



July 6, 2026

Administrator Lee Zeldin
Environmental Protection Agency,
1200 Pennsylvania Ave NW, Washington, DC 20004
Washington, DC

Submitted via: <https://www.regulations.gov/document/EPA-HQ-OAR-2025-3297-0001>

Dear Administrator Lee Zeldin,

Re: Comments on the Tier 4 Criteria Pollutant Standards, Part 1: Phase-In Schedule for Light-Duty and Medium-Duty Vehicles (Docket ID No. EPA-HQ-OAR- 2025-3297)

Thank you for the opportunity for the Clean Air for the Long Haul to submit the following comments in reference to the Environmental Protection Agency's ("EPA") proposed Part 1 rule reconsidering Tier 4 criteria pollutant standards for new motor vehicles 2024 final rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles".¹

The Clean Air for the Long Haul ("the Cohort") is a nationwide coalition of environmental justice groups working collectively to advance environmental justice by seeking emissions reductions in the power and transportation sectors in the United States.² The Cohort leads campaigns to amplify the voices and positions of overburdened communities in federal rulemaking. The Cohort actively champions the adoption and enforcement of clean air and climate justice policies that prioritize emissions reductions of toxic air pollution and greenhouse gases and protects the health of Black, Brown, Tribal, Indigenous, and low-wealth communities across the United States.

¹ U.S. EPA, 2024. Final rule: Multi-pollutant emissions standards for model years 2027 and later light-duty and medium-duty vehicles, <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-multi-pollutant-emissions-standards-model>

² Dare to Breathe, Campaign of the Clean Air for the Long Haul, 2025. <https://daretobreathe.org/about/>

The Cohort is a subset of the national Environmental Justice Leadership Forum, comprising over 40 organizations in 23 states. These groups are actively working together to ensure that diverse grassroots perspectives shape federal, state, and local programs and policy decisions, while advancing key climate justice and environmental policies that protect and strengthen communities of color and low-income communities nationwide.³

Disproportionate Impacts of Pollution from Light- and Medium-Duty Vehicles

Light- and medium-duty vehicles represent 94 percent of the nation's on-road vehicles⁴ and make up the greatest proportion of U.S. transportation related greenhouse gas emissions that fuel the climate crisis.⁵ They are also significant contributors of air pollutants, including smog- and ozone-forming nitrogen oxides (NOx), fine particulate matter (PM_{2.5} or soot), and volatile organic compounds (VOCs). In 2020 alone, these vehicles generated over 1 million tons of nitrogen oxides and over 33,400 tons of particulate matter.⁶

Tailpipe emissions are linked to adverse health impacts from asthma⁷ and respiratory disease⁸ to strokes and heart attacks,⁹ and even premature death. A recent report found that toxic vehicle pollution causes almost 42,000 premature deaths in the U.S. annually (equating to 4-5 people dying every hour) and more than 23,000 asthma cases every year.¹⁰ These impacts are not experienced equally. Communities of color are hit hardest by nearly every major pollution source, with light-duty gasoline vehicles driving some of the largest exposure disparities for Black, Hispanic, Asian, and other people of color.¹¹

³ Environmental Justice Leadership Forum. (n.d.). *Environmental Justice Leadership Forum*. <https://ejforum.org/about-us/>

⁴ American Lung Association, 2022. Zeroing in on Healthy Air, <https://www.lung.org/getmedia/13248145-06f0-4e35-b79b-6dfacfd29a71/zeroing-in-on-healthy-air-report-2022>

⁵ U.S. Environmental Protection Agency. (2025, January 9). Transportation Sector Emissions [Overviews and Factsheets]. <https://www.epa.gov/ghgemissions/transportation-sector-emissions>

⁶ American Lung Association, 2022. Zeroing in on Healthy Air, <https://www.lung.org/getmedia/13248145-06f0-4e35-b79b-6dfacfd29a71/zeroing-in-on-healthy-air-report-2022>

