

## Transcript of comments to EPA and NHTSA on September 26, 2018

### *DOCKETS NHTSA-2018-0067 AND EPA-HQ-OAR-2018-0283*

My name is Eric Junga. I am a senior research analyst for the transportation program at the American Council for an Energy-Efficient Economy (ACEEE), a nonprofit and nonpartisan research and education organization. ACEEE strongly opposes the proposal by EPA and NHTSA to roll back the fuel economy and greenhouse gas standards and to halt improvements at model year 2020. The model year 2021 through 2025 standards, as adopted in 2012, should be maintained or strengthened.

Today I address a few of the many unrealistic assumptions and poor judgments used to justify this rollback.

As a primary justification, the agencies argue that previously-adopted standards will make vehicles unaffordable. This is false. The average consumer expenditure on a new vehicle has remained essentially flat since the early 2000s—even while fuel economy and vehicle features have improved. Assertions to the contrary either fail to account for inflation, or do not reflect what consumers are actually paying, because they ignore incentives and rebates, a significant component of vehicle prices.

Full-size pickup trucks illustrate the success of current fuel economy standards. For example, this fall, GM will begin selling its redesigned Chevy Silverado, one of the best sellers in this category. Among many new features is a highly advanced turbocharged four-cylinder engine that will come standard in the Silverado's highest-volume trim. We estimate that it not only will meet its 2025 fuel economy target, but will do so with higher towing and payload capacities than the outgoing model. For this proposed rulemaking, the agencies predict that it would cost an additional \$4,100 for this truck to meet its 2025 target. Yet, GM has announced a \$700 price *decrease* over the outgoing model.

Overblown cost estimates feed into another justification for the rollback—that making vehicles more efficient will lead to over 12,000 additional road deaths. Many of these alleged fatalities stem from the assumption that improving fuel economy will cause people to buy fewer new vehicles and continue to drive their older, less-safe cars and trucks regardless of the vehicle's practical lifetime. The agencies compound this error by claiming that these older vehicles, inexplicably, will be driven for additional miles. Furthermore, half of the agencies' 12,000 projected deaths result from the assumption that consumers will use their fuel savings to drive more. Driving does carry the risk of a crash, but it should not be attributed to fuel economy.

Rolling back these standards will burden Americans with unnecessary fuel costs, auto-sector job losses, and adverse health and environmental impacts. It will eliminate regulatory certainty and jeopardize domestic automakers' global competitiveness. The agencies' proposal shows a willful and irresponsible disregard for science and sound policy. The existing standards were based on a technically robust and transparent process with extensive public input, and should be maintained as adopted and reaffirmed. Thank you.