

**NESCAUM TESTIMONY**  
**EPA/NHTSA Proposed SAFE Vehicles Rule Hearing**  
*September 25, 2018*  
*Dearborn, Michigan*

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- NESCAUM is the regional association of 8 state air quality agencies in the Northeast, where light duty vehicles account for nearly 25% of all greenhouse gas (GHG) emissions. My testimony represents the majority view of NESCAUM member states.
- The northeast states strongly oppose the proposed weakening of federal GHG standards for MY 2021 – 2025 light-duty vehicles, and *any* curtailment of state rights under the Clean Air Act to adopt motor vehicle emission standards that are at least as stringent as the federal standards.
- The proposed SAFE Vehicle Rule ignores EPA’s responsibility under federal law to protect the health and welfare of our nation from the adverse impacts of air pollution at a time when we are experiencing the dire effects of a changing climate - from record-breaking heat waves, to mega-forest fires in the west, to extreme hurricanes.
- EPA adopted the existing standards after a comprehensive technical analysis and stakeholder process that included automakers, who *supported* their adoption.
- Nothing has changed to warrant rolling them back. The technologies needed to meet these standards are here today at lower costs than projected, and they will drive further innovation.
- We also *strongly* oppose the SAFE Vehicle Rule’s unprecedented proposal to curtail California’s authority to adopt GHG emission standards—either through revocation of the existing waiver or a finding of preemption by the Energy Policy Conservation Act, which two federal courts have already rejected – and EPA’s new and incorrect interpretation that Section 177 does not allow states to adopt California’s GHG standards.
- For decades, California’s special authority under the Clean Air Act has been recognized by Congress and by EPA on a bipartisan basis as a vital part of our nation’s response to air pollution.

- Twelve states and the District of Columbia have exercised their authority under §177 to adopt California’s motor vehicle emission standards in lieu of the federal standards. Together with California, they represent 114 million people and 35% of new car sales.
- The California standards have delivered dramatic air quality and public health benefits and have made the United States a leader on clean cars worldwide. This Rule represents a risk to U.S. environmental and economic leadership.
- Implementation of California’s GHG and zero-emission vehicle standards is a core part of our states’ plans to cut transportation emissions to achieve their science-based targets to reduce GHG emissions by 80% by 2050, and to meet aggressive near-term targets.
- By including §§ 209 and 177 in the Clean Air Act, Congress recognized the important role that states have in protecting public health and welfare by clearly authorizing California to adopt its own motor vehicle emissions standards and giving other states the right to adopt those standards.
- Any curtailment of these rights, as proposed by the SAFE Vehicle Rule, would deprive states of a critical tool to address motor vehicle pollution and minimize climate disruption. Our states are fully prepared to defend these rights.
- Thank you