Willy James

Do you live in Placer County?
No

What outdoor activities do you enjoy?
Swiming

Hiking

Golfing

Skiing

How happy are you with the current master plan?
Happy

Do you have any general comments?

These are my general comments with an attachment.

Ceres

BICEP BUSINESS for INNOVATIVE CLIMATE & ENERGY POLICY
a project of Ceres

BICEP Members:

Annie's Inc
Aspen Skiing Company
Aveda
Autodesk
Avon Products
Ben & Jerry's
Burton Snowboards
CA Technologies
Clif Bar
Dignity Health
eBay Inc.
Eileen Fisher
Fetzer Vineyards
Gap Inc.
General Mills
IKEA
JLL
KB Home
The Kellogg Company
Levi Strauss & Co.
LBrands
L'Oreal
Mars Incorporated
Nestle
New Belgium Brewing
Nike
The North Face
Outdoor Industry Association
Owens Corning
Patagonia
Portland Trail Blazers
Seventh Generation
Starbucks
Stonyfield Farm
Symantec
Timberland
Unilever
VF Corporation
Vulcan, Inc.

December 30, 2016

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

Re. 2022-2025 Model Year Light-Duty Vehicle Greenhouse Gas Emission and Corporate Average Fuel Economy Standards; EPA–HQ–OAR–2015–0827

Dear Administrator McCarthy,

As major U.S. businesses representing over $400 billion in annual revenue, we are writing to voice our strong support for the Proposed Determination that the standards currently in place for MY2022-2025 are appropriate. The Proposed Determination is based on an updated analysis that draws on a comprehensive and robust technical record, and confirms the recent draft Technical Assessment Report's (TAR) findings that meeting the current standards for model years 2022-2025 will be feasible and cost-effective (indeed, costs are lower than projected in the 2012 rule), and that automakers are adopting fuel savings technologies at faster rates than anticipated. It also establishes that the 2025 standards can be met with very low levels of strong hybridization and full electrification, all while preserving consumer choice and ensuring fuel cost savings in all sizes of vehicles. In addition, independent studies establish that the standards will benefit the auto industry, and drive job and economic growth. Independent analyses also rebut opponents' claims that the standards will result in prohibitive vehicle prices and job losses.

Given its size and connections to so many other sectors, the health of the auto industry has a significant impact on the broader economy. The National Program represents a critical opportunity to strengthen our economy and create jobs – both by benefiting the auto industry and by ensuring fuel cost savings, which in turn will increase spending on non-energy goods and services. In addition, given the important role of strong standards in driving innovation, the standards will also help ensure the global competitiveness of the industry. Finally, given that transportation is now the largest source of GHG emissions in the U.S., strong clean car standards are imperative, both to meet our climate goals as well as our climate commitments under the Paris Agreement.

An economic analysis commissioned by Ceres and produced by independent automotive industry analysts Alan Baum and Dan Luria finds that the current National Program will reduce risk for the Detroit Three and benefit suppliers. First, the study shows that the Detroit Three will remain profitable under the current standards even at a very low $1.80 per gallon fuel price. Second, current standards provide insurance for the Detroit Three automakers and their suppliers against future market share losses in the event of a fuel price spike. Third, regulatory certainty is valuable to automakers, and especially to the Tier One suppliers that are making the majority of fuel-saving technology investments in research, development and production capacity by ensuring returns on their investments. Fourth, the analysis found that the standards provide significant benefits to suppliers, which stand to gain about $90 billion in increased orders under the standards. Notably, Tier One auto suppliers make up a significantly larger portion of the economy than the automakers, and employ over half a million Americans —more than two and a half times as many people as the automakers employ. Finally, weakening the standards could make the U.S. the outlier among global regulatory regimes, and put the Detroit Three at a disadvantage by undermining their ability to achieve economies of scale through increased use of global platforms. Another study, More Jobs per Gallon, commissioned by Ceres and authored by Management Information Services, found that the standards would create approximately 484,000 new jobs economy-wide, and that national gross economic output would be approximately $21.3 billion higher under the current standards. These study findings underscore the economic importance of the current standards to both automakers and suppliers, as well as to the broader economy.

Careful examination of the arguments made by those seeking to weaken the standards reveals flawed arguments and unsupported assumptions. For example, Ceres commissioned Baum and Luria to assess the argument that standards are making new vehicles unaffordable for the average consumer; Baum and Luria found that that the standards play a minor role in price increases. In fact, their analysis shows that the increased price of an average new car or truck is due to changes in consumer income distribution and preferences, as well as to automakers' own business strategies. Many expensive and profitable features have gone from optional to nearly universal on car companies' entire model line-up. Automakers are adding these additional luxury features in order to target the average new car buyer, whose income is 175% that of the median U.S. household, and who wants and is able to pay for those features. Providing higher-priced vehicles with higher trim levels has contributed to record profits for automakers, and the increasing sales of more profitable and larger crossover vehicles has been the major driver of the increase in new vehicles' prices, rather than costs associated with fuel economy regulations. Similarly, Baum and Luria analyzed an industry study claiming sales and job losses under the standards, and concluded that it was flawed and based on unfounded assumptions – for example, the industry study's outdated cost estimates are based on a 1991 study and incorrectly assumes that automakers will pass on all their costs to consumers. In contrast, the Proposed Determination is based on rigorous updated analyses and the draft TAR, which was issued jointly by the National Highway Safety Administration (NHTSA), the Environmental Protection Agency (EPA) and the California Air Resources Board, and is based on years of comprehensive and robust analysis informed by a wide range of industry stakeholders, the 2015 National Academy of Science report, a wide range of technical experts, and a variety of other stakeholders.

