

## **Opportunity to comment on proposed rollback of fuel economy and GHG emissions standards**

The Trump Administration is planning to roll back fuel economy standards and GHG emissions standards for cars and light trucks for model years 2021-2026. The proposed new rule would also revoke California's waiver to set its own rules under the Clean Air Act, rules that 12 other states and the District of Columbia also follow.

The clean car standards are the most effective climate policy implemented in the U.S. to date. They have reduced emissions by 228 metric tons and saved drivers more than \$57 billion on gasoline, according to the [Union of Concerned Scientists](#). Maintaining progress on fuel economy and tailpipe emissions is more important than ever, now that the transportation sector has replaced power plants as the biggest source of U.S. carbon emissions.

### **To submit comments on the proposed rules**

Public comment is being accepted through EPA's website until 11:59 PM Eastern on October 2, 2018. Follow this link to upload your comments:

<https://www.regulations.gov/docket?D=EPA-HQ-OAR-2018-0283>. The pertinent docket is " Rulemaking to Revise Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards," Docket ID: EPA-HQ-OAR-2018-0283.

### **Background on the clean car standards**

In April 2010, EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) finalized joint rules establishing a national program of standards for light-duty cars and trucks for model years 2012-2016. These uniform national standards were developed in collaboration with the state of California and major U.S. auto manufacturers.

In August 2012, EPA and NHTSA issued final rules extending the national program to further reduce GHG emissions and improve fuel economy for light-duty vehicles -- to model years 2017-2025. This second phase of the light-duty vehicle program was projected to reduce GHG emissions by approximately 2 billion metric tons and to save 4 billion barrels of oil over the lifetime of model year 2017-2025 vehicles.

EPA and NHTSA estimated that a consumer who purchased a model year 2025 vehicle would pay on average an additional \$1,800 due to new vehicle technology but would benefit from \$5,700-\$7,400 in fuel savings over the lifetime of the vehicle.

An overview of the EPA's Obama-era regulation of motor vehicles is available [here](#) in the LWVUS Toolkit for Climate Action.

### **Trump administration's rationale for rolling back the standards**

The new rules will save up to 1,000 lives annually -- for the following reasons.

- (1) People who buy fuel-efficient vehicles will drive more as their cost of driving goes down, increasing the chance that they will get into an accident. Current EPA/NHTSA officials have concluded that this "rebound effect" is twice as large as forecast by the Obama administration.

(2) The clean-car technology required under the current rules will cost far more than projected previously. The resulting higher sticker price will deter Americans from buying newer cars with advanced safety features and will keep them driving their older, less safe vehicles longer. Response: Consumers thus far have not hesitated to purchase cleaner vehicles with advanced technology despite higher prices.

(3) Stricter fuel economy rules will force automakers to produce lighter vehicles that are less able to withstand a crash. Response: Analysts have found that automakers have mostly cut weight from their larger vehicles in response to fuel-economy rules. This has made roads safer. Moreover, better engineering, stronger materials, and improved technology are resulting in safer cars overall.

### **Possible points to make in your comments on the proposed rollback**

- If the standards are rolled back as proposed, the U.S. will pump out an extra 2.2 billion metric tons of global warming emissions and consume 200 billion more gallons of fuel by 2040. If this happens, it will be impossible to achieve our obligations under the Paris climate agreement and will significantly hinder our ability to hold global warming to two degrees Celsius.
- The proposed roll back is dangerous to the health of all Americans. According to the [Union of Concerned Scientists](#), nearly one half of all Americans live in areas that don't meet federal air quality standards. Passenger vehicles and heavy-duty trucks are a major source of this pollution, which includes ozone, particulate matter, and other smog-forming emissions. A recent [MIT study](#) estimated that about 200,000 Americans die each year from air pollution. Vehicle emissions are the biggest contributor to these premature deaths.
- The evidence shows that the industry can meet the strong standards adopted in 2012 for model years 2022 to 2025 -- on time and at reasonable cost. The draft [Technical Assessment Report](#) published jointly by the EPA, NHTSA, and the California Air Resources Board in 2016 confirmed that there are plenty of existing known fuel-saving, low-emissions technologies that automakers can use to meet the 2025 standards.
- [Surveys](#) demonstrate overwhelming public support for continuing to strengthen fuel economy standards. By contrast, rolling back the standards will force Americans to pay more at the gas pump and increase air pollution that harms our health and the environment.
- Maintaining strong standards motivates the auto industry to keep innovating and helps US automakers stay competitive against foreign companies. Having a single national standard (rather than one standard for California and the states that follow its rules and another standard for the rest of the country) provides important regulatory certainty for the auto industry. Moreover, keeping the established GHG standards intact will provide the continuity and predictability the industry routinely requests for its businesses.