

SAFER AFFORDABLE FUEL EFFICIENT (SAFE) VEHICLES PROPOSED RULE FOR MODEL YEARS 2021-2026

Comments to US EPA and US DOT

Dusan Vuksan
TPB Transportation Engineer

TPB Technical Committee
October 5, 2018



Proposed Rule and TPB Action

- Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) are seeking comment (through October 26, 2018) on a proposed rule for model year (MY) 2021-2026 light duty vehicles
- Proposed Safer Affordable Fuel Efficient (SAFE) rule for Model Years 2021-2026 recommends relaxing existing Corporate Average Fuel Economy (CAFE) and CO2 (greenhouse gas, GHG) emissions standards for passenger cars and light trucks by maintaining model year 2020 standards in place for this time period
- TPB will be briefed on the proposed rule, and asked to approve a joint TPB/MWAQC/CEEPC comment letter at the October 17, 2018 meeting
 - The letter urges EPA to stand by its January 12, 2017 Final Determination and maintain the existing CAFE and GHG standards promulgated in 2012



SAFE Rule Impacts on the Region

- Increase future estimates of mobile source NOx emissions, making it harder to conform to mobile emissions budgets
- Attaining the region's environmental goals will be more difficult:
 - National Ambient Air Quality Standards for criteria pollutants (e.g., Ozone)
 - Reducing GHG



Background–Regional GHG Planning Efforts

- Region adopted specific goals for GHG reductions (National Capital Region Climate Change Report, 2008)
- Regional comprehensive policy seeks a significant decrease in greenhouse gas emissions (Region Forward, 2010)
- TPB examination of actions to reduce GHGs from transportation sector indicated that higher CAFE standards would play a vital role (“What Would It Take?” Scenario Study, 2010)



Background–Regional GHG Planning Efforts (Continued)

- TPB begins tracking contributions from regional transportation plan to GHG reductions (2010 CLRP)
- TPB adopted, as a priority, the goal to *Enhance Environmental Quality and Protect Natural and Cultural Resources* (Regional Transportation Priorities Plan, Goal 5, 2014)
- COG, TPB, and MWAQC joint examination of multi-sectoral actions to reduce GHG affirmed higher CAFE standards as a critical part of the solution (GHG Multi-Sector Working Group, 2016)
- Action plans for regional and local action to reduce greenhouse gas emissions (CEEPC, since 2010)



Background – Federal Standards

- In July 2012, EPA and NHTSA jointly set standards to reduce GHG emissions and improve fuel economy (CAFE) for model year 2017-2025 cars and light trucks
 - Standards varied by vehicle type and model years
 - For combined passenger cars and light duty trucks:
 - Average GHG equivalent mileage improved from 36.6 miles per gallon (mpg) for MY 2017 to 54.5 mpg for MY 2025
 - Average GHG emissions reduced from 243 grams per mile (gpm) for MY 2017 to 163 gpm for MY 2025
- In January 2017, EPA completed a required mid-term evaluation of the 2012 rule and determined to keep the 2012 standards in place
- In March 2017, EPA announced its intention to reconsider its January 2017 decision to retain the 2012 standards



Background – Federal Standards (Continued)

- In August 2017, EPA published a request for comment on its proposed reconsideration of the January 2017 decision to retain the standards
- In September 2017, TPB, MWAQC, and CEEPC submitted comments on proposed reconsideration of the Final Determination urging EPA to maintain the existing GHG emissions standards promulgated in 2012
- In August 2018, EPA and NHTSA proposed new SAFE GHG emissions and CAFE standards to replace the 2012 standards and are seeking comment on alternatives
 - Preferred alternative reflects maintaining the GHG emissions reductions (gpm) and CAFE standards promulgated in 2012 at MY 2020 levels into the future

MY 2021-2025 (Combined PC & LT)	2012 Standards	SAFE Rule (Preferred Alt.)
Mileage (CO2 equivalent)	44.7 to 54.5 mpg	41.7 mpg
GHG Emissions	199 to 163 gpm	213 gpm



Next Steps

- MWAQC and CEEPC approved the letter in September
- TPB to review and approve the letter on October 17
- Joint letter goes to Federal Docket before the October 26 deadline



Dusan Vuksan

TPB Transportation Engineer

(202) 962-3279

dvuksan@mwkog.org

Erin Morrow

TPB Transportation Engineer

(202) 962-3793

emorrow@mwkog.org

mwkog.org/TPB

Metropolitan Washington Council of Governments

777 North Capitol Street NE, Suite 300

Washington, DC 20002



National Capital Region
Transportation Planning Board