



September 1, 2017

Administrator G. Scott Pruitt  
U.S. Environmental Protection Agency  
Docket ID No. EPA-HQ-OAR-2015-0827  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

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

Dear Administrators Pruitt and Chao:

Thank you for providing an opportunity to comment on the Reconsideration of the Final Determination of the Mid-term Evaluation of Greenhouse Gas Emissions Standards for Model Years 2022-2025 Light-Duty Vehicles. On behalf of the Metropolitan Washington Air Quality Committee (MWAQC) and the Metropolitan Washington Council of Governments' (COG) Climate, Energy and Environment Policy Committee (CEEPC), we are writing to request that you maintain the greenhouse gas (GHG) emissions standards for Model Year (MY) 2022-2025 vehicles, as prescribed in the October 15, 2012, Final Rule.

MWAQC is certified by the governors of Maryland and Virginia and the mayor of the District of Columbia to develop plans demonstrating attainment of federal ozone and other criteria pollutant standards for the Washington, DC-MD-VA non-attainment area. COG's CEEPC serves as its principal policy adviser on climate change, including development of a regional climate change strategy to meet the regional greenhouse gas reduction goals adopted by the Board.

The region relies on the partnership between the federal government, the California Air Resource Board (CARB) and the automobile industry to develop a comprehensive program to improve the fuel efficiency of the light duty fleet and to reduce criterial pollutants and GHG emissions. Any relaxation of the existing standards will make it increasingly difficult to achieve compliance with the National Ambient Air Quality Standards (NAAQS) and more challenging for communities across the United States to meet their voluntary commitments to reduce GHG emissions.

While significant progress has been made in the Washington region to reduce emissions of criteria pollutants and GHG emissions, addressing emissions from the transportation sector remains a high priority. Total vehicle miles travelled (VMT) for the region is increasing with population and mobile transportation is the second largest contributor to GHG emissions in the region. Addressing sources of low-level NOx, including from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region.

Additionally, we are concerned that GHG emissions contributing to global climate change can contribute to conditions that exacerbate air quality degradation related to emissions of criteria pollutants, making NAAQS compliance more challenging. The role of the federal government's

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leadership in delivering effective regulatory limits on emissions from motor vehicles is a critical component of our ability to meet our adopted and mandated environmental objectives. As such, CEEPC and MWAQC believe the existing emission standards are needed, appropriate, and should be maintained.

While we recognize EPA's authority to reconsider the Mid-term Evaluation (MTE) Final Determination, MWAQC and CEEPC have reviewed the Final Determination and agree that the GHG emissions standards for passenger vehicles and light-duty vehicles (LDVs), Model Year (MY) 2022 through 2025, are acceptable and appropriate. Additionally, MWAQC and CEEPC agree that the MY 2021 GHG emission standards for LDVs are also appropriate.

Further, we concur with the conclusions of the 2016 Technical Assessment Report (TAR) that there are 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.

For these reasons, we urge the EPA to stand by the January 12, 2017 Final Determination and maintain the existing GHG emission standards promulgated in 2012.

Thank you again for the opportunity to provide comments on the EPA's and NHTSA's consideration of GHG standards for LDVs.

Sincerely,

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

The Honorable Penelope A. Gross  
Chair, Climate Energy and Environment Policy Committee (CEEPC)