

April 2, 2018

The Honorable Scott Pruitt  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Mail Code 1101A  
Washington, D.C. 20460

Re: 2022-2025 Model Year Light-Duty Vehicle Greenhouse Gas Emission Standards

Dear Administrator Pruitt:

As the environmental agency heads for the states of Connecticut, Delaware, Maryland, Massachusetts, New Jersey, Oregon, Pennsylvania, Rhode Island, Vermont and Washington, and the District of Columbia, we write to express our deep concern with your decision to initiate rulemaking to weaken the national greenhouse gas (GHG) emissions standards for model year (MY) 2022-2025 light-duty vehicles. This decision does not comport with a thorough technical record demonstrating the need for and feasibility of these critical environmental standards. Any weakening of the standards would increase pollution from cars and light trucks, with adverse public health and environmental impacts. Further, it would come at a high cost to consumers forced to pay more at the pump. We strongly urge EPA not to proceed with a new rulemaking, and to leave in place the light-duty vehicle regulations as finalized in 2012.

These standards, which were established after exhaustive technical analysis and with the full support of industry and states, could in fact be stronger, as improvements to advanced fuel-saving technologies continue to be introduced at a faster pace than envisioned in the rule. States and our nation need to continue to increase efforts to reduce air pollutant emissions, and cars and trucks are among the largest source of these contaminants. The U.S. has always been a world leader in the automobile industry, and part of this success has been the result of government promoting the most advanced vehicle technologies.

The fundamental principles of cooperative federalism that are embodied in the Clean Air Act (CAA) and other federal environmental statutes recognize the important right of states to go beyond federal requirements when necessary to protect the public health and welfare of their citizens. We strongly urge you to respect California's independent authority under CAA § 209(b) to set its own motor vehicle standards and the right of other states under CAA § 177 to adopt those standards to meet our environmental challenges. California's special role has been recognized for the past half century by EPA Administrators on a bipartisan basis and has been a vital part of the architecture of our nation's response to air pollution. In granting a waiver for California's existing light-duty vehicle GHG standards, EPA has already determined that California met its burden under § 209(b). An even stronger waiver case exists today based on the expanding body of scientific evidence establishing the nexus between human activity and climate change. Moreover, there continues to be broad bipartisan support for the authority Congress granted in § 177 to other states to adopt and enforce California standards that are more protective of public health and welfare.

For these reasons, we strongly urge you to leave both EPA's current GHG standards for MY 2022-25 and California's waiver intact.

Sincerely,



Rob Klee  
Commissioner  
Connecticut Department of Energy and Environment



Shawn Garvin  
Secretary  
Delaware Department of Natural Resources and Environmental Control



Tommy Wells  
Director  
D.C. Department of Energy and Environment



Ben Grumbles  
Secretary  
Maryland Department of the Environment




Martin Suuberg  
Commissioner  
Massachusetts Department of Environmental Protection



Catherine R. McCabe  
Acting Commissioner  
New Jersey Department of Environmental Protection



Richard Whitman  
Director  
Oregon Department of Environmental Quality



Patrick McDonnell  
Acting Secretary  
Pennsylvania Department of Environmental Protection



Janet Coit  
Director  
Rhode Island Department of Environmental Management



Julie Moore  
Secretary  
Vermont Agency of Natural Resources



Maia Bellon  
Director  
Department of Ecology  
State of Washington

cc: Bill Wehrum, Assistant Administrator  
Office of Air and Radiation

Christopher Grundler, Director  
Office of Transportation and Air Quality

Steve Cliff, Deputy Executive Officer  
California Air Resources Board