January 14, 2026

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re.: EPA Criteria Pollution Standards for New Motor Vehicles

Dear Administrator Zeldin,

This letter is submitted on behalf of the undersigned environmental, public health, and consumer advocacy organizations and local governments representing millions of people across the country. We write to express our unequivocal opposition to any action by the U.S. Environmental Protection Agency (EPA) to weaken, pause, or delay criteria air pollution standards or warranty and minimum useful life requirements for new motor vehicles, including the criteria pollution standards contained in EPA's 2024 rule, *Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles*, and the 2022 rule, *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards*.

Public Health Consequences

EPA's leadership in reducing toxic, health, and air quality harming pollutants is all the more important now, given the attempts to prevent California and other states from enforcing the most recent vehicle standards, including those for criteria pollutants -- which we maintain is illegal and unconscionable. Tailpipe emissions remain a significant source of nitrogen oxides (NOx), non-methane organic gas (NMOG), volatile organic compounds (VOCs), and particulate matter (PM2.5).[1] These criteria pollutants are linked to catastrophic health consequences:

- **Asthma and Respiratory Disease.** NOx and VOCs are precursors to ground-level ozone, a powerful lung irritant.[2] $PM_{2.5}$, particularly diesel exhaust, penetrates deep into the lungs, triggering asthma attacks, bronchitis, and permanently impairing lung development in children.[3]

[1] EPA, Smog, Soot, and Other Air Pollution from Transportation, https://www.epa.gov/transportation-air-pollution-and-climate-change/smog-soot-and-other-air-pollution-transportation.
[2] American Lung Association, Ozone, https://www.lung.org/clean-air/outdoors/what-makes-air-unhealthy/ozone.
[3] American Lung Association, Health Impact of Air Pollution, https://www.lung.org/research/sota/health-risks.

- **Cardiovascular Disease and Mortality.** Fine particulate matter is directly linked to heart attacks, strokes, and premature death.[4]
- **Environmental Justice.** Communities situated near major transportation corridors, ports, and warehouses – often low-income communities and communities of color – bear a disproportionate and morally unacceptable burden of this pollution. Strong vehicle standards are one of the most effective tools to reduce these harmful exposures and advance environmental justice.[5]

EPA's modeling[6] through 2055 shows that the 2024 light- and medium-duty criteria pollutant standards and the 2022 heavy-duty NOx standard would result in an decrease of more than:

- 5 million tons NOx
- 165,000 tons $PM_{2.5}$
- 2 million tons VOC

Health benefits[7] from these threatened standards would result in a decrease of more than:

- 50,000 premature deaths
- 85,000 hospital and ER visits
- 25 million asthma attacks
- 15 million lost school and work days

The public health need for these standards is irrefutable. These fundamental public health protections are necessary to ensure that all Americans, particularly those in pollution-burdened communities, can breathe clean air.

Technological Feasibility and Economic Benefits

As reported by E&E News on November 4, interagency review documents for EPA's proposal to rescind the 2009 endangerment finding and all vehicle GHG standards show that the White House Office of Management and Budget "urge[d] EPA to take separate action … to reconsider and replace … criteria pollutant emissions standards as well."[8] You separately announced in a March 2025 statement that EPA is reevaluating the 2022 standards to reduce NOx emissions

[4] EPA, Air Pollution and Cardiovascular Disease Basics, https://www.epa.gov/air-research/air-pollution-and-cardiovascular-disease-basics.

[5] See, e.g., Hiroko Tabuchi and Nadja Popovich, "People of Color Breathe More Hazardous Air. The Sources Are Everywhere," *The New York Times*, April 28, 2021, https://www.nytimes.com/2021/04/28/climate/air-pollution-minorities.html.

[6] EPA, Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles, Regulatory Impact Analysis, EPA-420-R-24-004, March 2024, Tables 8-28 and 8-31. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1019VPM.pdf; EPA, Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards, Regulatory Impact Analysis, Tables 5-29, 5-30 and 5-31. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1016A9N.pdf

[7] Calculated using EPA's COBRA calendar year 2040 national incident-per-ton factors for PM, PM precursors, and ozone precursors. Uses the high mortality value.

