**NTAA Template Letter for Tribes on the U. S. EPA’s Proposed Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles**

**NOTE:** *The NTAA recommends that you begin your comment letter with introductory remarks regarding the signatory’s position within the Tribe. The more individualized the letter, the greater its potential impact. Feel free to add your own arguments or specific stories that will make it educational for the EPA. Be sure to replace the highlighted text with your own text.*

*This proposed rule is a major initiative by the Biden administration to address climate change through reduced greenhouse gas emissions from motor vehicles. Emissions of ozone-forming pollutants and toxic pollutants from tailpipes would also be reduced. To the extent that these air pollution issues affect your Tribe, please include specific concerns.*

*The comment deadline is* ***July 5, 2023.*** *Your comment letter can be submitted electronically to the Federal Rulemaking Portal.* <https://www.regulations.gov/> OR email to a-r-Docket@epa.gov.

 [Date]

US Environmental Protection Agency

EPA Docket Center (EPA/DC)

Docket ID No. EPA-HQ-OAR-2022-0829

1200 Pennsylvania Avenue NW

Washington, DC 20460

RE: Comments from the [INSERT TRIBE’S NAME HERE] on The Environmental Protection Agency’s (EPA’s) Proposed Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles: Docket ID No. EPA-HQ-OAR-2022-0829

The **[INSERT TRIBE’S NAME HERE]** is pleased to submit these comments and recommendations regarding the U.S. Environmental Protection Agency’s (EPA’s) Proposed Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles as published in the *Federal Register* on May 5, 2023.

The acute and continuous impacts of climate change on **{INSERT TRIBE’S NAME HERE]** are well documented. Unfortunately, new consequences of this global crisis continue to be revealed. As described and documented in the analysis of this proposed rule, when fully implemented, the U.S. will accomplish reductions in greenhouse gas emissions from motor vehicles, the largest source of these pollutants. Although the proposed rule and anticipated reduction in emissions of greenhouse gases (specifically carbon dioxide) are characterized as “significant” and “stringent”5, Alternative 1 to the proposed standards will achieve more substantial reductions. We are mindful of the expected additional costs of new vehicles as projected for Alternative 1 requirements. These costs for vehicle purchasers will be mitigated by increased savings in vehicle operating costs. We recommend Alternative 1.

The **{INSERT TRIBE’S NAME HERE}** supports the proposed emissions standards for new light-duty and medium-duty vehicles for non-methane organic gases plus nitrogen oxides (NMOG+NOx). When fully implemented this will be an important step in reducing the impacts from the largest source of these ozone-precursor pollutants. Concurrently reduced emissions of NMOG+NOx will reduce ambient air concentrations of particulate matter, and PM2.5 more specifically. Reducing these tailpipe emissions will further reduce the release of multiple toxic air pollutants including benzene – a known human carcinogen.

As our light-duty and medium duty vehicle populations become more electrified, battery durability and warranty will be increasingly important. The {**INSERT TRIBE’S NAME HERE}** supports the proposed requirements regarding battery performance.\

The anticipated transition from gasoline-powered vehicles to partial or total electric power trains will require greatly enhanced systems and convenient vehicle charging units. We are aware that programs are emerging to build this infrastructure. Such initiatives by the EPA, the Department of Energy (DOE), and others must be operational and reliable for the proposed emissions standards to be achievable and acceptable.

In conclusion, the {**INSERT TRIBE’S NAME HERE}** supports this importantset of proposed regulations regarding air pollution emissions from new light-duty and medium-duty vehicles. This support is contingent upon EPA and other federal agencies’ assurances that infrastructure is in place to support the transition to an electric vehicle fleet nationwide.

Signed,

[INSERT NAME AND SIGNATURE OF TRIBAL LEADERSHIP HERE]