

Dept. of Justice: AG Kaul submits comment letter regarding EPA's proposed greenhouse gas standards for light- and medium-duty vehicles

Posted on Monday, Jul 10, 2023

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MADISON, Wis. – As part of a California-led coalition of 26 States and Cities, Attorney General Josh Kaul announced today that he has submitted [a comment letter](#) to the U.S. Environmental Protection Agency (EPA) regarding its proposed greenhouse gas (GHG) and criteria pollutant standards for light- and medium-duty highway vehicles model years 2027 through 2032. While EPA's proposal would lead to measurable progress — a 56 percent reduction in GHG emissions levels from the model year 2026 levels for light-duty vehicles, and a 44 percent reduction in GHG emissions levels from the model year 2026 levels for medium-duty vehicles — Attorney General Kaul urges EPA to move forward with more stringent GHG and criteria pollutant standards, which technological advancements make feasible nationwide. Light- and medium-duty vehicles include passenger cars, sport utility vehicles (SUVs), pickup trucks, and vans.

"We must take strong action to fight climate change," said Attorney General Kaul. "By setting higher, yet achievable, standards, we can do more to mitigate the harm to our health, our environment, and our economy from climate change."

The transportation sector is the largest source of GHG emissions in the United States, with light-duty vehicles being the largest contributor within that sector. In addition, light- and medium-duty vehicles are a significant source of non-GHG pollutants that detrimentally affect air quality. Both the impacts of climate change and poor air quality disproportionately harm environmental justice communities.

In their letter, the attorneys general and cities:

- Emphasize that strong emissions standards are necessary to protect the environment and public health. From extreme heat to wildfires to drought, they note that we are already experiencing the devastating impacts of climate change, which will continue to mount and compound with rising concentrations of GHGs in the atmosphere.
- Detail that the technologies necessary to reduce GHGs and criteria pollutants from new motor vehicles already exist and are widely in use in the market today.
- Explain that standards more stringent than EPA's proposed standards would comport with its statutory mandate in Section 202(a). Under Section 202(a)(1) of the Clean Air Act, EPA "shall by regulation prescribe . . . standards applicable to the emission of any air pollutant from any class or classes of new motor vehicles . . . , which in [its] judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare."

In submitting the comment letter, Attorney General Kaul is joined by the attorneys general of California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Illinois, Maine, Maryland, Minnesota, New Jersey, New Mexico, New York, North Carolina, Oregon, Rhode Island, Vermont, and Washington; the People of the State of Michigan; the Commonwealths of Massachusetts and Pennsylvania; and the Cities of Chicago, Denver, Los Angeles, New York, and Oakland.

Find this release and the letter on Wisconsin DOJ's website [here](#).