



**ENVIRONMENTAL DEFENSE FUND
STATEMENT ON
U.S. ENVIRONMENTAL PROTECTION AGENCY AND
NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION
“PROPOSED RULE - 2017 AND LATER MODEL YEAR LIGHT-
DUTY VEHICLE GREENHOUSE GAS EMISSIONS AND
CORPORATE AVERAGE FUEL ECONOMY
STANDARDS”**

EPA–HQ–OAR–2010–0799; NHTSA–2010–0131

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ERICA MOREHOUSE

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**Public Hearing
San Francisco, California
*January 24, 2012***

On behalf of Environmental Defense Fund and our more than 700,000 members nationwide and the numerous here in the Golden State, I sincerely thank you for the opportunity to testify today on this landmark proposal to address the extensive climate disrupting pollution from passenger vehicles and to provide consumers with nearly double the fuel efficiency of today’s cars and light trucks and hard earned dollars saved at the gas pump.

Celebrating Success

We applaud the collaboration between the Environmental Protection Agency, the Department of Transportation, auto companies, the workers that forge cleaner cars and the great state of California in building this landmark proposal, together, through tough negotiations and an abiding commitment to a common good for our nation. The success of this collaboration is reflected in the broad support for this rule from small businesses, consumers, veterans, national security experts, and many more across our land. And we applaud California for its steadfast leadership in spurring cleaner cars through its extraordinary world class expertise.

California's leadership is rooted in a firm bipartisanship. Over 40 years ago, during the development of the Clean Air Act in 1967, it was Republican Senator George Murphy of California who sponsored the pivotal legislative language guaranteeing California's continued leadership in establishing clean cars standards. Senator Murphy won sweeping bipartisan support for California to maintain its authority to protect human health and the environment from automobile emissions pointing to the very seriousness of air pollution: “In my judgment the pollution problem is one of the most serious domestic problems facing our country today.”

California has continued to show bipartisan leadership in driving our state and our nation toward cleaner cars and trucks. The National Academy of Sciences examined California's time tested leadership finding the Golden State has long been looked a “laboratory for emissions control innovations.”¹ California’s continued collaboration with EPA and DOT to establish protective fuel economy and greenhouse gas emissions standards will again mean cleaner cars and trucks for our nation and the world.

Securing America

The proposed rule under consideration today will help to provide energy security, economic security and climate security to our nation. Increasing the efficiency of our

passenger fleet is one of the single most effective solutions we can deploy to reduce our dependence on oil, and will likely be one of President Obama's greatest climate and energy security legacies.

With respect to energy security, when combined with the Phase I clean car standards, the proposed rule's fuel economy and emissions standards will cut our oil consumption by over 2 million barrels a day – more than we import from the entire Persian Gulf today. With respect to economic security, combined again with the Phase I clear car standards, the proposed rule will provide families with more than \$8,000 in fuel savings over the lifetime of a new vehicle by 2025, for a total of \$1.7 trillion in national fuel savings over the life of the program.

With respect to climate security, the combustion of oil in our nation's fleet of passenger vehicles accounts for about 20 percent of total U.S. greenhouse gases emissions. Together with the first phase model year 2012-2016 clean car standards that were finalized in 2010, the proposed standards under consideration today will cut heat-trapping carbon dioxide pollution by over 6 billion metric tons.

These emission reductions are an important part of a national and global effort to ward off the worst consequences of climate change. The U.S. Global Change Research Program has found that climate changes “are already affecting water, energy, transportation, agriculture, ecosystems, and health.”ⁱⁱ Its 2009 Assessment predicts that water resources will be further stressed, crop and livestock production will be increasingly challenged, coastal areas will be increasingly threatened, and human health will be impacted due to heat stress, waterborne diseases, poor air quality, extreme weather events, and diseases transmitted by insects and rodents.

In California and the Southwest: “Water supplies will become increasingly scarce, calling for trade-offs among competing uses, and potentially leading to conflict. Increasing temperature, drought, wildfire, and invasive species will accelerate transformation of the landscape. Increased frequency and altered timing of flooding will increase risks to

people, ecosystems, and infrastructure.”ⁱⁱⁱ And according to a peer-reviewed study published in the scientific journal *Climatic Change*, climate change is also likely to harm California’s economy by reducing the types of natural, non-irrigated vegetation available for livestock forage and the ability of forest ecosystems to store carbon dioxide.^{iv}

These impacts do not come at a small price. Natural disasters in 2011 wielded the costliest toll in history — a massive \$380 billion worth of losses from earthquakes, floods, tornadoes, hurricanes, wildfires, tsunamis and more. And that figure does not include the expenses associated with sickness or injuries triggered by the disasters.^v

Strengthening Our Clean Air Protections Against Lethal Particulates and Smog-Forming Pollution

The collaboration that helped develop the proposed rule demonstrates the best practices of our government. At the same time California is moving in parallel with EPA and DOT to establish criteria pollutant and greenhouse gas emission standards, the state is also developing a complimentary program that will help reduce the harmful oxides of nitrogen, particulate matter and volatile organic compound pollution from light-duty vehicles -- strengthening vital protections against deadly particulates and the key ingredients in smog. We respectfully urge EPA to build from the foundation forged by California’s leadership and immediately propose "Tier 3" emissions and gasoline fuel standards for passenger vehicles and to finalize these protections by the summer of 2012. Such a rigorous program would have immediate and far-reaching health and environmental benefits: reducing a cascade of harmful airborne contaminants, ensuring longer and healthier lives, and helping states and communities across our country restore healthy air. These vital health protections will be achieved through improvements in fuel quality standards that cost less than a penny a gallon. And timely finalization of these clean air standards would allow manufacturers to efficiently align technology upgrades with the proposed fuel efficiency and greenhouse gas emissions standards -- securing the suite of human health and environmental protections that are available from both standards through smart, optimized clean air investments for our communities, our state and the nation.

In conclusion, Environmental Defense Fund is proud to be among the manufacturers, the auto workers, the economists, the health and environmental advocates, the states, the national security groups, the small businesses and the consumers who **all agree** that cleaner more efficient vehicles are a step forward for American families and businesses. Thank you.

ⁱ National Academy of Sciences, “State and Federal Standards for Mobile-Source Emissions: Committee on State Practices in Setting Mobile Source Emissions Standards,” National Research Council (2006). Available online at:

<http://www.nap.edu/catalog/11586.html> (last accessed January 22, 2012).

ⁱⁱ National Climate Assessment. [Global Climate Change Impacts in the United States \(2009\)](#).

ⁱⁱⁱ National Climate Assessment. [Global Climate Change Impacts in the United States \(2009\)](#).

^{iv} Shaw, Rebecca, et. al., “The impact of climate change on California’s ecosystem services,” *Climatic Change*, November 2011. Available online at: <http://www.springerlink.com/content/q773hv2521138240/fulltext.html> (last accessed January 22, 2012).

^v Raloff, Janet, “Insurance payouts point to climate change,” Science News, web edition, January 4, 2012. Available online at: http://www.sciencenews.org/view/generic/id/337368/title/Science_%2B_the_Public_Insurance_payouts_point_to_climate_change (last accessed January 15, 2012).