

## ENVIRONMENTAL DEFENSE FUND STATEMENT ON

"LEV III" AMENDMENTS TO THE CALIFORNIA GREENHOUSE GAS AND CRITERIA POLLUTANT EXHAUST AND EVAPORATIVE EMISSION STANDARDS AND TEST PROCEDURES AND TO THE ON-BOARD DIAGNOSTIC SYSTEM REQUIREMENTS FOR PASSENGER CARS, LIGHT-DUTY TRUCKS, AND MEDIUM-DUTY VEHICLES, AND TO THE EVAPORATIVE EMISSION REQUIREMENTS FOR HEAVY-DUTY VEHICLES

ERICA MOREHOUSE

Public Hearing Los Angeles, California January 26-27, 2012

My name is Erica Morehouse and I am here on behalf of Environmental Defense Fund and our more than 700,000 members nationwide and the numerous members here in California. EDF applauds California's decades-long, bipartisan leadership on cleaner cars and urges the board to adopt the current Advance Clean Cars package, particularly the LEV III standards, without delay.

Because of California's leadership the entire nation will benefit. Following California's lead, the U.S. EPA and the NHTSA worked with CARB to establish a national program to increase fuel efficiency and reduce GHG emissions from the nation's fleet of model year 2012-2016 passenger vehicles. These standards will save consumers more than \$3000 over the lifetime of a 2016 vehicle. The rule is also expected to reduce greenhouse gas (GHG) emissions from the light-duty fleet by approximately 21 percent by 2030 and save 1.8 billion barrels of oil<sup>1</sup>. The model year 2017-2025 standards currently under

<sup>&</sup>lt;sup>1</sup> EPA Fact Sheet, *EPA and NHTSA Finalize Historic National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks*, (April 2010), available at <a href="http://www.epa.gov/otaq/climate/regulations/420f10014.htm">http://www.epa.gov/otaq/climate/regulations/420f10014.htm</a> (last accessed June 6, 2011).

consideration by CARB, EPA, and NHTSA will save approximately 4 billion barrels of oil and 2 billion metric tons of GHG emissions. The agencies also estimate that the fuel savings will far outweigh higher vehicle costs, and that the net benefits to society of the proposed standards will be as much as \$421 billion over the lifetime of the program.<sup>2</sup>

Californians will benefit along with the rest of the country. The LEV III program is an important tool in helping to ward off state, national and global consequences of climate change. ARB estimates the program will reduce GHG emissions by 52 million tons by 2025 and save \$5 billion in operating costs in 2025.

The LEV III standards are also a critical continuation of CARB's LEV II standards that will provide Californians with health and environmental benefits by reducing criteria pollutants. CARB estimates that smog forming pollutants that cause serious health problems will be reduced by 75 percent by 2025. These estimated reductions are expected to avoid up to 530 premature deaths by 2025, and will help hard hit areas like the San Joaquin Valley Air Basin and the South Coast Air Basin meet health-based air quality standards.

EDF urges the board to pass these standards without delay in order to reap the many environmental, health and economic benefits this program offers and to continue its critical leadership in promoting advanced clean cars.

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<sup>&</sup>lt;sup>2</sup> 76 Fed. Reg. 74854 (December 1, 2011) at 74859.