March 29, 2018

Administrator Scott Pruitt

Office of the Administrator 1101A U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Dear Administrator Pruitt.

As the representatives of consumer groups from across the country, we are writing on behalf of millions of Americans to voice our strong support for maintaining the current national passenger vehicle fuel economy and emissions standards and the rights of states to lead on vehicle emissions reductions. The strong national fuel economy and emissions program is supported by clean cars states, which have provided a national model of successful clean air policies for decades.

Thirteen states and the District of Columbia, representing 113 million Americans and over one third of the automotive market, have chosen to exercise their right to bring cleaner, more efficient vehicles to their communities. As such, they are currently protected from an imminent decision by your agency to weaken the standards. However, neighboring states and millions of other hardworking Americans will be saddled with more polluting, less efficient cars, trucks and SUVs that will cost them more at the pump.

It's not just clean cars state residents that want and deserve these standards. The Consumer Federation of America's latest survey provides indisputable evidence that consumers across the country want more fuel-efficient vehicles and strongly support standards requiring them. American families cannot afford to spend more money on gasoline and do not deserve to be burdened with polluting and inefficient vehicles that will hurt household finances when fuel prices rise again.

Right now, the national program and state vehicle emissions standards are improving public health and protecting consumer pocketbooks across the nation, in the following manner:

- The standards lower the cost of driving because emissions reductions also result in less fuel consumption. This savings exceeds the added cost of new fuel saving technology. Consumer Federation of America found that 70 percent of consumers, who finance their vehicle purchase with a loan will have positive cash flow in the first year.
- Low-income households will also benefit, as a larger percentage of their income goes toward driving costs. Low-income households tend to drive used vehicles, and many of these used cars, trucks and SUVs returning to market are ones that meet the standards that took effect in 2012.
- The standards preserve consumer choice providing cleaner, more fuel-efficient vehicles regardless of size or type. The Energy and Security Act of 2007, supported and signed into law by President Bush, made the standards adjustable based on different vehicle sizes, preventing consumers from being forced into smaller vehicles. A recent Consumer Federation of America analysis shows that automakers are achieving the standards and saving consumers money right now.

In the absence of leadership from the EPA, the clean cars states will do, as provided under the law, what's needed to maintain and grow these benefits. And, because pollution knows no borders, these states will need to commit to working even harder to protect their citizens and their neighbors. This is an example of American federalism at its best.

Attorneys general from clean cars states, including New York, Maine, Maryland, Massachusetts, Oregon, Rhode Island, Vermont, Washington, and the District of Columbia, as well as the Commonwealth of Pennsylvania's Department of Environmental Protection, expressed strong opposition to President Trump's action to direct your agency to reconsider the national program. Soon after, these attorneys general wrote a letter vowing to, ". . . vigorously and aggressively challenge President Trump's dangerous anti-environmental agenda in court – as we already have successfully done."

As consumer groups from these and other states, we also stand ready to defend and support actions that ensure states maintain the right to set vehicle emissions standards and the freedom for any other state to exercise that right, if the need arises.

In summary, we strongly urge the EPA not to take action to roll back or weaken common sense emissions and fuel economy standards that are helping millions of Americans breathe easier and save money at the pump. We also ask that state authority to lead on these standards now and in the future be maintained.

Sincerely,

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Consumer Federation of America

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