



Metropolitan Washington
Council of Governments



National Capital Region
Transportation Planning Board

September 27, 2017

Administrator G. Scott Pruitt
U.S. Environmental Protection Agency
Docket ID No. EPA-HQ-OAR-2015-0827
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Secretary Elaine Chao
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Subject: Comment on Reconsideration of the Final Determination of the Mid-Term Evaluation of Greenhouse Gas Emissions Standards for Model Year 2022-2025 Light-Duty Vehicles; Docket ID No. EPA-HQ-OAR-2015-0827

Dear Administrator Pruitt and Secretary Chao:

Thank you for providing an opportunity to comment on the Reconsideration of the Final Determination of the Mid-term Evaluation of Greenhouse Gas Emissions Standards for Model Years 2022-2025 Light-Duty Vehicles. 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 oppose any rollback of the current standards and request that you maintain the greenhouse gas (GHG) emissions standards for Model Year (MY) 2022-2025 vehicles, as prescribed in the October 15, 2012, Final Rule.

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. It is the region's forum for cooperative transportation decision-making, including issues related to air quality. COG's CEEPC serves as a principal policy adviser on climate change, including development of a regional climate change strategy to meet the regional greenhouse gas reduction goals adopted by MWAQC.

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 National Ambient Air Quality Standards (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. One such federal program is the 2012 joint rulemaking by the EPA and the National Highway Traffic Safety Administration (NHTSA) which set federal greenhouse gas (GHG) emissions and CAFE standards for light duty vehicles in model year (MY) 2017 and beyond. This partnership between the federal government, the California Air Resource Board (CARB), and the automobile industry developed a comprehensive program to improve the fuel efficiency of the light duty fleet and to reduce criteria pollutants and GHG emissions. Any relaxation of these standards will make it increasingly difficult for non-attainment and maintenance areas across the country to realize the reductions in NOx emissions needed to comply with existing NAAQS for criteria pollutants. Any relaxation of this rule will also make it more challenging for communities across the United States to meet their voluntary commitments to reduce GHG emissions.

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While significant progress has been made in the Washington region to reduce emissions of criteria pollutants and GHG emissions, addressing sources of low-level NOx, including from on-road vehicles, is critical to continuing to deliver cleaner air for the residents of the region. The 2012 GHG and CAFE standards rule provides for reduction in NOx emissions and supports the region in maintaining its compliance with the 2008 Ozone NAAQS. Additionally, these reductions will assist in meeting the 2015 Ozone NAAQS the region is working towards.

Additionally, we are concerned that GHG emissions contributing to global climate change can contribute to conditions that exacerbate air quality degradation related to emissions of criteria pollutants, making NAAQS compliance more challenging. 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 existing emission standards are needed, appropriate, and should be maintained.

While we recognize EPA's authority to reconsider the Mid-term Evaluation (MTE) Final Determination, MWAQC, TPB, and CEEPC have reviewed the Final Determination and agree that the GHG emissions standards for passenger vehicles and light-duty vehicles (LDVs), Model Year (MY) 2022 through 2025, are acceptable and appropriate. Additionally, we agree that the MY 2021 GHG emission standards for LDVs are also appropriate.

Further, we concur with the conclusions of the 2016 Technical Assessment Report (TAR) that there are a wide range of technologies that manufacturers can employ to meet the MY 2022-2025 standards with similar or lower costs than those projected in the 2012 Final Rule. We are encouraged to note that progress made to improve fuel economy and reduce emissions in recent years has been greater than expected, and that there are clear indications that consumers are accepting of and benefiting from the advancements in automobile technologies.

For these reasons, we urge the EPA to stand by the January 12, 2017 Final Determination and maintain the existing GHG emission standards promulgated in 2012.

Thank you again for the opportunity to provide comments on the EPA's and NHTSA's consideration of GHG standards for LDVs.

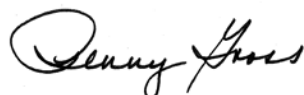
Sincerely,



The Honorable Hans Riemer
Chair, Metropolitan Washington Air Quality Committee (MWAQC)



The Honorable Bridget Donnell Newton
Chair, National Capital Region Transportation Planning Board (TPB)



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