[8] https://subscriber.politicopro.com/eenews/f/eenews/?id=0000019a-368f-d346-affb-3faf063e0000 (see comment on pg 92). See also https://www.regulations.gov/document/EPA-HQ-OAR-2025-0194-0090.

from heavy-duty vehicles.[9] Reuters likewise reported on December 11 that EPA is planning to delay enforcement of criteria pollution standards.[10] And EPA Assistant Administrator Aaron Szabo noted recently in the Hill that in 2026 "Americans can expect to see the reconsideration of two regulations - one pertaining to Model Year 2027 and Later Light-and Medium-Duty Vehicles, and the 2022 Heavy-Duty Engine and Vehicle NOx rule."[11]

Major vehicle manufacturers and industry groups are urging the Agency to roll back these critical public health protections, relying on unfounded arguments about technological feasibility and economic cost. In comments on EPA's proposal to rescind the 2009 endangerment finding, the Alliance for Automotive Innovation argued that compliance with the MY 2027 and later "Tier 4" light- and medium-duty criteria emission standards is "unachievable" without significant increases in electric vehicle market share, asserting the standards would add "hundreds of dollars of additional costs" to internal combustion engine vehicles.[12] Stellantis also asked EPA in its comments to "revise light and medium-duty Tier 4 criteria emissions as well as heavy-duty standards," and "to revise heavy-duty Low NOx criteria emissions stringency to pre-2027MY standards."[13] Furthermore, the Truck and Engine Manufacturers Association (EMA) has continued to assert that there is a tradeoff between GHG and NOx control.[14]

However, market realities don't support these assertions. Each of these standards can be met exclusively through improvements in internal combustion engine (ICE) technologies, such as cylinder deactivation, light weighting, and mild hybridization. Electrification technologies can also provide a cost-effective compliance pathway.

EPA's PM standards can be met through the installation of gasoline particulate filters (GPFs), a mature technology that has been used in series production on new gasoline vehicles in Europe since 2017 and is now being used by U.S., European, and Asian manufacturers.[15] GPFs are also cost-effective devices – in 2024, EPA estimated per vehicle manufacturing costs of $87–$176.[16]

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[9] https://www.epa.gov/newsreleases/epa-announces-action-implement-potuss-termination-biden-harris-electric-vehicle.

[10] Shephardson, David. "US EPA Considering Two-Year Delay Enforcing Biden Vehicle Pollution Rule." Reuters, 11 Dec. 2024, https://www.reuters.com/sustainability/climate-energy/us-epa-considering-two-year-delay-enforcing-biden-vehicle-pollution-rule-2025-12-11/.

[11] Szabo, Aaron. "EPA will keep its foot on the gas in 2026, ending burdensome regulations." The Hill, 19 Dec 2025. https://thehill.com/opinion/energy-environment/5653704-epa-will-keep-its-foot-on-the-gas-in-2026-ending-burdensome-regulations/

[12] Alliance for Automotive Innovation, Comments on EPA Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, *available at* https://www.autosinnovate.org/posts/agency-comments/energy-environment/2025-energy-environment/EPA%20on%20GHG%20Endangerment%20and%20Standards%20Rescission%209-22-2025.

[13] Stellantis, Comments on EPA Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, available at https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0194-0918.

[14] https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0194-0888.

[15] See 89 Fed. Reg at 27941 (April 18, 2024); See also MECA presentation to OMB, March 6, 2023 (showing that U.S.-manufactured models (Ford Mustang and Jeep Grand Cherokee) that are exported to Europe and China have GPFs installed).

[16] 89 Fed. Reg. at 27947 (April 18, 2024).

Other independent studies conducted over a decade ago found similar GPF costs of $50–$184, indicating that current costs could be significantly lower.[17] Heavy-duty NOx standards can be met through selective catalytic reduction (SCR) systems,[18] the same technologies that are already being used to meet standards set 15 years ago.[19]

Despite calls to weaken or eliminate standards, automakers are successfully meeting the standards in place today and many have noted that they are fully prepared to deliver vehicles that meet the upcoming 2027 and beyond standards. For example, Daimler noted in recent comments seeking to weaken pollution standards that they have already developed an engine to meet EPA's 2027 heavy-duty NOx standard.[20] And when asked about the 2027 NOx emissions standards on its Q3 earnings call, PACCAR noted, "From our standpoint we approach this in saying we're prepared for the 35mg NOx standard. We've got our team working great on it, with some new products coming out in support of it. We're ready to go with it."[21] Similarly, Cummins stated about the HD NOx standards, "Assuming the 2027 regulations largely stay in place as they are today, we'll be ready to launch our products into the market in 2027."[22]

The health benefits resulting from cleaner air far outweigh the costs of compliance. Less illness translates to lower healthcare costs, greater worker productivity, and stronger local economies. The economic case for clean air is overwhelming.

