

## **Comment 1 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: George

Last Name: Dutton

Email Address: georgedutton@mac.com

Affiliation:

Subject: Accelerate Timetable for Electric Car Requirements

Comment:

I am writing to urge the board to accelerate the timetable for requiring new car sales in CA be all electric vehicles so that this requirement becomes effective in 2030 and NOT 2035. As the board is surely aware, the climate crisis facing our state and planet is only accelerating in its intensity and impacts upon our people and communities. The time to act was decades ago, and any luxury we may have had to move slowly on this issue has vanished. Time and speed are of the essence now, and while moving up the timetable to require electric vehicles will be costly, we literally have no choice. We frittered away years of inaction or incremental action so that we have placed ourselves into the current predicament. We cannot wait until 2035, but must push the effective date to 2030. This will be difficult, and it will be costly, and will require a lot of rethinking among state leaders, consumers, and car manufacturers. But, again, we have no choice. Moving more slowly is no longer an option, and I urge, no, I insist, that the board adopt more aggressive target dates. This is necessary for the health of the environment we all depend upon, it is necessary for the health of those who breath our air, and it is necessary for our planet if we are to leave it in any shape for our children and their children to survive. If we need to devote huge amounts of our tax dollars to this effort, then we need to do it. Raise my taxes, if you have to, or do whatever is necessary to spare us the complete collapse of the already fraying ecosystem we all depend upon. I hope and pray that you will do the right thing and adopt a 2030 deadline for the transition to electric vehicles. Do it for my children, that they may have a future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-15 09:23:25

No Duplicates.

## **Comment 2 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lisa

Last Name: Howard

Email Address: lisad\_howard@yahoo.com

Affiliation:

Subject: I support a transition to ZEVs by 2035

Comment:

I am writing in support of the Advanced Clean Cars II Regulations that would require all new cars sold in California to be zero emissions by 2035. This regulation will not only help California achieve its goal of cutting greenhouse gases in line with the goals of the Paris treaty, but it will also mean cleaner air and better health for all Californians. It's a win-win for our state and the world. California is already experiencing the effects of climate change with longer and more severe droughts and more severe wildfires. Scientists project that snow in the Sierras, which is the water source for millions of Californians, will decrease drastically over the coming decades if we don't act now to curb our greenhouse gas emissions. We owe it to our children and grandchildren to take action now to ensure the most livable future for them. I support this regulation and hope CARB continues to take strong action for cleaner air and a better future for all Californians. Sincerely, Lisa Howard

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-17 10:02:19

No Duplicates.

## **Comment 3 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Mike

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation: Associate Member, County Democratic Part

Subject: Advanced Clean Car Regulation

Comment:

CARB,

We have a Code Red Climate Emergency requiring a large reduction in CO2 emissions, by 2030. If we fail, eventually, most life forms on the planet will cease to exist. Our species will suffer a "devastating collapse of the human population", to quote a 2005 issue of Scientific American. We will go extinct. We are on that path and it is unlikely we can get off that path because we refuse to face our predicament squarely and hire systems engineers to design a set of feasible, enforceable mitigation measures that will achieve the required 2030 level, for LDVs (cars).

For example, on Page 4 you write, "These emission reductions will help stabilize the climate and reduce the risk of severe drought and wildfire". "Help" stabilize? Is that all we need to do? We must get more specific. Much more specific. We must realize that climate mandates are what counts, not California climate mandates.

Cars emit the most of any category. CARB needs to have a Plan showing a set of specific measures (enforceable & feasible) that, taken together, will achieve the 2030 climate-stabilizing requirement.

I have attached such a plan in the Zip folder. It has been peer reviewed numerous times. I have presented it numerous time at conferences. Please read it and lets make it more precise. Note that there are 2 kinds of measures: those that improve fleet efficiency and those that reduce per-capita driving. This process does not seem to recognize that both things must be designed together, to get the needed reductions. When working the problem, it becomes obvious that both sets of measures are needed. I am sure my could be improved. They are not unique. My primary contribution is to derive the mathematical relationships to make the choices to solve the problem. I know that strong measures need to be implemented ASAP. So we need to implement the most important measures and keep working to improve the Plan. When the end of 2030 gets here, we need to have the problem solved in such a way that other states will follow us. Then we will hope we will be lucky and hope that there was some margin of safety in the specified reductions. I have no measures to get renewable electricity but it is clear from my work that getting to 80% renewable, by 2030, is a requirement and getting that 80% value to be even larger, would be a great help.

