

June 3, 2026

Representative Brett Guthrie  
Chairman  
House Committee on Energy and Commerce

Representative Frank Pallone  
Ranking Member  
House Committee on Energy and Commerce

Representative Gary Palmer  
Chairman  
House Subcommittee on Environment  
House Committee on Energy and Commerce

Representative Paul Tonko  
Ranking Member  
House Subcommittee on Environment  
House Committee on Energy and Commerce

*RE: Legislative hearing entitled, "Rules of the Road: Examining Legislation to Modernize the Clean Air Act's Mobile Source Requirements"*

Dear Chairman Guthrie, Ranking Member Pallone, Chairman Palmer, Ranking Member Tonko, and members of the Energy and Commerce Committee's Subcommittee on Environment,

In advance of the House Energy and Commerce Subcommittee on Environment's upcoming legislative hearing, the undersigned organizations write to express strong opposition to any legislative attempts to weaken Clean Air Act (CAA) requirements for mobile sources. With the exception of H.R. 2140, the Diesel Emissions Reduction Act of 2025, the slate of bills for discussion take us further from the clean transportation future we need, from a bill that would undermine state vehicle inspection and maintenance programs, to a bill that would take cost-effective fuel saving technology off the table. The CAA is one of our nation's bedrock environmental laws. In its more than 50-year history, it is estimated to have prevented at least 2.3 million premature deaths, 200,000 heart attacks and 17 million lost workdays.<sup>1</sup> However, these benefits will only continue if CAA protections are upheld.

Despite decades of progress, we still have a way to go to address our nation's air pollution crisis. More than 4 in 10 people living in the United States—an estimated 152.3 million—live in areas that don't meet federal air quality standards.<sup>2</sup>

Passenger vehicles, heavy-duty trucks, and locomotive engines that burn gasoline and diesel are a major source of air pollution, which includes particulate matter, nitrogen oxides, ozone and other highly toxic emissions.<sup>3</sup> <sup>4</sup> The health risks of air pollution are extremely serious. Poor air quality aggravates respiratory ailments like asthma and bronchitis and heightens the risk of life-threatening conditions like cancer and heart disease.<sup>5</sup> There is strong evidence that breathing fine particulate matter (PM<sub>2.5</sub>) impairs neurological functions, increasing the risk of Alzheimer's disease, and that it affects the developing fetus.<sup>6</sup> PM<sub>2.5</sub> from transportation is singlehandedly responsible for up to 20,000 premature deaths each year.<sup>7</sup> These consequences also burden our families and community members with substantial medical costs.<sup>8</sup> <sup>9</sup> All of these burdens disproportionately affect communities of color and low income households who are more likely to live near major trucking routes and transportation hubs.<sup>10, 11</sup>

In addition, the transportation sector is the number one source of greenhouse gas emissions in this country.<sup>12</sup> The rise in global temperature exacerbates local air quality issues in a number of ways, including increasing the likelihood and scale of climate-fueled wildfires and contributing to the formation of ground-level smog.<sup>13, 14</sup>

We need to be moving forward, not backwards, towards a clean air future. Since the passage of the Clean Air Act, the Environmental Protection Agency has – through well-documented, science-based regulatory processes – worked to drive emissions down from new mobile sources and pressed to maintain those reductions over the entire lifetime of those vehicles. The slate of bills for discussion at the Subcommittee’s hearing seeks to undermine this extensive history through exceptions and exclusions that put that progress at risk and curtail authority that gives states and the federal government the power to protect the health and welfare of the people of this country.

Sincerely,

Union of Concerned Scientists  
Acadia Center  
Alliance for Clean Energy New York  
Alliance of Nurses for Healthy Environments  
Alternatives for Community & Environment (ACE)  
Center for Engagement, Environmental Justice, and Health  
Center for Sustainable Life  
Chesapeake Earth Holders  
Chesapeake Physicians for Social Responsibility  
Climate Communications Coalition  
Coltura  
Communities for a Healthy Bay  
Do Good LLC  
Earthjustice Action  
EDF Action  
EJAT Cheverly MD area  
Environmental Law & Policy Center  
GreenLatinos  
Heartwood  
League of Conservation Voters (LCV)  
LivableStreets Alliance  
Moms Clean Air Force  
Mountain Mamas  
Native Sun Community Power Development  
Natural Resources Defense Council  
Neighbors for Clean Air  
New York City Environmental Justice Alliance  
New Yorkers for Clean Power  
Newton EV Task Force

Out For Justice  
Partnership for Policy Integrity  
Plug In America  
Policy Foundation, INC  
Public Citizen  
Respiratory Health Association  
Sierra Club  
Southwest Energy Efficiency Project  
Tri-State Transportation Campaign  
Washington Conservation Action  
WBBA (We Build Back Better Alliance)  
WE ACT for Environmental Justice

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<sup>1</sup> Environmental Protection Agency (EPA). 2025. “The Clean Air Act and the Economy.” Last updated on September 25. <https://www.epa.gov/clean-air-act-overview/clean-air-act-and-economy>.

