

**Testimony of David P. Littell, Commissioner
Maine Department of Environmental Protection**

**On the U.S. Environmental Protection Agency's Reconsideration
of the Request for Waiver of Federal Preemption
for California State Motor Vehicle Pollution Control Standards**

**March 5, 2009
Arlington, Virginia**

Good morning. My name is David Littell and I am commissioner of the Maine Department of Environmental Protection. I am speaking on behalf of NESCAUM – the eight northeast states – in support of California's 2005 request for a waiver of federal preemption for its greenhouse gas regulation for passenger cars, light-duty trucks, and medium-duty passenger vehicles. California's December 21, 2005 waiver submittal provided a solid demonstration that its greenhouse gas emission standards meet relevant waiver criteria. NESCAUM and its member states therefore strongly urge EPA to reverse its denial of the California waiver request published in March of 2008.

As you know, Maine is one of 13 states that exercised its option under the Clean Air Act's Section 177 to adopt California's motor vehicle greenhouse gas emissions standards as our own. This is because Maine has a vital interest in reducing global warming emissions from vehicular and other sources in our state – in fact vehicle greenhouse gas reductions is among the top three ranked of Maine's 55 greenhouse gas reduction strategies in Maine's Climate Action Plan. The need for action is no longer in dispute, as has been confirmed recently by the world's scientists. I would refer you to the latest Intergovernmental Panel on Climate Change (IPCC) report on climate change impacts, adaptation and vulnerability. In fact, the need for immediate action may be more urgent than was previously thought -- many climate scientists now believe the pace of global warming could be even faster than recent IPCC scenario predictions.

As described in a recent *Washington Post* article industrial greenhouse gas emissions have increased more quickly than expected and higher temperatures are triggering self-reinforcing feedback mechanisms in global ecosystems. The article quoted a member of the United Nations' IPCC, who stated, "We are basically looking now at a future climate that's beyond anything we've considered seriously in climate model simulations."¹

The impacts of climate change on the Northeast is modeled to mean: more frequent and intense storms; increased damage in coastal areas from flooding and storm surges; reduced revenue for traditional New England industries such as maple syrup, skiing, and snowmobiling as well as ecological stress on fishing grounds, forest and coastal ecosystems and important species including loons, chickadees, lynx, moose, bobcats and lobster. We believe that mounting scientific evidence of the impacts of global warming necessitate immediate action to reverse the growth of greenhouse gas emissions from every sector -- including transportation -- as part of a comprehensive state-led effort to combat global warming.

The California program is a crucial linchpin in state and regional efforts to reduce the impact of climate change. In order to address greenhouse gas emissions from the region, all of the states in the Northeast have either passed legislation that requires significant reductions in emissions or have committed to reductions as part of the New England Governors'/Eastern Canadian Premiers' Climate Action Plan adopted in 2001. Legislation signed in the region specifies reductions of greenhouse gases of 10 to 25 percent below 1990 levels by 2020, and more significant reductions beyond 2020.

Approximately 25 percent of total anthropogenic greenhouse gas emissions in the NESCAUM region come from passenger cars and light-duty trucks. In recognition of this, seven of the eight NESCAUM states have exercised their option under Section 177 of the Clean Air Act to adopt the California motor vehicle greenhouse gas emission

¹ Washington Post, "Scientists: Pace of Climate Change Exceeds Estimates," February 15, 2009 (*quoting* Dr. Christopher Field, Director, Carnegie Institution's Department of Global Ecology at Stanford University).

standards. When the Northeast states implement these standards, we project that they will reduce regional emissions by 27 million tons of greenhouse gases annually in 2020, and 39 million tons in 2030. This equates to an 18 percent reduction in motor vehicle greenhouse gas emissions in 2020 and a 24 percent reduction in 2030 for our region.

Importantly, the standards are achievable using today's automotive technologies. In 2004, the Northeast States Center for a Clean Air Future ("NESCCAF") conducted a comprehensive study to assess the feasibility and costs associated with introduction of technologies to reduce greenhouse gasses from passenger cars. The study found that cost effective technologies exist to reduce motor vehicle greenhouse gas emissions to achieve reductions of up to 55 percent. The study was designed to replicate a program that met the California greenhouse gas regulation requirements and restrictions.

The NESCCAF study found that technologies currently in production such as improved air conditioning, variable valve timing and lift, 6-speed automatic transmissions, and cylinder deactivation can be used to reduce motor vehicle greenhouse gas emissions by 25 percent. Much greater reductions of up to 55 percent can be achieved through the use of more advanced technologies such as gasoline direct injection, and hybrid electric and diesel vehicles. Two-thirds of the technologies evaluated in the NESCCAF analysis are already in high volume production, which is defined as over 500,000 units manufactured per year. Examples of vehicles that are available today with these technologies include GM Tahoe, Suburban, Silverado and other models with cylinder deactivation, Honda Accord, Ridgeline, Fit and other models with variable valve timing, and the turbocharged Volvo S60.

Recent high gasoline prices and the associated high costs of operating vehicles have spurred automobile manufacturers to introduce some of these technologies at no additional cost to consumers. Other cars, SUVs, and trucks are being planned that will include these and other technologies. In addition, American automobile manufacturers have announced the introduction of electric hybrid and plug-in electric hybrid vehicles.

Greenhouse gas standards will provide regulatory certainty to manufacturers who need to introduce these technologies to remain competitive in the global automotive market.

We applaud the Administration for its aggressive recent actions on climate change. The charge delivered to the U.S. Department of Transportation to finalize the first phase of the light-duty motor vehicle fuel economy standards and EPA's reconsideration of the waiver denial are extremely positive steps. We urge EPA to expeditiously grant California its waiver as a critical next step in reducing the risks posed by climate change.

Thank you. I am happy to answer any questions the panel may have.