



M. Jodi Rell
GOVERNOR
STATE OF CONNECTICUT

November 19, 2009

Lisa Jackson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Mail Code: 1101A
Washington, DC 20460

Ray LaHood, Secretary
U.S. Department of Transportation
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Administrator Jackson and Secretary LaHood:

I write to congratulate you on your groundbreaking joint effort to coordinate two very significant regulatory efforts on vehicle fuel efficiency requirements (CAFE) and motor vehicle greenhouse gas (GHG) emission standards. Both of these efforts are praiseworthy by themselves; in tandem, you have made a bold statement that energy, the economy and the environment are closely and inexorably linked and our government's policies must reflect this undeniable fact.

The State of Connecticut has long recognized the severe environmental and economic risks associated with a changing climate and has maintained a leadership role in developing state and regional actions to mitigate our greenhouse gas emissions while preparing to adapt, both physically and economically, to a changing climate. While we have done much in Connecticut, no one state or even one region is in a position to fully address climate change. I strongly believe that comprehensive federal action is needed to effectively address transportation related climate emissions, which in Connecticut accounts for almost forty percent of our state's greenhouse gas emissions. It is also critical to note that the global community is awaiting clear signals of our nation's intentions.

The jointly proposed CAFE and GHG emission standards support many of the same goals championed by the State of Connecticut since more efficient vehicles will use less fuel and emit fewer green house gases. Specifically, the proposal directly supports two important initiatives in our state: Connecticut's Strategic Energy Plan – A Vision for a Cleaner, Greener State and An Act Concerning Connecticut Global Warming Solutions. Both of these

initiatives make bold statements – to reduce fossil fuel consumption by 20% by 2020; and to reduce green house gas emissions by 10% below 1990 levels by 2020. Strong federal action is needed to assist us in this effort and to help us reduce both gasoline consumption and the economic uncertainties of associated with a dubious supply chain and unpredictable price spikes. More importantly, the proposal supports our economy by allowing us to retain more of our economic resources – resources that can be used to create green jobs for a clean energy future.

We also believe that this historic proposal is significant in that it is the direct result of state leadership and innovation. This leadership and innovation occurred because of the explicit authority provided to California and other states under the federal Clean Air Act. In 2005, California along with Connecticut and eventually thirteen other states¹ adopted Low Emission Vehicle regulations requiring a reduction in the fleet average generation of GHGs per mile in motor vehicles sold in the state. These regulations convincingly demonstrated that our nation can address global warming while maintaining our quality of life, creating jobs, enhancing energy security, reducing our dependence on foreign oil and saving money for consumers. Having 15 states leading the way and serving as laboratories of innovation, demonstrates that states and the public are confident that these requirements will work and are important to our climate initiatives, which lends credibility to the proposed rules.

In accordance with a proposal now being developed by California, Connecticut will adopt regulations deeming vehicles that comply with the new federal standards to be in compliance with our adopted state standards from 2012 through 2016. But we must emphasize that the federal Clean Air Act provision of states' rights to adopt motor vehicle standards – for California under Section 209 and for Connecticut under Section 177 – was crucial in allowing the states to lay the groundwork and create the momentum for this national vehicle GHG emissions reduction program. Therefore, California's statutory right to adopt more rigorous motor vehicle standards than the federal government's, and our state's statutory right to opt in to California's programs, must be acknowledged as the catalyst for innovation and progress. We ask that our federal partners join the states as active proponents for the full preservation of these important states' rights.

I understand and appreciate the added complexity of inter-agency coordination in government and your efforts are truly to be commended. In moving forward to address climate change, I urge your agencies and all federal agencies involved in climate change to continue to work together and to approach climate change in partnership with the states. Our state's successes over the past decade, especially in the areas of energy efficiency and renewable energy, can be reproduced nationally and should inform future federal policies and actions. I also believe that a strong state – federal partnership should preserve the rights of states to continue experimenting with innovative approaches to address our climate change challenges.

Again, congratulations on your joint effort and thank you for the opportunity to offer these initial comments. The Connecticut Department of Environmental Protection will be

¹ Arizona, the District of Columbia, Maine, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon, Pennsylvania, Rhode Island, Vermont and Washington

submitting additional technical comments to your agencies. In the meantime, please contact Amey Marrella, Commissioner of Environmental Protection, if we can be of any further assistance.

Sincerely,

A handwritten signature in cursive script that reads "M. Jodi Rell". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

M. Jodi Rell
Governor

Cc: Connecticut Congressional Delegation

Commissioner Amey Marrella

Docket ID No. EPA-HQ-OAR-2009-0427
EPA Docket Center (EPA/DC)
Air and Radiation Docket
Mail Code 2822T
1200 Pennsylvania Ave NW.
Washington, DC 20460

NHTSA Docket Management Facility, M-30
US Department of Transportation
West Building, Ground Floor, Rm. W12-140
1200 New Jersey Ave, SE
Washington, DC 20590 NHTSA-2009-0059