



Asthma and Allergy  
Foundation of America



CHILDREN'S  
ENVIRONMENTAL  
HEALTH  
NETWORK



CLIMATE  
for HEALTH



The Medical  
Society Consortium  
ON CLIMATE & HEALTH



National Association of  
Pediatric Nurse Practitioners™



National League  
for Nursing



The Honorable Pete Buttigieg  
Secretary  
Docket Management Facility  
United States Department of Transportation  
1200 New Jersey Avenue SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

Re: Docket No. FHWA-2021-0022

Dear Secretary Buttigieg:

The transition to zero-emission transportation is a critical element of protecting the health of all Americans today, and to safeguarding a healthy future. The transportation sector is the leading source of climate pollution in the United States and a major source of the air pollution burdens facing too many communities. As leading health and medical organizations and the people we serve, we call on the federal government to ensure a robust and equitable distribution of the benefits of zero-emission transportation across the United States, with a clear focus on ensuring access in underserved and disadvantaged communities.

Today, more than 40 percent of Americans are exposed to unhealthy levels of harmful air pollution, and all Americans are at risk of health impacts due to climate change. The American Lung Association's [State of the Air](#) 2021 report found that approximately 135 million Americans live in communities impacted by harmful levels of ozone and/or particle pollution. The report further noted that these burdens are concentrated in communities of color, with people of color being three times more likely to live in communities with the most polluted air than white people. The health effects of polluted air include impaired lung function and development, asthma attacks, heart attacks and strokes, lung cancer and premature death. The transportation sector is a dominant source of harmful pollution and must be addressed through the rapid transition to zero-emission technologies.

The Infrastructure and Jobs Act (IIJA) provided an important down-payment in this transition to zero-emission transportation. Now, the roll-out must ensure the benefits of

this transition support health and equity to the greatest extent possible. In response to the request for information, we offer the following comments to achieve these goals:

- ***Build upon the IIJA Investments.*** \$7.5 billion investment is a crucial start but, it is not a sufficient investment on its own. It must be followed up with transformative investments in a healthier transportation system. These funds should be additive to state and local investments in infrastructure and should be used to spur additional funding from the states. State plans required under the IIJA for formula must illustrate how local funds will be coordinated with and/or build-upon IIJA investments. Beyond investment in zero-emission transportation, we urge DOT to take a comprehensive approach to aligning transportation investments with public health, health equity and reduction of harmful emissions through projects that spur zero-emission mobility choices for pedestrians, bicyclists, transit riders and drivers alike.<sup>1</sup> Our organizations are committed to continuing to advocate for ongoing investments in healthier transportation systems for all.
- ***Ensure equitable access to the benefits of zero-emission transportation.*** Our organizations support focusing the investments of the IIJA on lower-income, rural, and other underserved communities to ensure all Americans benefit from the rapid transition to zero-emissions. The American Lung Association's 2020 [Road to Clean Air](#) report found that a national transition to zero-emission transportation could yield over \$70 billion in annual health benefits and save over 6,000 lives due to cleaner air. In order to ensure communities most impacted by transportation pollution benefit from the transition to zero-emission transportation, states must include provisions that require equitable distribution of charging and associated benefits. An important element of the competitive funding grant could be to ensure community leaders/organizations are included in the development of grant proposals to illustrate community knowledge and support for appropriate project locations and scale.
- ***Distribution of funding must result in near-term and lasting emission reductions.*** A key goal of the IIJA zero-emission transportation infrastructure funding must be to deploy the funding to ensure clean air and health benefits accrue quickly and continuously. The infrastructure investments should translate to greater access to zero-emission transportation health benefits in the near term, especially for communities most impacted by pollution today. Funds directed to the states should be tied to specific long-term maintenance plans for infrastructure supported with IIJA funds. This will help to ensure that community-driven projects begin and continue to deliver transformative health and mobility benefits over the long term.

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<sup>1</sup> See, for example, the California State Transportation Agency Climate Action Plan for Transportation Infrastructure (CAPTI) framework for alignment of transportation dollars with framework for aligning state transportation investments with climate, health, and social equity goals. July 2021. <https://calsta.ca.gov/-/media/calsta-media/documents/capti-2021-calsta.pdf>

- ***Support a broad-based approach to zero-emission fueling infrastructure.***  
Wherever possible, infrastructure programs should be designed to safely and efficiently serve the widest range of vehicles across weight classes. This could provide for expansion of zero-emission transit or shuttle service while also serving local residents in communities with access to personal vehicle charging or other mobility options (e.g., rural or urban car share, bike share, etc.). Again, we urge the DOT to take a comprehensive view of mobility needs that address community needs and ensure access to the benefits of zero-emission transportation for all travelers.

As the IIJA funding rolls out, it is critical to make good on the promised focus on equitable distribution of infrastructure investments. Communities across the United States are poised to expand access to zero-emission transportation and this funding can provide an important boost. We support an ongoing effort to bring lasting health benefits of zero-emission transportation choices to communities most impacted by pollution today through carefully guiding the use of these funds and ensuring ongoing investment.

Sincerely,

Allergy & Asthma Network

Alliance of Nurses for Healthy Environments

American Lung Association

American Psychological Association

American Public Health Association

Asthma and Allergy Foundation of America

Children's Environmental Health Network

Climate for Health

Health Care Without Harm

Medical Society Consortium on Climate and Health

Medical Students for a Sustainable Future (MS4SF)

National Association of Pediatric Nurse Practitioners

National League for Nursing

Physicians for Social Responsibility

Public Health Institute