

## **Testimony by the Environmental Protection Network**

### **EPA Public Hearing on Revised 2023 and Later Model Year Light-Duty Vehicle GHG Emissions Standards**

August 25, 2021

Thank you for the opportunity to provide testimony today. My name is Jeff Alson, and I am speaking on behalf of the Environmental Protection Network (EPN), a group of more than 550 EPA alumni volunteering their time to protect the integrity of EPA, human health, and the environment. From 1978 until 2018, I was a Senior Engineer and Policy Advisor in EPA's Office of Transportation and Air Quality and worked extensively on the clean car standards.

EPN strongly believes that EPA's top priority must be a post-2026 rule to establish a clear regulatory requirement to achieve near-100 percent zero-emissions car and light-truck sales by 2035. Transportation is the leading source of U.S. GHG, and it takes about 15 years of new car sales to turn over the fleet. If the U.S. is to reach the IPCC goal of net-zero emissions by 2050, it is imperative that EPA promulgate standards to transform the new car fleet to zero-emissions vehicles by 2035, providing critical regulatory certainty and lead time, and a level playing field for U.S. automakers to be EV leaders without worrying that others may drag their feet.

EPN strongly supports the proposed 2023-2026 standards as an important building block and the minimum needed to establish a foundation for a strong 2035 rule. Any changes should be in the direction of more, not less, stringent standards. There is no question automakers have sufficient lead time to meet the proposed standards for 2023. Until last year's rollback, manufacturers' product plans were geared toward meeting the original 2025 standards finalised in EPA's 2012 rule, which were slightly more stringent than those in the current proposal. In fact, there are products on the market today that meet the standards and existing plans to expand advanced technologies to more products.

Zero-emissions vehicles offer large public health benefits to everyone, but especially to vulnerable communities who are the most at risk to climate-related extreme weather events, as well as to high pollution levels from urban freeways and oil refineries. The lower and more stable fuel and maintenance costs of electric vehicles will be a major economic benefit to low-income communities, as unanticipated gasoline price spikes and repair bills can destroy a tight family budget.

Finally, EPN supports EPA's decision to undertake its own GHG rulemaking, separate from NHTSA, reversing the previous administration's decision to essentially lock agency staff out of a meaningful role in the 2020 rollback. NHTSA has clear legal limits on considering electric vehicles when setting CAFE standards, and can't promulgate CAFE rules for more than five years at a time, thereby making CAFE limited in its ability to address long-term climate impacts. It is imperative that future EPA rulemakings not be constrained by NHTSA's statutory limitations.