



Asthma and Allergy Foundation of America



October 6, 2023

The President  
The White House  
Washington, DC 20500

**Re: Support for EPA Proposed Particle Pollution Standards to Protect Health**

Dear Mr. President:

The undersigned health and medical organizations write to express our strong support for the United States Environmental Protection Agency’s (EPA) proposal for strengthening standards for fine particle pollution emissions within the proposed Multi-Pollutant Emissions Standards for Model Year 2027 and Later Light-Duty and Medium-Duty Vehicles. Establishing the more stringent proposal for controlling fine particle emissions will save lives, reduce asthma attacks and cancer risk, and substantially reduce black carbon climate pollutants.

According to the American Lung Association’s “State of the Air 2023” report, 64 million Americans live in communities impacted by unhealthy levels of fine particle pollution.<sup>1</sup> Given EPA’s critical work to establish more health-protective particle pollution standards, the proposal to tighten engine particle emission standards across a broader range of real-world driving conditions will play a critical role in protecting health and reducing black carbon, a major short-lived contributor to the climate crisis.<sup>2</sup>

Climate change is a health emergency, with a host of physical and mental health impacts already being felt nationwide. Breathing particle pollution can also contribute to a wide range of devastating health impacts, including asthma attacks, heart attacks and strokes, lung cancer and premature death. Children, seniors, people living with heart and lung disease, and individuals who are pregnant face greater risks to their health.<sup>3</sup>

Low-income communities also often bear a disproportionate burden from particulate pollution.<sup>4</sup> Light duty gasoline vehicles are one of the leading sources for pollution disparities for people falling into the U.S. Census-defined groups of People of Color, Black, Hispanic, and Asian.<sup>5</sup> Cleaning up particle pollution from gasoline vehicles through the stringent standards proposed

by EPA will reduce suffering for millions of Americans, advance health equity and support climate health.

EPA estimates that the proposal would result in the widespread deployment of particle filters for gasoline engines. These proven technologies are providing cost-effective reductions in fine particle pollution in vehicle markets in Europe, where nearly every gasoline direct injection (GDI) is equipped with a gasoline particle filter, and China, where every GDI and port fuel injected engine (PFI) vehicle is certified with a filter.<sup>6</sup> Unfortunately, automakers supplying these foreign markets are not providing these climate- and health-protective technologies as standard on American models. The EPA proposals to further control particle emissions are needed to catch up to the world's largest markets.

In June, MECA Clean Mobility released a report that showed tremendous health benefits of GPFs, even with significant deployment of zero-emission vehicles projected by EPA. According to the analysis, the cumulative benefits of standards that facilitate more GPF use in the combustion vehicle fleet through 2050 would be:

- 58,000 to 112,000 tons of particulate matter exhaust emissions eliminated
- 42,000 to 81,000 tons of climate-forcing black carbon emissions eliminated
- \$18 to \$163 billion in healthcare cost savings<sup>7</sup>
- Up to 22,000 premature deaths prevented
- Up to 314,000 asthma attacks avoided<sup>8</sup>

In order to protect people at the greatest risk, promote environmental justice and reduce cancer risk, asthma attacks, premature death and a wide range of health emergencies posed by particle pollution, EPA must include the proposed standards for fine particle pollution in the final Light Duty Vehicle Standards, and adopt the strongest possible standards without delay.

Sincerely

Allergy & Asthma Network  
Alliance of Nurses for Healthy Environments  
American Lung Association  
American Public Health Association  
American Thoracic Society  
Asthma and Allergy Foundation of America  
Climate Psychiatry Alliance  
Medical Society Consortium on Climate and Health  
National Association of Pediatric Nurse Practitioners  
National Medical Association  
Physicians for Social Responsibility  
Public Health Institute

Cc. Michael Regan, Administrator, U.S. Environmental Protection Agency

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<sup>1</sup> American Lung Association. State of the Air 2023. Key Findings: Short-Term Particle Pollution. April 2023. <https://www.lung.org/research/sota/key-findings/short-term-particle-pollution>

<sup>2</sup> United States Environmental Protection Agency. Effects of Black Carbon. <https://www3.epa.gov/airquality/blackcarbon/effects.html>

<sup>3</sup> American Lung Association. Health Effects of Particle Pollution. April 2023. <https://www.lung.org/research/sota/health-risks>

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<sup>4</sup> Jbaily, A., Zhou, X., Liu, J. *et al.* Air pollution exposure disparities across US population and income groups. *Nature* **601**, 228–233 (2022). <https://doi.org/10.1038/s41586-021-04190-y>

<sup>5</sup> Christopher W. Tessum *et al.* PM<sub>2.5</sub> pollutants disproportionately and systemically affect people of color in the United States. *Sci. Adv.* **7**, eabf4491 (2021). DOI:10.1126/sciadv.abf4491. <https://www.science.org/doi/10.1126/sciadv.abf4491>

<sup>6</sup> MECA Clean Mobility. Impacts Analysis of a Revised Federal Light-Duty On-Road Particulate Matter Standard. June 2022, at p. 1: “The US regulatory framework for the control of light-duty PM exhaust has fallen behind the EU, China and India where Euro 6, China 6 and BS 6 standards (respectively) have resulted in the incorporation of high-pressure fuel injection and gasoline particulate filter (GPF) control technology in currently sold light-duty on-road vehicles. In fact, nearly every European GDI engine car and every Chinese GDI and PFI engine car is currently certified with a GPF. Furthermore, LDVs in Europe have been required to meet the approximate equivalent of a 0.5 mg/mile standard since 2017 and in China since 2023 due to the implementation of a particle number standard of 6x10<sup>11</sup> per km.” [https://www.meca.org/wp-content/uploads/2023/06/LDV\\_PM\\_Standard\\_Final\\_Report\\_06272023.pdf](https://www.meca.org/wp-content/uploads/2023/06/LDV_PM_Standard_Final_Report_06272023.pdf)

<sup>7</sup> MECA Clean Mobility. *Ibid.*

<sup>8</sup> MECA Clean Mobility, Michael Geller comments presented to United States Environmental Protection Agency hearing on Multi-Pollutant Emissions Standards for Model Year 2027 and Later Light-Duty and Medium-Duty Vehicles. May 2023. [MECA-Oral\\_comments\\_FINAL\\_05092023.pdf](https://www.meca.org/wp-content/uploads/2023/05/MECA-Oral_comments_FINAL_05092023.pdf)