

**Earthjustice | Environment America | Natural Resources Defense Council
Pew Charitable Trusts | Safe Climate Campaign
Sierra Club | Union of Concerned Scientists**

November 13, 2015

Dear Conferee,

The transportation bill in conference between the House and Senate includes several provisions that weaken historic gas mileage standards that were broadly supported by states, health groups, consumers, automakers, environmental organizations and millions of Americans. Instead of focusing on rebuilding our roads and bridges and expanding our transit systems, these provisions would increase fuel consumption and carbon pollution and increase consumer costs at the pump. On behalf of our millions of members and supporters, the undersigned environmental and science organizations urge you to eliminate provisions in the transportation bill that would lead to increased vehicle emissions and fuel use and imperil innovation in advanced technologies.

The bills in conference include several provisions that threaten vehicle standards—rules that were set after years of work with the auto industry. Other provisions would slow the adoption of electric vehicles.

- An amendment offered by Rep. Mullin (R-OK) and incorporated largely along party lines would provide windfall incentives for manufacturers to produce dirtier, less efficient vehicles. It would mandate that the Environmental Protection Agency give natural gas vehicles “any preference or incentive” given to electric vehicles, both in existing and future regulations. This unnecessary and broad provision ignores the fact that electric vehicles have far lower life-cycle emissions than natural gas vehicles, in part due to potent methane emissions.
- The House bill also includes a provision sponsored by Rep. Burgess (R-TX) exempting small volume vehicle manufacturers, including luxury sports car companies like Lotus and McLaren, from safety and environmental standards. Under this provision, small volume automobile manufacturers would be allowed to install engines certified under the Clean Air Act, regardless of when the engine was certified. This means automakers could install dirty, decades-old engines, instead of their cleaner contemporary counterparts. It would be a clear step backwards for public health.
- Electric vehicles are critical in reducing oil consumption, strengthening our nation’s security, fostering innovation, and cutting carbon pollution in the years ahead, and they should not be subject to arbitrary user fees. But the Senate bill includes a provision that increases federal transportation funding for states that enact fees on electric vehicles, making them more expensive to own. This provision could unnecessarily stunt electric vehicle sales.

Further, some in Congress may try to add other provisions that were in neither passed-bill in conference. These include provisions that would let automakers lower their fleet gas mileage by installing unrelated vehicle safety technologies. Specifically, the provision would let automakers claim a credit of up to 9 grams per mile of carbon pollution (the same improvement required for vehicles from 2012 to 2013) for installing safety technologies that are already slated to be widely implemented. We support the deployment of world class safety technologies; however, increased safety should not come at the expense of weakening our nation's clean air standards. Unfortunately, the mileage-credit provision would create a loophole eliminating up to 14 percent of the total fuel savings from the 2017-2025 standards for cars, SUVs, minivans and pickups. EPA and NHTSA explicitly rejected this approach in the final 2017-2025 standards, stating "*In the case of crash avoidance technologies, we are prohibiting off-cycle credits for these technologies under any circumstances.*" It is critical that the conference committee reject efforts to include this proposal in the transportation bill, as it amounts to an end-run around crucial gas-saving rules that were finalized with the support of the auto industry.

Congress should reject these provisions and any others that would lead to greater fuel consumption and carbon pollution, and undermine American innovation. We instead ask that you focus on moving our transportation system into the 21st century.

Sincerely,

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