



## **Environmental Defense Fund**

### Virtual Public Hearing for Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles

Testimony by Andy Su

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Hello, my name is Andy Su. Thank you for the opportunity to testify today on behalf of Environmental Defense Fund and our more than 2 million members.

The transportation sector is the largest U.S. source of GHG emissions, and it is responsible for significant NO<sub>x</sub> and particulate matter emissions. Protective final EPA standards are critical to reducing that pollution and saving lives, especially in communities of color and low-income communities, which are exposed to a disproportionate amount of vehicle pollution.

EPA's proposal is feasible, cost-effective and a vital step forward. We urge the agency to finalize the most protective multipollutant standards possible that are consistent with and build from the proposals, helping to ensure at least two-thirds of new light-duty vehicles and at least 40 percent of new medium-duty vehicles sold in 2032 are zero-emitting, putting us on the path to zero-emissions from new vehicles in 2035. This should be paired with a voluntary, but once chosen by a manufacturer, enforceable, leadership pathway that would deliver nationwide ZEV levels consistent with the Advanced Clean Cars II standards and exceed pollution reductions associated with EPA's proposals.

Protective standards must also ensure reduction of harmful air pollution from remaining ICE and PHEVs and EDF strongly supports EPA's proposal to adopt protective NOx and PM standards that will result in the use of gasoline particulate filters.

Standards at this level are eminently achievable thanks to manufacturer and fleet investments and commitments, historic federal investments, rapidly declining ZEV costs, and state policies like the Advanced Clean Cars II and Advanced Clean Trucks rules, which have already been adopted by half a dozen other states.

The historic investments in the Inflation Reduction Act and Bipartisan Infrastructure Law have helped launch an American electric vehicle manufacturing renaissance, driving momentum for protective national safeguards. According to a new report by EDF and WSP, more than \$120 billion in EV manufacturing investments and 143,000 new U.S. jobs have been announced in the last eight years, with more than 40 percent of those announcements since the passage of the IRA. The analysis also finds that already-announced U.S. production facilities will be capable of manufacturing 4.3 million new ZEVs annually by 2026—or approximately a third of all new vehicles sold last year.

Analysis by Roush and ERM also shows that the tax credits in the IRA are dramatically accelerating the purchase price parity between a BEV and a comparable gasoline vehicle. Including the benefits of the IRA, the purchaser of a model year 2025 midsize battery electric car could see upfront savings of over \$7,000 compared to a similar gasoline car with savings of nearly \$20,000 over the life of the EV. Also, many major automakers have independently committed to producing significant levels of new ZEVs, with some planning to eliminate tailpipe pollution from their fleets by 2035 and even earlier.

Finally, in order to fully realize the health, environmental and economic benefits and to provide a stable investment signal and regulatory certainty for manufacturers, we urge EPA to finalize the standards before the end of 2023.

Thank you for considering our views and for EPA's important work to reduce harmful pollution from light and medium duty vehicles.