



West End Revitalization Association Right to Basic Amenities

September 15, 2022

Administrator Michael Regan
U.S Environmental Protection Agency
200 Pennsylvania Avenue NW
Washington, DC 20460

Joseph Goffman
Principal Deputy Assistant Administrator
Administrator Performing Delegated Duties of Assistant Administrator
Office of Air and Radiation
U.S Environmental Protection Agency
200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Regan and Mr. Goffman,

We write to urge the Environmental Protection Agency (EPA) to finalize the strongest and most protective heavy-duty trucks nitrogen oxides (NOx) standards by the end of 2022 to safeguard overburdened communities and put us on a path towards a zero-emissions future.

As a coalition of environmental justice organizations from across the country, the Clean Air for the Long Haul Cohort lives in and advocates for communities that are disproportionately and adversely impacted by harmful air pollution from the transportation sector. Medium- and heavy-duty trucks, in particular, are the largest source of harmful smog and soot-forming nitrogen oxides in the U.S.¹ Our communities are unjustly exposed to greater concentrations of these health-harming pollutants due to their proximity to “diesel death zones,” composed of high-traffic roadways and trucking routes, bus depots, and goods movement facilities.^{2,3,4}

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<https://www.epa.gov/system/files/documents/2022-04/hd-2027-stds-nprm-overview-2022-04.pdf>²

<https://grist.org/Array/seeking-environmental-justice-in-californias-diesel-death-zones/>

³ <https://www.lung.org/research/sota/key-findings/people-at-risk>

⁴ <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1014874.pdf>



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Transportation pollution compounds upon similarly concentrated industrial air pollution in our communities, all due to this country’s legacy of discriminatory transportation and land-use planning.⁵ Low-income and communities of color that are overburdened by unrelentingly poor air quality face heart attacks, other cardiovascular and respiratory conditions, asthma-related emergency room visits, and premature deaths. Chronic exposure to harmful air pollution is the reason our friends and families are more susceptible to viruses that cause the COVID-19 pandemic.^{6,7}

Option 1 of the *Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards* (Docket no. EPA-HQ-QAR-2019-0055) could provide necessary relief to overburdened communities.⁸ This option, if aligned with the stringency and abridged timeline of California’s Heavy-Duty Omnibus rule,⁹ would require 90% NOx emissions reductions from medium- and heavy-duty vehicles and engines by 2027, avoiding \$1.3 trillion in health damages linked to fine particulates and ozone pollution from 2027-2050.^{10,11} In contrast, Option 2 would require 75% NOx emissions reductions starting in 2027, achieving less reductions than Option 1,¹² and would create less stringent useful life and warranty periods. This weaker option prioritizes industrial interests and does little to alleviate the environmental and health burdens of diesel pollution that has plagued our communities for generations.

To further strengthen Option 1, we ask that you eliminate zero-emission vehicle crediting and not allow early action credits. These proposed flexibilities would undermine the emission reduction standards and incentivize continued purchasing of dirty fossil fuel trucks and buses. The 72 million people living within 200 meters of major trucking routes, many of which are low-income and people of color,¹³ will

⁵ <https://www.propublica.org/events/sacrifice-zones-communities-in-the-path-of-industrial-pollution>
https://www.researchgate.net/profile/Gonzalo-Bacigalupe/publication/342496424_COVID-19_Interconnectedness_Health_Inequity_the_Climate_Crisis_and_Collective_Trauma/links/5f426f5b92851cd3021f56e7/COVID-19-Interconnectedness-Health-Inequity-the-Climate-Crisis-and-Collective-Trauma.pdf

⁷ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7204717/>

⁸ According to an analysis done by ICCT, under EPA’s Option 1, disadvantaged communities would receive the largest health benefits, experiencing 26%–27% greater than average reductions in PM exposure, <https://theicct.org/epa-truck-standards-environmental-justice-jun22/>

⁹ <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>

¹⁰ <https://theicct.org/publication/air-quality-and-health-impacts-of-heavy-duty-vehicles-in-g20-economies/>

¹¹ <https://theicct.org/epa-hdv-proposal-march2022-statement/>

¹² EPA proposed Option 1 would achieve 61% heavy-duty NOx emissions reductions versus 47% for Option 2 in 2045, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P10144K0.pdf>

¹³ <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P10144K0.pdf>



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continue to suffer from unequal health impacts from medium- and heavy-duty vehicle pollution if crediting is advanced.

The agency should set stringent standards that align with California's Heavy-Duty Omnibus requirements, ensuring that stringent NOx emission reductions are achieved across the country, and encouraging a ramp-up of zero-emission electric technology for all classes of trucks and buses. To address the health and environmental burdens placed disproportionately upon environmental justice communities, we urge the EPA to move swiftly in finalizing the Clean Trucks rule with an enhanced Option 1.

Thank you for your leadership on this issue and we welcome any opportunities for further discussion. For inquiries or to schedule a meeting with the Clean Air for the Long Haul Cohort, please reach out Anastasia Gordon via email at anastasia@weact.org.

Sincerely,

Clean Air for the Long Haul Cohort:

CleanAirNow, Kansas City, KS & MO

CT Coalition for Economic and Environmental Justice, Hartford, CT

Deep South Center for Environmental Justice, New Orleans, LA

South Bronx Unite, New York City, NY

WE ACT for Environmental Justice, New York City, NY

West End Revitalization Association (WERA), Mebane, NC

Wisconsin Green Muslims, Milwaukee, WI

New Jersey Environmental Justice Alliance, NJ

CC: The White House, Climate Policy Office