

**Erik C. White**  
**National Association of Clean Air Agencies**  
**Before the**  
**U.S. Environmental Protection Agency**  
**on the**  
**Notice of Proposed Rulemaking**  
**“Multi-Pollutant Emissions Standards for MY 2027 and Later Light-Duty and Medium-Duty Vehicles”**  
**Docket ID No. EPA–HQ–OAR–2022-0829**  
**May 9, 2023**  
**Virtual Public Hearing**

Good morning. My name is Erik White and I am the Director of the Placer County Air Pollution Control District in California. I am testifying 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 40 states, including 115 local air agencies, the District of Columbia and five 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 has long been a proponent of progressively more stringent multipollutant emission standards for passenger cars and light trucks. We have supported EPA’s 2012 rulemaking for greenhouse gas emission standards for model years 2017 and later and the agency’s 2021 repeal and replacement of a 2020 regulation that rolled back those standards. Likewise, we have supported EPA’s 2014 Tier 3 rule, which included vehicle and fuel standards that, when combined, reduced nitrogen oxides, volatile organic compounds, direct particulate matter, carbon monoxide and air toxics. We now welcome the agency’s multipollutant light- and medium-duty vehicle rule and the opportunity to further advance this important program in a way that optimally reflects the potential of technological innovation and the unprecedented financial incentives provided under the Bipartisan Infrastructure Law and Inflation Reduction Act, to best protect human health and our planet.

In NACAA’s January 15, 2021, transition paper to the Biden-Harris Administration, the association wrote, “Despite the technological and regulatory progress made over the past nearly 60 years, mobile sources continue to dominate emission inventories across the U.S. and are the largest contributing sector to GHG emissions. Our nation needs a strong sustainable transportation strategy. Top priority must be placed on new federal programs to continue to reduce emissions from the mobile source sector . . . As efforts to reduce GHGs and tackle climate change move forward, the need for further reductions in criteria pollutant emissions, especially nitrogen oxides and PM from the mobile source sector, should not be overlooked.” The proposed multipollutant rule for light- and medium-duty vehicles offers an opportunity for the federal government to take a robust step toward this goal and NACAA is optimistic that working with states, cities, counties and other stakeholders, EPA can finalize another step of standards that will protect and save lives, foster innovation, create prosperity and reduce the risks facing our climate. We appreciate the opportunity to participate today, as we continue to study the proposal, and will provide written comments by the close of the comment period.

Thank you.