At Lockheed, when I wrote a report, it had to solve the problem. I knew it would be peer-reviewed by people that had to find every weakness, or they would lose their job. I knew that if my mistakes were too serious, I would lose my job. The problem was that the flight systems we were designing would be flown and if they failed,

Lockheed would lose billions of dollars.  
The world of Climate Action Plans, Regional Transportation Plans, our climate emergency, our governments, our government agencies, and so on have no need to actually solve problems. They only need to make a little progress and sound like they are solving the problem. Climate is not like other problems. It will kill us all, unless we achieve what the climate scientists are telling us what we must achieve. It needs a systems engineering approach.

I have uploaded the report, the slides used to present the report a car parking systems-engineering report that defines the parking problem, and a slide show on parking with an emphasis on employee parking. Regarding parking, I have included an email from Keith Jones, the CEO of ACE parking. He wants to help. But can government grasp the importance of having car-parking systems that improves the way we pay for the use of parking? Please understand that need.

I hope you will contact me.

Highest

regards,

Mike Bullock

Mike

Bullock1800 Bayberry DriveOceanside, CA 92054760-754-8025

Former

California Democratic Party Delegate, 76th Assembly District  
(author of 2 adopted resolutions and 5 Platform changes)

Former

Elected (now Associate) Member of the San Diego County Democratic Party Central Committee (author of 5 adopted resolutions)

Satellite

Systems Engineer, 36 years (Now Retired)

Air and

Waste Management Association published and presented papers:

Author, The

Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving

Author, A Climate-Killing Regional

Transportation Plan Winds Up in Court: Background and Remedies

Co-author, A Plan to Efficiently and Conveniently Unbundle Car Parking Cost

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-accii2022-AGIFdlU4Um1XPgNg.zip'

Original File Name: BullockZip Folder.zip

Date and Time Comment Was Submitted: 2022-04-17 16:32:37

No Duplicates.

## **Comment 4 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Eric

Last Name: Shoquist

Email Address: eshoquist@gmail.com

Affiliation:

Subject: ACC II remarks

Comment:

Dear Board,

While I think the goal of ACC II is worthy, mandating something like this without making sure that everything needed for it is in place, or already on the way is folly - and that is what ACC II currently is folly. To pick a number out of thin air - probably based on ramping up to another date picked out of thin air (governors 2035 zero ICE goal) just doesn't make sense. Where is the infrastructure to support this? I have had a Chevy Volt, Kia Niro (plugin hybrid), as well as a Chevy Bolt and from experience prefer the plugin hybrids because of the difficulty of finding an affordable place to charge. It's ridiculous currently to find a charging station (that will connect to the car), and know the price you'll pay. It's definitely not like going to a gas station where you see the prices advertised. On many I see no list of costs and even in their apps you have to search for it. Then on top of that some places have minimum charges, or additional fees that they tack on to it. Its ridiculous! Of course most people will charge at home I agree. Lets talk about that. As recently as the winter of 2020-2021 in my area we had 3 major outages due to risk of fire. Two of these came without warning. Now while I already had solar on my house because SDG&E shut down power it didn't do me any good in running my house or charging my car. No I would have to shell out a lot of money to have my own battery bank to be able to sustain my car during this time. The power grid is too dependant on external power and thus will be at risk to shut down due to weather events in the foreseeable future. Getting rid of things like San Onofre had a major cost and we are and will be paying for it for as long as I can see. In addition the EV market is, and will continue to be dominated by buyers in the top 20% of incomes in the state. I don't know anyone in what I would call middle to lower income buying these vehicles - because even with rebates they can't afford it! So as far as I'm concerned currently all the EV incentives are just additional perks for the rich only.

So unless you revamp our power grid (which won't happen in 4 yrs!), you put the infrastructure in to support all these new EVs (which I'm not seeing any real movement on by the state to this point), and find a way to make it possible for everyone to buy EVs - your mandating a certain percentage of EVs will be just like when I believe you previously mandated a 15% EV rate by 2018, which of course was a similar pipe dream. I agree EVs are coming - the problem is setting arbitrary goals that are not supported by the infrastructure and ability of all to participate in the EV market.

I am against this arbitrary goal of 35% and think you should get the infrastructure ready before making such a goal, and provide a

meaningful way for all to participate prior to any future goals  
like this

regards  
eric shoquilst

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-18 08:57:30

No Duplicates.

