

**NESCAUM'S TESTIMONY ON EPA'S PROPOSED RULE TO
REVISE 2023 AND LATER MODEL YEAR LIGHT-DUTY VEHICLE
GREENHOUSE GAS EMISSIONS STANDARDS**

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Good morning. My name is James Flynn. I am a Senior Policy Advisor for Clean Transportation at the Northeast States for Coordinated Air Use Management (NESCAUM). Thank you for the opportunity to present this testimony on the Environmental Protection Agency's (EPA) proposed rule to revise the 2023 and later model year greenhouse gas (GHG) emissions standards for passenger cars and light trucks.

NESCAUM is the regional association of state air quality agencies in the Northeast. We serve as a technical and policy advisor to our member agencies and facilitate multi-state initiatives to accelerate electric vehicle adoption. For more than three decades, NESCAUM and its members have closely collaborated with California and other states, EPA, and the automobile industry to promote low- and zero-emission vehicles.

My testimony focuses on the urgent need to address the climate crisis and the justification for the strongest possible federal GHG emissions standards for light-duty vehicles.

As an initial matter, NESCAUM appreciates the administration's renewed commitment—reflected in EPA's proposed rule and recent Executive Orders—to coordinate with states leading the way in reducing vehicle emissions, including those that adopt California's emissions standards. Indeed, seven of NESCAUM's states have exercised their authority under Section 177 of the Clean Air Act to adopt California's Advanced Clean Car standards.

The public health, environmental, and economic costs of climate change impacts—such as increasing heat waves, drought, sea level rise, flooding, and wildfires—are mounting. Transportation is the largest source of GHGs in the United States and light-duty vehicles are the largest contributor of those emissions. Mitigating the climate crisis will require substantial reductions in GHG emissions from motor vehicles.

Light-duty cars and trucks are also a major source of particulate matter, air toxics, and ozone-forming pollutants that harm public health. Significant portions of the Northeast are not in attainment with federal ozone standards, and climate change is expected to exacerbate tropospheric ozone levels. Low-income communities, communities of color, and indigenous populations in the Northeast are particularly vulnerable to the effects of climate change and are disproportionately impacted by air pollution.

There is ample justification for strong national GHG standards that recover and restore the benefits of the national program adopted by EPA in 2012. Zero-emission vehicle technology has advanced rapidly since then; and the pace of innovation has only accelerated since EPA confirmed those standards to be technologically feasible and appropriate during the 2018 mid-term evaluation. Battery costs continue to decline. Many automakers have announced plans to electrify some or all their fleets. In the 2019 Framework Agreements, several manufacturers voluntarily agreed to comply with California's GHG emission reduction targets through model year 2026 across their national vehicle fleets, notwithstanding the unjustified weakening of federal GHG standards in the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule.

For many years, NESCAUM's members have been at the forefront of clean transportation policy—including by adopting California's light-duty vehicle emissions standards—and are committed to the rapid electrification of the entire light-duty fleet. Strong national standards are a critical building block for state efforts to accelerate the transition to electric vehicles to achieve substantial reductions in GHG and criteria pollutant emissions.

For these reasons, NESCAUM urges EPA to swiftly adopt the most stringent GHG emission standards for light-duty vehicles feasible for model years 2023 through 2026, and to act quickly to propose ambitious post-model year 2026 standards. Thank you for the opportunity to present this testimony.