Metropolitan Washington Council of Governments

National Capital Region Transportation Planning Board

June 2, 2023

Administrator Michael S. Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Support for the Proposed Rule for "Phase 3" Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles; Docket ID No. EPA–HQ–OAR–2022–0985

Dear Administrator Regan:

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), we are writing to express our support for the proposed rule for "Phase 3" greenhouse gas emissions standards for heavy-duty vehicles that would build upon the "Phase 2" standards and phase in over model years 2027 through 2032.

MWAQC is the air quality planning committee for the National Capital Region, certified by the governors of Maryland and Virginia and the mayor of the District of Columbia, to develop plans to attain federal standards for air quality and improve air quality. The TPB is the federally designated 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. As an MPO, the TPB is mandated to conform with and integrate regional air quality plans in its transportation plans. COG is the association of local governments in metropolitan Washington and supports MWAQC and the TPB. CEEPC serves as the principal policy adviser on climate change to the COG Board of Directors and is tasked with the development of a regional climate change strategy to meet the region's goals for reducing greenhouse gas emissions.

The EPA's current proposal to establish Phase 3 greenhouse gas emissions standards for heavy-duty vehicles would provide the critical leadership needed for our region to work towards meeting adopted environmental goals and standards. We agree that this comprehensive federal program would achieve significant greenhouse gas emissions reductions and would result in substantial public health and welfare benefits. As noted in the *Metropolitan Washington 2030 Climate and Energy Action Plan*, underserved communities have been disproportionately affected by ambient air pollution and climate-change-related health impacts. Therefore, more stringent greenhouse gas emissions standards and subsequent emissions reductions have the potential to help the most vulnerable populations.

Poor air quality affects the residents living and working in metropolitan Washington. The region is currently designated as being in nonattainment of federal National Ambient Air Quality Standards (NAAQS) for ozone. Nitrogen Oxides (NOx) are a precursor pollutant of ground-level ozone. In addition, NOx is a precursor to secondary particulate matter, such as particulate matter 2.5 micrometers in diameter and smaller (PM2.5). Exposure to PM2.5, along with ground-level ozone, is associated with premature death, increased hospitalizations, and emergency room visits due to exacerbation of chronic heart and lung diseases and other serious health impacts. Some

communities in metropolitan Washington face higher rates of illnesses such as asthma than the national average, and these illnesses are aggravated by these pollutants. As such, reductions in NOx emissions will provide health benefits from both reduced ozone and PM2.5 pollution.

While significant progress has been made in metropolitan Washington to reduce NOx emissions, addressing sources of NOx, including those from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region. Over the last five ozone seasons, the region recorded an annual average of eight 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. EPA estimates that the Phase 3 standards will reduce NOx and PM2.5 emissions by 28% and 39% in 2055, respectively, as described on page 25935 of the Federal Register notice.

Strengthening the greenhouse gas emissions standards will also provide considerable support for metropolitan Washington and communities across the United States to meet their greenhouse gas emissions reduction goals. Unfortunately, our region is already experiencing the impacts of climate change. Observations in metropolitan Washington show that temperatures and the water surface level in the Potomac River are rising and will likely continue to rise. Extreme weather events and increases in the number of days with extreme heat or extreme cold will increase risks to health, energy usage patterns, plant and animal habitats, and infrastructure. These changes in our weather patterns are also affecting stormwater, drinking water, and wastewater. Broad-based climate change mitigation and adaptation strategies, such as national rules, are necessary to reduce the impacts of climate change and fight the adverse effects of climate change on our region and planet.

The National Capital Region has goals to reduce greenhouse gas emissions 50% by 2030 and 80% by 2050, compared to 2005 levels. In 2022, the TPB adopted the same goals, but specifically for on-road transportation. As such, MWAQC, CEEPC, and the TPB believe that the newly proposed Phase 3 greenhouse gas emissions standards for heavy-duty vehicles, which are estimated by EPA to reduce downstream greenhouse gas emissions by 18% cumulatively between 2027 and 2055 as compared to the reference case (Table V-5 of the Federal Register Notice), are necessary for the region to achieve its greenhouse gas reduction goals.

The National Capital Region has implemented emissions reduction measures across all sectors, including on-road transportation, which contributes approximately 31% and 39% of the region's greenhouse gas and NOx emissions, respectively. The region relies heavily on federal control programs for a significant amount of additional greenhouse gas and NOx emissions reductions since these programs provide benefits across the economy. The federal government's leadership in delivering effective regulatory limits on greenhouse gas emissions from motor vehicles could also help reduce ozone and fine particle precursors and is a critical component of our ability to meet adopted environmental objectives and standards.

For these reasons, MWAQC, CEEPC, and the TPB support the EPA's proposal to establish Phase 3 greenhouse gas standards for heavy-duty vehicles.

Thank you for the opportunity to provide comments on this proposed rule.

