test procedures and warranty and useful life requirements that will help ensure the standards more fully reduce emissions while vehicles are operating. EPA also built flexibilities into the rule to make it feasible for manufacturers to comply in a cost-effective manner. Additionally, the new extended warranty provisions

¹ American Lung Association (2022): https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report.pdf
² epa.gov/newsreleases/final-epa-standards-heavy-duty-vehicles-slash-dangerous-pollution-and-take-key-step
will help protect small business owners in the trucking industry by encouraging the production of more durable emissions control equipment and ensuring manufacturers are responsible for addressing any issues that may arise. This will reduce repair costs and downtime over the operational lifetime of the vehicle and serve as an incentive for fleets to purchase these newer trucks.

During the rulemaking process, EPA listened to a range of stakeholders, including manufacturers, fleet operators, and owner-operators, and incorporated their feedback, including by providing regulatory flexibilities, into the final standards. Canceling these more stringent standards would amount to an attack on efforts to begin delivering much-needed emission reductions and life-saving relief to the frontline communities that continue to bear the brunt of NOx pollution – most of which are low-income and/or people of color.³

As a diverse set of organizations representing environmental, public health, industry, and consumer protection interests, we have found that strong vehicle emission standards protect public health and workers, and help position the United States as a clean transportation leader. Therefore, we once again urge you to vote against this troubling resolution.

Sincerely,

Alliance of Nurses for Healthy Environments
Arizona Climate Action Coalition
CALSTART
Center for Biological Diversity
Center for Climate Change and Health
Ceres
Change the Chamber
Climate Action Campaign
Coltura
Earthjustice
Elders Climate Action
Elders Climate Action - Arizona Chapter
Electric Vehicle Association
Environmental Defense Fund
Environmental Law & Policy Center
Evergreen Action
EVHybridNoire
GreenLatinos
Interfaith Power & Light
League of Conservation Voters (LCV)
Michigan Clinicians for Climate Action
Michigan League of Conservation Voters
Michigan Sustainable Business Forum
Moms Clean Air Force

³ https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report.pdf
Moms Clean Air Force - AZ
Moms Clean Air Force - GA
Moms Clean Air Force - MI
National Parks Conservation Association
Natural Resources Defense Council
PennFuture
Pennsylvania Interfaith Power & Light
Plug in America
Public Citizen
Sierra Club
Southern Environmental Law Center
Union of Concerned Scientists
Voices for Progress
Wisconsin Health Professionals for Climate Action
Zero Emission Transportation Association (ZETA)