

**CEVA Members:**

Amazon  
American Airlines Group, Inc.  
AT&T, Inc.  
Best Buy Co, Inc.  
CBRE  
Centrica Business Solutions  
Clif Bar & Company  
Consumers Energy  
DHL  
Edison International  
Exelon Corporation  
Genentech, Inc.  
Heritage Environmental Services, LLC  
Hertz Global Holdings, Inc.  
IKEA USA  
JLL  
LeasePlan  
Lime  
Lyft  
Merchants Fleet  
National Grid  
Schindler Elevator Co.  
Siemens  
T-Mobile  
TK Elevator  
Uber  
UNFI

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 companies that represent over \$1 trillion in annual revenue<sup>1</sup> and collectively own, lease, or operate more than one million fleet or networked vehicles in the United States, we are writing to express our support for strong light duty vehicle standards, and to urge you to adopt the most stringent proposal - Alternative 2 - in strengthening the SAFE Part II regulations adopted by the Trump Administration.

We share a common goal of electrifying our fleets and networks as well as reducing our transportation carbon footprint, and we recognize that strong policies will be necessary to effect this critical transition. Our members see climate change as a significant risk, and reducing GHGs as a major economic opportunity. We recognize that clean vehicles, including zero emission vehicles (ZEVs) and efficient internal combustion engine vehicles, bring significant economic and environmental benefits, including operational cost savings and protection from fuel price volatility, as well as improved air quality and a reduced carbon footprint.

Strong vehicle standards are critical to ensuring economic benefits as well as meeting climate goals. While we are working to do our part as individual companies, we need strong standards to ensure the widespread availability of clean vehicles in the U.S., as well as to drive the economies of scale that will accelerate the necessary transition to electrification.

In sum, we urge EPA to adopt standards at least as stringent as Alternative 2, which are necessary to accelerate the cost-effective deployment of fuel-efficient and electric light-duty commercial vehicles, and allow our members to meet our climate goals. Further, we strongly urge that the next round of standards be aligned with climate goals by ensuring at least 50% ZEV sales, and a 60% reduction in emissions by 2030, and that put the U.S. on a glide path toward 100% passenger ZEV sales by 2035.

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<sup>1</sup> Based on 2020 annual revenue.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Forni". The signature is fluid and cursive, with the first name "Sara" and last name "Forni" clearly distinguishable.

Sara Forni

On behalf of the Corporate Electric Vehicle Alliance (CEVA), led by Ceres  
Head of CEVA

CC:

Acting Administrator Steve Cliff  
National Highway Traffic Safety Administration

Gina McCarthy  
National Climate Advisor

Ali Zaidi  
Deputy National Climate Advisor