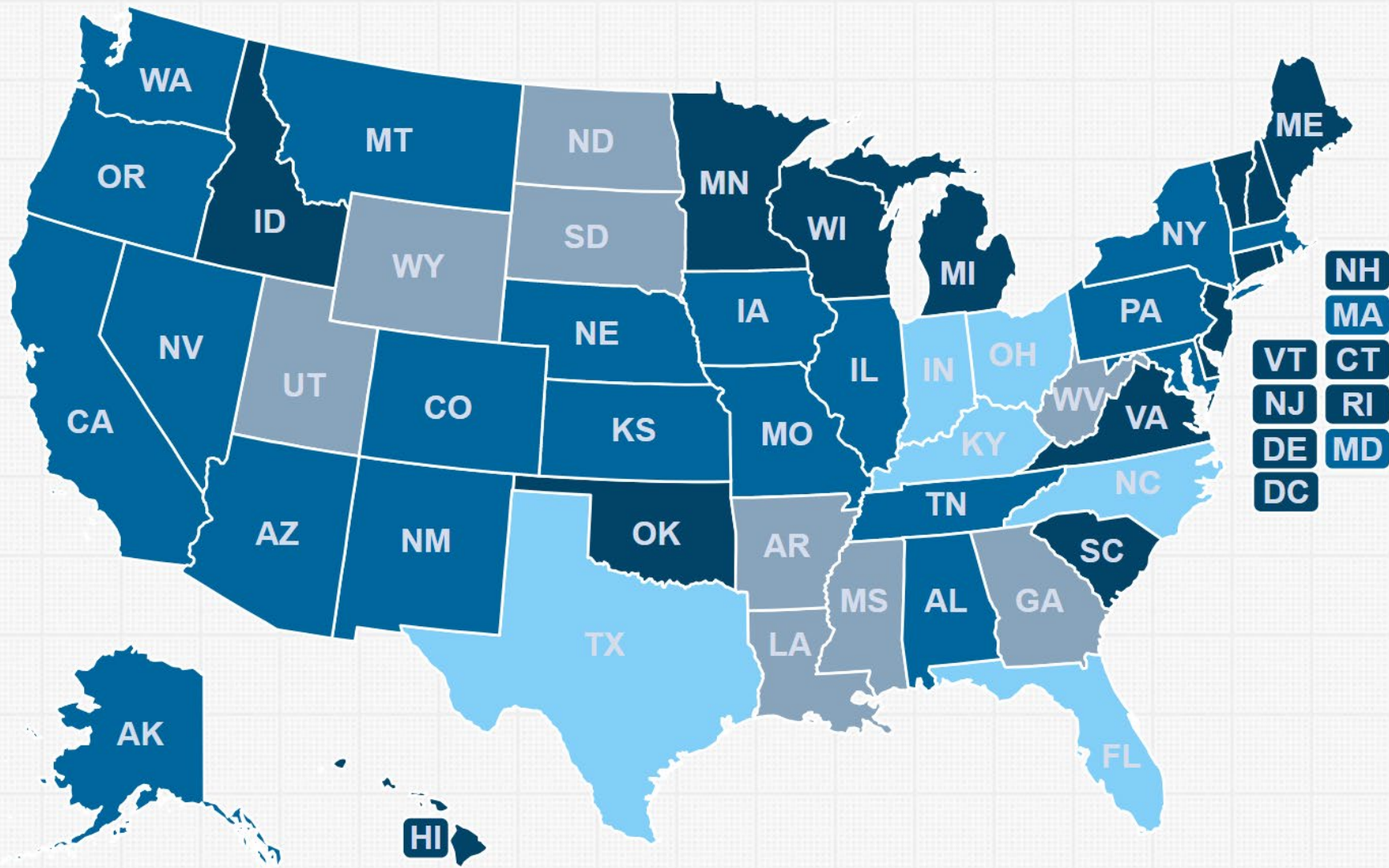




# **Clean Cars, CAFÉ, and California's Authority**

**Caltrans/CARB Meeting  
San Diego, CA  
May 16, 2019**

**Miles Keogh, Executive Director, NACAA  
mkeogh@4cleanair.org \* @WeAre4CleanAir**



- Local agencies
- State agencies
- State & local agencies

# Comments – October 26, 2018

- ❑ We opposed the proposed rule & called for it to be withdrawn
- ❑ We urged retention of the existing national program
- ❑ We argued for real & meaningful collaboration between EPA, state and local air agencies, California, industry & other stakeholders to reach agreement
- ❑ Read for yourself:
- ❑ [http://4cleanair.org/sites/default/files/Documents/NACAA\\_COMMENTS-EPA\\_NHTSA\\_LDV\\_NPRM-102618.pdf](http://4cleanair.org/sites/default/files/Documents/NACAA_COMMENTS-EPA_NHTSA_LDV_NPRM-102618.pdf)



# Concerns

- ❑ Greenhouse gas emissions to increase substantially
- ❑ Criteria pollutant reduction success story blocked
- ❑ Implications for SIPs, attainment, toxics
  - ✓ Criteria pollutants & toxics barely considered
  - ✓ Production emissions ignored
  - ✓ Reductions already in SIPs
  - ✓ Non-attainment extended for 12 areas
  - ✓ Numerous areas at risk for attainment backsliding
- ❑ Compliant technologies already in widespread use
- ❑ Internal safety analyses in conflict with each other
- ❑ Waiver issues could create “3<sup>rd</sup> car” for 177’s
- ❑ We oppose all 7 alternatives

# A Pillar of the Clean Air Act

- ❑ “A cleaner, low emissions transportation sector is essential to achieve state & local climate goals and to meet and sustain federal air quality standards.”
- ❑ EPA waiver denial authority is narrowly constrained; pre-emption arguments flatly rejected by courts
- ❑ A dozen “177” states plus DC choose to use California’s GHG standard; 9 choose to adopt ZEV
- ❑ If transportation reductions aren’t available, other state & local agencies will seek reductions elsewhere

**Thank You!**