



April 17, 2022

Administrator Michael Regan  
U.S. Environmental Protection Agency  
Docket ID No EPA-HQ-OAR-2019-0055  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Subject: Comment on Proposed Rule Regarding Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards; Docket ID No EPA-HQ-OAR-2019-0055

Dear Administrator Regan:

Thank you for providing an opportunity to comment on the proposed rule: Control of Air Pollution from New Motor Vehicles- Heavy-Duty Engine and Vehicle Standards.<sup>1</sup> On behalf of the Metropolitan Washington Air Quality Committee (MWAQC), the National Capital Region Transportation Planning Board (TPB), and the Metropolitan Washington Council of Governments' (COG) Climate, Energy and Environment Policy Committee (CEEPC), we are writing to offer our support for the proposed rule to change the heavy-duty emission control program – including the standards, test procedures, regulatory useful life, emission-related warranty, and other requirements – to further reduce the air quality impacts of heavy-duty engines across a range of operating conditions and over a longer period of the operational life of heavy-duty engines. We also support the proposed targeted updates to the existing Heavy-Duty Greenhouse Gas (GHG) Emissions Phase 2 program that will further GHG reductions in the model year (MY) 2027 timeframe.

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. The TPB is the federally designated metropolitan planning organization (MPO) for metropolitan Washington and is the region's forum for cooperative transportation decision making, including issues related to air quality. COG's CEEPC serves as a principal policy forum on climate change and is tasked with the development of a regional climate change strategy to meet the regional GHG reduction goals adopted by the COG Board of Directors.

We agree that the proposed rule has the potential to achieve significant Nitrogen Oxide (NO<sub>x</sub>) emissions reductions and will likely result in substantial public health and welfare benefits. The region is currently designated as being in non-attainment of federal National Ambient Air Quality Standards (NAAQS) for ozone. NO<sub>x</sub> is a precursor pollutant of ground-level ozone. As such, reductions in NO<sub>x</sub> emissions will enable the region to attain the federal NAAQS for ozone. In addition, NO<sub>x</sub> is a precursor to secondary particulate matter, such as particulate matter measuring 2.5 micrometers in diameter and smaller (PM<sub>2.5</sub>). Exposure to PM<sub>2.5</sub>, 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.

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<sup>1</sup> U.S. Environmental Protection Agency, "Proposed Rule and Related Materials for Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards," Other Policies and Guidance, Regulations for Emissions from Vehicles and Engines, March 15, 2022, <https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-and-related-materials-control-air-1>.

As noted in the *Metropolitan Washington 2030 Climate and Energy Action Plan*,<sup>2</sup> underserved communities have been disproportionately affected by harmful environmental exposures, such as ambient air pollution and climate-change-related health impacts. Therefore, more stringent controls on air pollution from heavy-duty vehicles 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. 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 NO<sub>x</sub> emissions will provide health benefits from both reduced ozone and PM<sub>2.5</sub> pollution. Finally, GHG emissions from the transportation sector are one of the major contributors of GHGs in the metropolitan Washington region. Tightening of the “Phase 2” GHG emissions standards for several heavy-duty categories would facilitate progress towards our long-term climate goals, which include a 50 percent greenhouse gas emission reduction below 2005 levels by 2030 and an 80 percent reduction below 2005 levels by 2050. It would also accelerate the adoption of zero emission vehicles in the region’s heavy-duty fleet, which is one of COG’s legislative priorities.

The National Capital region has implemented several emissions control measures in all emissions sectors, including transportation, over the years to improve its air quality and comply with NAAQS for a variety of criteria pollutants. The region also relies heavily on federal emissions control programs for a significant amount of its emissions reductions. While significant progress has been made in the Washington region to reduce emissions of criteria pollutants and GHG emissions, addressing sources of low-level NO<sub>x</sub>, including from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region. The role of the federal government's 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, MWAQC, TPB, and CEEPC believe the continued updates to emission standards to reduce pollutants are appropriate and necessary.

Thank you again for the opportunity to provide comments on the EPA’s proposed heavy-duty engine and vehicle standards.

Sincerely,

The Honorable Takis Karantonis  
Chair, Metropolitan Washington Air Quality Committee (MWAQC)

The Honorable Pamela Sebesky  
Chair, National Capital Region Transportation Planning Board (TPB)

The Honorable Koran Saines  
Chair, Climate Energy and Environment Policy Committee (CEEPC)

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<sup>2</sup> “Metropolitan Washington 2030 Climate and Energy Action Plan” (Washington, D.C.: Metropolitan Washington Council of Governments, November 18, 2020), <https://www.mwcog.org/documents/2020/11/18/metropolitan-washington-2030-climate-and-energy-action-plan/>.