**Comment 5 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Donna

Last Name: Davies

Email Address: dnndavies@gmail.com

Affiliation:

Subject: Proposed Advanced Clean Cars II

Comment:

I strongly encourage the adoption and implementation of the proposal of Advanced Clean Cars II which will require that 100% of new car sales in California are zero emission or plug-in hybrid electric vehicles by 2035. This is the right thing to do as it is absolutely necessary. Thank you so much for doing this. Donna Davies

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-21 14:02:48

No Duplicates.

**Comment 6 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Claudia

Last Name: Hevel

Email Address: heveldoty@gmail.com

Affiliation: Retired

Subject: Advanced Clean Cars II

Comment:

I support the adoption and implementation of the proposal of Advanced Clean Cars II which will require that 100% of new car sales in California are zero emission or plug-in hybrid electric vehicles by 2035. This is the absolutely necessary to reduce carbon emissions.  
Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-23 07:31:14

No Duplicates.



**Comment 7 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bob  
Last Name: Smith  
Email Address: email@email.com  
Affiliation:

Subject: Advanced Clean Cars II Regulations  
Comment:

I think it is important to pass this bill.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-26 06:06:02

No Duplicates.

## **Comment 8 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ronald

Last Name: Stein

Email Address: Ronald.Stein@PTSadvance.com

Affiliation: PTS ADVANCE

Subject: Electric vehicle performance

Comment:

Why does the EV industry avoid sharing their performance in extreme cold and heat conditions, outside the temperate climate that EV's experience in sunny California?

Timex has a slogan, "It takes a licking and keeps on ticking." The U.S Army puts its vehicles in blizzard laboratories and bakes them in heat sheds. The gasoline/diesel producers have specifications for the heat/cold operations of their fluids. With minimal sales in States with extreme weather conditions, are the EV's performing below the expectations of the buyers?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-26 07:37:45

No Duplicates.

**Comment 9 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ronald

Last Name: Stein

Email Address: Ronald.Stein@PTSadvance.com

Affiliation: PTS ADVANCE

Subject: Electric vehicle battery recycling

Comment:

The useful life of those large EV batteries is limited, generally from 15 to 20 years, but none of the recycling plans are public.

With no plan currently in place to recycle lithium products when they reach their end, the world could literally run out of these exotic minerals in a few short years.

An estimated 11 million tons of spent lithium-ion batteries will flood our markets by 2025, without systems in place to handle them.

When and how will the recycling and disposal of spent EV batteries be addressed by the automobile manufacturers, and made public?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-04-26 08:22:09

No Duplicates.

## **Comment 10 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Noel

Last Name: Rabinowitz

Email Address: noelienoel+testcarb@gmail.com

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

- 100% zero-emission vehicle sales by 2030.
- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, Sincerely, Noel Rabinowitz  
Alameda, CA 94501

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-02 16:41:43

631 Duplicates.

## **Comment 11 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Georgia

Last Name: Labey

Email Address: georgia.labey@gmail.com

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

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This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, Sincerely, Georgia Labey  
Palm Desert, CA  
92211

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-03 16:54:45

No Duplicates.

## **Comment 12 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Marianna and Freddie

Last Name: Mejia

Email Address: mspillover@gmail.com

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

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- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, Sincerely, Marianna and Freddie Mejia Soquel, CA  
95073

Attachment: "

Original File Name:



Date and Time Comment Was Submitted: 2022-05-03 18:03:02

No Duplicates.

## **Comment 13 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Tom

Last Name: Becker

Email Address: tsbecker069@gmail.com

Affiliation: T. Becker Power Systems

Subject: Advanced Clean Cars II Regulations

Comment:

This is the first of 2 comment letters I will be submitting to CARB for the Advanced Clean Car II Regulation.

I request CARB staff respond to the following itemized comments, as required by CEQA and state and federal regulations pertaining to response to public comments.

1A) EPA requires the state must demonstrate a "need" for the EPA emission waiver this proposed regulation is operating under.

2A) The state's EPA waiver requires the state to demonstrate the emission reductions in the proposed regulation are "needed" to meet federal air quality standards.

3A) The state's EPA waiver requires the state demonstrate that it has exhausted all emission reduction alternatives available to the state before the state implements the motor vehicle emission and fuel economy standards found in the proposed regulation.

4A) The state does not "need" the motor vehicle emission and fuel economy standards found in the proposed regulation to achieve its federal air quality standard goals.

5A) The state can achieve its federal air quality standards goals by reducing Vehicle Miles Traveled (VMT) by 50% from a 2014 baseline, while implementing the motor vehicle emission and fuel economy standards proposed during the Trump Administration.

