



September 26, 2018

Acting Administrator Andrew Wheeler
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2018-0283
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Secretary Elaine Chao
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Subject: Comment on the Proposed SAFE Vehicle Rule for CAFE and Tailpipe Carbon Dioxide Emissions Standards for Model Year 2021-2026 Light-Duty Vehicles; Docket ID No. EPA-HQ-OAR-2018- 0283

Dear Administrator Wheeler and Secretary Chao:

Thank you for providing an opportunity to comment on the proposed Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Corporate Average Fuel Economy (CAFE) and tailpipe carbon dioxide emissions standards for Model Years 2021-2026 passenger cars and light trucks. We, the undersigned, writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC), the Metropolitan Washington Council of Governments' (COG) Climate, Energy and Environment Policy Committee (CEEPC), and the National Capital Region Transportation Planning Board (TPB), oppose the proposed changes to certain existing CAFE and tailpipe carbon dioxide emissions standards for passenger cars and light duty trucks. We support EPA's "Baseline/No-Action" alternative in the proposed rule and strongly urge you to maintain the current tailpipe carbon dioxide emission standards for these vehicles as prescribed in the October 15, 2012 "Final Rule for 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards" (2012 Greenhouse Gas and CAFE Final Rule).

MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia as the air quality planning commission for the National Capital region, under the auspices of the COG, to develop plans to attain federal standards for air quality and improve air quality. The TPB is the metropolitan planning organization (MPO) for the National Capital Region jointly established by the governors of Maryland and Virginia and the mayor of the District of Columbia and so designated by the federal government. As an MPO, the TPB is mandated to conform with and integrate regional air quality plans in its transportation plans. CEEPC serves as the principal policy adviser on climate change to the COG Board of Directors, including development of a regional climate change strategy to meet the goals of reducing CO₂ and other greenhouse gases adopted by the region.

The region is currently designated as non-attainment of federal National Ambient Air Quality Standards (NAAQS) for Ozone. The region has also adopted specific targets for reducing greenhouse gas emissions to protect public health, preserve infrastructure, and nurture the National Capital Region's economic competitiveness.

In support of these objectives the National Capital Region has implemented several emissions reduction measures across all sectors, including transportation, that contributes approximately one-third of the region's

greenhouse gas emissions. The region relies heavily on federal control programs for a significant amount of additional greenhouse gas emissions reductions since they provide benefits across the marketplace. The role of the federal government's leadership in delivering effective regulatory limits on carbon dioxide emission from motor vehicles is a critical component of our ability to meet adopted environmental objectives and standards.

One such federal program is the 2012 Greenhouse Gas and CAFE Final Rule promulgated jointly by the EPA and the National Highway Traffic Safety Administration (NHTSA), which set federal tailpipe CO₂ emission and CAFE standards for light duty vehicles. This rule, resulting from a partnership between the federal government, the California Air Resource Board (CARB), and the automobile industry, is a comprehensive program to improve the fuel efficiency and to reduce motor vehicle emissions of criteria pollutants and greenhouse gases.

While significant progress has been made in the Washington region to reduce emissions, addressing sources of NO_x, including those from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region. We are concerned that any relaxation of the 2012 Greenhouse Gas and CAFE Final Rule will make it increasingly difficult for the region to realize the reductions in NO_x emissions needed to comply with the 2015 Ozone NAAQS.

Additionally, relaxation of the 2012 Greenhouse Gas and CAFE Final Rule will make it extremely challenging for the National Capital Region, and communities across the United States, to meet their greenhouse gas reduction goals.

As such, MWAQC, TPB, and CEEPC believe the existing CAFE and tailpipe CO₂ emission standards for passenger cars and light duty vehicles model year 2017 and later are appropriate, feasible, and needed, and should be maintained.

Further, we concur with the conclusions of the 2016 Technical Assessment Report (TAR) that there is a wide range of technologies that manufacturers can employ to meet the MY 2022-2025 standards with similar or lower costs than those projected in the 2012 Final Rule. We are encouraged to note that progress made to improve fuel economy and reduce emissions in recent years has been greater than expected, and that there are clear indications that consumers are accepting of and benefiting from the advancements in automobile technologies.

Thank you again for the opportunity to provide comments on the EPA's and NHTSA's consideration of carbon dioxide and greenhouse gas standards for light duty vehicles.

Sincerely,

The Honorable Hans Riemer
Chair, Metropolitan Washington Air Quality Committee (MWAQC)

The Honorable Mary Lehman
Chair, Climate Energy and Environment Policy Committee (CEEPC)

The Honorable Charles Allen
Chair, National Capital Region Transportation Planning Board (TPB)