Metropolitan Washington Council of Governments

National Capital Region Transportation Planning Board

September 23, 2021

Acting Administrator Steven Cliff
U.S. National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Re: Support for the Proposed Corporate Average Fuel Economy Standards for Model Years 2024-2026 Passenger Cars and Light Trucks; Docket ID No. NHTSA-2021-0053

Dear Acting Administrator Cliff:

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 offer our support for the proposed rule to revise existing corporate average fuel economy (CAFE) standards for model years (MY) 2024-2026 passenger cars and light trucks. We support your efforts to revise these standards to be more stringent than the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule standards, and the proposed rule aligns with our 2021 Legislative Priorities.[1] We sent a letter to the Environmental Protection Agency (EPA) in September offering our support for the proposed rule to revise national greenhouse gas (GHG) emissions standards for passenger cars and light trucks through MY 2026.[2]

MWAQC is the air quality planning commission 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 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. 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 GHG emissions.

In a letter dated October 17, 2018, MWAQC, CEEPC, and the TPB provided comment on the proposed SAFE Vehicles Rule for CAFE and tailpipe carbon dioxide emissions standards for MY

[1] "COG Legislative Priorities," Metropolitan Washington Council of Governments, January 13, 2021, https://www.mwcog.org/documents/2021/01/13/cog-legislative-priorities-legislative-priorities/.
[2] Day, Robert, Chair, Metropolitan Washington Air Quality Committee (MWAQC), Deni Taveras, Chair, Climate, Energy and Environment Policy Committee (CEEPC), and Charles Allen, Chair, National Capital Region Transportation Planning Board (TPB). Letter to Michael S. Regan, Administrator, U.S. Environmental Protection Agency. "Support for the Proposed Rule to Revise Existing National Greenhouse Gas Emissions Standards for Passenger Cars and Light Trucks through Model Year 2026; Docket ID No. EPA-HQ-OAR-2021-0208." Letter, September 10, 2021.

2021-2026 passenger cars and light trucks.[3] Our committees strongly opposed the proposed changes to certain existing CAFE and tailpipe carbon dioxide emissions standards for passenger cars and light duty trucks and urged the NHTSA to maintain more stringent CAFE 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."

NHTSA's current proposal to strengthen CAFE standards for passenger cars and light trucks by setting stringent requirements for fuel economy improvements for MY 2024-2026 would provide critical leadership needed for our region to work towards meeting adopted environmental goals and standards. We agree that this comprehensive federal program will achieve significant GHG emissions reductions and will result in substantial public health and welfare benefits, while providing consumers with savings from lower fuel costs. As noted in the *Metropolitan Washington 2030 Climate and Energy Action Plan*, underserved communities have been disproportionately affected by harmful environmental exposures, such as ambient air pollution and climate-change-related health impacts. Therefore, more stringent CAFE 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 seven 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. In the short term, strengthening CAFE standards for passenger cars and light trucks may have minimal impact on our region's ability to realize the reductions in NOx emissions needed to comply with the 2015 Ozone NAAQS. However, in the long term, strengthening these standards will reduce NOx and PM2.5 emissions as shown by NHTSA's forecasts in Table V-8 and Table V-10 of the Federal Register Notice.

Strengthening CAFE standards will also provide considerable support for metropolitan Washington and communities across the United States to meet their GHG 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 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

[3] Hans Riemer, Mary Lehman, and Charles Allen to Andrew Wheeler and Elaine Chao, "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," Letter, October 17, 2018.

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.

In 2008, the *National Capital Region Climate Change Report* established regional climate goals to reduce GHG emissions by 20% below 2005 levels by 2020, and 80% below 2005 levels by 2050. In October 2020, the COG Board of Directors adopted new 2030 climate goals to supplement the previous goals, including a goal to reduce GHG emissions by 50% below 2005 levels by 2030. Emissions from the transportation sector are one of the major contributors of GHGs in the region. As such, MWAQC, CEEPC, and the TPB believe that revising the CAFE standards for MY 2024-2026 passenger cars and light duty vehicles to be more stringent than the SAFE Vehicles Rule is appropriate, feasible, and needed in order 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 34% and 38% of the region's GHG and NOx emissions, respectively. The region relies heavily on federal control programs for a significant amount of additional GHG and NOx emissions reductions since these programs provide benefits across the marketplace. The federal government's leadership in establishing more stringent CAFE standards 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 NHTSA's proposal to strengthen CAFE standards for MY 2024-2026 passenger cars and light trucks.

Thank you for the opportunity to provide comments on the proposed rule to revise existing CAFE Standards for Model Years 2024-2026 Passenger Cars and Trucks.

Please contact Erin Morrow, TPB Transportation Engineer, at 202-962-3793 or emorrow@mwcog.org if you have any questions. Thank you for your consideration.

Sincerely,

Robert Day
Chair, Metropolitan Washington Air Quality Committee (MWAQC)

Deni Taveras
Chair, Climate Energy and Environment Policy Committee (CEEPC)

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