



September 27, 2023

Administrator Ann E. Carlson
National Highway Traffic Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Support for the Proposed Rule to Establish Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027–2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030–2035; Docket ID No. NHTSA–2023–0022¹

Dear Administrator Carlson:

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 Corporate Average Fuel Economy (CAFE) Standards for Passenger Cars and Light Trucks for Model Years 2027–2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans (HDPUVs) for Model Years 2030–2035.

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 National Highway Traffic Safety Administration (NHTSA) proposal to establish CAFE standards for model year 2027–2032 passenger cars and light trucks and model year 2030–2035 HDPUVs 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, together with EPA's recently proposed greenhouse gas emission standards for light-, medium- and heavy-duty vehicles, 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 standards and subsequent emissions reductions have the potential to provide significant help to

¹ “ Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027-2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030-2035,” 88 Fed. Reg. 56128 (National Highway Traffic Safety Administration (NHTSA), U.S. Department of Transportation (DOT), August 17, 2023), <https://www.federalregister.gov/documents/2023/08/17/2023-16515/corporate-average-fuel-economy-standards-for-passenger-cars-and-light-trucks-for-model-years>.

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, any 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. In the Draft Environmental Impact Statement (EIS),² NHTSA estimates that strengthening these standards will result in modest increases in NOx and PM2.5 emissions in 2035 for the preferred alternative (Figure S-1 and Figure S-2 of the Draft EIS). The Draft EIS also shows decreases in NOx and PM2.5 emissions in 2050 for the preferred alternative (Page S-12 of the Draft EIS). At the national level, relatively small increases in NOx emissions in 2035 of less than one percent relative to the 2035 “No Action” alternative are forecasted to mainly come from higher electricity production by fossil-fueled power plants for charging the electric vehicles. The region urges NHTSA to work closely with the EPA and other federal, regional, and state partners on implementing additional strategies and measures to further reduce emissions from the power sector.

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 CAFE standards, which are estimated by NHTSA to reduce passenger car and light truck fuel consumption by 34% between 2022 and 2050 (Table S-3 of the Draft EIS) and 1.9% for HDPUVs for the same time period (Table S-4 of the Draft EIS) for the preferred alternative, 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 contribute 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.

For these reasons, MWAQC, CEEPC, and the TPB support the NHTSA’s proposal to establish new fuel efficiency standards for passenger cars and light trucks, and new fuel efficiency standards for heavy-duty pickup trucks and vans.

² “Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks, Model Years 2027–2032, and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans, Model Years 2030–2035: Summary,” Draft Environmental Impact Statement, July 2023, https://www.nhtsa.gov/sites/nhtsa.gov/files/2023-08/CAFE-2027-2032-HDPUV-2030-2035-Draft-EIS-Summary_072723-tag.pdf.

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

Sincerely,

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)