6A) By federal law, the state must be technology neutral when preparing and implementing the proposed rule. The state is not allowed to prepare or implement the proposed rule if it gives an advantage to or inhibits the use of any technology that can be used to meet the federal air quality standards goal of the proposed rule.

Thank you,

T.Becker Power Systems

Tom Becker, owner

Buellton, CA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-08 09:14:39

No Duplicates.



## **Comment 14 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Kevin

Last Name: Ma

Email Address: kevinma.sd@gmail.com

Affiliation:

Subject: Push for a Strong Proposal

Comment:

Given the high amount of emissions from our transportation sector, it is imperative that we should do as much as possible to reduce emissions in that sector, in order to meet our legal obligations in statute as well as our ethical obligation to maintain a healthy environment for all, whether it be from the toxic air pollutants that affect those living next to highways or the carbon dioxide that affects our general climate. And it's harder to encourage a good economy when the cost of climate inaction grows ever more larger, from wildfires and energy-demand-induced inflation.

While I prefer strategies that reduce the amount of vehicles there are, I recognize that this isn't the hearing for that. As such, for this hearing, I ask for rules that require:

- 100% zero-emission vehicle sales by 2030.- 7% annual pollution cuts from gas-powered cars in the meantime.-

Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

Separately, I also ask CARB to look into the general increasing sizes of vehicles, which inherently increase the energy demand and thus complicate our path to a clean transportation fleet and energy grid. This trend needs to be reversed, which would also provide safety benefits for pedestrians, bicyclists, and other road users.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-10 13:00:17

No Duplicates.

## **Comment 15 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Andrew

Last Name: Morrall

Email Address: andrewmorrall@aol.com

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

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- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, Sincerely, Andrew Morrall  
Oakland, CA 94611

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-10 14:29:55

No Duplicates.

**Comment 16 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Robert

Last Name: Beerman

Email Address: joebeerman@sbcglobal.net

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, The California Smog Program, since its inception, has made remarkable strides in cleaning up vehicle emissions to almost zero. Electric Vehicles are a great idea but the technology to have them replace fossil fuel burning vehicles is far into the future. To try to make Electric Vehicles the only option before that technology is perfected will lead to pollution problems when these batteries are no longer useful. At this time, we have to rely on other states to sell us electricity. We are in a drought so we can't rely on Hydro/Electric power. Solar power will never produce enough electricity to fulfill California's needs. The only solution to our energy problem, at this time, is to use Natural Gas and Nuclear power. They are both, good, cheap and clean sources of electric power. Sincerely, Robert Beerman  
Canoga Park, CA 91303

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-11 12:00:26

No Duplicates.

**Comment 17 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Monika

Last Name: Tournis

Email Address: Mkkat@icloud.com

Affiliation:

Subject: Extension of HOV stickers due to car shortage

Comment:

Please consider issuing an extension of HOV stickers for another year for those set to expire on Jan 1, 2023 (purple). Many of us are not in a position to buy or lease a new car at this time due to car shortage and dramatic increases in the cost of cars. Furthermore, we hardly drove these cars for the last 2 years. Now that so many of us are back to commuting, an extension would provide relief to our family, by being able to keep and continue to drive our nearly new car for another year.  
Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-12 10:46:13

No Duplicates.



**Comment 18 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Anna

Last Name: Vanderspek

Email Address: anna@greenenergyconsumers.org

Affiliation: Green Energy Consumers Alliance

Subject: Support and strengthen ACCII

Comment:

Please see the attached comments from Green Energy Consumers Alliance on ACCII.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-accii2022-Wj1RJVYyAzVXPwIW.pdf>'

Original File Name: Green Energy Consumers Alliance Letter to CARB - Support Strong ACCII.pdf

Date and Time Comment Was Submitted: 2022-05-16 11:55:56

No Duplicates.

**Comment 19 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Matthew

Last Name: Fogarty

Email Address: mat.fogarty@gmail.com

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, Cars are rapidly killing the planet. If the pollution from cars was visible they would be illegal, yet because we cannot see CO2 we ignore it. Please make gasoline powered cars illegal sell after 2030. We cannot wait longer. Sincerely, Matthew Fogarty Orinda, CA 94563

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-19 17:45:34

No Duplicates.

**Comment 20 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Mike

Last Name: Gordon

Email Address: tdforsshort@gmail.com

Affiliation:

Subject: New gas cars banned or not by 2035

Comment:

I'm very much against banning new gas cars by 2035 or later. I might purchase a new Ev in the next couple years, but I want my options.

