Metropolitan Washington Air Quality Committee

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EPA Docket ID No. EPA-HQ-OAR-2009-0865 United States Environmental Protection Agency Mail Code 6102T 1200 Pennsylvania Avenue, NW Washington, DC 20460

I am writing on behalf of the Metropolitan Washington Air Quality Committee (MWAQC) regarding EPA's Proposed Fuel Economy Labels. MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop regional air pollution control strategies for the Washington, DC-MD-VA region.

MWAQC supports the proposed updates to fuel economy labels and prefers option 1 with the grade prominently displayed. We feel that these revised label designs would provide a strong educational value for consumers considering an automobile purchase. The labels represent the fuel performance of a vehicle clearly and the grading system allows consumers to easily compare vehicles across different categories. Additionally, reporting the greenhouse gas and other pollutant emissions will help consumers to consider how their selection of an automobile impacts the environment.

We would like to ensure that EPA maintains the integrity of the grading system with regards to the value of various vehicle types. We feel that a car with a conventional gasoline engine should not be able to receive the same grade as a hybrid car in the same class, because this does not help inform the consumer of the value of different types of vehicles. However, we understand that the sample labels provided do not represent real automobiles, and trust that your grading system will ultimately reflect the value of these different vehicle types.

Thank you for considering our comments about the proposed new Fuel Economy Labels. We look forward to continuing our efforts with your leadership and support to improve air quality in the Mid-Atlantic and metropolitan Washington region.

Sincerely,

Leta Mach, Chair Metropolitan Washington Air Quality Committee