

December 3, 2021

Ms. Elke Hodson
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards, Docket ID No. EPA-HQ-OAR-2021-0208

Dear Ms. Hodson:

The California Air Resources Board (CARB) appreciated the opportunity to meet with you and your colleagues at the Office of Information and Regulatory Affairs (OIRA) and the U.S. Environmental Protection Agency (EPA) to discuss the importance of and need for EPA's revised light-duty vehicle greenhouse gas emission standards for model years 2023 and later. More stringent standards as proposed are cost-effective, net-beneficial, and critical to addressing the climate crisis and meeting public health goals for air quality.

As we discussed, CARB provides the following documents to assist OIRA's review of EPA's proposed standards:

- EPA, The 2021 EPA Automotive Trends Report, November 2021;
- CARB Report: Passenger Vehicle Manufacturers are Outperforming the ZEV Regulation through Model Year 2020, December 3, 2021;
- Veloz, Electric Vehicle Sales in California and the U.S., Quarter 3 2021 Update; and
- Alliance for Automotive Innovation, Electric Vehicle Sales Dashboard, data last updated October 6, 2021.¹

The latest information available contained in these documents shows continued improvement in reducing emissions with conventional powertrain systems and building the capacity to meet a growing market demand for zero-emission vehicles. Overall, the industry is in compliance with the emission standards and positioned to remain so, including with more stringent standards as proposed. While some manufacturers are exceeding the standards, others are using credits. This is a feature, not a bug, of the regulations. Manufacturers are using the credit provisions of the regulations as intended to plan for compliance as it best suits their own business plans. These data further support establishing the most stringent standards feasible.

¹ See also [electric-vehicle-sales-dashboard \(autosinnovate.org\)](https://www.autosinnovate.org/electric-vehicle-sales-dashboard).

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If you have any further questions about these documents, our technical comments supporting more stringent standards, or our discussion today, please do not hesitate to reach out to me at Pippin.Brehler@arb.ca.gov or (279) 208-7445.

Sincerely,

Pippin C. Brehler

Pippin C. Brehler
Senior Attorney

Enclosures