



ZERO EMISSION  
TRANSPORTATION  
ASSOCIATION

August 5, 2022

The Honorable Pete Buttigieg  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

The Honorable Michael Regan  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20004

The Honorable Brenda Mallory  
Chair  
Council on Environmental Quality  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

The Honorable Steven Cliff  
Administrator  
National Highway Traffic Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Ave SE  
Washington, DC 20590

**Re: Industry Support for Proposing New Emissions and Fuel Economy Performance Standards This Year**

Dear Secretary Buttigieg, Administrator Regan, Chair Mallory, and Administrator Cliff:

The Zero Emission Transportation Association (ZETA) is a federal coalition focused on advocating for 100% EV sales by 2030. ZETA is committed to enacting policies that drive EV adoption, create hundreds of thousands of jobs, secure American global EV manufacturing leadership, drastically improve public health, and significantly reduce carbon pollution. On behalf of our members, we write to you today to urge the Biden-Harris Administration to issue notices of proposed rulemakings for the next round of passenger vehicle and light-duty truck fuel economy and emission standards as soon as possible—and by no later than the end of this year.

The Administration has recently taken important steps to reduce criteria air and carbon pollution emissions and boost fuel efficiency in our transportation system. President Biden made his ambitions clear in *Executive Order (EO) 14037: Strengthening American Leadership in Clean Cars and Trucks*, which was issued one year ago today.<sup>1</sup> Last year, the Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) finalized stringent new tailpipe and fuel economy performance standards governing passenger vehicles and light-duty trucks through Model Year (MY) 2026. ZETA strongly supports those rules, having participated in the rulemaking process and presently intervening on NHTSA's behalf in the *State of Texas, et al. v. National Highway Traffic Safety Administration, et al.*

As we look to the future, EPA and NHTSA need to take the next step by promulgating even stronger emissions and fuel economy standards to govern MY2027 and beyond as soon as possible. We are hopeful

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<sup>1</sup> <https://www.federalregister.gov/documents/2021/08/10/2021-17121/strengthening-american-leadership-in-clean-cars-and-trucks>

that by leveraging the expertise within the Administration, the notices of proposed rulemakings can be published before the end of this year.

Putting in place the next set of strong emission and fuel economy performance standards for MY2027 and beyond will produce good-paying American jobs, reduce consumer costs, and boost public health. At present, the American auto industry is investing hundreds of billions of dollars in zero-emission transportation, which is, in turn, creating hundreds of thousands of new jobs.<sup>2</sup> Strong rules will signal robust demand for these electric automotive technologies, facilitating further industry investment, which will continue to foster job creation throughout the country.

Additionally, during an era in which increased gasoline prices have overwhelmingly contributed to inflation, developing rules to boost fuel economy and reduce emissions significantly will ensure long-term lower costs for American drivers.<sup>3</sup> Reducing our reliance on gasoline for transportation will financially benefit consumers and mitigate against likely future inflationary pressures. Furthermore, zero-emission vehicles are much cheaper to own and operate than gas-powered vehicles, generating additional cost savings that consumers can spend instead on food, rent, childcare, or other economically productive activities.<sup>4</sup>

Finally, more stringent emissions and fuel economy standards will protect the nation's public health and welfare, particularly in frontline communities located in metropolitan areas and near transportation corridors. The International Council on Clean Transportation estimates that there were 22,000 premature deaths attributable to transportation-sector particulate matter and ozone pollution in the United States in 2015.<sup>5</sup> Transportation-sector pollution is also responsible for triggering chronic respiratory and autoimmune health impairments, which cause hundreds of thousands of hospital visits and lost work days each year.<sup>6</sup> Reducing tailpipe emissions and encouraging zero-emission transportation options will significantly mitigate these deaths and illnesses, disproportionately affecting communities of color and lower-income communities.

We appreciate your consideration and look forward to substantively contributing to these rulemaking processes soon.

Sincerely,



Joe Britton  
Executive Director  
Zero Emission Transportation Association

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<sup>2</sup> <https://www.zeta2030.org/education-fund/investments>

<sup>3</sup> <https://www.npr.org/2022/07/13/1111070073/no-retreat-in-the-summer-heat-prices-likely-topped-40-year-high-last-month>

<sup>4</sup> <https://8829857.fs1.hubspotusercontent-na1.net/hubfs/8829857/ZETA-Cost-Savings-July.pdf>

<sup>5</sup> [https://theicct.org/sites/default/files/publications/Global\\_health\\_impacts\\_transport\\_emissions\\_2010-2015\\_20190226.pdf](https://theicct.org/sites/default/files/publications/Global_health_impacts_transport_emissions_2010-2015_20190226.pdf)

<sup>6</sup> <https://www.lung.org/getmedia/99cc945c-47f2-4ba9-ba59-14c311ca332a/electric-vehicle-report.pdf>