<sup>2</sup> American Lung Association. *State of the Air 2026 Report*. Chicago, IL. Accessed May 27, 2026. <https://www.lung.org/getmedia/32f0646d-c5de-4501-boac-07cd63c974d4/State-of-the-Air-2026-Report.pdf>.

<sup>3</sup> Environmental Protection Agency (EPA). 2025. “Smog, Soot, and Other Air Pollution from Transportation.” Last updated on August 7. <https://www.epa.gov/transportation-air-pollution-and-climate-change/smog-soot-and-other-air-pollution-transportation>.

<sup>4</sup> Environmental Protection Agency (EPA). 2025. “Learn About How Mobile Source Pollution Affects Your Health.” Last updated on September 17. <https://www.epa.gov/mobile-source-pollution/learn-about-how-mobile-source-pollution-affects-your-health>.

<sup>5</sup> National Institute of Environmental Health Sciences. 2026. “Air Pollution and Your Health.” Last reviewed on March 6. <https://www.niehs.nih.gov/health/topics/agents/air-pollution>.

<sup>6</sup> *Ibid*.

<sup>7</sup> Choma, Ernani F., John S. Evans, José A. Gómez-Ibáñez, Qian Di, Joel D. Schwartz, James K. Hammitt, John D. Spengler. 2021. “Health benefits of decreases in on-road transportation emissions in the United States from 2008 to 2017.” *Proceedings of the National Academy of Sciences* 118 (51): e2107402118. <https://doi.org/10.1073/pnas.2107402118>

<sup>8</sup> Alexeeff, Stacey E., Ananya Roy, Jun Shan, G. Thomas Ray, Charles Q. Quesenberry, Joshua Apte, Christopher J. Portier, Stephen K. Van Den Eeden. 2022. “Association between traffic related air pollution exposure and direct health care costs in Northern California.” *Atmospheric Environment* 287. 119271, ISSN 1352-2310. <https://doi.org/10.1016/j.atmosenv.2022.119271>

<sup>9</sup> Hakami A, Zhao S, Soltanzadeh M, Vasilakos P, Alhusban A, Oztaner B, Fann N, Chang H, Krupnick A, Russell T. 2024. “Estimating Model-Based Marginal Societal Health Benefits of Air Pollution Emission Reductions in the United States and Canada.” *Res Rep Health Eff Inst* (218):1-63. PMID: 39397785; PMCID: PMC11476235. <https://pubmed.ncbi.nlm.nih.gov/39397785/>

<sup>10</sup> American Lung Association. *State of the Air 2026 Report*. Chicago, IL. Accessed May 27, 2026. <https://www.lung.org/getmedia/32f0646d-c5de-4501-boac-07cd63c974d4/State-of-the-Air-2026-Report.pdf>.

<sup>11</sup> Wilson, Sam. 2026. *Addressing Freight Pollution at the Source: Air Pollution, Freight Facility Clusters, and the Role of Indirect Source Rules*. Cambridge, MA: Union of Concerned Scientists. Accessed June 1, 2026. <http://www.ucs.org/resources/addressing-freight-pollution-source>

<sup>12</sup> Environmental Protection Agency (EPA). 2026. “Transportation Sector Emissions.” Last updated on March 10. <https://www.epa.gov/ghgemissions/transportation-sector-emissions>

<sup>13</sup> Merner, Delta L. 2021. “New Study Finds Climate Change Exacerbates Neighborhood Smog.” *The Equation*. Accessed May 27, 2026. <https://blog.ucs.org/delta-merner/new-study-finds-climate-change-exacerbates-neighborhood-smog/>

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<sup>14</sup> Phillips, Carly. 2022. "Climate Change Threatens Already Poor Air Quality in California's Central Valley." *The Equation*. Accessed May 27, 2026. <https://blog.ucs.org/carly-phillips/climate-change-threatens-already-poor-air-quality-in-californias-central-valley/>