

January 11, 2024

Administrator Michael Regan
U.S. Environmental Protection Agency
By email and via electronic docket

RE: Support for Particulate Matter Emission Standards for Light- and Medium-Duty Vehicles

Dear Administrator Regan:

We are all former lead auto industry regulators with the state of California, where we served as deputy executive officers of the California Air Resources Board (CARB) with responsibility for mobile sources. With that experience in mind, but speaking in our individual capacities, we are writing to express our strong support for the Environmental Protection Agency's (EPA) proposal to strengthen standards for harmful particulate matter (PM) emissions within the Agency's proposed Multi-Pollutant Emissions Standards for Model Year 2027 and Later Light-Duty and Medium-Duty Vehicles, 88 Fed. Reg. 29184 (May 5, 2023). The proposal would, finally, drive the use of gasoline particulate filters (GPFs) for automobiles nationally, bringing the U.S. in line with technological developments in other leading world regulations.

We understand that some in the auto industry are arguing that the absence of a GPF standard in CARB's rules suggests that EPA should not impose such a requirement. That argument is wrong. California's distinct context – with cleaner fuels than are available nationally, and a greater degree of mandated vehicle electrification – has meant CARB has not yet taken this course, but that different context does not generalize to the federal program. On the contrary, Californians and the country would benefit from EPA's proposal. We would be dismayed if a false analogy to the CARB program led to weakening of EPA's important effort.

As longtime regulators with extensive experience in seeking better health and environmental outcomes for U.S. citizens through cleaner transport, we know the outsized role that strong particulate matter (PM) emission standards – as proposed by this rule – will have on improving quality of life conditions for Americans over the coming decades. Cutting vehicular PM emission would improve air quality in ways that save lives, reduce asthma and cancer risks, and reduce resulting healthcare-related costs from those conditions. This standard will have a particularly pronounced benefit for low-income communities, who also often bear a disproportionate burden from particulate matter pollution. 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.

EPA's proposed PM limit of 0.5 mg/mile would greatly reduce fine particulate emissions from new gasoline vehicles, which have been rising with the popularity of more efficient gasoline direct injection (GDI) engines. EPA estimates that the proposal would result in the widespread deployment of exhaust filters for gasoline engines, known as gasoline particulate filters (GPFs), which are already widely used in Europe and China to effectively reduce fine particulate emissions. GPFs are a mature, cost-effective technology for the U.S. to deploy. Studies have demonstrated they can reduce particulate emissions by 97% to 100% compared to vehicles without filters, dramatically reducing the impact of each individual

vehicle. The costs are reasonable, especially in light of the dramatic benefits — a recent ICCT study showed incremental direct costs from GPFs ranging from ~\$87-\$261.

The proposed standards also include a phase-in period over the course of 4 years, beginning with model year 2027 passenger vehicles and expanding to most SUVs and trucks by 2030. Given the maturity of GPF technology in the field, we urge the EPA and the White House preserve the phase-in schedule in the final rule and to possibly consider a faster phase-in. Those three years mean ~15 million US vehicles will not have this technology deployed – a missed opportunity for more immediate progress on American air quality, particularly in disadvantaged communities where electrification efforts may take longer, based on current understanding of cost and infrastructure barriers.

By finalizing the proposed standards, EPA will bring the U.S. in line with other major vehicle markets. According to MECA, by 2023, four years ahead of EPA’s proposed start to particulate standard phase-in, two-thirds of the automotive manufacturing markets, including Europe, India and China, will be meeting tighter PM emission standards similar to those now proposed by EPA.

We urge the Administration to finalize its Multi-Pollutant Emissions Standards without delay, including the strong health-protecting particulate standards the EPA has proposed. We have an opportunity to make meaningful change for the American people – the time for progressive action is now.

Sincerely,



Craig Segall, VP, Evergreen Action, Former Deputy Executive Officer, California Air Resources Board



Dr. Alberto Ayala, Executive Director and Air Pollution Control Officer, Sacramento Metropolitan Air Quality Management District and Former Deputy Executive Officer, California Air Resources Board



Tom Cackette, Consultant, Former Chief Deputy Executive Officer at California Air Resources Board