

Testimony of  
BlueGreen Alliance

Before the  
U.S. Environmental Protection Agency

RE: Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas  
Emissions Standards - Proposed Rule  
Docket No.: EPA-HQ-OAR-2021-0208

August 26, 2021

The BlueGreen Alliance unites America's largest labor unions and environmental organizations—representing millions of Americans—to solve today's environmental challenges in ways that create and maintain quality jobs and build a clean, thriving, and equitable economy. We thank you for the opportunity to testify today.

We know that climate change and economic injustice are the most fundamental challenges we face today—and we know they're inextricably intertwined. In the transportation sector, which accounts for 30 percent of U.S. greenhouse gas emissions, this intersection is visible in the disproportionate impact of transportation emissions on low-income and non-white communities. It's visible in the disparities in access to cleaner vehicles and other mobility options across income levels. And it's visible in the economic impacts of decades of disinvestment in auto manufacturing communities, which have seen good jobs offshored and anchor facilities shuttered due to ill-conceived industrial policies that gutted the middle class.

That's why it's critical that we use *all the tools we have at our disposal* to urgently reduce greenhouse gas emissions through policies and investments that engage and benefit *all people*—from the manufacturing workers who build the vehicles of the future, to the people who drive them. From the communities where they are made, to the communities where they are driven. Strong clean vehicle standards—accompanied by policies to rebuild manufacturing, protect and create good family supporting jobs, and revitalize communities—are critical to achieving these aims.

We welcome the EPA's action proposing Clean Cars SAFE 2 Replacement Rule vehicle standards. Returning to a strong trajectory of vehicle emissions reductions is essential to put the United States back in a leadership role in curbing GHG emissions from transportation, clean vehicle deployment, and manufacturing innovation.

**Research from the BlueGreen Alliance and the Natural Resources Defense Council shows that strong vehicle standards represent a critical foundation for job-supporting manufacturing investment across the United States.**<sup>1</sup> Over the past decade auto, parts, and materials manufacturing workers across the nation rose to the challenge of building the innovative technology needed to meet the vehicle standards promulgated in 2010 and 2012. Those strong standards—coupled with reinvestment in domestic manufacturing—helped bring back manufacturing jobs after the last recession. They have spurred rapid investment in assembly facilities, and in the supply chains building fuel economy-enhancing technology.<sup>2</sup>

The weakening of these standards under the past administration put these jobs at risk, while also threatening the health of the industry as a whole. We cannot afford to fall behind, particularly at a time when our global competitors are proactively moving to capture the gains from the shift to EVs that is already occurring.

Strong standards provide domestic market certainty—a necessary foundation to attract and retain advanced vehicle technology investment here. Coupling ambitious standards with manufacturing policies that spur reinvestment in domestic automotive manufacturing and supply chains will be key to ensuring that we capture the opportunities for workers and communities and make an equitable transition to the next generation of clean vehicle technology.

The EPA has the opportunity to leverage its short- and long-term clean vehicle standards to drive innovation and deliver fuel savings and pollution reduction for *all types* of vehicles that meet *all communities'* needs. Coordinated vehicle standards and manufacturing investment will achieve deep GHG reductions, protect and create good auto manufacturing jobs that provide pathways to the middle class for workers of all backgrounds, and ensure that those workers are the center of building and deploying the EV fleet of the future here in the United States.

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<sup>1</sup> BlueGreen Alliance and Natural Resources Defense Council, *Supplying Ingenuity II: U.S. Suppliers of Key Clean, Fuel-Efficient Vehicle Technologies*, June 2017. Available online: <http://www.bluegreenalliance.org/wp-content/uploads/2017/05/Supplying-Ingenuity-vFINAL-low-res.pdf>.

<sup>2</sup> BlueGreen Alliance, *Driving Investment: How Fuel Efficiency is Rebuilding American Manufacturing*, January 2018. Available online: <https://www.bluegreenalliance.org/resources/driving-investment-how-fuel-efficiency-is-rebuilding-american-manufacturing/>.