



Alliance of Nurses for Healthy Environments



Asthma and Allergy Foundation of America



Children's Environmental Health Network



CLIMATE for HEALTH.



June 4, 2021

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Docket Number DOT-OST-2021-0036

Dear Secretary Buttigieg:

Thank you for the opportunity to comment on existing rules and agency action. As national health, medical, and nursing organizations, protecting the health of all Americans is our priority, and cleaning up harmful pollution from the transportation sector is a critical step to our collective mission.

We strongly support the goals laid out by President Biden in Executive Orders 13990 and 13992, particularly his priorities of promoting and improving public health, ensuring access to clean air and water, and prioritizing environmental justice. Urgent action is needed to protect public health against pollution from transportation. Emissions from gasoline- and diesel-powered vehicles pose immediate harms to health. These emissions form unhealthy ozone and particle pollution, which can lead to premature death, hospitalizations, missed days of work and school, asthma attacks and a host of other health problems.<sup>1</sup> They also disproportionately impact communities located near highways, ports, warehouses and other places where traffic is concentrated – which are more likely to be low-income or communities of color.

Pollution from fossil-fuel-powered transportation is also the nation's leading source of the carbon pollution that drives climate change. Climate change poses additional health threats,

---

<sup>1</sup> For more information on the health effects of ozone and particulate matter, please see the American Lung Association's "State of the Air" report: <https://www.lung.org/research/sota/health-risks>

including by driving more extreme heat and storms and creating conditions for greater exposures to wildfire smoke and ground-level ozone pollution. Millions of Americans face greater risk from these threats, including children, older adults, pregnant people, people with chronic lung diseases like asthma, people with cardiovascular diseases, low-income communities, and even healthy adults who work or exercise outdoors.

We call on the U.S. Department of Transportation (DOT) to rescind the previous administration's action, "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." Under the Clean Air Act, the State of California has the authority to develop and enact pollution controls for vehicles that are stronger than federal standards in order to protect residents' health, and states can follow those standards. This authority has driven pollution reductions and innovations nationwide, and it is core to achieving President Biden's goals of addressing climate change and improving air quality. NHTSA must revoke its unfounded preemption of California's Advanced Clean Cars zero-emission vehicles and greenhouse gas emissions programs and ensure the interpretation of California's Clean Air Act authority remains clear.

We also call on DOT to rescind "The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks." The previous Administration ignored the best health science when they weakened existing vehicle emissions and fuel efficiency standards that were set to help reduce carbon pollution from cars, light trucks and SUVs. The rollback is set to increase harmful pollutants, threaten public health and burden communities most impacted by the oil industry with more toxic pollution.

The standards that the SAFE rule rolled back reduced pollution and improved fuel economy. U.S. EPA, NHTSA and the state of California carefully researched and negotiated these federal and state standards with significant public and stakeholder input before they were adopted. Not only that, the industry had been meeting them ahead of schedule in a cost-effective manner. The previous administration's rollback not only weakened the protections against climate change, they required the nation to consume an additional half million barrels of oil a day.<sup>2</sup> That is bad news for communities already hit hard by the extraction, transportation and refining of petroleum products. Without NHTSA acting, those communities will face increased risk from more carcinogens and other toxic emissions, as well as increased risk of unhealthy ozone and particle pollution.

Our organizations are calling on the Biden Administration to set strong standards that move the nation toward a future of more efficient, pollution-free transportation. This includes advocating that the U.S. Environmental Protection Agency and the state of California set strong greenhouse gas emissions vehicles standards. These standards must support the achievement of the same or greater reduction in greenhouse gases in the immediate term as would have been achieved before the SAFE rule was finalized. We urge DOT to ensure that future fuel efficiency standards are similarly strong and help accelerate the nation's transition to zero-emission vehicles.

Our organizations know that climate change is a health emergency, but also a health opportunity. We urge DOT to support the nation's transition away from polluting forms of transportation to a future of active transportation, clean public transit and zero-emission cars

---

<sup>2</sup> 83 Federal Register 42986

and trucks. Not only will this protect Americans' health from the impacts of climate change, it will provide immediate clean air benefits that further the administration's goals of clean air, clean water, improved public health and environmental justice.

Signed,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Lung Association

American Public Health Association

American Thoracic Society

Association of Schools and Program of Public Health

Asthma and Allergy Foundation of America

Children's Environmental Health Network

Climate for Health

Health Care Without Harm

National Environmental Health Association

National Hispanic Medical Association

National Medical Association

Public Health Institute