



Aug. 27, 2018

Trump Administration Analysis: Freezing Clean Car Standards Would Cause Hundreds of Fatalities Per Year and Sicken Thousands

Omitted Analysis Contradicts Justification for Freezing Standards

The Trump administration's [proposal](#) to roll back fuel economy and greenhouse gas standards ("clean car standards")¹ omitted [internal administration analysis](#) showing that extra pollution resulting from the plan would cause up to 299 premature fatalities per year by 2050. The proposal also would result in Americans missing thousands of days of work annually from conditions such as acute bronchitis.²

The omission of this information from the proposed rule is particularly notable because the administration framed safety as the central rationale for proposing the rollback. The proposed rule, which was jointly released on Aug. 2 by the U.S. Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA), purports to save about 1,000 lives annually. It is named the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule." It would freeze automobile fuel economy and greenhouse gas emission standards at 2020 levels, foregoing improvements that are slated to take place between 2021 and 2025.

It is worth noting that the safety claims in the "SAFE" rule suffer from numerous flaws, as [Public Citizen](#)³ and the administration's own [EPA experts](#)⁴ have observed. Half of the lives the proposed rule purports to save would result from people being deterred from driving because they would experience worse fuel economy than if existing standards were retained. Other safety claims relied on dubious assumptions about how much it would cost the automakers to comply with the existing standards and equally questionable extrapolations from those assumptions. [EPA experts'](#) analysis concluded that the proposed rule would result in more fatalities per mile driven than the status quo.⁵

¹ The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, Notice of Proposed Rulemaking, 49 CFR Parts 523, 531, 533, 536, and 537 (Environmental Protection Agency) and 40 CFR Parts 85 and 86 (National Highway Traffic Safety Administration), <http://bit.ly/2vq1o5K>. [Hereinafter, "Proposed rule" and cited in text]

² Draft Environmental Impact Statement, National Highway Traffic Safety Administration (NHTSA) (July 2018), <http://bit.ly/2OZmeA6>. [Hereinafter, "Draft EIS" and cited in text]

³ Clean Cars Rollback: The Absurdity of the Trump Administration's Safety Claims, Public Citizen (Aug. 16, 2018), <http://bit.ly/2MjvcDX>.

⁴ William Charmley e-mail to Chandana L. Achanta, Chad S. Whiteman and Jim Laity, all of the Executive Office of the President, Office of Management and Budget (June 18, 2018 12:51 PM), <http://bit.ly/2MfPSUS>.

⁵ *Id.*

Accompanying the rulemaking, NHTSA produced a draft Environmental Impact Statement (draft EIS). The draft EIS acknowledged that negative health consequences would result from the proposals that the administration was contemplating.

The proposed “alternatives would result in increased incidence of [particulate matter]-related adverse health impacts due to the emissions increases. Increases in adverse health outcomes include increased incidences of premature mortality, acute bronchitis, respiratory emergency room visits, and work-loss days,” the draft EIS said. [Draft EIS, p. S-7 and S-8] The administration chose the most environmentally damaging of the alternative of those analyzed in the draft EIS as its preferred option in the proposed rule.

The draft EIS includes a finding that the proposed rule would cause an extra 32 to 73 premature deaths per year by 2025, and between 134 and 299 premature deaths by 2050. (The different estimates were derived by applying two different studies on the effects of pollution on human health.) The proposal also would result in 4,480 days away from work due to illness by 2025 and 16,819 sick days in 2050, according to the draft EIS. [Draft EIS, p. 4-47] [See table]

Projected Effects of Freezing Fuel Economy Standards, According to NHTSA Analysis

Year (study)	Premature Mortality (Krewski study)	Premature Mortality (Leeule study)	Work-Loss Days)
2025	32	73	4,480
2035	86	194	10,892
2050	134	299	16,819

Source: Draft EIS. The figures presented here referred to the alternative that the administration adopted as its preferred option in its proposed rule.

It is important to note that these adverse effects would be in addition to the significant health impacts from the additional global warming pollution due to the Trump administration proposal, which would undo our most effective federal climate program on the books. This rule would have devastating consequences for the 25 million Americans who currently have asthma, as warmer temperatures exacerbate air quality issues.

Hotter temperatures driven by climate change also increase the risk of unhealthy ozone levels and lead to increased drought and wildfires (both of which create particle pollution). Other impacts from climate change include severe weather events and the spread of infectious vector-borne disease. The transportation sector is the [largest source](#) of GHG emissions in the United States.⁶ Freezing clean car standards at 2020 levels would cause emissions of 2.2 billion metric tons of GHG emissions by 2040 that would otherwise have [been avoided](#).⁷

The proposed rule acknowledges that the plan would increase emissions of air pollutants, both from vehicle tailpipes and from fuel refinement, but includes little detail on the projected results.

⁶ August 2016 Monthly Energy Review, Energy Information Administration (EIA) (Aug. 2016), <http://bit.ly/2MMq8ie>.

⁷ Dave Cooke, New EPA Administrator, Same Bad Idea – Car Standard Rollbacks Would Be Awful, Union of Concerned Scientists (July 20, 2018), <http://bit.ly/2MfKe59>.

For instance, the proposed rule says: “Added fuel production and use will increase emissions of more localized air pollutants (or their chemical precursors), and the resulting increase in the U.S. population’s exposure to harmful levels of these pollutants will lead to somewhat higher costs from its adverse effects on health.” The rule estimates a societal cost of that added pollution of \$0.8 billion to \$1.2 billion but does not translate those costs into health outcomes, such as premature fatalities, illnesses and days away from work, as the draft EIS does. [Proposed rule, p. 170-176]

Non-greenhouse gas pollutants are expressly regulated by the Clean Air Act Tier 3 standards. However the proposed rule would result in increased emissions of these pollutants. The proposed rule reports that determining the pollution consequences from the policy change would require analysis that had not yet been conducted at the time of publication but will be conducted prior to issuance of a final rule.

“For the final rule, a national-scale air quality modeling analysis will be performed to analyze the impacts of the standards on [particulate matter 2.5], ozone, and selected air toxics,” the proposed rule said. [Proposed rule, p. 731]

The contents of that analysis and any other findings on health effects due to increased pollution that are included in the final rule will warrant very close examination and consideration.