



September 28, 2017

Honorable E. Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Honorable Elaine L. Chao
Secretary
Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Re: Docket ID No. EPA-HQ-OAR-2015-0827

Dear Administrator Pruitt and Secretary Chao:

I am writing on behalf of Colorado Communities for Climate Action to provide comments on the Environmental Protection Agency and the National Highway Traffic Safety Administration's reconsideration of greenhouse gas emission standards and fuel efficiency standards for light-duty vehicles for model years 2021 through 2025.

CC4CA is a coalition of 15 local governments advocating for state and federal actions to reduce climate-changing emissions, to protect the climate for current and future generations. We believe that NHTSA and EPA should keep in place the fuel efficiency and emission standards for light duty vehicles sold in model years 2021 through 2025, according to the final standards and augural standards established by the two agencies in a joint rulemaking in 2012. These standards require new vehicles in each successive model year to be about four percent more efficient and produce about four percent fewer heat-trapping emissions than in the preceding year.

There is every reason to maintain the 2021–2025 standards, and there is no reason to relax them.

Four basic reasons demonstrate why the light duty standards should be kept as previously set.

1. New information and new developments since the 2012 rulemaking consistently strengthen, not weaken, the original case for the standards.

According to the 2016 draft technical assessment report by EPA, NHTSA, and the California Air Resources Board, a wider range of technologies now exists for manufacturers to use to meet the standards, at costs that are similar or lower, than originally considered when the 2012

rule was adopted. Technology improvements include advances in more efficient engines and transmissions, aerodynamics, light-weighting, improved accessories, low rolling resistance tires, improved air conditioning systems, and more. New technologies not even considered in 2012 include higher compression ratios, naturally aspirated gasoline engines, continuously variable transmissions (CVTs), and 48-volt mild hybrid systems. In short, in 2012 the technology then available was officially determined to make the standards achievable, and now new advances have made them even more technologically achievable.

Also according to the 2016 joint technical assessment:

- Advanced gasoline vehicle technologies will continue to be the predominant technologies to meet the standards, with only modest levels of advanced clean vehicles (such as electric vehicles) needed to meet the standards;
- Consumer choices for future purchases of both cars and trucks, reflecting updated market trends since 2012, are fully accommodated by the current flexibility of the 2012 “footprint-based” standards, reflecting differences among different categories of cars and light trucks.
- Automobile manufacturers, on average, have actually exceeded the requirements of the first several years of the 2012 rules, even as the industry continues to rebound from the recent great recession, achieving six consecutive years of sales increases and a new all-time sales record in 2015. This demonstrates positive consumer response to vehicles complying with the standards.

We know of no new government analyses or other new credible information changing these conclusions, which clearly support continuation of the 2021–2025 standards.

2. The need for the reductions in heat-trapping emissions the standards would achieve is even more clearly needed now than when the standards were first set.

Every year, the case for reducing heat-trapping emissions becomes more compelling. The U.S. government’s third national climate assessment, published in 2014, reported “an unambiguous story: the planet is warming, and over the last half century, this warming has been driven primarily by human activity.” Since then, the record for the highest measured average global temperature was broken by 2014 when that year was completed, broken again in 2015, and broken yet again in 2016. The 17 completed years of this century now include 15 of the 16 hottest years on record.

As the evidence of human-caused climate change has mounted, so have many efforts to reduce it. In Colorado this year, for example, Governor John Hickenlooper set new official state goals of reducing statewide heat-trapping emissions by more than 26 percent by 2025, compared to 2005 levels. Achieving these goals will require new actions, and achieving them will be infinitely harder if the federal government backtracks on its current policies. Especially now that emissions from the transportation sector have surpassed those from electricity generation as the major human contributors to climate change, the federal vehicle emission/efficiency standards are one of the most important tools to meet goals such as Colorado’s. On a national basis, the model year 2021–2025 emission/efficiency standards were estimated during the 2012 rulemaking to reduce heat-trapping emissions by about 1.4 billion metric tons of carbon dioxide equivalent over the lifetimes of the vehicles subject to the standards. Colorado’s share (on a per capita basis) would be 24 million metric tons avoided—nearly one-fifth of a full year of statewide heat-trapping emissions.

3. The federal vehicle emission/efficiency standards are among the most cost-effective rules ever adopted.

The original federal rulemaking in 2012 documented that the net benefits of the 2017–2025 emission/efficiency standards will be from \$326 billion to \$451 billion over the lifetimes of the vehicles subject to the standards.

People would pay somewhat more in buying new vehicles, but would save money as they drive off the lot, because each month's fuel savings would exceed the increase in car payments. Over the lifetime of a vehicle, fuel savings were estimated to be more than 2.5 times the incremental increase in vehicle purchase prices. In Colorado, according to an analysis by the Union of Concerned Scientists, these savings would add up to an average of \$2,700 per household by 2030. These savings, in Colorado and nationally, would have obvious, major economic benefits.

4. Weakening the federal rules would lead to two systems for new vehicles in the nation—more fuel efficient, less polluting, and less expensive vehicles in California and the states that would continue to follow its rules, and less efficient, more polluting, and more expensive vehicles in other states.

California has had motor vehicle emission standards longer than the federal government, and the Clean Air Act has long allowed California to have its own standards, at least as stringent as federal ones. Other states then can adopt the California standards. Thirteen additional states, and the District of Columbia, have adopted the California standards, which cover about 40 percent of light duty vehicle sales. After EPA and NHTSA adopted in 2012 the new efficiency/ emission standards, California amended its standards to synchronize them with the federal standard, setting up one set of identical standards for the entire nation, allowing vehicle manufacturers to meet all of the standards with a single national fleet. This has obvious benefits for the manufacturers and vehicle buyers.

If the federal government relaxes its standards, we will return to two sets of vehicle standards and lose the advantages for manufacturers and others of the current single, synchronized system.

On behalf of the 15 local governments that are members of Colorado Communities for Climate Action, I thank you for consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Anita Seitz".

Anita Seitz
President