

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 long-term investors with over \$2.723 trillion in assets under management, we are writing to express our support for strong light duty vehicle standards, and to urge you to adopt the most stringent proposed alternative - Alternative 2 - to strengthen the SAFE Part II regulations adopted in 2020. The U.S.' ability to meet climate goals, and the future competitiveness of the U.S. auto industry, are both contingent on strong vehicle standards as well as a rapid shift to low-emission and electric vehicles. Adopting standards at least as stringent as Alternative 2 will be necessary to effect this critical transition and to maximize economic benefits.

We see climate change as a significant economic risk, and reducing GHG emissions by transitioning to cleaner vehicles as a major economic opportunity. Ceres analyses consistently show that stronger standards support growth both in the auto industry and throughout the U.S. economy. For example, our 2018 analysis found that auto parts suppliers, who at the time employed 2.6 times more Americans than automakers, would especially stand to lose under weakened standards; the supplier sector could have [lost](#) \$20 billion in sales of clean vehicle technologies from 2021-2025 under the current rule.

Robust vehicle standards are critical to ensuring the global competitiveness of the U.S. auto industry, as well as staving off the worst impacts of climate change. In addition to adopting standards at least as stringent as Alternative 2, we urge EPA to ensure that the next round of standards is aligned with climate goals by ensuring at least 50% ZEV sales, and a 60% reduction in emissions, by 2030.

Thank you for your consideration of these comments.

Sincerely,

EOS at Federated Hermes (on behalf of its stewardship clients)
BMO Global Asset Management
The Office of the New York City Comptroller
New York State Common Retirement Fund
Impax Asset Management, LLC
Miller/Howard Investments INC.
Seventh Generation Interfaith
Committee on Mission Responsibility Through Investment of the Presbyterian Church U.S.A.

Boston Walden Trust
NEI Investments
Trillium Asset Management
Adrian Dominican Sisters, Portfolio Advisory Board
Congregation of St. Joseph
Daughters of Charity, Province of St. Louise
Mercy Investment Services, Inc.
First Affirmative Financial Network

cc:
Acting Administrator Steve Cliff
National Highway Traffic Safety Administration

Gina McCarthy
National Climate Advisor

Ali Zaidi
Deputy National Climate Advisor