

ITEM 13 – Action
October 17, 2018

Comments to US EPA and US DOT on the Safer Affordable Fuel
Efficient (SAFE) Vehicles Proposed Rule for Model Years
2021-2026

Staff Recommendation: Approve Joint TPB/Metropolitan
Washington Air Quality Committee/Climate
Energy & Environment Policy Committee
Comment Letter for Transmission to
US EPA and US DOT.

Issues: None

Background: The Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA) are seeking comments on a proposed rule for model year 2021-2026 light duty vehicles through October 26, 2018. The rule recommends amending certain existing Corporate Average Fuel Economy (CAFE) and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and keeping the model year 2020 standards in place for this time period. The board will be briefed on the proposed rule, and asked to approve a joint TPB/MWAQC/CEEPC comment letter urging the EPA to stand by its January 12, 2017 Final Determination and maintain the existing GHG standards promulgated in 2012 (i.e., supporting the “Baseline/No-Action” alternative).



Metropolitan Washington
Council of Governments



National Capital Region
Transportation Planning Board

October 17, 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

NOTE: This letter was approved by MWAQC and CEEPC on September 26, 2018.

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), strongly 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 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 greenhouse gases and criteria pollutants.

Poor air quality not only affects the residents living and working in the Washington region, but also millions of tourists that visit the region each year. Over the last five ozone seasons, the region recorded an average of eleven unhealthy air days, which are in part caused by emissions transported into the region, making this not only a regional issue but a national one.

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 must be maintained to protect public health in the Washington region.

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)



SAFER AFFORDABLE FUEL EFFICIENT (SAFE) VEHICLES PROPOSED RULE FOR MODEL YEARS 2021-2026

Comments to US EPA and US DOT

Dusan Vuksan
TPB Transportation Engineer

TPB Meeting
October 17, 2018



National Capital Region
Transportation Planning Board

Agenda Item #13

Proposed Rule And TPB Action

- Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) are seeking comment (through October 26, 2018) on a proposed rule for model year (MY) 2021-2026 light duty vehicles
- Proposed Safer Affordable Fuel Efficient (SAFE) rule for Model Years 2021-2026 recommends relaxing existing Corporate Average Fuel Economy (CAFE) and CO₂ (greenhouse gas, GHG) emissions standards for passenger cars (PC) and light trucks (LT)
- TPB is being asked to approve a joint TPB/MWAQC/CEEPC comment letter
 - The letter urges EPA to stand by its January 12, 2017 Final Determination and maintain the existing CAFE and GHG standards promulgated in 2012



National Capital Region
Transportation Planning Board

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Impacts of SAFE Rule On The Region

- Increase future estimates of mobile source NOx emissions, making it harder to conform to mobile emissions budgets
- Attaining the region's environmental goals will be more difficult:
 - National Ambient Air Quality Standards for criteria pollutants (e.g., Ozone)
 - Reducing GHG emissions

Regional GHG Planning Efforts

- Region adopts specific goals for GHG reductions (Climate Change Report, 2008)
- Regional comprehensive policy seeks a significant decrease in greenhouse gas emissions (Region Forward, 2010)
- Develop and implement Action plans for regional and local action to reduce greenhouse gas emissions (CEEPC, since 2010)
- TPB examination of actions to reduce GHGs from transportation sector indicated that higher CAFE and GHG emissions standards would play a vital role ("What Would It Take?" Scenario Study, 2010)
- TPB begins tracking contributions from regional transportation plan to GHG reductions (2010 CLRP)
- TPB adopts as goal to Enhance Environmental Quality and Protect Natural and Cultural Resources (Regional Transportation Priorities Plan, 2014)
- COG, TPB, and MWAQC joint examination of multi-sectoral GHG reductions actions affirms higher CAFE and GHG emissions standards as a critical strategy (GHG Multi-Sector Working Group, 2016)

Federal Standards: Background

- July 2012: EPA and NHTSA jointly set standards to reduce GHG emissions and improve fuel economy (CAFE) for model year 2017-2025 cars and light trucks
 - Standards vary by vehicle type and model years
 - For combined passenger cars and light duty trucks:
 - Average GHG equivalent mileage improved from 36.6 miles per gallon (mpg) for MY 2017 to 54.5 mpg for MY 2025
 - Average GHG emissions reduced from 243 grams per mile (gpm) for MY 2017 to 163 gpm for MY 2025
- January 2017: EPA completed a required mid-term evaluation of the 2012 rule and determined to keep the 2012 standards in place
- March 2017: EPA announced its intention to reconsider its January 2017 decision to retain the 2012 standards



Federal Standards: Background

- August 2017: EPA published a request for comment on its proposed reconsideration of the January 2017 decision to retain the standards
- September 2017: TPB, MWAQC, and CEEPC submitted comments on proposed reconsideration of the Final Determination urging EPA to maintain the existing GHG emissions standards promulgated in 2012
- August 2018: EPA and NHTSA proposed new SAFE GHG emissions and CAFE standards to replace the 2012 standards and are seeking comment on alternatives
 - Preferred alternative reflects maintaining the GHG emissions reductions (gpm) and CAFE standards promulgated in 2012 at MY 2020 levels into the future

MY 2021-2025 (Combined PC & LT)	2012 Standards	SAFE Rule (Preferred Alt.)
Mileage (CO2 equivalent)	44.7 to 54.5 mpg	41.7 mpg
GHG Emissions	199 to 163 gpm	213 gpm



Next Steps

- MWAQC and CEEPC approved the letter in September
- Upon TPB approval, joint letter to be submitted to Federal Docket before the October 26 deadline
- EPA to consider all comments received and take final action on proposed SAFE Rule



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