

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

September 26, 2018

Dear Acting EPA Administrator Wheeler and Acting NHTSA Administrator King,

As a member of the Pennsylvania State Senate, I 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. I am writing in opposition to this proposal. Instead, I 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 global warming pollution in half for cars sold in 2025 and beyond. Removing these standards would pump more carbon dioxide into the atmosphere, contributing to more intense and costly wildfires and 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.<sup>1</sup>

In addition, under the federal Clean Air Act, clean car programs in thirteen states (including Pennsylvania) and the District of Columbia have addressed air pollution, reduced health care costs associated with air pollution, 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.<sup>2</sup>

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

At the same time, vehicles are also a major source of other air pollutants like ozone and particulate matter that lead to smog and poor air quality, and put our health at risk. Poor air quality increases respiratory ailments, heightens the risk of life-threatening conditions like cancer, and burdens our healthcare system with substantial medical costs.

Halting these standards will mean more air pollution for the state's residents and more climate pollution for everyone.

Besides the clear environmental and public health benefits, CAFE and state clean cars 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

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

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

create an estimated 650,000 new jobs throughout the U.S., including 50,000 new car manufacturing jobs.<sup>3</sup> 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.<sup>4</sup>

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.<sup>5</sup>

Lastly, the American 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.<sup>6</sup> Even the EPA's own research concluded in January 2017 that the nation's clean car standards were achievable and should not be weakened.<sup>7</sup> The American public supports cleaner cars and wants to keep moving forward. And we've seen tens of thousands of citizens and hundreds of health experts voice their support for cleaner cars.

I am greatly concerned about this wrongheaded proposal to undercut Pennsylvania citizens and their local officials from taking stronger steps to reduce air pollution and protect our residents. It's disheartening that federal officials may roll back these standards and usurp local control, given the ongoing talk in our nation's capitol 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 track record of success -- we oppose Docket # EPA-HQ-OAR-2018-0283. I 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 I call on you to strengthen these standards to continue to improve fuel efficiency and reduce air pollution.

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

Sincerely,



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

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

<sup>5</sup> [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](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)

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

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