If the state wants to promote EV ownership, please reduce the sales tax and registration fees on new EVs. An EV can cost \$ 15-20 K more than a similar gas powered vehicle, and the added cost of taxes and registration makes the EV a bad choice for middle income residents.

Sincerely,

Mike and Lilia Gordon

235 Redbud, Paradise, CA 95969

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-23 12:36:17

No Duplicates.

## **Comment 21 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dalton

Last Name: Kraus

Email Address: Daltonkraus@comcast.net

Affiliation:

Subject: Why we should ban selling gas vehicles

Comment:

Hello,

I am concerned about the banning of selling gas vehicles. The reason for this concern comes from the alternative option which is electric vehicles. Electric vehicles are more expensive and makes it harder for lower income individuals to purchase and maintain. Also a huge concern comes from the utility grid which has proven to be unreliable. If we add more electric vehicles this will put more strain on the grid causing more blackouts and will result in citizens missing days at work which will impact the economy. This will cause inflation to continue to increase and may result in even more fires than we see today. Instead we should drill for oil or look towards water powered vehicles. Please don't increase the strain on our already poor utility grid.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-23 12:16:18

No Duplicates.

**Comment 22 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Kathryn

Last Name: Webb

Email Address: webbkathryn5@gmail.com

Affiliation: 350 Sacramento

Subject: 100% EV Sales by 2030

Comment:

Since transportation is one of the biggest sources of climate emissions in California, it is imperative that we address this when we are combatting climate change. Therefore, we must have 100% Electric Vehicle (EV) sales by 2030 or sooner. We need aggressive targets for clean cars, and bold leadership from the state that demonstrates our government's commitment to combatting climate change.

We have the tools we need to make the shift to clean vehicles, and now we need bold action across the state. Act now to ensure EVs are 100% of the transportation sector, and do your part to curb climate change.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-24 08:45:11

No Duplicates.

**Comment 23 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lorna

Last Name: Bishop

Email Address: lornabishop56@yahoo.com

Affiliation:

Subject: Electric vehicles

Comment:

Enough already. You people have caused enough problems with this clean energy hoax. Stop!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-24 13:15:51

No Duplicates.

**Comment 24 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Cindy  
Last Name: Knight  
Email Address: knightenite@gmail.com  
Affiliation:

Subject: Governor proposed a plan to ban the sale of gas-powered vehicles by 2035  
Comment:

Please do  
int let this prooposed plan to only sale electrice cars go  
through.This new plan would impose more controls and costs on all  
Californians, especially those who can least afford it.  
This  
proposed plan admits that it would cost an estimated \$18 billion in  
2035 and \$27 billion in 2045 and would eliminate at least 80,000  
jobs from families across the state according to the four scenarios  
described in the plan. This change would not only bring higher  
energy costs as a result of imposing an all-electric energy grid,  
but would also deny my ability to choose the energy and  
transportation that is best for my family.  
Where are  
we going to get the electricity from? We use gas to make electricity.  
How is that helping the planet? The mining for the battries uses  
child labor and dectroys the land that it is mined from.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-24 15:17:26

No Duplicates.

**Comment 25 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Angel  
Last Name: Ibarra  
Email Address: aibarra@brisbaneca.org  
Affiliation: City of Brisbane

Subject: From City of Brisbane's Mayor re: Advanced Clean Cars  
Comment:

Please see attached letter of support from  
City of Brisbane's Mayor Coleen Mackin.  
Thank you,

Angel Ibarra  
City of Brisbane

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-accii2022-UGJXYVdkWThRelVI.pdf'

Original File Name: 2022-05-20\_Advanced Clean Cars II Regulation.pdf

Date and Time Comment Was Submitted: 2022-05-25 12:38:36

No Duplicates.



**Comment 26 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jon

Last Name: Ellison

Email Address: jellison@surewest.net

Affiliation: The Earth

Subject: Electric Vehicles

Comment:

We MUST do whatever we can to stem adverse climate change caused by humans. Fossil fueled vehicles are one of the major causes and YOU an do something about it. Please put an early end to the production/sale of fossil fuel powered vehicles by 2030 or before. You know we are in the environmental "tipping point" for our planet. Like Greta said, "Act like your house is on fire." Please set the strogest standard possible, for the sake of my grandchildren and their unborn children.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 15:29:04

No Duplicates.

## **Comment 27 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Thomas

Last Name: Yeates

Email Address: tyeates@arrowflight.com

Affiliation: 350.org

Subject: Electric Vehicles

Comment:

Transportation is the biggest source of destructive emissions in California. A different infrastructure that includes good jobs closer to worker's homes and vastly improved public transportation would address this but that isn't where we are now.