⁷ Southerland, V. A., Brauer, M., Mohegh, A., Hammer, M. S., Donkelaar, A. van, Martin, R. V., Apte, J. S., & Anenberg, S. C. (2022). Global urban temporal trends in fine particulate matter (PM_{2.5}) and attributable health burdens: Estimates from global datasets. *The Lancet Planetary Health*, 6(2), e139–e146. [https://doi.org/10.1016/S2542-5196\(21\)00350-8](https://doi.org/10.1016/S2542-5196(21)00350-8)

⁸ American Lung Association (2026) Health Impact of Air Pollution. <https://www.lung.org/research/sota/health-risks>

⁹ Moderato, L., Aschieri, D., Lazzeroni, D., Rossi, L., Biagi, A., Binno, S. M., Monello, A., Pelizzoni, V., Sticozzi, C., Zanni, A., Capucci, A., Nani, S., Ardissino, D., Nicolini, F., & Niccoli, G. (2023). Air pollution and out-of-hospital cardiac arrest risk: A 7-year study from a highly polluted area. *European Heart Journal. Acute Cardiovascular Care*, 12(12), 810–817. <https://doi.org/10.1093/ehjacc/zuad105>

¹⁰ International Council on Clean Transportation. (2026). *Cleaner Vehicles, Healthier Communities*. <https://theicct.org/wp-content/uploads/2026/06/ICCT-Fact-Sheet-National.pdf>

¹¹ Christopher W. Tessum et al. PM_{2.5} pollutants disproportionately and systemically affect people of color in the United States. *Sci. Adv.* 7, eabf4491(2021). DOI: [10.1126/sciadv.abf4491](https://doi.org/10.1126/sciadv.abf4491)

Due to a legacy of discriminatory policies, low-income communities and communities of color are far more likely to live near major highways,¹² ports,¹³ and distribution centers,¹⁴ increasing their exposure to harmful transportation pollution and associated health burdens. According to the latest American Lung Association's State of the Air Report, although communities of color make up 42 percent of the overall population of the U.S., they represent over 54 percent of the people living in a county with at least one failing grade for air quality. A person of color is almost three times as likely as a white individual to live in a community with a failing grade for all three measures of air pollution, including year-round, short-term soot pollution, and ozone.¹⁵

Like many environmental justice communities nationwide, the toll of this exposure is a stark reality of the communities our organizations represent. In 2016, asthma-related emergency room visits were over six times higher in New York City's low-income areas.¹⁶ Children in the South Bronx in particular are surrounded by roadways and face a 17 percent asthma risk,¹⁷ over double the national average. Moving to Michigan, traffic from cars is a major driver of Detroit's PM2.5 burden. Black, low-income neighborhoods near highways face roughly 2–3 times higher soot exposure than whiter, higher-income areas with lower traffic.^{18,19,20} On the west coast, in Los Angeles, disadvantaged Hispanic and Asian communities face traffic-pollution consisting of benzene, NOx, and carbon monoxide at levels up to 60 percent higher than other areas.²¹ A statewide analysis found that Black Californians experience 43 percent higher PM2.5 from

¹² Antonczak, B., Thompson, T. M., DePaola, M. W., & Rowangould, G. (2023). 2020 Near-roadway population census, traffic exposure and equity in the United States. *Transportation Research Part D: Transport and Environment*, 125, 103965. <https://doi.org/10.1016/j.trd.2023.103965>

¹³ Gillingham, K., & Huang, P. (n.d.). *Racial Disparities in the Health Effects from Air Pollution: Evidence from Ports*. Gillingham, K., & Huang, P. (n.d.). *Racial Disparities in the Health Effects from Air Pollution: Evidence from Ports*. Retrieved <https://resources.environment.yale.edu/gillingham/RacialDisparitiesAirPollution.pdf>

¹⁴ Environmental Defense Fund. (2023, April 25). Air Pollution from Warehouse Trucks Places Unequal Burden on Communities of Color and Areas of Low Wealth. <https://www.edf.org/media/edf-report-air-pollution-warehouse-trucks-places-unequal-burden-communities-color-and-areas>

¹⁵ American Lung Association. (2026, April 22). State of the Air 2026 Report. <https://www.lung.org/getmedia/32f0646d-c5de-4501-b0ac-07cd63c974d4/State-of-the-Air-2026-Report.pdf>

