

## **Testimony of Erin Murphy, Environmental Defense Fund**

### **EPA & NHTSA Hearing on the Proposed Rule to Roll Back the Clean Car Standards Pittsburgh, PA – September 26, 2018**

Good morning. My name is Erin Murphy and I am an attorney with the Environmental Defense Fund. Thank you for the opportunity to testify.

I am speaking today in opposition to the Trump Administration's shortsighted, harmful proposal to roll back the Clean Car Standards. As EDF will explain more fully in our written comments, the proposal should be withdrawn and the current standards should be maintained through 2025.

#### **The current standards are supported by facts and law.**

- As my dad always says, especially when working on his car, if it ain't broke, don't fix it. The existing standards protect our climate, clean air and public health—and are supported by years of analysis, particularly by the staffs of the two agencies present today.
- The standards were developed through a collaborative, rigorous process. EPA, NHTSA, and the California Air Resources Board engaged in stakeholder discussions, reviewed about 300,000 public comments, and issued a final rule in 2012 with support from auto manufacturers, suppliers, labor, and consumer groups.
- The agencies conducted a multi-year evaluation of the appropriateness of the standards, and concluded that there are even more technologies available than expected, at lower cost, to achieve these standards.
- We should be accelerating these win-win standards—but instead, NHTSA and EPA are ignoring the record and rushing to roll back this crucial program.

#### **So, who wants this extreme rollback? It's not clear.**

- The Trump Administration claims that the proposal will improve safety. But the proposal's safety claims have already been debunked, and consumer advocacy and safety groups oppose the rollback.
- The Trump Administration claims that industry will benefit. But the Auto Alliance and Global Automakers stated that "Automakers support continued improvements in fuel economy," and Ford and Honda have stated that they do not support a rollback.

- The Trump Administration claims that U.S. workers will benefit. But the administration acknowledges that the proposal will result in tens of thousands of job losses.
- Finally, the proposal will drastically increase climate pollution, as well as criteria and toxic air pollutants. Everyone with lungs should oppose this rollback.

**This rulemaking process fails to provide adequate opportunity for public input.**

- EDF, multiple states, industry groups, and consumer, health and environmental organizations requested a 60-day extension of the public comment period. The administration denied these requests. The wholly inadequate time period for stakeholders to develop comments on this complex, technical proposal limits informed public input.
- Additionally, NHTSA and EPA announced that they would hold a hearing in Washington, DC on the proposal, but they reneged on that commitment, denying over 6 million DC metro area residents an opportunity to testify—many of whom do not have the time or resources to travel for such a hearing.
- The cancellation of the DC hearing is particularly egregious because DC and Maryland have adopted California’s vehicle emissions standards—so those residents have a clear stake in EPA’s proposal to deny underlying state authority to adopt these standards.
- *More* hearings, and *more* public participation, are better than less.

I ask that NHTSA and EPA listen to the public, consider the harmful effects of their proposed action, and withdraw this damaging and indefensible proposal.