

NESCAUM Comments:

Proposed California Greenhouse Gas Emissions Standards for Medium- and Heavy-Duty Engines and Vehicles and Proposed Amendments to the Tractor-Trailer GHG Regulation

Good afternoon. My name is Paul Miller. I'm Deputy Director of the Northeast States for Coordinated Air Use Management, or NESCAUM. We are the regional association of state air pollution control agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont.

I'm speaking today in strong support of staff's proposal, but also more broadly in support of California's longstanding statutory authority, and in commendation of ARB's longstanding environmental leadership. Our states, and indeed the entire nation, have long benefitted from California's unstinting commitment to cleaner air and lower greenhouse gas emissions.

The citizens in our states continue to be exposed to unacceptably high levels of air pollution, much of it caused by highway vehicles. In addition, many of our states face binding requirements to reduce greenhouse gas emissions dramatically by mid-century – requirements that cannot be met without deep GHG reductions from the transportation sector. However, because our states are pre-empted under the Clean Air Act from writing their own emission standards for new cars and trucks, we rely on California to develop regulations that maximize environmental benefits while ensuring continued economic growth. As California's long-term growing economy demonstrates, smart environmental regulation that prioritizes public health can absolutely go hand-in-hand with a healthy and expanding economy.

California's leadership has not only led to improved air quality and public health outcomes in the states that have adopted California's rules; it has repeatedly, over decades, established the basis for increasingly effective federal regulations, by demonstrating need and technical

feasibility, and by creating, in combination with the other states adopting California's program, enough of a market pull to establish economies of scale for developers of advanced vehicle technologies.

We also commend ARB for its common-sense approach to closing the so-called "glider loophole" for rebuilt diesel trucks. Like ARB, we have strongly opposed the effort to re-open this loophole in the federal rule. Given the substantial increase in NOx and PM emissions to occur under EPA's abdication of its mission to protect public health and the environment, it is simply unavoidable that states will look to other available means to limit or mitigate the resulting damage.

As you know, seven of our eight states have for years been partners with ARB in regulating light-duty vehicles, with great success. Several of our states were sued by the automakers after first adopting California's light-duty vehicle program, and successfully fought for their adopted programs in court. Many of our states and others have also seen fit to adopt California's rules for heavy-duty engines in the past, when it appeared the federal government might shirk its responsibility at that time. In fact, at no time have the federal vehicle requirements been strengthened without California first paving the way.

If history is to repeat itself now, it is our intent that we will once again work with our states, other section 177 states, and California to continue our shared strong tradition in promoting, adopting, and defending clean vehicle programs

I thank you for this opportunity to speak today. We look forward to continuing to work together as partners in the months and years ahead.

Thank you.