

Comment from Conor Michaud

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In 2018, President Trump's administration proposed delaying the U.S.'s progress towards more fuel-efficient vehicles and a cleaner environment. This decision came in the form of the 2018 Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which proposed to halt improvements made in vehicle fuel-efficiency in 2020, keeping those standards in place from 2021 through 2026 (U.S. Department of Transportation 2018). In a statement made by the Department of Transportation's National Highway Traffic Safety Administration, who proposed this rule in part with the EPA, the agency claims the rule will provide a "much-needed time-out from further, costly increases" (U.S. Department of Transportation 2018).

Rather than continuing to increase the stringency of emission standards and fuel efficiency, the administration opted to delay, citing the need to alleviate the financial burdens placed upon manufacturers. The administration failed to consider the Energy Independence and Security Act of 2007, which mandated improvements to fuel efficiency standards, requiring the maximum feasible level of efficiency standards to be put in place by 2030 (Union of Concerned Scientists 2017). Delaying improvements in fuel efficiency standards consequently delays future technological improvements and industry standards, thereby lowering the maximum feasible level of efficiency required by 2030.

In 2009, the U.S. adopted a national program to implement new strict fuel efficiency standards, partly designed to combat climate change (Union of Concerned Scientists 2017). Progress was made during phase I and phase II of this national program and vehicle manufacturers agreed to new current and future standards, but the 2018 SAFE rule threatened to dampen any progress made. By impeding new fuel efficiency standards, the Trump administration made environmental and public health a trivial concern. In the eyes of the administration, it was better to provide relief to billion-dollar vehicle manufacturing goliaths than push forward and work to reduce carbon emissions, slow climate change, and clean our air.

In January of 2021, President Biden declared that his administration would work to reduce greenhouse gas emissions (GHG), protect our environment, and improve our public health (The White House 2021). Furthermore, the White House declared a full review of all policies and guidance put in place between January 20, 2017 and January 20, 2021, including the SAFE Vehicles Rule (The White House 2021). In response to President Biden's Executive Order, the National Highway Traffic Safety Administration (NHTSA), reviewed the SAFE Vehicles Rule and proposed increasing fuel economy standards by 8 percent each year for model years 2024-2026 (Regulations.gov 2021). This proposal represents the change we need to make if we are going to effectively reduce carbon emissions and advance technological improvements in the automotive industry. In addition, the NHTSA has determined that these proposed standards will produce a net benefit of over \$28 billion for model years 2024-2026 (Regulations.gov 2021).

I offer my full support in the NHTSA's proposal to strengthen vehicle emission standards and work with the automotive industry to create cleaner burning, more fuel-efficient vehicles. The Transportation sector contributes 29% to the U.S.'s total GHG making it the largest contributor

(Environmental Protection Agency, n.d.). We need immediate action that will set meaningful emission standards and shift our dependency away from fossil fuels. Our country must commit to reducing our GHG emissions and building a world that is sustainable and less reliant on our finite fossil fuel reserves.

References

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