

**Oral Comments of Jeff Alson, EPA Retiree (1978-2018),  
to the Science Advisory Board (SAB) on the  
Proposed Rollback of the Clean Car Standards**

January 17, 2020

Thank you. My name is Jeff Alson. I was an engineer at EPA's National Vehicle and Fuel Emissions Laboratory for 40 years. I retired in 2018 and am the only EPA retiree who spent 10 years helping to develop the car greenhouse gas emissions standards and personally witnessed the process behind the proposed 2018 rollback. I am speaking today as a private citizen and on behalf of the [Environmental Protection Network](https://www.environmentalprotectionnetwork.org), with almost 500 EPA alumni working to protect the integrity of EPA, human health, and the environment.

I want to provide a personal and direct testimonial from someone "who was there" for why it is so important for the SAB to be weighing in on the dishonest science behind the proposed rollback.

One, EPA leadership proposed the rollback while completely ignoring its own scientific and engineering experts, instead relying on an analysis that was 100% performed by DOT/NHTSA. Over the previous 7 years, EPA and NHTSA staff worked together constantly, publishing 10,000 pages detailing the most comprehensive federal automotive technology and regulatory analysis ever. EPA has expert staff, the world's leading vehicle pollution laboratory, and has performed over 10,000 fuel economy tests, while NHTSA has a skeletal staff, no laboratory, and has never performed a single fuel economy test. Yet, DOT refused to have a single technical working meeting with EPA staff as they prepared the proposal. EPA experts like me were not allowed to do our jobs, and I know this because I was there.

Two, the NHTSA rulemaking analysis was the most biased that I have ever seen. In 2016, NHTSA projected that the 2025 standards would yield net societal benefits of about \$90 billion. In the proposal, just 2 years later, NHTSA projected net societal costs of \$200 billion—a nearly \$300 billion reversal. To get the results demanded by political ideologues, NHTSA changed dozens of key assumptions from their own previous analyses, nearly all of which made the rollback look better. SAB has identified a few biases—most notably the absurd assumption that drivers of used cars would "stay home" and travel far less under the rollback—but this is just the tip of the iceberg, and there are many more inexplicable biases that contribute to the \$300 billion change.

Three, I want to dispel the claim that the NHTSA rulemaking documents are transparent. I stipulate that they are long. But NHTSA chose to hide many important assumptions and findings. For example, even as they repeatedly touted the purported safety benefits, they never admitted that the overall fatality rate, fatalities per mile, is essentially unchanged, as 97-99% of the reduced fatalities under the rollback are simply due to fewer miles. Likewise, they failed to disclose that they assumed that only half of the extra gasoline refining and only 5% of the extra oil needed under the rollback would be domestic, which underestimates U.S. pollution-related fatalities by tens of thousands, even though the U.S. has been increasing oil production and gasoline refining for many years.

I can personally testify that the proposal was a scientific travesty. I recommend that the SAB call for a central role for EPA's world-class technical staff, for an analysis that is scientifically credible and transparent, and for a re-proposal to allow public review before decisions on a final rule.