

Testimony of Luke Tonachel, Director of the Clean Vehicles and Fuels Project at the Natural Resources Defense Council before the U.S. Environmental Protection Agency at the Public Hearing for Reconsideration of the Final Determination of the Mid-term Evaluation of Greenhouse Gas Emissions Standards for Model Years 2022–2025 Light-Duty Vehicles

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As Prepared for Delivery

Good morning Director Grundler and EPA staff. My name is Luke Tonachel and I direct the Clean Vehicles and Fuels Project at the Natural Resources Defense Council, or NRDC. I'm here today on behalf of NRDC's more than more than 2 million members and online activists. NRDC strongly opposes any rollbacks to the existing vehicle standards and we oppose the re-opening of the Midterm Evaluation Final Determination. I will briefly describe why re-opening the Final Determination is unnecessary, harmful and unpopular.

First, the Final Determination issued January 2017 is based on sound science and a comprehensive technical evaluation process. The Draft Technical Assessment Report by EPA, NHTSA and CARB and subsequent EPA Technical Support Document summarize roughly 8 years of careful technology and cost assessment and found the 2022-2025 standards were not only achievable at reasonable cost but could also be strengthened. The EPA has used robust technology cost evaluation techniques including tear-down studies considered a best practice by the National Academies of Science. Based on the technical record, there's no reason to change the standards.

Second, rolling back the standards – which the Administrator's comments suggest is a likely goal of re-opening the Final Determination – sends us backward in the fight to solve climate change. Addressing dangerous greenhouse gas pollution is required by law. If we stay with the current standards through 2025 and set even tighter standards going forward, we have a chance to avoid dangerous climate change. Even a little weakening of the rules makes this task much more difficult and more expensive. Weakening vehicle greenhouse gas and fuel efficiency standards is a double-whammy in the context of climate. Unfortunately, Hurricane Harvey offers a startling and sober example of why we need climate action. Weaker standards leading to more carbon pollution will add to the likelihood of extreme weather events, like the hurricane, that have caused pain and suffering to Gulf Coast citizens and increased fuel costs. Weaker standards also mean Americans are saddled with less efficient vehicles and become more vulnerable to gas price shocks.

Third, weakened standards are a threat to jobs, including auto sector jobs. The standards – when maintained – provide certainty for investment that drives innovation. That innovation makes domestic automakers and their vast network of suppliers competitive in a global market

that is continuing to demand cleaner vehicles. Europe and China are working now to tighten their vehicle standards. Maintaining strong standards will support automotive innovation and hundreds of thousands of American jobs. A report released earlier this year by NRDC and the BlueGreen Alliance found that throughout the automotive supply chain there are nearly 300,000 manufacturing workers in 1200 facilities across 43 states building the technologies that make vehicles cleaner and more fuel efficient. Rolling back the standards will stifle investment in innovation here at home and innovative suppliers could take their jobs to the foreign markets that want their clean vehicle products. American workers would lose out under weaker standards.

Fourth, rolling back the clean car and fuel economy standards is unpopular. It's not surprising that the public supports strong vehicle standards because they reduce pollution, spur domestic innovation and jobs and save drivers money at the pump. There is overwhelming, bipartisan support for strong fuel economy standards among residents in the Midwest auto manufacturing strongholds of Michigan, Ohio, Indiana, Missouri and Tennessee, according to recent surveys. Across these states, more than two-thirds of the respondents – and in all but one case more than 70% of respondents – support keeping the 2025 standards that achieve 40 mpg in real-world driving, equivalent to 54.5 mpg in the compliance test lab. Americans want the EPA to keep the standards that are already on the books.

In conclusion, I'm sure you'll hear much testimony today about how re-opening the Final Determination and weakening the standards is harmful and unwarranted. Additionally, we believe that MY 2021 should be off the table. Weakening 2021 would only make the harms to the environment and consumers worse.

EPA must do all it can to keep the U.S. on the path to a cleaner environment. Doing so will protect public health, strengthen our economy and foster a vibrant and innovative auto industry. On behalf of NRDC, our supporters and future generations, I strongly urge EPA to maintain the current vehicle standards through 2025.