

**Environmental Protection Agency and Department of Transportation  
Hearing on the Proposed Rollback of the Clean Car Standards  
Fresno, CA – September 24, 2018**

**Testimony of EDF's Martha Roberts**

Thanks very much for the opportunity to testify today. My name is Martha Roberts, I'm an attorney with Environmental Defense Fund.

The current Clean Car Standards have an extraordinary range of benefits and rest on an extensive technical record. Clean Car Standards have already been in place since model year 2012. We've already seen that Clean Car Standards mean families are able to buy a wide range of cars and trucks that pollute less and cost families less money at the gas pump—at the same time the auto industry has thrived. This is a success story!

An EDF analysis of the cumulative impacts of this proposed rollback underscores what's at stake: by 2040, the rollback would increase climate pollution by 2.2 billion tons (that's about the annual emissions of all of India). This is a needless, massively backwards step to take at a moment in time when the urgent and dire threat of climate change is becoming only more clear and more devastating.

But that drastic harm is not the only cost. At the same time, rolling back these standards would cost consumers hundreds of billions of hard-earned dollars at the gas pump. Clean Car standards also spur auto sector innovation and vitality—in fact, the proposal's own analysis concluded that this rollback would cost 60,000 jobs.

There are a host of reasons why this rollback is unlawful. Given my short time to testify, I'll focus on just two: the proposal's disregard of the extensive technical record showing the existing standards are eminently feasible, achievable, and beneficial; and the proposal's extreme and indefensible attack on state leadership.

EPA, the Department of Transportation, and the California Air Resources Board embarked on an exhaustive, multi-year technical analysis and public process to review the Model Year 2022-2025 standards. The draft Technical Assessment Report—which was jointly issued by all three agencies—strongly upheld the feasibility of the existing standards, concluding that

“A wider range of technologies exist for manufacturers to use to meet the MY2022-2025 standards, and at costs that are similar or lower, than those projected in the 2012 rule”

It's hard to see how the administration's dramatically different assertions—that the standards have suddenly become much more costly and require far higher levels of hybrid and EV penetration, for example—accord with the extensive record evidence supporting the existing standards and underscoring their achievability and low cost. Even the experts the agencies rely on have expressed serious concerns with how their work has been used. The New York Times quoted an economist whose research was cited repeatedly in the proposal as saying: “I don't know how they are going to defend this analysis... I just don't think it's correct.”

Finally I want to comment on America's long tradition of state leadership on clean cars, which has yielded tremendous benefits—reducing pollution while fostering innovation. Development of the catalytic converter—which revolutionized our ability to reduce dangerous smog-forming pollution from cars—was spurred in large part by state adoption of pollution standards for passenger cars. This record of state leadership has been recognized in the Clean Air Act since its earliest establishment.

Nevertheless, the administration's proposal to rollback national clean car standards also includes two separate, aggressive attacks on this state success story—attacks that are fundamentally inconsistent with Congress's cooperative federalism vision for auto pollution control—and in one case is entirely unprecedented, and in the other has already been rejected in federal court. This attack is an effort to block the bedrock clean car protections that numerous states have put in place to protect millions—nearly half our country—from the dangerous pollution discharged by cars and trucks. The administration should reverse this reckless attack.

In conclusion, this proposal to eviscerate a tremendously successful program is contrary to law, facts, and the best interests of all stakeholders. It should be immediately withdrawn. Thank you for the opportunity to speak.