California is still a car culture. We need massive production of affordable EVs, and we need the public to embrace them.

Therefore I believe the state of California must put it's climate budget into public outreach. Excellent EVs have been available for over a decade, yet they are still only a fraction of the vehicles on our roads and freeways. When the public demands them, industry will build them. Please mount a massive public awareness program with regular TV and radio spots on the most popular stations, freeway billboards, magazines and newspapers. The future looks grim because we refuse to stop causing the climate disaster. Accurately educate the causes of the crisis to the public, they deserve to know. Only then will behaviors change.

Thomas Yeates

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 16:04:19

No Duplicates.

**Comment 28 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: santokh

Last Name: sohal

Email Address: ssohal88@gmail.com

Affiliation:

Subject: electric cars - concerns

Comment:

The collective business community has deep concerns with CARB's Climate Change Scoping Plan. The decisions made and the path chosen will have a profound impact on all Californians, dictating how they must run their businesses, what cars they can drive, where they can live, and what stove they can cook with. Life as we know it in California will be altered going forward. Major implications for businesses and individuals in California, include:

- Increasing costs to businesses, especially agricultural and transportation sectors
- Employment/Jobs &ndash; despite a growing population, these policies will cost California over 85,000 jobs
- Higher utility costs disproportionately impacting inland and rural communities
- Eliminating consumer choice by mandating electric vehicles, appliances, residential, and commercial buildings
- Worsening our electric grid reliability by pushing electrification without infrastructure in place, thus increasing the likelihood power outages

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 16:37:48

No Duplicates.

**Comment 29 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Henry

Last Name: Marvin

Email Address: marvinins@yahoo.com

Affiliation:

Subject: Clean Car Electrical Grid not set up to handle

Comment:

Has CARB thought about the problems of wanting to be 100% electrical vehicles?

We already have rolling blackouts, how is our electrical grid going to handle all cars to be plugged in?

What happens when you are in the freeway and an accident happens in the winter, you are stuck on the freeway and your electricity has run out?

Do I want to be driving and stop in a dangerous area to sit and recharge my car at night?

I feel we should allow vehicles that have gas and electric to power them. It keeps from these problems that California does not have an answer for.

Please allow another way of thinking, at this point I feel CARB is pushing for all electric no matter what the problems or comments of California citizens.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 16:41:37

No Duplicates.

## **Comment 30 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jeff

Last Name: Holden

Email Address: jeff@multipointcontentstrategies.com

Affiliation:

Subject: Advanced Clean Cars II

Comment:

With all due respect to the engineers helping improve our environment with cleaner air, this potential mandate is extremely premature. As a small business owner/operator, we're already experiencing outrageous expense increases as a result of transportation costs. We rely heavily on the grid for our business as we're a small podcast production company and in the past year we've seen challenges with the ability to get out electricity to run the studio and A/C. Yet, infrastructure be damned, we're considering a legal mandate to overwhelm the system with more electric draw? One only has to use common sense to see the challenges of putting the cart before the horse. As demand for electricity increases faster than supply, as it must under the proposed circumstances, the only result can be higher cost. Period. And then somebody has to pay for the infrastructure to support the demand. Again, higher cost. Who bears the responsibility of all this? Small business and taxpayers. With less in their pockets to spend, customers dwindle. As customers dwindle, so do small businesses. Yes, we have a problem in the state. Many of them. But why create additional burden when no matter what happens on the road, is offset with one large fire... for the year!

Please focus your energies on what's currently realistic. The majority of CA residents are not in a position to absorb higher utility bills, they're unable to afford an EV and if the lowest income communities did get EV's they would have no way to charge them. Think before acting and do what's best for the environment by taking one step at a time rather than leaping before looking. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 16:50:52

No Duplicates.

## **Comment 31 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Kenneth

Last Name: Post

Email Address: kpCARB@shore.ws

Affiliation:

Subject: Advanced Clean Cars II (ACC II)

Comment:

Although I drive an electric vehicle, I am opposed to forcing businesses to switch to electric vehicles so quickly. It can only encourage more businesses to move out of California and cost thousands of jobs.

As an alternative I would suggest a major incentive for transportation would be to allow electric trucks to drive 65MPH instead of 55MPH.

We must be careful not to overwhelm our electric system and also overwhelm the electrical charging system that is just starting to grow.

