



Environmental Protection Agency
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1200 Pennsylvania Avenue, NW
Washington, DC 20460

July 2, 2021

Consumer Reports Comments on EPA's "Reconsideration of Waiver Status for
California's Vehicle Emission Standards"
(Docket No. EPA-HQ-OAR-2021-0257)

Submitted via: www.regulations.gov

Consumer Reports strongly supports EPA's proposal to restore California's waiver under the clean air act for their Advanced Clean Cars (ACC) program. Restoration of state authority for this program will be vital for expanding consumer choice in the light duty vehicle market and achieving our climate goals.

This action is not only supported by Consumer Reports staff, but also it's members. Attached is a petition signed by 48,599 Consumer Reports members who support EPA taking this action to restore state authority to set clean car standards. In addition to written petition signatures, four Consumer Reports members also testified at a June 2nd hearing in favor of this action.

State leadership under the Clean Air Act has helped improve public health and drive the auto industry towards a clean car revolution that will drive down consumer costs, expand consumer choice and reduce global warming pollution. State authority is especially important in times when political leadership in the federal government has abdicated its responsibility to set strong federal standards as we have seen in past years. In taking this action you will provide states a choice of returning to stronger clean car standards, which our research has estimated will save consumers an average of \$2,100 on each new vehicle purchased by 2025.¹

State authority is also vital to help drive a more equitable marketplace. New car buyers on average are older, whiter, and wealthier than average,² and the decisions they make determine the vehicles available for purchase on the used market. That means that the preferences of a smaller, less diverse subset of Americans largely drives the market for new cars, even if those vehicles do not match the needs and wants of the 70% of Americans who can't afford, or chose not to enter, the new car market.³ Reinstating the waiver will restore important tools that states can use to address some of these systemic inequities.

¹ Consumer Reports, "The Un-SAFE Rule Update: Weakening Fuel Economy and Emissions Standards Costs Consumers Money in Every State," November 2019.
https://advocacy.consumerreports.org/press_release/new-consumer-reports-analysis-shows-near-freeze-of-fuel-economy-rules-would-cost-consumers-300-billion/

² Based on Consumer Reports' analysis of Bureau of Labor Statistics 2019 Consumer Expenditure survey. <https://www.bls.gov/cex/tables.htm>

³ In 2018 and 2019 used car purchases accounted for 70% of total vehicle US light duty vehicle sales based upon comparing used vehicle sales of around 40,000,000 according to Edmunds 2019 Used Vehicle Report with widely reported new vehicle sales of around 17,000,000 in each year.

Edmunds, "Used Vehicle Report: the car comeback CY 2019"
<https://static.ed.edmunds-media.com/unversioned/img/industry-center/insights/2019-used-vehicle-report.pdf>

But reaffirming state authority must be just the first step. Consumers across the country want and deserve better access to clean cars.⁴ To ensure that automakers actually deliver them, they need strong federal action. They deserve restoration of federal clean car standards at least as strong as the Obama-Biden administration standards through 2025, and then new standards through 2030 that will cut emissions from new cars and light-duty trucks at least 60 percent below today's levels, saving consumers an estimated \$1.6 trillion dollars and eliminating 10 gigatons of global warming pollution through 2050.⁵

At this moment we have a great opportunity to make a major difference in the lives of all Americans, and we urge the EPA to seize on it.

Respectfully Submitted,

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⁴ Consumer Reports, "Consumer Attitudes about Fuel Economy: 2020 Survey Results," February 2021. <https://advocacy.consumerreports.org/wp-content/uploads/2021/02/National-Fuel-Economy-Survey-Report-Feb-2021-FINAL.pdf> and

Consumer Reports, "Consumer Interest and Knowledge of Electric Vehicles: 2020 Survey Results," December 2020. <https://advocacy.consumerreports.org/wp-content/uploads/2020/12/CR-National-EV-Survey-December-2020-2.pdf>

⁵ Consumer Reports, "Fact Sheet: Vehicle Greenhouse Gas Emissions Standards," March 23, 2021 <https://advocacy.consumerreports.org/research/fact-sheet-vehicle-greenhouse-gas-emissions-standards/>