We urge EPA to keep existing standards in place, so that communities across the country can benefit from the emissions reductions required by EPA's most recent standards for light-, medium-, and heavy-duty vehicles. Any rollback would lead directly to increased hospitalization rates, lost work and school days, and thousands of preventable deaths. These standards also represent an important part of many states' plans to meet national ambient air quality standards (NAAQS) for ozone and $PM_{2.5}$.

Our communities expect EPA, under your leadership, to prioritize its mission: to protect human health and the environment. That mission is currently under threat. We urge you to reject calls from industry groups to delay or dismantle critical clean air protections. These standards are vital, necessary, and technologically achievable.

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[17] Minjares, R and Posada Sanchez, F. (2011). Estimated cost of gasoline particulate filters. *International Council on Clean Transportation.* https://theicct.org/publication/estimated-cost-of-gasoline-particulate-filters/; Steininger. (2011). Particle number emission limits for Euro 6 positive ignition vehicles. https://www.nanoparticles.ch/archive/2011_Steininger_PR.pdf

[18] 88 Fed. Reg. 4333 (January 24, 2023).

[19] https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-control-air-pollution-new-motor-vehicles.

[20] Daimler Truck North America, Comments on EPA Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards, https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0194-7519.

[21] PACCAR 2025 Q3 earnings call at minute 13:15. https://investors.paccar.com/events-and-presentations/events/event-details/2025/PACCAR-Third-Quarter-Earnings-Conference-Call/default.aspx.

[22] Cummins 2025 Q3 earnings call at minute 46:15. https://investor.cummins.com/events-presentations/ir-calendar/detail/8294/q3-2025-cummins-inc-earnings-conference-call.

EPA must proceed with the full implementation and enforcement of these protective standards to save lives, protect our children, and secure a cleaner, healthier future for all.

Respectfully,

Alliance for Clean Energy New York
Alliance for Climate Transition
Alternatives for Community & Environment (ACE)
Arizona Forward
Arizona Interfaith Power & Light
Breathe Southern California
California Communities Against Toxics
California Interfaith Power & Light
Cedar Lane Unitarian Universalist Environmental Justice Ministry
Center for Biological Diversity
Center for Community Action and Environmental Justice (CCAEJ)
Change the Chamber
Chesapeake Earth Holders
City of Portland, OR
Clean Air Task Force
Climate Action Campaign
Climate Mayors
Climate Solutions
Colorado Communities for Climate Action
Coltura
Communities for a Healthy Bay
Conservation Law Foundation
Conservation Voters New Mexico
CT League of Conservation Voters
Duwamish River Community Coalition
Earthjustice
Ecology Center
Elders Climate Action
Elders Climate Action Maryland
Electric Vehicle Association
Environmental Defense Fund
Environmental Justice Ministry Cedar Lane Unitarian Universalist Congregation
Environmental Law & Policy Center
Environmental Protection Network
Evergreen Action
Faith Organizing Alliance
Fresh Energy
Girl Plus Environment
Green Sanctuary, Unitarian Universalist Church of Silver Spring (MD)

GreenLatinos
Group Against Smog & Pollution
Hip Hop Caucus
Indivisible HoCoMD Environmental Action
League of Conservation Voters
Michigan Clinicians for Climate Action
Michigan Sustainable Business Forum
Moms Clean Air Force
Mountain Mamas
Native Sun Community Power Development
Natural Resources Council of Maine
Natural Resources Defense Council
Neighbors for Clean Air
New Jersey League of Conservation Voters
New Jersey Sustainable Business Network
New Mexico Interfaith Power and Light
Oregon Environmental Council
Oregon League of Conservation Voters
Physicians for Social Responsibility
Plug In America
Policy Foundation INC.
Portland Clean Energy Task Force
Public Citizen
Respiratory Health Association
Sierra Club
Solar United Neighbors
Southern Environmental Law Center
Southwest Energy Efficiency Project
Transportation Working Group, 350 Massachusetts
Union of Concerned Scientists
Vermont Conservation Voters
Vermont Natural Resources Council
Washington Physicians for Social Responsibility
WBBA
WE ACT for Environmental Justice
West Berkeley Alliance for Clean Air and Safe Jobs

CC: Aaron Szabo, Assistant Administrator, Office of Air and Radiation
Eric Amidon, Chief of Staff