As someone who drove a fuel cell electric vehicle for 3 years, I know all too well about having more cars on the road than the hydrogen delivery system can handle. Many, many times having to wait in line for hydrogen and even having to park the car for 4 days because of the unavailability of hydrogen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-25 21:46:42

No Duplicates.

**Comment 32 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: PATRICK

Last Name: FAUBION

Email Address: PATRICK-AL@CA.RR.COM

Affiliation:

Subject: INFRASTRUCTURE AVAILABILITY

Comment:

FIRST REGULATION TO ENACT: ENACT NO REGULATION FOR WHICH INFRASTRUCTURE DOES NOT EXIST. FOR EXAMPLE: MANDATING ELECTRIC CARS WHEN THE POWER GRID IS OVERLOADED NOW. IT TAKES ABOUT 10 YEARS TO GET A POWER PLANT BUILT FROM PLANNING, PERMITS TO OPERATION.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:03:56

No Duplicates.

## **Comment 33 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bob

Last Name: Wiley

Email Address: bibisq@hotmail.com

Affiliation:

Subject: Energy issues

Comment:

If we are to go all electric, then where will we get our electricity from?

It is unwise to eliminate energy forms and options. We will need to expand production from our state's power plants and that includes re-opening the nuclear plants that have been sitting dormant for years. If we want enough clean, efficient energy, the wind and solar we currently have is not efficient enough to power thousands/millions of more vehicles.

California has maxed out the power grid. I am against going "all electric" until we can address the power supply issue.

Plus, one other area to consider; what about those who don't have the capability to charge a vehicle? I live in a small house with no garage. The nearest parking for me is 250ft. across a street up a hill. I wouldn't have any option to charge my electric vehicle unless I were to run a long extension cord across two other properties and a city street. That doesn't work for me and I know I'm not the only one in a situation like this.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:10:51

No Duplicates.



**Comment 34 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jamie

Last Name: Perlman

Email Address: jamieperlman@yahoo.com

Affiliation: Self

Subject: Two points to comment on Proposed Advanced Clean Cars II Regulations

Comment:

1. CARB should require automakers to reach a target of 75% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market;
2. I also ask that you include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:23:41

20 Duplicates.

**Comment 35 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Greg  
Last Name: Camphire  
Email Address: gac37@hotmail.com  
Affiliation:

Subject: Clean Cars For Everyone  
Comment:

Hello,

CARB should require automakers to reach a target of 75% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market.

I also ask that you include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.

These actions, and others to divest from fossil fuels, are necessary to mitigate the mass extinction event that we are currently living through. We must take these decisive steps to adapt to the climate emergency we have created and ensure the future of humanity on Earth.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:23:38

No Duplicates.

**Comment 36 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dania

Last Name: Zaire

Email Address: dz262@cornell.edu

Affiliation:

Subject: new cars need to be zero-emission

Comment:

Hello, I am writing to ask CARB to require automakers to reach a target of 90% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market and to also ask that you include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.

Thank you,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:40:45

No Duplicates.

**Comment 37 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joshua

Last Name: Bergstrom

Email Address: das.roos@gmail.com

Affiliation:

Subject: Help us have clean neighborhoods

Comment:

Require automakers to reach a target of 100% of their new vehicles being zero-emission in 2030, in order to minimize pollution and maximize the number of non-fossil fuel cars in the market. Create strong equity standards that ensure automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:51:42

No Duplicates.

## **Comment 38 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Link

Email Address: d\_linkeg@yahoo.com

Affiliation:

Subject: Require clean ZEV >75% by 2030 and assist lower income communities to participate, too

Comment:

CARB should make a binding requirement that automakers reach a target of 75% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market.

Include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.

Work with other government entities to ensure that multi-user housing is required to install inexpensive non-networked EVSEs so that ALL Californians are able to charge at "home", where it is much less expensive and better for electricity uses when charging takes place at night.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 09:03:30

No Duplicates.

**Comment 39 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Karen

Last Name: Ulring

Email Address: kulring@earthlink.net

Affiliation:

Subject: Requirements for clean cars

Comment:

Pollution is one of the biggest drivers of climate change, and we can make progress by building cars that meet zero emissions by 2030. Let's do that, and require that car manufacturers provide 75% of their new cars to meet that standard.

I'd also like to stress that we put in place strong standards that will ensure affordability and access to these new cars.

Thank you,

Karen Ulring

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 09:22:59

No Duplicates.

