

ENVIRONMENTAL PROTECTION NETWORK AND SAVE EPA ANN ARBOR

Summary of Comments on the ‘Safer Affordable Fuel-Efficient Vehicle Proposed Rule’ by Former Employees of the U.S. Environmental Protection Agency National Vehicle and Fuel Emissions Laboratory (NVFEL), Save EPA Ann Arbor & the Environmental Protection Network October 26, 2018

On August 24, 2018, the U.S. Department of Transportation (DOT) and the Environmental Protection Agency (EPA) jointly [proposed](#) to amend certain existing Corporate Average Fuel Economy (CAFE) and greenhouse gas emissions (GHG) standards for passenger cars and light trucks, and establish new standards, covering model years 2021 through 2026.

Former employees of the EPA National Vehicle and Fuel Emissions Laboratory (NVFEL), [Save EPA Ann Arbor](#) and the [Environmental Protection Network](#) (EPN) believe that GHG standards would be severely weakened under the Safer Affordable Fuel-Efficient (SAFE) Vehicle Rule. There is no technical, environmental or economic rationale for such a massive rollback of these standards that have been working well for the last 7 years and are required by law.

In contrast to the current GHG and fuel economy standards published in 2012, the lack of transparency and expertise that characterize the development of SAFE is of major concern. The EPA’s NVFEL is the world’s leading vehicle pollution and fuel economy test laboratory. Its technical staff and analysts have published dozens of papers, performed over 10,000 fuel economy tests, and benchmarked the world’s cleanest and most efficient vehicles. Yet DOT and the Administration completely cut these experts out of the process that generated the SAFE proposal.

Further, concerns about the SAFE proposal extend to the complete lack of data or evidence to support DOT’s analysis. EPA and DOT stand behind a regulatory proposal with no basis in science or engineering or economics and go one step further by relying on questionable assumptions to justify weakening the standards.

A few of these erroneous assumptions include exaggerating the cost of technology to meet the existing standards by 50-80%; applying artificially low gasoline prices that don’t reach \$3 per gallon for ten years; and modeling national travel rates in the near term that are 20-25% lower than those documented by official federal data.

Additionally, under the Clean Air Act and the endangerment finding, EPA has a legal obligation to reduce greenhouse gas emissions and take actions requisite to protect public health from the threats of climate change. Americans deserve clean air and clean water, and weakening vehicle efficiency and GHG standards is a direct threat to public health and the planet. Rolling back these standards will only increase pollution and the devastating impacts of climate change today and for future generations.

For all of these reasons, former NVFEL employees, Save EPA Ann Arbor and EPN strongly recommend retaining and enforcing the existing 2021-2025 vehicle fuel efficiency and GHG standards and withdrawing the SAFE proposal.

Read EPN’s Full Public Comments: <https://www.environmentalprotectionnetwork.org/safe-comments/>

For more information, contact EPN by email at info@environmentalprotectionnetwork.org or call 202-656-6229.

Media inquiries can be directed to careen_kaganevans@ecicommunications.com.