

**MECA's ORAL STATEMENT
ON THE ENVIRONMENTAL PROTECTION AGENCY'S CONSIDERATION OF
CALIFORNIA'S REQUEST FOR A WAIVER OF PREEMPTION FOR THE
ADVANCED CLEAN CARS II REGULATION**

January 10, 2024

Good afternoon, I'm Michael Geller, the Deputy Director for MECA Clean Mobility. Thank you for this opportunity to provide supportive comments for granting of a waiver to allow the California Air Resources Board to enforce their Advanced Clean Cars II Regulation beginning in 2026. MECA is an industry trade association of the world's leading suppliers of emission control, efficiency and electric technology for on-and off-road vehicles and equipment. Our members represent over 70,000 of the nearly 300,000 North American jobs building the technologies that reduce emissions from today's vehicles. The jobs supported by clean mobility suppliers include thousands of union jobs in manufacturing as well as engineering jobs developing the technologies that will maintain U.S. leadership in the transportation transition to meet our carbon neutrality goals.

The following points summarize our position:

1. California has compelling air quality needs.
2. CARB's ACC II's standards for combustion vehicles should harmonize with EPA's proposed standards for the same classes of vehicles.
3. While California's timeline for required zero emission vehicle (ZEV) sales is very aggressive, the state is the most well positioned for ZEV uptake given the combination of state investments in charging infrastructure and grid decarbonization.

Regarding, California's air quality needs, more than half (21 million out of nearly 40 million) of Californians live in areas that exceed the most stringent 70 ppb ozone standard, with many areas also exceeding the previous ozone standards of 75 and 80 ppb. Furthermore, millions of Californians live near heavily-trafficked roadways, where particulate matter emissions from cars and trucks are highest. As stated in more detail below, California's alignment with EPA's

proposed PM standards for light- and medium-duty vehicles would provide significant benefits to those communities most impacted by near-road PM emissions.

Since CARB finalized the ACC II regulation, EPA has proposed new federal emission standards for MY 2027 and later light- and medium-duty vehicles. In several cases, EPA's emission standards for combustion vehicles are more stringent than CARB's. For example, EPA has proposed more stringent PM standards for both light-duty and medium-duty vehicles as well as more stringent NMOG+NOx standards for medium-duty vehicles. A recent MECA emission inventory and health benefits analysis concluded that significant health benefits would be delivered from a complementary strategy of electrification and stringent PM controls on combustion vehicles resulting from EPA's proposed Light and Medium Duty Vehicle Regulation. Given combustion vehicles will be sold for at least another decade in California, MECA supports CARB aligning ACC II standards for combustion vehicles with EPA's proposed standards for the same classes of vehicles.

As we commented to CARB during the rulemaking process, MECA supports technology neutral standards rather than mandating any single technology because we believe this results in a more resilient and sustainable solution to achieving emission reduction goals. However, we also recognize California's unique authority granted by the Clean Air Act due to the state's air quality challenges. While California's timeline for required zero emission vehicle (ZEV) sales is very aggressive, the state is the most well positioned for ZEV uptake given the combination of state investments in charging infrastructure and grid decarbonization.

In conclusion, for over 50 years, California has played a leadership role in advancing vehicle standards and air quality policies that created a market for clean vehicle technologies first in California, then the U.S. and around the world. This successful model was envisioned in the Clean Air Act, whereby California acts as a laboratory for new policies to enable manufacturers to gain experience that benefits the rest of the nation. Thank you very much.