

**EDF Oral Statement on SAB's Draft Report on the Proposed SAFE Vehicles Rule
January 17, 2020**

My name is Chet France. On behalf of Environmental Defense Fund and our two and a half million members nationwide, I thank you for the opportunity to provide oral comments today on SAB's review of EPA's proposed SAFE rule. For purposes of background, I retired from the Environmental Protection Agency in 2012 after 38 years of service, including as Director of EPA's Assessment and Standards Division leading the development of EPA's light-duty vehicle greenhouse gas programs for model years 2012-2025. These are the very standards that EPA proposed to substantially weaken here. Since 2014, I have been consulting for EDF and have been intimately involved in reviewing EPA's efforts to rollback the model year 2021–2026 GHG standards for cars and light trucks.

SAB's own review of the scientific analysis which forms the basis of EPA's proposed rule echoes the review of many others. The SAB concluded that the proposed SAFE rule's regulatory analysis has "significant weaknesses" and "strongly recommended" that the Agency address these concerns in the final rule because "many of the analytic changes will move the results in favor of the avarage standards." Based on my expert review of the proposed rule, I agree with the draft report's conclusions and strongly recommend that the SAB adopt this report.

Unfortunately, in SAB's words the review only focused on areas of the analysis "where there appear to be significant weaknesses." Based on my assessment and expertise in these analyses, I want to underscore that the scientific and technical basis for the EPA proposed rule includes widespread foundational flaws not addressed by the SAB. In EDF's comments on the proposed rule, which have been submitted to the SAB, we identified many other key flaws and biases involving the determination of technology costs and benefits and the calculation of the proposal's impacts on emissions and public health. When we corrected these flaws and re-ran the models (which is described in detail in Appendix A of our written comments), we found that the proposed rollback would actually have a net cost of between \$100 billion and \$300 billion instead of a benefit and cause a dramatic increase in harmful emissions and health impacts. In particular, the analysis we presented in our written comments shows that the proposed rollback will result in 14,000 to 32,000 premature mortality incidences, translating into dollar damages of \$89 to \$197 billion. The agency entirely ignored these impacts in its proposal.

Finally, the SAB should urge that any revised approach be re-proposed to allow for public comment and expert review. The deeply flawed Proposal demonstrates the pitfalls of basing a regulatory proposal upon unproven, nontransparent, improvised methods and analysis. SAB should urge EPA to ensure that any new analytical approaches deployed in any final action on

the Proposed Rule are based on established, rigorous science and have been subject to public comment and expert review *before* being used to justify changes to the existing standards.

Thank you for your consideration of my recommendations.

EDF written comments links:

Introduction: https://www.edf.org/sites/default/files/EDF1_Comment_Intro.PDF

Appendix A: https://www.edf.org/sites/default/files/EDF2_Comment_Appendix_A.PDF

Appendix B: https://www.edf.org/sites/default/files/EDF3_Comment_Appendix_B_Rykowski.pdf