

TESTIMONY
ENVIRONMENTAL DEFENSE FUND

Testimony by Eric Wriston

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My name is Eric Wriston and I am testifying today on behalf of Environmental Defense Fund and our more than 3 million members.

California's Advanced Clean Cars II rule provides critical health and climate protections, and it is important that EPA affords full effect to these life-saving standards. Near-term vehicle emissions reductions are vital to mitigating the effects of climate change and protecting public health, especially the health of low-income communities and communities of color disproportionately impacted by transportation air pollution.

More than one third of all Americans live in counties with unhealthy levels of ozone or particle pollution, and eight out of the ten counties with the highest levels of these pollutants are in California. The South Coast and San Joaquin Valley are the only two areas in the nation designated as "extreme" nonattainment for the federal health-based ozone standard and the San Joaquin Valley has the highest fine particulate levels in the nation.

These ACC II standards will save lives, reduce harmful air and climate pollution, save Californians money, and deliver jobs. The state estimates that ACC II will provide the public with at least \$12 billion in public health benefits over the life of the regulation.

Finalizing the waiver will bring emissions reductions to millions more Americans across the country. Eleven other states have formally adopted the regulation and at least three more are in the rulemaking process.

The electric vehicle market is more than ready to meet these standards. Thanks in part to California's leadership and the investments in the Inflation Reduction Act and the Bipartisan Infrastructure Law, there has been rapid momentum for electric vehicle manufacturing and sales in the U.S. According to a report by EDF and WSP, more than \$165 billion in investments and nearly 180,000 new U.S. jobs have been announced in the last eight years.¹ And more than a quarter of all new passenger vehicles sales in California in 2023 were EVs.²

The increasing economies of scale from this expanded market have led to decreasing EV costs. EDF compared the lifetime costs—over 10 years—of owning and operating select EVs to the cost of comparable gasoline vehicles. We found all the EVs studied are estimated to be equally or less expensive to own and operate than their gasoline counterpart—with savings totaling more than \$18,000 for some models.

¹ WSP and EDF, *U.S. Electric Vehicle Manufacturing Investments and Jobs Characterizing the Impacts of the Inflation Reduction Act after 1 Year*, <https://www.edf.org/media/one-year-after-ira-passage-new-report-finds-us-electric-vehicle-investments-jobs-continue>.

² California Energy Commission, *New ZEV Sales in California*, <https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics/new-zev-sales>.

As evidenced by the voices testifying today, these next generation standards are broadly supported by a diverse breadth of stakeholders, including health and environmental groups, fleets, and automakers themselves, including Ford, GM, Toyota, and Honda.³

The transportation sector is the largest source of climate pollution in the U.S. and California, and is a main source of harmful pollutants that cause smog and damage human health. The life-saving standards adopted by California and many other states are critical to curbing that pollution and moving toward an emissions-free future. We urge EPA to grant the waiver given its manifest consistency with Clean Air Act requirements and the extensive benefits it will provide to Californians.

³ For example, Ford stated that ACC II is “a landmark standard that will define clean transportation and set an example for the United States,” and GM expressed their “shared vision of an all-electric future, eliminating tailpipe emissions from new light-duty vehicles by 2035.” Ford, *Statement on Proposed Advanced Clean Cars II Regulations in California*, <https://media.ford.com/content/fordmedia/fna/us/en/news/2022/08/24/ford-statement-on-proposed-advanced-clean-cars-ii-regulations-in.html>; Autoweek, *Do California’s Zero Emission by 2035 Rules Go Far Enough?*, <https://www.autoweek.com/news/industry-news/a40993559/california-zero-emission-by-2035-rules-passed/>; Honda, *Statement on California Mandate for 100% EVs by 2035*, <https://hondanews.com/en-US/honda-corporate/releases/release-1503019bd8a757ea08267d7944099b3a-statement-on-california-mandate-for-100-evs-by-2035>; CarScoops, *Toyota Recognizes California’s Authority to Set Vehicle Emission Standards*, <https://www.carscoops.com/2022/08/toyota-recognizes-californias-authority-to-set-vehicle-emission-standards/>; Letter from Major Businesses and Investors in Support of ACC II, <https://www.ceres.org/sites/default/files/Major%20Businesses%20and%20Institutions%20Support%20an%20Ambitious%20ACC%20II%20Standard.pdf>.