

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

Comments to US EPA and US DOT

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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 (PC) and light trucks (LT)
- TPB is being asked to approve a joint TPB/MWAQC/CEEPC comment letter
 - The letter urges EPA to stand by its January 12, 2017 Final Determination and maintain the existing CAFE and GHG standards promulgated in 2012



Impacts of SAFE Rule 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 emissions



Regional GHG Planning Efforts

- Region adopts specific goals for GHG reductions (Climate Change Report, 2008)
- Regional comprehensive policy seeks a significant decrease in greenhouse gas emissions (Region Forward, 2010)
- Develop and implement Action plans for regional and local action to reduce greenhouse gas emissions (CEEPC, since 2010)
- TPB examination of actions to reduce GHGs from transportation sector indicated that higher CAFE and GHG emissions standards would play a vital role (“What Would It Take?” Scenario Study, 2010)
- TPB begins tracking contributions from regional transportation plan to GHG reductions (2010 CLRP)
- TPB adopts as goal to Enhance Environmental Quality and Protect Natural and Cultural Resources (Regional Transportation Priorities Plan, 2014)
- COG, TPB, and MWAQC joint examination of multi-sectoral GHG reductions actions affirms higher CAFE and GHG emissions standards as a critical strategy (GHG Multi-Sector Working Group, 2016)



Federal Standards: Background

- 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 vary 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
- January 2017: EPA completed a required mid-term evaluation of the 2012 rule and determined to keep the 2012 standards in place
- March 2017: EPA announced its intention to reconsider its January 2017 decision to retain the 2012 standards



Federal Standards: Background

- August 2017: EPA published a request for comment on its proposed reconsideration of the January 2017 decision to retain the standards
- 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
- 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
- Upon TPB approval, joint letter to be submitted to Federal Docket before the October 26 deadline
- EPA to consider all comments received and take final action on proposed SAFE Rule



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