¹⁶ Walters S, Wilson L, Konty K, Day S, Agerton T, Olson C. (September 2021). *Disparities among Children with Asthma in New York City*. New York City Department of Health and Mental Hygiene: Epi Data Brief (126) <https://www.nyc.gov/assets/doh/downloads/pdf/epi/databrief126.pdf>

¹⁷ Sheldon Silver, Jeffrey Klein, Richard N. Gottfried, & Richard Brodsky. (n.d.). A Special Report on Asthma from the New York State Assembly. Committee on State-Federal Relations. Retrieved July 6, 2026, from https://assembly.state.ny.us/write/upload/comm/postings/2001/20010907_0002136/

¹⁸ Shkembi, A., Smith, L. M., & Neitzel, R. L. (2024). Linking environmental injustices in Detroit, MI to institutional racial segregation through historical federal redlining. *Journal of Exposure Science & Environmental Epidemiology*, 34(3), 389–398. <https://doi.org/10.1038/s41370-022-00512-y>

¹⁹ Shkembi, A., Park, S. K., Zelner, J., & Neitzel, R. (2025). Racial and Ethnic Inequities to Cumulative Environmental and Occupational Impacts in Michigan. *GeoHealth*, 9(6), e2025GH001482. <https://doi.org/10.1029/2025GH001482>

²⁰ Zhang, K., & Batterman, S. (2013). Air pollution and health risks due to vehicle traffic. *The Science of the Total Environment*, 0, 307–316. <https://doi.org/10.1016/j.scitotenv.2013.01.074>

²¹ Ofodile, J., Pfannerstill, E. Y., Arata, C., Pusede, S. E., Ivey, C. E., & Goldstein, A. H. (2025). Inequality in Hazardous Air Pollutant Emissions and Concentrations Measured Over Los Angeles. *Environmental Science & Technology*, 59(15), 7588–7599. <https://doi.org/10.1021/acs.est.5c00808>

vehicles, including cars, than white residents, while Latino Californians are exposed to 39 percent higher levels.²² Lastly, In Kansas City, asthma rates and acute care visits are highest in census tracts closest to rail yards, highways, and Toxic Release Inventory (TRI) facilities. Local research highlights that proximity to freight and industrial pollution sources continues to be a key indicator of cumulative health burdens in environmental justice communities.^{23,24}

The Part 1 Reconsideration of the Tier 4 Standards Misses the Mark

Delaying the implementation of the 2024 Tier 4 criteria pollution standards is indefensible. Stringent, timely vehicle emissions standards are crucial for cutting tailpipe emissions and safeguarding public health, especially for low-income and people of color. A two-year extension of the weaker, 2014 Tier 3 standards²⁵ forces these communities to endure two more years of dirtier air and preventable illness, further entrenching generational inequity.

EPA estimated that the 2024 rule would reduce 36,000 tons of NO_x, 8,700 tons of particulate matter, and 150,000 of VOCs, providing \$13 billion in annual health benefits.²⁶ Not only are Tier 4's public-health gains postponed by the delay, but reverting to Tier 3 is fundamentally inadequate, and EPA's own analyses make that clear. The Tier 4 regulatory impact assessment (RIA) shows far larger reductions in soot and NO_x along with significantly greater avoided deaths, hospitalizations, and asthma attacks than the Tier 3.²⁷ By contrast, the Tier 3 RIA documents far smaller health benefits and weaker protections for pollution-burdened communities.²⁸ Extending Tier 3 for two more years effectively locks the country, especially low-income and people of color communities into inferior standards that cannot deliver the stronger health protections Tier 4 is designed to achieve.

Moreover, EPA fails to analyze the forgone health benefits from not implementing the Tier 4 in 2027-2028 or the additional deaths, hospitalizations, or asthma attacks caused by two extra

²² David Reichmuth. (2019, January 28). Inequitable Exposure to Air Pollution from Vehicles in California. Union of Concerned Scientists.

