



July 6, 2026

Administrator Lee Zeldin
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20004

Re: EPA-HQ-OAR-2025-3297, Revision of Tier 4 Criteria Pollutant Standards, Part 1:
Amendments to Phase-In Schedule for Light-Duty and Medium-Duty Vehicles

Dear Administrator Zeldin:

The undersigned national, state and local health and medical organizations call on the United States Environmental Protection Agency (EPA) to withdraw the proposed rule to delay the implementation of the Tier 4 Criteria Pollutant Standards for light- and medium-duty vehicles, and to abandon efforts to move forward with Part 2 that the agency announced as part of this proposal. Health and medical organizations have long advocated for strong emissions standards as a critical tool to improve regional air quality and reduce the health impacts of air pollution.

Traffic-related air pollution leads to preventable death and disease.

The American Lung Association's most recent "State of the Air" report noted that over 152 million people live in communities impacted by unhealthy levels of ozone and/or particle pollution. Nearly half of the nation's children (33.5 million people under the age of 18) live in counties that failed at least one measure of air pollution.¹ Exposure to air pollution can

¹ American Lung Association. State of the Air 2026. April 2026. www.lung.org/sota

contribute to asthma attacks, heart attacks and stroke, lung cancer, low birthweight and premature birth, premature death and other health risks.

Traffic pollution specifically is associated with premature death due to cardiovascular disease, lung cancer death, asthma onset in children and adults and other negative outcomes.² Confidence was found to be high in the association between traffic-related air pollution and all-cause, circulatory and ischemic heart disease mortality, and moderate to high for lung cancer mortality. For children, exposure to traffic pollution can set up lifelong health challenges. A growing body of research has showed associations between traffic pollution and poorer cognitive function, such as a moderate to high confidence in associations of prenatal or early life exposure and autism spectrum disorder, and moderate to high confidence of asthma onset in children.³ There are also moderate associations with low birth weight and small for gestational age, which could require further care for newborns immediately after birth and beyond.⁴

The Tier 4 standards finalized in 2024 were estimated to yield \$13 billion in annual health benefits, but the current proposal does not include modeling to determine the health impacts of the delay.

In recent years, the health and medical community called on EPA to finalize the strongest possible standards on light- and medium-duty vehicle pollution, and celebrated the finalization of the Tier 4 standards in 2024.⁵ According to EPA in 2024, the rule is expected to avoid hundreds of premature deaths, 3,700 new asthma cases and 250,000 lost school days annually.⁶ These benefits come from the reduction of 8,700 tons of particulate matter, 36,000 tons of nitrogen oxides and 150,000 tons of volatile organic compounds.⁷ This analysis supports what the Health Effects Institute showed in their 2022 data meta-analysis – reducing traffic pollution saves lives and prevents disease.

Despite the health benefits estimated to be achieved by proven technologies, EPA is now proposing to delay the implementation of these lifesaving standards, which in turn would forgo years of health benefits. What's more, the agency states that it "did not conduct any

² Health Effects Institute. "Systematic Review and Meta-analysis of Selected Health Effects of Long-Term Exposure to Traffic-Related Air Pollution." Special Report 23: 2022 [Traffic Pollution and Your Health - HEI](#)

³ *Ibid*

⁴ *Ibid*

⁵ [Comments from Health Orgs – EPA Light- and Medium-Duty Vehicle Multi-Pollutant Standards](#), July 5 2023.

⁶ Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles: Final Rule, Factsheet. March 2024, <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P1019VP5.pdf>

⁷ *Ibid*

air quality modeling for the proposal.” This is deeply concerning. EPA’s mission is to protect public health and the environment. In February 2025, Administrator Zeldin announced EPA’s five-pillared “Powering the Great American Comeback” Initiative in which Pillar 1 is to ensure clean air for every American.⁸ This proposed delay in achieving health benefits would undermine the Administrator’s stated priority.

