

July 5, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Attn: Docket ID No. EPA-HQ-OAR-2022-0985, EPA-HQ-OAR-2022-0829

Dear Administrator Regan:

On behalf of the 52 undersigned local officials, we urge the EPA to protect the health of our cities' residents and fight climate change by finalizing the strongest clean car and truck vehicle emission standards before the end of 2023.

EPA should finalize the most stringent standards possible for the Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles (LDV) and the Greenhouse Gas Emissions Standards for Heavy-Duty Engines and Vehicles Phase 3 (HDV). We recommend these car and truck standards:

- Be aligned on rulemaking timelines;
- Account for technological advances and cost-savings in zero-emission technologies, including those made possible by recent legislation;
- Achieve critically necessary reductions in greenhouse gases (GHGs) and other pollutants; and
- Be developed with thorough stakeholder involvement that ensures all affected communities can engage in the rulemaking process.

Ambitious federal standards, coupled with actions we are taking in our cities and towns to accelerate the use of clean vehicles, will enable our localities to more quickly cut transportation pollution and help ensure our residents and businesses have access to zero-emission technologies.

Timelines

The sooner that long-term LDV and HDV standards are in place, the sooner that vehicle manufacturers and related companies will have the regulatory certainty needed to plan their decision-making, product development, and rollout. We urge the EPA to finalize both standards by the end of 2023.

Technological advances and cost savings

EPA should ensure the LDV and HDV standards reflect major advancements in zero-emission technologies. Globally, there are more than 839 different models of zero-emission vans, trucks and buses commercially available with new models being introduced at an unprecedented rate.¹

Throughout the rulemaking process, EPA should also recognize and consider investments from the recently enacted Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA).

¹ <https://globaldrivetozero.org/tools/zeti-data-explorer> (Accessed March 15, 2023).

Together, these two laws are expected to reduce adoption costs for ZEVs by providing at least \$245 billion in federal funds—through tax credits, loans, and grants—to support ZEV charging infrastructure, manufacturing, and purchasing. Long-term regulatory certainty will push domestic manufacturers to take full advantage of these investments.

Critical pollution reductions

In 2020, the transportation sector contributed 27 percent of total GHG emissions in the United States—more than any other single sector. Transport also contributes over 55 percent of our nation’s total nitrogen oxide (NOx) emissions. NOx and particulate matter pollution pose serious health risks, leading to devastating human health impacts including asthma, other respiratory issues, and even premature death.

Fast-tracking robust car and truck standards is critical for the United States to meet its GHG targets over the coming decade, meet Clean Air Act requirements and provide long-overdue protections for environmental justice communities. We believe that such standards would be consistent with the U.S. nationally determined contribution to the Paris Agreement, under which the United States committed to cut economy-wide GHG emissions by 50 to 52 percent in 2030, compared to 2005 levels.

Stakeholder involvement

EPA must incorporate a robust and responsive stakeholder engagement process— particularly for frontline communities. Transportation is a leading source of air pollution and disproportionately harms people on lower incomes and people of color. EPA must work with environmental justice communities to ensure they are included in decision-making processes.

Outcomes

The final standards should:

- Ensure the LDV and HDV standards support greater zero-emission vehicle adoption by considering market growth expected from IRA and IIJA investments (which will surpass existing commitments outlined in Executive Order 14037);
- Put the nation on a trajectory to ensure 100 percent of all LDVs and HDVs sold in 2035 are zero-emission vehicles including pathway milestones assuring continuous progress; and
- Reflect recently adopted state LDV and HDV emissions standards, consistent with state authority under the Clean Air Act.

By implementing these recommendations, we believe that the resultant standards will not only meet the Clean Air Act’s statutory command to protect public health, but will also help lower fuel costs for consumers, create good, green jobs, and reduce burden on frontline communities.

We thank you for your consideration as you work to finalize these life-saving standards this year.

Sincerely,

Mayor Becky Daggett
Flagstaff, AZ

Mayor John J. Bauters
Emeryville, CA

Mayor Chance Cutrano
Fairfax, CA

Mayor Devin T. Murphy
Pinole, CA

Mayor Matt Mahan
San Jose, CA

Mayor Louise From
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Katherine Golub, City Councilor
Greenfield, MA

Samantha Perlman, City Councilor
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Michael Bettencourt
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Winchester, MA

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