



January 27, 2016

DRAFT

Administrator Gina McCarthy
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
Docket ID No. EPA-HQ-OAR-2014-0827
Mail Code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Administrator Mark R. Rosekind
U.S. Department of Transportation
National Highway Traffic Safety Administration
Docket ID No. NHTSA-2014-0132
Docket Management Facility, M-30
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrators McCarthy and Rosekind:

We are writing 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) to comment on the Joint EPA/NHTSA proposal, published in the July 13, 2015 Federal Register, entitled Greenhouse Gas Emissions and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles – Phase 2 (80 Fed. Reg. 40138-40765).

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 Climate, Energy and Environment Policy Committee (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 Washington region has made great strides in cleaning the air, thereby reducing the health impacts of poor air quality. It has done so by lowering emissions of pollutants that produce smog and fine particles in the atmosphere.

As a result, the region has met the NAAQS fine particle standards published in 1997 (15 $\mu\text{g}/\text{m}^3$) and 2013 (12 $\mu\text{g}/\text{m}^3$) as well as daily fine particle standards published in 1997 (65 $\mu\text{g}/\text{m}^3$) and 2006 (35 $\mu\text{g}/\text{m}^3$). The region has also met the 1-hour ozone standard published in 1979 (0.12 ppm). Additionally, monitoring data shows that the region has lowered its design value for the 8-hour ozone NAAQS to 0.070 ppm, and therefore will be able to show that the region is in attainment of the 2008 ozone standard (0.075 ppm). The region will need to take ongoing actions to remain in attainment of the new 2015 ozone standard (0.070 ppm).

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The region is also developing strategies and action plans to reduce emissions of greenhouse gases to meet challenging long term emission reduction targets. Recent analysis conducted in support of regional efforts determined that while existing and future new actions are expected to result in substantial reductions in emissions of greenhouse gases in the region through 2050, additional federal, state and local actions will be required for the region to close the gap to meet future reduction targets. In particular, reducing emissions from medium- and heavy-duty vehicles is critical. They currently represent approximately 20 percent of total greenhouse gas emissions from the transportation sector in the region.

In view of the challenges ahead for maintaining attainment of the federal ozone and fine particle standards, and for reducing emissions of greenhouse gases, the metropolitan Washington region urges EPA and NHTSA to move quickly in 2016 to finalize the proposed rule on medium- and heavy-duty engines and vehicles. We support an expedited timeline for implementation, with standards fully implemented by 2024 (Alternative 4). Particularly given our continued need to further reduce ozone pollution in the region, we urge EPA and NHTSA to identify ways to implement requirements for reductions in emissions of NO_x from medium- and heavy-duty vehicles, beyond the current 2010 on-road heavy-duty NO_x exhaust emission standards and non-road heavy-duty engine exhaust emission standards. Further, we want to express our support for several other comments submitted by the National Association of Clean Air Agencies (NACAA) on September 29, 2015, including concerns about closing the existing loophole for glider kits and glider vehicles; and the need to address possible increases in emissions of NO_x or PM as a result of increased use of APUs on all affected vehicles.

Thank you for the opportunity to provide comments on this important Phase 2 rulemaking.

Sincerely,

The Honorable Brianne Nadeau
Chair, Metropolitan Washington Air Quality Committee (MWAQC)

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