

RE: Docket: EPA-HQ-OAR-2018-0283

October 26, 2018

Dear Acting EPA Administrator Wheeler and Acting NHTSA Administrator King,

As members of the Pennsylvania General Assembly, we respectfully submit these comments regarding the United States Environmental Protection Agency (U.S. EPA) and the National Highway Traffic Safety Administration (NHTSA) Docket EPA-HQ-OAR-2018-0283 pertaining to fuel efficiency standards for cars and trucks. We are writing in opposition to this proposal. Instead, we call on U.S. EPA and NHTSA to increase fuel efficiency standards and support states' rights to set tailpipe emission safeguards.

Corporate Average Fuel Economy (CAFE) standards are set to double the mileage for cars and light trucks per gallon of gas, in turn slashing pollution in half for cars sold in 2025 and beyond. The automotive industry has already invested billions of dollars in long-term strategies to meet these new standards. Changing the rules now will cost money and jobs while harming the environment. Removing the rules also rewards Volkswagen, the company that opposed the clean-cars deal that President Obama struck with carmakers, auto workers and environmental groups. Volkswagen is the same company that cheated on emission inspections.

Removing the clean-air standards would also pump more carbon dioxide into the atmosphere, contributing to more intense and costly wildfires and other extreme weather disasters. Conversely, keeping these standards in place would mean that, in 2030, U.S. drivers would save more than 3 million barrels of oil per day.¹

Under the federal Clean Air Act, clean-car programs in thirteen states (including Pennsylvania) and the District of Columbia have reduced air pollution and the healthcare costs associated with it, and boosted local economies for decades. Pennsylvania began implementing these stronger standards in 2008, requiring any passenger cars and light duty trucks from that year or newer to meet more stringent standards for pollution.²

The nation's transportation sector is now our largest source of climate pollution. Our changing climate is leading to extreme weather such as heat waves and downpours, along with wildfires and flooding.

Halting the clean-car standards will mean more air pollution for the state's residents and more extreme weather and weather-related costs for everyone.

¹ <https://www.ucsusa.org/clean-vehicles/fuel-efficiency/fuel-economy-basics.html#bf-toc-2>

² <http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=4138&DocName=FACTS%20ABOUT%20THE%20PENNSYLVANIA%20CLEAN%20VEHICLES%20PROGRAM.PDF%20>

Besides the clear environmental and public health benefits, CAFE and state clean-car standards also save consumers money and are expected to create new jobs. On average, these standards will save drivers between \$3,200 and \$5,700 in gas costs over the life of a new car by 2025, and create an estimated 650,000 new jobs throughout the U.S., including 50,000 new car manufacturing jobs.³ Here in Pennsylvania, these standards have already saved consumers and businesses more than \$1.2 billion, and stand to create over 26,000 new jobs in the state by 2030.⁴

Moreover, while some attempt to make the argument that more fuel efficient cars are less safe cars, the research shows otherwise. In fact, today's more advanced, fuel-efficient cars and trucks are some of the safest ever built. A recent study by the National Bureau of Economic Research found that reducing the overall average weight of vehicles on the road may actually result in fewer fatalities as a result of car crashes.⁵

Lastly, the public overwhelmingly supports cleaner and more fuel-efficient cars. A recent poll by the Consumers Union showed that 73% of Americans agree that the government should be setting higher standards for fuel efficiency.⁶ Even the EPA's own research concluded in January 2017 that the nation's clean car standards were achievable and should not be weakened.⁷ The American public supports cleaner cars and wants to keep moving forward. We, the undersigned, are greatly concerned about this wrongheaded proposal to undercut Pennsylvania's efforts to make our air cleaner, keep the public healthier and boost jobs and our economy. It's disheartening that federal officials may roll back these standards and usurp local control, given the ongoing talk in Washington about the need for less federal intrusion into state issues.

For all of these reasons -- the environmental and public health benefits, the consumer savings, the potential job creation, and the success of the clean-car standards -- we oppose Docket # EPA-HQ-OAR-2018-0283. We urge you to keep the federal clean-car standards intact and honor the authority of states like Pennsylvania to protect the well-being of our citizens. And we call on you to strengthen these standards to continue to improve fuel efficiency and reduce air pollution.

We look forward to hearing back from you on this important issue in the near future.

Sincerely,

³ <http://calcleancars.org/wp-content/uploads/2017/11/Clean-Cars-Campaign-State-Backgrounder.pdf>

⁴ <https://www.ucsusa.org/sites/default/files/imagess/reports/vehicles/cv-factsheet-mpg-benefits-pennsylvania.pdf>

⁵ https://www.washingtonpost.com/news/energy-environment/wp/2017/05/03/scientists-just-debunked-one-of-the-biggest-arguments-against-fuel-economy-standards-for-cars/?noredirect=on&utm_term=.a7db38a50ed0

⁶ <https://consumersunion.org/news/2017-fuel-economy-survey/>

⁷ <https://www.epa.gov/regulations-emissions-vehicles-and-engines/midterm-evaluation-light-duty-vehicle-greenhouse-gas#proposed=determination>

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