Sincerely,

Administrator Michael S. Regan
June 2, 2023

Anita Bonds
Chair, Metropolitan Washington Air Quality Committee (MWAQC)

Takis Karantonis
Chair, Climate Energy and Environment Policy Committee (CEEPC)

Reuben Collins
Chair, National Capital Region Transportation Planning Board (TPB)

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Administrator Michael S. Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Support for the Proposed Rule to Establish Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles; Docket ID No. EPA-HQ-OAR-2022-0829

Dear Administrator Regan:

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), we are writing to express our support for the proposed rule to establish Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles.

MWAQC is the air quality planning committee for the National Capital Region, certified by the governors of Maryland and Virginia and the mayor of the District of Columbia, to develop plans to attain federal standards for air quality and improve air quality. The TPB is the federally designated 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. As an MPO, the TPB is mandated to conform with and integrate regional air quality plans in its transportation plans. COG is the association of local governments in metropolitan Washington and supports MWAQC and the TPB. CEEPC serves as the principal policy adviser on climate change to the COG Board of Directors and is tasked with the development of a regional climate change strategy to meet the region's goals for reducing greenhouse gas emissions.

The EPA's current proposal to establish multi-pollutant emissions standards for model years 2027 and later light-duty and medium-duty vehicles would provide the critical leadership needed for our region to work towards meeting adopted environmental goals and standards. We agree that this comprehensive federal program would achieve significant greenhouse gas emissions reductions and would result in substantial public health and welfare benefits. As noted in the *Metropolitan Washington 2030 Climate and Energy Action Plan*, underserved communities have been disproportionately affected by ambient air pollution and climate-change-related health impacts. Therefore, more stringent greenhouse gas emissions standards and subsequent emissions reductions have the potential to help the most vulnerable populations.

Poor air quality affects the residents living and working in metropolitan Washington. The region is currently designated as being in nonattainment of federal National Ambient Air Quality Standards (NAAQS) for ozone. Nitrogen Oxides (NOx) are a precursor pollutant of ground-level ozone. In addition, NOx is a precursor to secondary particulate matter, such as particulate matter 2.5 micrometers in diameter and smaller (PM2.5). Exposure to PM2.5, along with ground-level ozone, is associated with premature death, increased hospitalizations, and emergency room visits due to exacerbation of chronic heart and lung diseases and other serious health impacts. Some

communities in metropolitan Washington face higher rates of illnesses such as asthma than the national average, and these illnesses are aggravated by these pollutants. As such, reductions in NOx emissions will provide health benefits from both reduced ozone and PM2.5 pollution.

While significant progress has been made in metropolitan Washington to reduce NOx emissions, addressing sources of NOx, including those from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region. Over the last five ozone seasons, the region recorded an annual average of eight 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. EPA estimates that strengthening these standards will reduce NOx and PM2.5 emissions by 41% and 35% in 2055, respectively, as shown in Table 4 of the Federal Register notice.

Strengthening the greenhouse gas emissions standards will also provide considerable support for metropolitan Washington and communities across the United States to meet their greenhouse gas emissions reduction goals. Unfortunately, our region is already experiencing the impacts of climate change. Observations in metropolitan Washington show that temperatures and the water surface level in the Potomac River are rising and will likely continue to rise. Extreme weather events and increases in the number of days with extreme heat or extreme cold will increase risks to health, energy usage patterns, plant and animal habitats, and infrastructure. These changes in our weather patterns are also affecting stormwater, drinking water, and wastewater. Broad-based climate change mitigation and adaptation strategies, such as national rules, are necessary to reduce the impacts of climate change and fight the adverse effects of climate change on our region and planet.

The National Capital Region has goals to reduce greenhouse gas emissions 50% by 2030 and 80% by 2050, compared to 2005 levels. In 2022, the TPB adopted the same goals, but specifically for on-road transportation. As such, MWAQC, CEEPC, and the TPB believe that the newly proposed greenhouse gas emissions standards for model years 2027 and later light-duty and medium-duty vehicles, which are estimated by EPA to reduce carbon dioxide emissions by 47% in 2055 (Table 2 of the Federal Register Notice), are necessary for the region to achieve its greenhouse gas reduction goals.

The metropolitan Washington region has implemented emissions reduction measures across all sectors, including on-road transportation, which contributes approximately 31% and 39% of the region's greenhouse gas and NOx emissions, respectively. The region relies heavily on federal control programs for a significant amount of additional greenhouse gas and NOx emissions reductions since these programs provide benefits across the economy. The federal government's leadership in delivering effective regulatory limits on greenhouse gas emissions from motor vehicles could also help reduce ozone and fine particle precursors and is a critical component of our ability to meet adopted environmental objectives and standards.

For these reasons, MWAQC, CEEPC, and the TPB support the EPA's proposal to establish multi-pollutant emissions standards for model years 2027 and later light-duty and medium-duty vehicles.

Thank you for the opportunity to provide comments on this proposed rule.

Sincerely,

Administrator Michael S. Regan
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