

Remarks of Martha Roberts, Environmental Defense Fund

September 6, 2017

My name is Martha Roberts and I am here on behalf of Environmental Defense Fund's over two million members.

First, I want to thank EPA for its long, bipartisan history of cleaning up our air, water, and land – making communities safer and healthier across the United States.

EPA has a proven record of leadership in spurring the development and adoption of low emitting cars and protecting Americans from harmful transportation pollution—from the development and diffusion of catalytic converters that dramatically help clear the air of smog, to lower emitting, more efficient vehicles that reduce the cost of ownership and reduce climate pollution.

I'm here today to call on EPA to continue the tremendous success and leadership of its clean cars program, and to condemn the current Administration's signals that it will recklessly weaken these standards and shortchange EPA's role.

EPA's clean car standards save consumers money, boost our energy security, protect American jobs by keeping the U.S. auto industry competitive in the global market, and protect us from the growing threat of climate change. Right now we need no reminder of the incredible risks we face from increased extreme weather and sea level rise.

Moreover, these standards are working. The administrative record is packed with documentation that automakers are already achieving pollution reductions faster and at lower cost than expected.

The record provides clear support for EPA to *strengthen* its model year 2022 through 2025 Clean Car standards.

In light of the program's success and vital pollution reduction benefits, any effort to weaken the 2022-2025 standards would be illegitimate and contrary to law.

Furthermore, EPA's request for comment on the Model Year 2021 standards is wholly inappropriate. These standards are firmly established in law and not subject to the Mid-Term Review. EPA's decision breaks an agreement made with vehicle manufacturers to limit the Mid-Term Review to 2022-2025 model year standards, and will cause confusion and uncertainty over what are firmly and long established, eminently achievable standards.

The American public strongly supports these standards—and opposes these misguided, unwise efforts to roll them back. Any rollback would be arbitrary, capricious and contrary to law in light of the rock solid record for the current 2021 and 2022-2025 standards, and in light of EPA's solemn delegated statutory responsibility under our nation's clean air laws to protect the public from harmful climate pollution.

I want to talk in more detail about the current standards' critical contribution to protecting Americans from climate change.

The threat of climate change is here and now and already poses a grave risk to American citizens.

EPA's clean cars program is one of the most significant actions that America is taking to reduce climate pollution.

Transportation is America's largest source of climate pollution,ⁱ with passenger vehicles alone accounting for over 20 percent of this pollution.ⁱⁱ

EPA's program will yield enormous pollution reductions. The model year 2022 through 2025 standards avoid 540 million metric tons of climate pollution over the lifetime of these model year vehicles.ⁱⁱⁱ That's the equivalent of taking almost 115 million average cars off the road for a year.^{iv}

Moreover, as I said at the outset, these standards have an impressive, demonstrated track record of success.

Today, auto manufacturers and suppliers are developing and deploying low emission, high efficiency vehicles at a faster rate and lower cost than was forecast in the 2012 rule.^v New technologies are already being utilized that allow vehicle models to meet standards out to 2025.^{vi}

Since the Clean Cars program began in 2012, the auto industry has collectively exceeded the fuel economy and GHG standards in each of the last four years^{vii} while setting new sales records.

Moreover, the standards are vital to protect the competitiveness of the American auto industry and, with it, American jobs. Many other countries have adopted standards that will motivate improved performance of passenger vehicles similar to those established by the Clean Cars program. This includes Canada,^{viii} the European Union,^{ix} China,^x India^{xi} and South Korea,^{xii} while Britain and France have even pledged to phase out sales of gasoline-powered vehicles in coming decades.^{xiii} Clean Car standards are essential if the American auto sector is going to keep pace with global trends.

Because my time is short, I can only briefly touch on a few of the many other benefits that come with robust clean car standards. But these benefits are important to remember, because they underscore *just how common sense* these standards are.

The standards save consumers money. EPA's own analysis found that consumers who finance their vehicle with a 5-year loan would see payback within the first year.^{xiv}

The standards enhance American energy security. The 2022 through 2025 standards will avoid an estimated 1.2 billion barrels of oil consumption over the vehicles' lifetimes.^{xv} Clean Car standards will continue to solidify the national security benefits that Americans have gained from increasing our energy security in recent years.

In closing, I want to reiterate that EPA should maintain, if not *strengthen*, the model year 2022 through 2025 Clean Car standards, not roll them back. EPA should not disturb the firmly settled Model Year 2021 standards.

Thank you for the work you do to protect public health and the environment.

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- ⁱ Energy Information Administration, <https://www.eia.gov/todayinenergy/detail.php?id=29612>.
- ⁱⁱ U.S. Energy Information Administration, Annual Energy Outlook, https://www.eia.gov/outlooks/aeo/tables_ref.cfm.
- ⁱⁱⁱ EPA, “Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards under the Midterm Evaluation,” pg. 6 (January 2017), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ91.pdf>.
- ^{iv} EPA, Greenhouse Gas Emissions from a Typical Passenger Vehicle, <https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle-0>.
- ^v EPA, “Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards under the Midterm Evaluation,” pg. 4, 13 & 18-26 (January 2017), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ91.pdf>.
- ^{vi} EPA, “Light-Duty Automotive Technology, Carbon Dioxide Emissions, and Fuel Economy Trends Report 1975-2016,” (2016), <https://www.epa.gov/fueleconomy/trends-report>.
- ^{vii} EPA, “Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards under the Midterm Evaluation,” pg. 7-8 (January 2017), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ91.pdf>.
- ^{viii} TransportPolicy.net, Canada: Light-duty: Fuel Consumption and GHG, <http://transportpolicy.net/index.php?title=Canada: Light-duty: Fuel Consumption and GHG>.
- ^{ix} TransportPolicy.net, EU: Light-duty: GHG, <http://www.transportpolicy.net/index.php?title=EU: Light-duty: GHG>.
- ^x TransportPolicy.net, China: Light-duty: Fuel Consumption, <http://www.transportpolicy.net/index.php?title=China: Light-duty: Fuel Consumption>.
- ^{xi} TransportPolicy.net, India: Light-duty: Fuel Consumption, <http://transportpolicy.net/index.php?title=India: Light-duty: Fuel Consumption>.
- ^{xii} TransportPolicy.net, South Korea: Light-duty: Fuel Economy and GHG, <http://transportpolicy.net/index.php?title=South Korea: Light-duty: Fuel Economy and GHG>.
- ^{xiii} Stephen Castle, Britain to Ban New Diesel and Gas Cars by 2040, New York Times (July 26, 2017) https://www.nytimes.com/2017/07/26/world/europe/uk-diesel-petrol-emissions.html?_r=0.
- ^{xiv} EPA, “Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards under the Midterm Evaluation,” pg. 7 (January 2017), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ91.pdf>.
- ^{xv} EPA, “Final Determination on the Appropriateness of the Model Year 2022-2025 Light-Duty Vehicle Greenhouse Gas Emissions Standards under the Midterm Evaluation,” pg. 6 (January 2017), available at <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100QQ91.pdf>.