

CEVA Members:

Amazon
American Airlines Group, Inc.
AT&T, Inc.
Best Buy Co, Inc.
CBRE
Centrica Business Solutions
Clif Bar & Company
Consumers Energy
DHL
Edison International
Exelon Corporation
Genentech, Inc.
Heritage Environmental Services, LLC
Hertz Global Holdings, Inc.
IKEA USA
JLL
LeasePlan
Lime
Lyft
Merchants Fleet
National Grid
Schindler Elevator Co.
Siemens
T-Mobile
TK Elevator
Uber
UNFI

September 27, 2021

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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

Dear Administrator Regan,

As companies that represent over \$1 trillion in annual revenue¹ and collectively own, lease, or operate more than one million fleet or networked vehicles in the United States, we are writing to express our support for strong light duty vehicle standards, and to urge you to adopt the most stringent proposal - Alternative 2 - in strengthening the SAFE Part II regulations adopted by the Trump Administration.

We share a common goal of electrifying our fleets and networks as well as reducing our transportation carbon footprint, and we recognize that strong policies will be necessary to effect this critical transition. Our members see climate change as a significant risk, and reducing GHGs as a major economic opportunity. We recognize that clean vehicles, including zero emission vehicles (ZEVs) and efficient internal combustion engine vehicles, bring significant economic and environmental benefits, including operational cost savings and protection from fuel price volatility, as well as improved air quality and a reduced carbon footprint.

Strong vehicle standards are critical to ensuring economic benefits as well as meeting climate goals. While we are working to do our part as individual companies, we need strong standards to ensure the widespread availability of clean vehicles in the U.S., as well as to drive the economies of scale that will accelerate the necessary transition to electrification.

In sum, we urge EPA to adopt standards at least as stringent as Alternative 2, which are necessary to accelerate the cost-effective deployment of fuel-efficient and electric light-duty commercial vehicles, and allow our members to meet our climate goals. Further, we strongly urge that the next round of standards be aligned with climate goals by ensuring at least 50% ZEV sales, and a 60% reduction in emissions by 2030, and that put the U.S. on a glide path toward 100% passenger ZEV sales by 2035.

¹ Based on 2020 annual revenue.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Forni". The signature is fluid and cursive, with the first name "Sara" and last name "Forni" clearly distinguishable.

Sara Forni

On behalf of the Corporate Electric Vehicle Alliance (CEVA), led by Ceres
Head of CEVA

CC:

Acting Administrator Steve Cliff
National Highway Traffic Safety Administration

Gina McCarthy
National Climate Advisor

Ali Zaidi
Deputy National Climate Advisor