



October 26, 2018

Mr. Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: EPA-HQ-OAR-2018-0283

Dear Acting Administrator Wheeler,

On behalf of The U.S. Conference of Mayors and the National League of Cities, we appreciate the opportunity to submit comments on the U.S. Environmental Protection Agency's (EPA) and the U.S. Department of Transportation National Highway Traffic Safety Administration's (NHTSA) Proposed Rule, "*The Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026*" (Docket EPA-HQ-OAR-2018-0283). This joint rulemaking amends existing Corporate Average Fuel Economy (CAFE) and greenhouse gas emissions standards for passenger cars and light-duty trucks and establishes new standards, covering model years 2021 through 2026. We oppose EPA's and NHTSA's efforts.

Cities across the United States are seeing the effects of climate change and are taking action to mitigate impacts on their residents, businesses, infrastructure and economy. Recent extreme weather events, such as heat waves, droughts, heavy downpours, floods, hurricanes and changes in other storms have brought renewed attention to the need to anticipate, prepare for and adapt to these events—across all levels of government. Local elected officials serve as first responders on the front lines when it comes to preparing in advance of these types of emergencies, natural disasters and extreme weather events. They offer immediate assistance to those impacted, and identify strategies, solutions, and partnerships to address situations quickly and efficiently. Weakening the vehicle greenhouse gas emission standards through this proposed rule would hinder local governments' ability to meet their goals under local climate action plans, a key component of which often involves greenhouse gas reduction.

According to EPA's own [analysis](#), the transportation sector generated the largest share of greenhouse gas emissions, nearly 28.5 percent, in the U.S in 2016. Cities are taking action to reduce vehicle emissions through investments in transportation alternatives such as public transit, bike/pedestrian infrastructure, and electric vehicles. These efforts, however, are not enough to meet local emission reduction targets. Therefore, cities heavily rely on vehicle emission standards to help meet overall goals.

Moreover, vehicle emissions impact air quality and a community's ability to meet required ozone levels. Falling outside of required ozone levels can have negative impacts on cities, potentially disqualifying them from federal funding opportunities for highway and transit infrastructure. Robust vehicle emission standards are key to ensuring cities are able to meet ozone requirements.

Finally, we oppose the withdrawal of the Clean Air Act California waiver that allows the state to set its own standards for greenhouse gas emissions and zero emissions vehicles, which 12 other states plus the District of Columbia have adopted. States and local governments are charged with protecting the health, safety, and welfare of its residents. Preempting this authority would overturn nearly a decade of precedent and prevent state and local governments from tailoring laws to the specific needs of their communities.

Attached to this letter is a "Local Leaders' Clean Car Declaration" signed by over 60 local and state leaders earlier this year to voice opposition to EPA's Final Determination to weaken the clean car standards, declaring, "We strongly support the current federal standards for a modern vehicle fleet agreed to in 2012 by the automotive industry, the federal government and the State of California."

In closing, thank you for considering the perspective of local elected officials as you move forward. We urge you to withdraw the proposed rule and to commit to partnering with mayors and cities in taking urgent action to reduce carbon emissions and mitigate the effects of climate change. If you have any questions, please do not hesitate to contact our staff: Judy Sheahan, The U.S. Conference of Mayors (jsheahan@usmayors.org or 202-861-6775) and Carolyn Berndt, National League of Cities (berndt@nlc.org or 202-626-3101).

Sincerely,



Tom Cochran
CEO and Executive Director
The U.S. Conference of Mayors



Clarence E. Anthony
CEO and Executive Director
National League of Cities

LOCAL LEADERS' CLEAN CARS DECLARATION

As U.S. attorneys general, mayors and county executives, we – not federal officials in Washington, D.C. – are primarily responsible for the transportation systems upon which our residents and our local and regional economies depend. A clean, efficient and high-performance vehicle fleet is an essential component of these systems.

We strongly support the current federal standards for such a modern vehicle fleet agreed to in 2012 by the automotive industry, the federal government and the State of California.

We believe these standards are both necessary and feasible – a conclusion reaffirmed in a major 2016 study by the U.S. Environmental Protection Agency, the U.S. Department of Transportation and the California Air Resources Board. This study found that auto companies are adopting fuel economy technologies at unprecedented rates and will be able to meet these standards primarily with conventional vehicles. The study also found that the cost of compliance will be similar or lower than anticipated in 2012, with substantial fuel savings payback for consumers. These findings are consistent with a major 2015 study by the National Academy of Sciences.

All Americans -- not only the residents of the states, cities and counties signing this manifesto – deserve to enjoy fuel-efficient, low-emission cars and light trucks that save money on gas, improve our health and support American jobs. We strongly urge the auto industry to join us, and to use its influence with the Administration to ensure that these standards remain in place.

Given our responsibilities to our citizens, we also strongly oppose and will vigorously resist any effort by the Administration to prevent states from enforcing reasonable, commonsense emissions performance standards for vehicle fleets sold in their jurisdictions. Such standards are particularly appropriate given the serious public health impacts of air pollution in our cities and states and the severe impacts posed by climate change, including recent storms, droughts, floods and fires that have hit multiple regions of the U.S. in just the past few years. If the Administration attempts to deny states and cities the basic right to protect their citizens, we will strongly challenge such an effort in court.

Whatever decisions the Administration may make, we are committed to using our market power and our regulatory authority to ensure that the vehicle fleets deployed in our jurisdictions fully meet or exceed the promises made by the auto industry in 2012. We look forward to cooperating with the auto industry to enable us to achieve this goal. Americans need and deserve clean cars.

If federal officials obstruct progress on this front, states and cities will pick up the leadership mantle to protect our constituents' health, support our local economies, and maintain the international competitiveness of the U.S. automotive industry. With the support of the American people, which we already strongly enjoy, we are confident we will prevail.

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Mayor Christine Berg, Lafayette, CO
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Mayor Adam Paul, Lakewood, CO
Mayor Robert Garcia, Long Beach, CA
Mayor Eric Garcetti, Los Angeles, CA
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