



July 5th, 2023

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2022-0829
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

To Whom It May Concern:

We are writing on behalf of the members of the Western States Air Resources Council (WESTAR) regarding the U.S. Environmental Protection Agency's (EPA's) proposed rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," published in the Federal Register on May 5, 2023 (88 FR 29184). WESTAR is a regional, non-partisan, non-profit association of State air pollution control agencies in the western United States. All WESTAR members except North Dakota, South Dakota, and Wyoming support this letter.

WESTAR applauds EPA for its past efforts to reduce emissions from the transportation sector, and this proposed rule is another step in the right direction toward further reducing criteria pollutant and GHG emissions from this sector. Given that mobile sources are the primary contributor to GHG emissions and contribute over half of the anthropogenic NO_x emissions in the U.S.,¹ setting standards that lower the emissions from these sources is paramount. EPA projects that CO₂ would be reduced by 26 percent relative to the no-action scenario.² By 2055, EPA also projects a 35-40 percent reduction in PM_{2.5}, NO_x, and SO_x, and over 40% reduction in VOC emissions.³ WESTAR members support regulations that reduce emissions.

EPA's action not only yields advantages at the national level but also provides significant benefits to states, local air agencies, and Tribes in the West who face challenges in meeting criteria pollutant standards in part due to significant emissions from federally regulated mobile sources. In terms of ozone formation, many areas in the West are NO_x-limited and therefore focus emissions reduction efforts on NO_x reductions, as they are most effective in reducing ozone concentrations. The

¹ U.S. Environmental Protection Agency, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles," Govinfo, <https://www.govinfo.gov/content/pkg/FR-2023-05-05/pdf/2023-07974.pdf> (accessed June 8, 2023).

² U.S. Environmental Protection Agency, Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles Draft Regulatory Impact Analysis ("DRIA"), EPA-420-D-23-003, Section VI and Chapter 9 (April 2023), <https://www.epa.gov/system/files/documents/2023-04/420d23003.pdf>.

³ See DRIA Section VII and Chapter 9

proposed emissions standards for light-duty and medium-duty vehicles will reduce emissions in these areas and assist these agencies in achieving their ozone attainment planning goals.

In addition, EPA's approach to addressing multiple pollutants simultaneously simplifies the regulatory landscape and supports the paradigm shift from single to multi-pollutant policies, a shift many western states, local air agencies, and Tribes appreciate. Beyond regulatory simplification, the holistic approach to emissions standards outlined in the proposed rule acknowledges the interconnectedness of different pollutants and their cumulative impacts. This approach will help to improve overall air quality and protect the health and well-being of communities in the West.

Thank you for the opportunity to provide comment. If you have questions or need further information, please contact WESTAR's executive director, Mary Uhl (maryuhl@westar.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Czecholinki', with a stylized flourish at the end.

Daniel Czecholinki, President