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**NESCAUM Response to EPA/NHTSA Proposal to Freeze Federal GHG Standards
And Block California's Standards**

(Boston, MA) The Northeast States for Coordinated Air Use Management (NESCAUM) strongly opposes the proposal by the U.S. Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) to weaken federal greenhouse gas (GHG) standards for passenger cars and light-trucks and threaten California's GHG standards and the zero-emission vehicle program. Light-duty passenger cars and trucks are the single largest source of both GHGs and smog-forming pollutants in our region. Rolling back emission standards for these vehicles will endanger public health and welfare.

Most of the northeast states enforce California's Advanced Clean Car standards, including the zero-emission vehicle program, in lieu of the federal standards, and some have been doing so for nearly three decades. The emission reductions achieved by implementing the California standards have helped our states achieve dramatic improvements in air quality over this period, even as their economies grew and vehicle miles travelled increased substantially. While states originally adopted California's standards to address their smog problems, the California standards are also a key component of our states' comprehensive plans to achieve their GHG emission reduction targets for 2050. To protect public health and welfare, states continue to need California's Advanced Clean Car standards to attain national ambient air quality standards and reduce GHG emissions.

The extensive analyses conducted by U.S. EPA and the California Air Resources Board during the mid-term review for the GHG standards clearly support the viability of the existing federal and California standards through model year 2025. Further, the rapid advance in electric vehicle technology provides additional opportunities and flexibilities for the automobile industry to comply with the existing standards.

States' rights and responsibilities to protect public health and the environment from the impacts of air pollution have been a basic tenet of environmental policy since the Clean Air Act of 1970. The U.S. has always been the leader in low emission vehicle technology, and California and our states have played a critical role in driving the clean vehicle market. Clean and efficient cars are good for the environment and economy and there is no practical reason for freezing GHG standards at 2020 levels or for removing the zero-emission vehicle component of California's program. We need to do more, not less, to address harmful emissions from cars and trucks.

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