



**EPA's public hearing for the Multi-Pollutant Emissions Standards
for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles
Notice of Proposed Rulemaking
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Remarks of Donna Jackson, Director of Membership Development, Project 21

I would like to thank the members of the Environmental Protection Agency (EPA) for inviting me today. My name is Donna Jackson, and I am the Director of Membership Development for Project 21, a program of the National Center for Public Policy Research.

Project 21 is one of the nation's oldest and largest network of black conservative leaders. Our hundreds of members come from all walks of life, from police officers to small business owners to teachers to energy industry workers to clergy to health care workers - both professionals and non-professionals. We are in the business of looking for and promoting better solutions to the challenges faced by the Black community and America in general. And transportation affordability is definitely one of those challenges.

The proposed rule, Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles, has the distinction of harming black people on two continents, in the African nation of Congo as well as here in the United States. In the Congo, where seventy

five percent of the world's cobalt needed for rechargeable EV batteries is located, black slave and child labor is readily being used to mine the minerals. It is well documented that their conditions are deplorable. The need for cobalt, and thus the extent of the suffering, will increase exponentially as a result of EPA's proposed rule.

And if that wasn't bad enough, this new proposed rule will create an economic hardship and serious decline in the standards of living for all Americans, but especially black Americans. Blacks have more single households, lower median household income and a higher poverty rate than the overall population. According to the 2021 US Census Bureau, US median household income for Black Americans was \$45,000 compared to \$71,000 for White Americans and \$101,000 for Asian Americans. As such, they can't afford more expensive EV vehicles, nor the higher prices for the limited supply of gasoline powered vehicles. As it is, many blacks have been priced out of new vehicles and can only afford used ones, but the proposed rule would almost certainly increase used car prices as well. Overall, the consequence of this rule will remove private car ownership for many if not most black Americans.

Even if EVs weren't so expensive, they still don't fit the lives of many black Americans. For example, more blacks are renters, so fewer will have the chance to charge their vehicles at home. Many blacks live in apartments where street or lot parking is the norm with no ability to charge. In addition, many black households can only afford one vehicle, but the reality is that EVs are practical only for multi-car households. The list goes on. Suffice it to say that no EV supporter ever bothered to ask the black community if that is what we want -- if EVs fit the needs of our families.

And for those few blacks who do want an EV, they are free to choose one with or without the EPA's mandates. The proposed rule here only serves to force more expensive vehicles on everyone, whether we like it or not. The truth is that black people, like most Americans, want to make these choices for themselves.

For these reasons, I urge EPA to withdraw the proposed rule and instead start thinking about ways to make personal transportation more accessible and affordable rather than less so.