In the regulatory impact analysis accompanying the proposal, EPA says “the emissions changes described...would also be associated with impacts to air quality and human health... the EPA did not monetize the health effects associated with emissions changes. The net benefits associated with this proposal are therefore the cost savings.” Dozens of national, state and local health organizations have strongly urged EPA to return to its long-established practice of monetizing the well-documented health harms of increased emissions of air pollutants.⁹ The net benefits of this proposal fail to take into account the high monetized costs of increased asthma attacks, missed days of work and school, emergency department visits, premature deaths and other impacts of the proposed rule – but this does not change the fact that emissions reductions have health benefits, and emissions increases carry health harms.

Technology to dramatically clean up particle pollution is cost-effective, readily available and already in use across the globe.

The Tier 4 standards established more health-protective controls on fine particle pollution from new vehicles. These protections will result in more than 90 percent reduction in deadly particles, expected to be met through the widespread deployment of gasoline particle filters (GPFs) for gasoline engines in the United States. These proven technologies are providing cost-effective reductions in fine particle pollution in vehicle markets in Europe, where nearly every gasoline direct injection engine is equipped with a gasoline particle filter, and China, where every gasoline direct injection engine and port fuel injected engine is certified with a filter.¹⁰ An increasing number of new vehicles sold in the United States are equipped with this technology to comply with the current standards.

The Manufacturers of Emission Controls Association (MECA) released a report that showed tremendous health benefits of GPFs. According to MECA, the cumulative benefits of

⁸ [EPA Administrator Lee Zeldin Announces EPA’s “Powering the Great American Comeback” Initiative | US EPA](#)

⁹ [Letter to EPA from Health Groups on Counting Health Benefits](#), March 2026.

¹⁰ MECA Clean Mobility. Impacts Analysis of a Revised Federal Light-Duty On-Road Particulate Matter Standard. June 2023, https://www.meca.org/wp-content/uploads/2023/06/LDV_PM_Standard_Final_Report_06272023.pdf

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
- \$18 to \$163 billion in healthcare cost savings¹¹
- Up to 22,000 premature deaths
- Up to 314,000 asthma attacks.¹²

This technology is also cost-effective. The price of installing the full system on vehicles costs an average of between \$95 and \$325 per vehicle, with future direct costs estimated to be between \$75-260, representing 1% or less of the price consumers pay.¹³ The health benefits of installing this technology far outweigh the per-vehicle cost.

EPA should return to its mission of protecting health and providing clean air for all by abandoning this delay and future rollbacks.

EPA has acknowledged that the agency plans to undertake a full reconsideration of the tailpipe emissions standards in the near future. At the same time, EPA has issued a proposal for review by the Office of Management and Budget related to heavy-duty truck standards adopted in 2022. The sum of EPA's actions to weaken, delay and repeal vehicle emission standards stands in grave contrast to its mission to protect health.

On behalf of communities across the country that would face greater health harms due to delays in traffic pollution clean-up, our organizations urge EPA to abandon this proposal and implement the Tier 4 light- and medium-duty vehicle standards on its original timeline.

Sincerely,

Alliance of Nurses for Healthy Environments
American Academy of Pediatrics
American Lung Association
California Nurses for Environmental Health and Justice
Center for Environmental Health

¹¹ *Ibid*

¹² 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. [MECAOral_comments_FINAL_05092023.pdf](#)

¹³ ICCT, "What EPA's New Multi-Pollutant Emissions Proposal Means for PM Emissions and GPFs" Factsheet. November 2023

Children's Environmental Health Network

International Society for Environmental Epidemiology-North America Chapter

Medical Students for a Sustainable Future (MS4SF)

Medical Society Consortium on Climate and Health

National Association of Pediatric Nurse Practitioners

National Association of Pediatric Nurse Practitioners- SF Bay Area Chapter

National League for Nursing

OUCH-Int'l

Physicians for Social Responsibility

Regional Asthma Management & Prevention

San Francisco Bay Physicians for Social Responsibility