

March 22, 2017

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 York, Oregon, Pennsylvania, Rhode Island, Vermont and Washington, and the District of Columbia, we write to urge you to maintain the U.S. Environmental Protection Agency's (EPA's) "Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards." While the record suggests that more stringent standards may be appropriate, we agree with EPA's January 13, 2017 decision to keep the current national greenhouse gas (GHG) standards for model year (MY) 2022-2025 to provide automobile manufacturers with regulatory certainty. We also support maintaining these national standards in order to maximize environmental and economic benefits and to ensure that the United States continues as a world leader in advanced vehicles. In addition, we strongly urge you to respect the independent authority of California to implement its own standards and the right of other states to opt into those California standards to meet the environmental challenges we face.

As part of the 2012 rulemaking establishing the MY 2017-2025 light-duty vehicle GHG standards, which the automobile manufacturers strongly endorsed, EPA made a commitment to conduct a Midterm Evaluation of the standards for MY 2022-2025. After conducting a robust evaluation of an extensive technical record and providing multiple opportunities for public input, EPA determined that the standards for MY 2022-2025 are still appropriate under section 202(a) of the federal Clean Air Act. EPA's completion of the Midterm Evaluation ahead of schedule does not provide grounds to reopen or alter EPA's determination, nor does it change the facts supporting the decision. The record clearly shows that technologies needed to meet the standards are here today, automakers are expected to meet the standards at lower costs than previously estimated, and many other technologies in active development may provide even more cost effective compliance options. The record also establishes that the standards will save consumers money on fuels that will then be available to invest in other areas of the economy, provide public health and welfare benefits, and will not negatively impact the economic viability of the automobile industry or vehicle safety.

In addition, we strongly urge you to resist industry lobbying to attempt to revoke the waiver issued to California to implement its own GHG standards. You have often spoken of the importance of states' rights, and the right of California to establish and enforce standards that are needed to meet its environmental challenges is fundamental to the Clean Air Act, as is the right of other states to opt into the California standards. California's authority to adopt its own standards has been recognized for the past half century by EPA Administrators on a bipartisan basis. Any effort to revoke EPA's waiver decision for California's standards would be unprecedented, run afoul of the statutory criteria for granting or denying a waiver in section 209(b) of the federal Clean Air Act, and undermine our state rights. In granting a waiver for California's GHG standards, EPA determined that California met its burden and an even stronger waiver case could be made today. Moreover, our states continue to have broad bipartisan support for the authority Congress granted to states in section 177 of the Clean Air Act to adopt and enforce California standards that are more protective of public health and welfare.

For these reasons, we respectfully request that you preserve EPA's current GHG standards for MY 2022-25 and leave California's waiver intact.

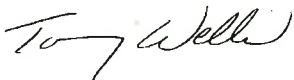
Sincerely,



Robert Klee
Commissioner
Connecticut Department of Energy and Environmental Protection



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



Basil Seggos
Commissioner
New York Department of Environmental Conservation



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



Maia Bellon
Director
Department of Ecology
State of Washington



Emily Boedecker
Commissioner
Vermont Department of Environmental Conservation

cc: Christopher Grundler, Director
Office of Transportation and Air Quality
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Mary Nichols
Chairman
California Air Resources Board
1001 "I" Street
Sacramento, California 95814