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Via Online Submission

EPA-HQ-OAR-2019-0055
Andrew Wheeler, Administrator
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
EPA Docket Center, EPA WJC West Building
1301 Constitution Avenue, N.W. Room 3334
Washington, D.C. 20004

Re: Pre-Proposal Comments of the City of New York on the Advance Notice of Proposed Rulemaking for Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards; EPA-HQ-OAR-2019-0055

Dear Administrator Wheeler:

The City of New York ("New York City" or "City") appreciates this opportunity to comment on the Advance Notice of Proposed Rulemaking for Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine Standards, Docket No. EPA-HQ-OAR-2019-0055, published on January 21, 2020. A number of agencies, including the New York City Department of Environmental Protection, the Department of Health and Mental Hygiene, and the Mayor's Office of Sustainability, are interested in the proposed action, as they are involved in monitoring air quality and protecting public health.

Reducing emissions from heavy duty engine traffic in and around New York City can improve public health – especially among our most vulnerable residents. Reducing NOx, an ozone precursor, will assist the efforts of many states, and New York City, to attain federal ozone standards. Ozone can cause respiratory problems and other adverse health impacts. The City therefore supports the initiative's goal of reducing NOx emissions from highway heavy duty trucks and buses.

In addition to NOx, vehicles emit fine particulate matter (PM 2.5), which contributes to multiple adverse health outcomes. The City's Department of Health and Mental Hygiene recently released a study which found that traffic-related PM 2.5 causes 320 premature deaths

and 870 emergency department visits and hospitalizations each year among City residents.¹ The greatest adverse health outcomes came from trucks and buses traveling the City's streets, which account for over half of traffic PM 2.5-related health outcomes. Addressing PM 2.5 emissions would also help New York City reduce health inequities. High-poverty neighborhoods in New York City experienced 1.7 times the PM 2.5 exposure and 9.2 times as many hospital visits due to emissions from trucks and buses than did more affluent areas of the City.²

Accordingly, New York City suggests that the proposed rule should target reductions in PM 2.5. Any monitoring and reduction of particular matter should include sources beyond tailpipe emissions, as there are non-tailpipe PM sources (including tires and brake dust) that are not included in the measurement of tailpipe PM. Heavy duty engines can also be a source of carbon dioxide (CO₂), carbon monoxide (CO), non-methane organic gases (NMOG), and formaldehyde (HCHO) and thus, New York City recommends that the initiative also include monitoring and reduction of these pollutants for new motor vehicles.

Finally, New York City encourages EPA to explore electric vehicle options in the cleaner technology component of the proposal as they produce no tailpipe emissions. Electric vehicles also have lower lifecycle emissions than their internal combustion engine counterparts.³

New York City thanks EPA for its consideration and for providing the opportunity to submit these comments.

Sincerely,



William Plache, Senior Counsel
Claire MacLachlan, Legal Intern (not
admitted to the bar)
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¹ IYAD KHEIRBEK ET AL., NEW YORK CITY DEPARTMENT OF HEALTH AND MENTAL HYGIENE, AIR POLLUTION AND THE HEALTH OF NEW YORKERS: THE IMPACT OF FINE PARTICLES AND OZONE, <https://www1.nyc.gov/assets/doh/downloads/pdf/eode/eode-air-quality-impact.pdf>, (last accessed Feb. 13, 2020).

² *Id.*

³ *See generally* RACHEL NEALER, DAVID REICHMUTH, & DON ANAIR, UNION OF CONCERNED SCIENTISTS, CLEANER CARS FROM CRADLE TO GRAVE: HOW ELECTRIC CARS BEAT GASOLINE CARS ON LIFETIME GLOBAL WARMING EMISSIONS (2015) (<https://www.ucsusa.org/sites/default/files/attach/2015/11/Cleaner-Cars-from-Cradle-to-Grave-full-report.pdf>) (last accessed February 11, 2020).