As successful American businesses, we know the importance of recognizing and seizing opportunities. We support staying the course on the standards because they represent an important opportunity to strengthen our economy, save consumers and businesses money, enhance the competitiveness of the American auto industry, and mitigate climate risk.

Sincerely,

Anne Kelly
On behalf of Business for Innovative Climate and Energy Policy [BICEP]
Director, BICEP

cc: Janet McCabe, Acting Assistant Administrator for the Office of Air and Radiation, U.S. Environmental Protection Agency

December 30, 2016

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

Secretary Anthony Foxx
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re. Proposed Determination Regarding 2022-2025 Model Year Light-Duty Vehicle Greenhouse Gas Emission Standards; EPA–HQ–OAR–2015–0827

Dear Administrator McCarthy,

As long-term investors with over $720 billion in assets under management, we are writing to voice our strong support for EPA's Proposed Determination that the current standards for model years 2022-2025 (MY 2022-2025) Greenhouse Gas (GHG) Emissions standards remain appropriate.

The standards represent a critical opportunity to strengthen the U.S. economy and create jobs – both by benefiting the auto industry and by ensuring fuel cost savings, which in turn will increase spending on non-energy goods and services. In addition, given the critical role of strong standards in driving innovation, the standards will also help ensure the global competitiveness of the industry.

An economic analysis[1] commissioned by Ceres and produced by independent automotive industry analysts found that the current National Program would reduce risk for the Detroit Three and benefit suppliers. First, the study shows that the Detroit Three will remain profitable under the current standards under all fuel price scenarios considered - even under a very low $1.80 per gallon fuel price. Second, the current standards provide insurance for the Detroit Three automakers and their suppliers against future market losses in the event of a fuel price spike. Third, regulatory certainty is valuable to automakers, and especially the Tier One suppliers, who are making the majority of fuel-saving technology investments in research, development and production capacity; the standards will allow them to realize returns on their investments and avoid stranded costs. Fourth, the analysis found that the standards provide significant benefits to suppliers, which make up a significantly larger portion of the economy than the automakers, and employ over half a million Americans - over two and a half times more people than the automakers. Specifically, the study found that Tier One auto suppliers stand to gain

[1] http://www.ceres.org/files/analyst-brief-economic-effects-on-us-automakers-and-suppliers/at_download/file

about $90 billion in increased orders for fuel-saving technology under the current standards (in the 2014-2025 time frame). Fifth, weakening the standards could make the U.S. an outlier among global regulatory regimes, and put the Detroit Three at a disadvantage because it would undermine their ability to achieve economies of scale through increased use of global platforms.

Finally, strong standards will serve to mitigate the economic risks associated with our continuing dependence on oil as well as climate change. In light of the volatility of fuel prices, strong standards are needed in order to reduce transportation costs for businesses and consumers. In addition, climate change presents significant long-term risks to the global economy, and to investors across all asset classes. Strong standards will serve to mitigate that risk by providing significant GHG reductions; the MY 2022-2025 standards would save approximately 537 million metric tons of GHG emissions, and reduce oil use by 1.2 billion barrels.[2]

In sum, the standards will strengthen the U.S. economy, provide the regulatory certainty needed to spur innovation, reduce both our dependence on oil and climate risk, save businesses and consumers money, and create jobs. Accordingly, we urge that EPA issue a Final Determination preserving the MY 2022-2025 standards.

Sincerely,

California State Teachers' Retirement System
Office of the New York State Comptroller
New York City Office of the Comptroller
Office of the Connecticut State Treasurer
ACTIAM
Trinity Health
Presbyterian Church U.S.A.
Dignity Health
Trilogy Global Advisors LP
Dana Investment Advisors
Miller/Howard Investments, Inc.
NEI Investments
Pax World Management LLC
Walden Asset Management
Everence and the Praxis Mutual Funds
Trillium Asset Management
Domini Impact Investments LLC
Reynders, McVeigh Capital Management, LLC
Seventh Generation Interfaith Inc
Sustainability & Impact Investing Group, Rockefeller Asset Management
First Affirmative Financial Network

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[2] Proposed Determination at 11
https://nepis.epa.gov/Exe/ZyPDF.cgi/P100OXEO.PDF?Dockey=P100OXEO.PDF

Zevin Asset Management
The George Gund Foundation
Unitarian Universalist Association
Sonen Capital LLC
Green Century Capital Management
Friends Fiduciary Corporation
MissionPoint Partners
Arjuna Capital
Mennonite Education Agency
Tri-State Coalition for Responsible Investment
Sierra Club Foundation
Sisters of St. Dominic of Caldwell NJ
Christopher Reynolds Foundation
BVM Shareholder Education & Advocacy Group
ICCR (Interfaith Center on Corporate Responsibility)
Sisters of Saint Joseph of Chestnut Hill, Philadelphia, PA
Sisters of St. Francis of Philadelphia