

**Testimony of
Tracy Babbidge
on Behalf of the
National Association of Clean Air Agencies
Before the
U.S. Environmental Protection Agency
on the
Notice of Proposed Rulemaking
“Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions Standards”
Docket ID No. EPA-HQ-OAR-2021-0208
August 26, 2021
Virtual Public Hearing**

Good morning. I am Tracy Babbidge, Air Bureau Chief with the Connecticut Department of Energy and Environmental Protection. I am testifying today on behalf of the National Association of Clean Air Agencies, for which I serve as Co-Chair of the Mobile Sources and Fuels Committee. NACAA is the national, nonpartisan, non-profit association of air pollution control agencies in 41 states, including 115 local air agencies, the District of Columbia and four territories. The air quality professionals in our member agencies have vast experience dedicated to advancing the equitable protection of clean air and public health in the U.S. This testimony is based upon that experience. The views expressed in this testimony do not represent the positions of every state and local air pollution control agency in the country.

NACAA welcomes EPA’s proposal to revise emission standards for model year 2023 through 2026 light-duty vehicles and commends the agency for placing a top priority on seeking to rectify the 2020 rollback, under the so-called “SAFE 2” Rule, of the 2012 National Clean Car Standards.

As NACAA noted in its January 2021 transition paper to the Biden Administration, increasingly stringent standards to reduce emissions from passenger cars and light trucks are urgently needed. Such standards are critical components in an overall strategy to further reduce greenhouse gas and criteria pollutant emissions from passenger cars and light trucks, a significant contributor to climate change as well as many nonattainment areas in the U.S. The proposal’s benefits will provide progress in the mission of our member agencies of attaining or maintaining health-based National Ambient Air Quality Standards and of addressing air quality impacts in disproportionately impacted communities. These standards would also contribute to domestic job growth, economic development and fuel security.

As we have also noted, EPA should work to ultimately return to a national program, one that maintains the authority preserved to California and other states under the Clean Air Act, of light-duty vehicle emission standards that is informed by science, is protective of the climate, is developed in close collaboration with California and other state and local air agencies, protects and preserves states’ rights and delivers emission reductions essential for achieving and/or maintaining environmental and public health goals.

NACAA is carefully reviewing the details of this proposal and looks forward to working with EPA and other stakeholders to ensure a timely final rule with appropriately robust standards that will lay a firm foundation for a subsequent federal rulemaking with progressively stringent standards and increased levels of zero-emission vehicle deployment.

We appreciate the opportunity to participate today and will provide more detailed written comments by the close of the comment period.

Thank you.