

The Honorable Elaine L. Chao  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

The Honorable Heidi King  
Deputy Administrator  
National Highway Traffic Safety Administration  
1200 New Jersey Avenue, SE  
Washington, D.C. 20590

The Honorable Andrew Wheeler  
Acting Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

The Honorable William Wehrum  
Assistant Administrator, Office of Air and  
Radiation  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Dear Secretary Chao, Acting Administrator Wheeler, Deputy Administrator King, and Assistant Administrator Wehrum:

We write today on behalf of our millions of members and supporters to strongly oppose your recently released joint Notice of Proposed Rulemaking (NPRM) ironically titled “The Safer Affordable Fuel-Efficient Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks.”<sup>1</sup> Our existing standards are producing the cleanest and safest vehicles Americans have ever had—and putting money in their pockets rather than the pockets of oil companies.<sup>2</sup> These standards are especially important for low-income Americans, as they spend a greater proportion of their income on gasoline. This proposal to roll back the standards constitutes an unwarranted attack on consumers, our environment, our health, and longstanding tenets of cooperative federalism. The proposal further flouts the original bounds of the midterm evaluation, violating the very agreement all stakeholders historically agreed to in 2011.<sup>3</sup>

While all the proposed alternatives to change the standards unequivocally constitute a rollback to the existing progress,<sup>4</sup> the preferred scenario indicated by your agencies remains the most egregious. Preliminary analyses indicates that the preferred scenario will result in an additional 2.2 billion metric tons of global warming emissions by 2040, equivalent to keeping 43 coal-fired power plants online.<sup>5</sup> Increasing U.S. greenhouse gas emissions 11% by 2035 at a time when the world’s carbon budget is nearly depleted promises grave impacts for our health and planet.<sup>6</sup>

This roll back would also mean American consumers grow even more dependent on oil, and more exposed to gasoline price spikes and our nation more dependent on oil-producing countries, with the proposal resulting in an additional 200 billion gallons of gasoline consumed by 2040— as much oil as

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<sup>1</sup> The proposed rule will not benefit consumers or improve safety, and will flatline pollution reductions and improvements in fuel efficiency.

<https://blog.ucsusa.org/dave-cooke/8-ridiculous-things-in-the-trump-rollback-of-clean-car-standards-and-1-thing-they-get-right>;  
[http://environment.yale.edu/gillingham/Bentoetal\\_CAFEAttributesAccidents.pdf](http://environment.yale.edu/gillingham/Bentoetal_CAFEAttributesAccidents.pdf)

<sup>2</sup> <https://consumerfed.org/wp-content/uploads/2018/05/fuel-efficiency-vs-safety-cost-and-fleet-turnover-1.pdf>

<sup>3</sup> <https://obamawhitehouse.archives.gov/the-press-office/2011/07/29/president-obama-announces-historic-545-mpg-fuel-efficiency-standard>

<sup>4</sup> <https://www.ucsusa.org/clean-vehicles/fuel-economy-ticker>; <http://ucsusa.org/autorankings2018>

<sup>5</sup> <http://blogs.edf.org/climate411/files/2018/04/MTE-Relaxation-Impacts-Final.pdf>

<sup>6</sup> <https://www.fastcompany.com/90212827/trumps-clean-car-rollback-will-cost-the-u-s-450-billion>

we've imported from the Persian Gulf since the standards were first finalized in 2010.<sup>7</sup> This additional oil usage will cost consumers spending on gasoline about \$20 billion in 2025 and nearly \$50 billion by 2035.<sup>8</sup>

Beyond costing customers hundreds of billions of dollars more at the pump, the agencies' own analysis found this proposal would cost at least 60,000 jobs.<sup>9</sup> This number fails to account for the cost of ceding innovation and technology leadership to other countries, with automakers shifting to international markets.<sup>10</sup> Europe and China are moving forward aggressively with both standards and technology advances, and weakening our standards will make domestic auto manufacturers uncompetitive. The existing standards have coincided with record years of vehicle sales<sup>11</sup> and the addition of 700,000 auto industry jobs.<sup>12</sup> Analysis by the Blue Green Alliance found that 288,000 American workers "are building technology that improves fuel economy for today's innovative vehicles."<sup>13</sup> This proposal threatens not only these American jobs, but our ingenuity and competitiveness globally.

