

EPA Public Hearing - Testimony of Alice Henderson, Environmental Defense Fund

June 2, 2021

California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption (86 Fed. Reg. 22421)

Thank you for the opportunity to provide testimony today. My name is Alice Henderson. I'm speaking on behalf of the Environmental Defense Fund.

EDF supports EPA's reconsideration of the "SAFE1" action and the swift reinstatement of the 2013 waiver for California's Advanced Clean Car standards. The Trump administration's attack on state authority under the Clean Air Act was unlawful and undermines a vital tool that Congress granted to states to protect us from vehicular air pollution.

Reversing that action is an important step toward reducing the air pollution burden that disproportionately impacts low-income communities and communities of color, and toward avoiding some of the immense damage that climate change will continue to inflict on human health, the economy, and our environment. EDF urges EPA to swiftly restore the Clean Air Act waiver for California's greenhouse gas and zero-emission vehicle standards to ensure that states can continue using these standards to achieve the emissions reductions we so urgently need.

Through its protective automotive standards, California has provided a half century of clean air leadership, serving as a testing ground for innovation in emissions control with far-reaching benefits. For over 60 years, California programs have incentivized the development of technologies that have been deployed across the state, the nation, and the world. It is critical that California be able to continue and build upon this leadership to address the climate and air pollution crises that we face.

California is currently developing the next generation of Advanced Clean Cars standards, which have the potential to accelerate deployment of zero-emission vehicles. The state's Air Resources Board recently [released materials](#) indicating the state is looking to propose multipollutant standards that will ensure all new cars sold in California are zero-emitting vehicles by 2035, an action [EDF has estimated](#) will reduce 1.2 billion tons of climate pollution and prevent over 7,400 premature deaths by 2050. California's leadership in pressing forward with these historic standards is yet another reminder of the critical importance of state authority under the Clean Air Act in driving progress.

If left in effect, SAFE1 will continue to frustrate the important work of states across the country – including Colorado, where I live – that have already adopted the greenhouse gas and ZEV standards covered under the 2013 waiver, as well as states that are looking to adopt clean car standards in the future.

EDF respectfully urges EPA to swiftly finalize its reconsideration and reinstate the waiver so that California can resume its traditional role in setting vehicle emission standards – including greenhouse gas standards – that move the whole country forward. Thank you.

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