
National Tribal Air Association

Proposed SAFE Vehicles Rule

WEBINAR PRESENTATION, OCTOBER 10, 2018



Summary of Current Standards

- EPA and National Highway Traffic Safety Administration (NHTSA) jointly set and enforce the national program for Light-Duty vehicle Greenhouse Gas (GHG) emission and Corporate Average Fuel Economy (CAFE) standards
 - Under Section 202 of the Clean Air Act and Energy Policy and Conservation Act of 1975
- In 2012, EPA and NHTSA issued a joint rulemaking titled “Final Rule for Model Year 2017 and Later Light-Duty Vehicle Greenhouse Gas Emission and Corporate Average Fuel Economy Standards,”
 - Agreement among the federal agencies, California, and 13 major auto manufacturers
 - Established the current standards requiring vehicle fleets to increase average fuel economy to 54.5 mpg by model year (MY) 2025.
 - Estimated to reduce GHG emissions by 2 billion metric tons of CO₂, and save significantly on fuel consumption in MY 2017 - 2025

SAFE Vehicles Rule

- EPA released the Safer Affordable Fuel Efficient (SAFE) Vehicles Proposed Rule for Model Years 2021-2026 (SAFE Vehicles Rule)
 - Replaces the original standards set in 2012
 - Freezes the CAFE and GHG standards in MY's 2020 through 2026
 - Excludes air conditioning leakage, and nitrous oxide (N₂O) and methane (CH₄) GHGs from consideration for GHG compliance model year 2020
 - Withdraws California Waiver of the Clean Air Act
- **Deadline to Comment: October 26, 2018**

Comparison of current standards to SAFE Vehicles rule

Table I. Projected Average Required Fleet-Wide Fuel Economy and CO₂ standards for Combined U.S. Passenger Cars and Light Trucks by Model Year for Current Standards and Proposed SAFE Vehicle Rule

Model Year	Current Standards for Final Rulemaking in 2012		SAFE Vehicles Rule Standards for Preferred Alternative	
	Projected Required MPG	Projected CO ₂ Target (g/mile)	Projected Required MPG	Projected CO ₂ Target (g/mile)
MY 2021	39.0	199	36.9	241
MY 2022	40.8	190	36.9	241
MY 2023	42.7	180	36.9	241
MY 2024	44.7	171	37.0	241
MY 2025	46.8	163	37.0	240
MY 2026	46.7	163	37.0	240

MPG=miles per gallon; MY= model year; CO₂=Carbon Dioxide G/mile =grams/mile
 Note: Projected data from EPA-HQ-OAR-2010-0799¹ and EPA-HQ-OAR-2018-0283⁴

Direct and Indirect impacts analysis from NHTSA-2017-0069

	Current Standards for Final Rulemaking in 2012	SAFE Vehicles Rule Standards for Preferred Alternative
Energy	Combined US Passenger Car & Light truck Fuel Consumption for 2020-2050 (billion gallons)	
	2878	3084
Energy	Combined US Passenger Car & Light Truck Increase in Fuel Consumption for 2020-2050 (billion gallons)	
	--	206
Air Quality	Criteria Air Pollutant Emissions Changes in 2035	
	--	Increase: PM2.5, SO2, and VOCs. Decrease: CO and NOX.
Air Quality	Toxic Air Pollutant Emissions Changes in 2035	
	--	Increase: DPM. Decrease: acetaldehyde, acrolein, 1,3-butadiene, benzene, and formaldehyde.
Air Quality	Increases in Premature Mortality Cases and Work-Loss Days in 2035	
	--	Premature mortality: 86– 194 cases Work-loss: 10,892 days
Climate	Total Greenhouse Gas Emissions from U.S. Passenger Cars and Light Trucks for 2021–2100 (MMTCO2)	
	77,800	85,100

Impacts of the SAFE Vehicles rule

- Sets one National standard with no flexibility to states/tribes
- Offers reduced regulatory costs and compliance flexibility to industry
- Increase vehicle CO₂ emissions by 713 million metric tons (MMT) over the lifetime of the vehicles produced
- Increases in criteria pollutant emissions from 1% for PM_{2.5} to 9% for SO₂.
- Increase fuel consumption by 0.5 million barrels per day
- Increase upstream GHG emissions by 159 MMT for MY's 2021 – 2026

NTAA Policy Response Kit for the SAFE Vehicles rule

- SAFE Fact Sheet
- Tribal Template Letter
- Webinar Recording
- NTAA comment letter

NTAA Proposed Comment Letter

- Air quality and public health
- Impacts to Tribes and Alaskan Native Villages
- Vehicle Technology and Safety
- Cumulative impacts of emissions

Air Quality and Public Health

- Increased impacts of vehicle pollution on human health and the environment
- Result in increase adverse health impacts nationwide
- Health impacts include asthma, respiratory damage and diseases, cardiovascular disease, and even premature death

Impacts to Tribes and Alaskan Native Villages

- Lack of Tribal consultation
 - Executive Order 13175
- Higher rates of health effects from air pollution in Tribal communities
- Disproportionate impacts from climate change on indigenous communities

Climate Change Impacts on Tribes

- Controlling vehicle emissions can address GHG-driven climate change
- Impacts include frequent and intense heat waves, more intense precipitation events, increased storm surges, erosion, and flooding, prolonged droughts, and increased wildfires and insect/pest outbreaks in forests.
 - Tribes and Alaska Native Villages cultures are closely integrated into the ecosystem
 - Economies are heavily dependent the use of fish, wildlife, and native plants.
 - Loss of traditional cultural practices, due to climate-driven die-off or range shift of culturally significant flora and fauna



<http://ipcc.ch/report/sr15/>

NTAA Contact Information

- If you have questions or need more information, contact: Jaime O. Yazzie, Program Coordinator, NTAA, at Jaime.Yazzie@nau.edu / 928.523.0673
- NTAA's Policy Response Kit for the SAFE Vehicles Rule, go to: <https://www7.nau.edu/itep/main/ntaa/PolicyResponseKits/SAFE>