Not only will this proposal stall progress on a federal level, it also directly assaults states' authority to protect their citizens. By proposing to revoke the authority of states to put in place stronger protections to address harmful air pollution from vehicles and claiming that state air pollution standards interfere with federal fuel economy standards, the NPRM flies in the face of the Trump Administration's express commitment to "restor[e] power to the states through cooperative federalism."<sup>14</sup> The proposed assault on state authority directly threatens 118 million people living in states that have moved,<sup>15</sup> or are moving,<sup>16</sup> to protect the health of their own communities by putting in place strong pollution standards. This proposal flies in the face of the Clean Air Act's long-standing recognition of state leadership on clean cars.

We strongly support the existing strong fuel economy and greenhouse gas emission standards for automobiles. These standards are critical to protecting public health, reducing oil consumption, and saving consumers money at the pump. The findings of the Technical Assessment Report (TAR) and the original final determination<sup>17</sup> for model years 2022-2025 demonstrate that the standards are readily achievable and will deliver massive benefits for Americans in reduced pollution and fuel savings.

Vehicle pollution and fuel economy standards are instrumental in ensuring a safe planet, protecting human health, and spurring the innovation that fuels our economy. Reducing pollution from transportation—the largest contributor to greenhouse gas pollution in our country—is critical to averting the worst

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<sup>7</sup> <https://blog.ucsusa.org/dave-cooke/new-epa-administrator-same-bad-idea-car-standard-rollbacks-would-be-awful>

<sup>8</sup> <https://blog.ucsusa.org/don-anair/auto-standards-rollback-oil-companies-win-everyone-else-loses>

<sup>9</sup> <https://www.epa.gov/sites/production/files/2018-08/documents/safe-my-2021-2026-cafe-ld-ghg-nhtsa-epa-nprm-2018-08-02.pdf> (Table VII-5; page 597-599).

<sup>10</sup> <https://www.nytimes.com/2017/06/20/business/ford-focus-china-production.html>

<sup>11</sup> [https://www.washingtonpost.com/business/economy/us-car-sales-hit-record-high-in-2015/2016/01/05/363aaf30-af14-11e5-b820-eea4d64be2a1\\_story.html?utm\\_term=.da15f5027e09](https://www.washingtonpost.com/business/economy/us-car-sales-hit-record-high-in-2015/2016/01/05/363aaf30-af14-11e5-b820-eea4d64be2a1_story.html?utm_term=.da15f5027e09)

<sup>12</sup> <https://www.bluegreenalliance.org/resources/sound-vehicle-standards-policies-drive-strong-job-growth/>

<sup>13</sup> <https://www.bluegreenalliance.org/resources/supplying-ingenuity-ii-u-s-suppliers-of-key-clean-fuel-efficient-vehicle-technologies/>

<sup>14</sup> <https://www.epa.gov/newsreleases/epa-releases-administrator-pruitts-year-one-accomplishments-report>

<sup>15</sup> Connecticut, Delaware, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Vermont, and Washington, as well as the District of Columbia have currently adopted CA standards.

<sup>16</sup> Colorado is in the process of adopting California's standards:

<https://www.colorado.gov/governor/news/gov-hickenlooper-signs-executive-order-calling-state-adopt-low-emissions-vehicle-standards>

<sup>17</sup> <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100QQ91.pdf>

impacts of climate change. Moreover, climate change is linked to more bad air days that contribute to asthma attacks and respiratory problems threatening the health of children and other vulnerable populations. Reducing climate pollution from vehicles also reduces other harmful pollutants and health harms, especially for low-income communities that often are located near refineries, freeways, and high-traffic corridors.

This proposed rule threatens our health and environment,<sup>18</sup> will raise costs on American families,<sup>19</sup> is at odds with the technical progress the industry is making to reduce vehicle pollution, contains attacks on state authority that are legally indefensible,<sup>20</sup> undermines our safety,<sup>21</sup> and is based on deeply flawed analysis. The massive technical record developed by the federal government and based on the best available science that found the standards to be readily achievable, at lower cost than originally projected, less than two years ago.

For these reasons, we strongly oppose the NPRM for model years 2021-2026 passenger cars and light trucks, and urge you to protect our communities by maintaining the science-based standards already on the books that will reduce climate emissions and gasoline use.

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<sup>18</sup> <http://blogs.edf.org/climate411/files/2018/04/MTE-Relaxation-Impacts-Final.pdf>

<sup>19</sup> <http://blogs.edf.org/climate411/2018/07/24/americans-save-hard-earned-money-with-clean-car-standards-that-trump-may-soon-roll-back/>

<sup>20</sup> <http://legal-planet.org/2018/04/27/the-new-epa-plan-to-roll-back-auto-emissions-standards-and-revoke-the-california-waiver-is-legally-indefensible/>

<sup>21</sup> <http://blogs.edf.org/climate411/2018/08/01/clean-cars-are-safer-and-cheaper-to-drive/>