<https://www.ucs.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019>

²³ Friedman E, Lee BR, Rahn D, Lugo Martinez B, Mena A. Assessing environmental injustice in Kansas City by linking paediatric asthma to local sources of pollution: a cross-sectional study. *BMJ Open*. 2024 Jul 17;14(7):e080915. doi: 10.1136/bmjopen-2023-080915. PMID: 39019634; PMCID: PMC11256072.

²⁴ Lugo Martinez, Beto (2026). Community Led Roadmap to Zero Emissions. figshare. Online resource. <https://doi.org/10.6084/m9.figshare.32399565.v1>

²⁵ U.S. Environmental Protection Agency. (2016, August 12). *Final Rule for Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards* [Other Policies and Guidance]. <https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-control-air-pollution-motor-vehicles-tier-3>

²⁶ U.S. EPA, 2024. Fact Sheet: Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles: Final Rule. <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1019VP5.pdf>

²⁷ U.S. EPA, 2026. Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-in Schedule for Light-Duty and Medium-Duty Vehicles - Draft Regulatory Impact Analysis. <https://www.epa.gov/system/files/documents/2026-05/420d26001.pdf>

²⁸ U.S. EPA, 2014. Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards Final Rule - Regulatory Impact Analysis. <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100ISWM.PDF?Dockey=P100ISWM.pdf>

years of Tier 3. Nor did EPA account for the distributional impacts this delay would have on pollution-burdened communities. Rather, the EPA focuses on the cost-savings to manufacturers, ignoring the real-world health costs that communities will continue to bear. This departure from longstanding EPA practice leads to an insufficient analysis that undervalues lives and obscures the public health and economic costs of adopting weak air quality standards.

Stronger standards are technically feasible, and the path forward must be towards zero-emission cars and light-duty trucks. Automakers already have commercially proven technologies such as advanced catalysts, particulate filters, hybrid systems, and full battery-electric drivetrains to meet tighter Tier 4 limits. The recent slowdown in electric vehicle sales reflects the loss of federal tax incentives under the current administration²⁹ and is not driven by consumer rejection as EPA claims. EPA's own analyses show EV adoption drops sharply when Inflation Reduction Act credits are removed, even with identical consumer-preference assumptions. Eliminating fossil-fuel tailpipe pollution is one of the most powerful ways to improve public health, especially in environmental-justice communities that experience the highest exposure and health burdens from vehicle pollution.

Conclusion

Delaying these standards postpones urgently needed safeguards and jeopardises public health, particularly for low-income communities and communities of color who disproportionately live near highways and other high traffic roadways and are overburdened by vehicular tailpipe pollution. Every additional year of weaker emissions limits means more missed school days, emergency room visits, and avoidable health outcomes even though affordable and technically feasible pollution control technologies and zero-emissions electric vehicles exist.

If finalized, this action and any future Part 2 rulemaking to further weaken the Tier 4 criteria pollutant standards sacrifices environmental justice communities in deference to the vehicle manufacturing and oil and gas industries. At the same time, we are seeing repeated attempts to prevent California and other states from enforcing the stringent vehicle standards while EPA is pursuing rollbacks of vehicle emissions limits for heavy-duty vehicles and other clean air protections, including the recent rescission of the endangerment finding and greenhouse gas standards for motor vehicles. Taken together, these actions run counter to the Agency's mission to protect public health and the environment.

Clean air is a fundamental right of **ALL** communities across this country. We deserve a full and transparent rulemaking process, one that includes robust public participation and thorough environmental justice and health analyses that reflects the gravity of the pollution burdens at stake. We deserve life-saving, health-protective vehicle emissions standards that are implemented and enforced on time, with industry held accountable for noncompliance. **The Clean Air for the Long Haul urges the EPA to withdraw this proposal and allow the Tier 4 vehicle standards to take effect on schedule beginning with model year 2027.**

²⁹ Bloomberg (2026) Electric Vehicle Outlooks Sinks After US Withdraws Support. <https://www.bloomberg.com/news/articles/2026-06-16/electric-vehicle-outlook-sinks-after-us-withdraws-policy-support>

Respectfully,

The Clean Air for the Long Haul and Environmental Justice Leadership Forum members