**Comment 40 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jens

Last Name: Muhle

Email Address: jens.muehle@gmail.com

Affiliation:

Subject: zero-emission vehicles

Comment:

Given the urgency of the climate emergency, CARB needs to require automakers to at least reach a target of 75% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market. I also ask that you include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change. Right now, only affluent people can afford electric cars and solar panels to charge them, while many less well off people cannot afford either and are stuck with high gas prices.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 09:41:32

No Duplicates.

**Comment 41 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Marcus

Last Name: Gomez

Email Address: marcus@californiaclothing.net

Affiliation: Cal Hispanic Chamber of Commerce

Subject: Advanced Clean Cars Rule (ACC II)

Comment:

My name is Marcus Gomez and I am a Small business owner. My company is California Clothing Recyclers and we export used clothing to third world countries. We are located here in Sacramento. We have two trucks and a van one gas truck a diesel truck with the DEF system and two forklift. For my company to go all electric would put a heavy burden on my company. I do think we need to do something about the climate but I also think that the CARB Board is being too aggressive. To the point of affecting all businesses and the consumer.

My feeling is that the board is putting the cart before the horse. You would like us to be all electric by 2035 2040. My question is where will you get the electricity to power all you ask for. We are asked to save energy now also where will all the gas vehicle go. The poorer communities will not be able to afford electric vehicles. I think you need to update the electric grid before you start asking the public to go all electric. Please feel free to contact me if you would like to discuss more. Thank You!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 09:32:21

No Duplicates.



**Comment 42 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Saran

Last Name: K.

Email Address: sarank@mac.com

Affiliation:

Subject: Clean cars

Comment:

Clean cars mean cleaner air, less pollution fewer people getting sick.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 11:04:31

No Duplicates.

**Comment 43 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bonnie

Last Name: Nixon

Email Address: bonnienx@gmail.com

Affiliation: San Pedro Resident

Subject: Clean and Affordable Cars/Trucks/Jobs for Community

Comment:

Lower and middle income citizens in the South Bay of LA - all the communities surrounding the Ports where there is severe non-attainment must be able to afford and or be subsidized to purchase electric and at a minimum hybrid vehicles. The prices of these vehicles is cost prohibitive for any normal working class citizen. Please find a way to flood the market with these vehicles and use the \$100B State Surplus to subsidize us all so we can make this area cleaner. Also help the trucking industry - especially the independent drivers purchase battery powered drayage trucks versus diesel. Finally, please work closely with the Unions to help them reframe the automation and electrification discussion so that we are not pitting the economy against the environment. We must and can assure good paying jobs with this transition if it is done intelligently. What good is a job if there is no health? How can we protect our public and children so that they can breathe? Commitments can be made by all parties so that lower and middle income families and individuals prosper versus suffer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 11:00:56

No Duplicates.

**Comment 44 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation:

Subject: Coalition Travel Letter

Comment:

Please see the attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/299-accii2022-AGNROFMzAzwEa1Mn.pdf'

Original File Name: Coalition Travel Letter FINAL.pdf

Date and Time Comment Was Submitted: 2022-05-26 11:15:17

No Duplicates.

## **Comment 45 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Judy

Last Name: Robinson

Email Address: Judyrob1214@gmail.com

Affiliation:

Subject: Clean Cars For All Comments

Comment:

Thank you for the opportunity to comment.

1. CARB should require automakers to reach a target of 75% of their new vehicles being zero-emission in 2030, in order to maximize pollution reductions and the number of clean cars in the market;
2. Please include strong equity standards that ensure that automakers increase affordability and access to ZEVs for disadvantaged communities, which face the worst impacts of air pollution and climate change.
3. These programs require creativity and flexibility to meet the different challenges of our communities. Please allow funding to be available for programs like: helping people get their driver's licenses back, e-mobility hubs that include various zero emission types of transportation including e-bikes. And for these programs to allow community organizations to cover their admin costs to run successful programs including paying community residents to drive their neighbors to school, doctors, grocery store, job interviews and other important trips that address transportation barriers with a lean energy and equity based solutions. Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 11:17:05

No Duplicates.

## **Comment 46 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Mark

Last Name: Cato

Email Address: mcato3@gmail.com

Affiliation:

Subject: Advanced Clean Cars II Regulations

Comment:

Dear Sir or Madame,

The climate crisis, long talked about as "distant" or "in the future" is here, now. We don't have time for a gentle phase out of fossil fuel consumption. Please consider a more aggressive stance with your proposal for clean cars by the year 2030 to where 75% of all new cars & trucks are "clean" (EV or Fuel Cell). Please consider the fact that even if a standard such as this is enacted, many used cars and trucks will still be on the road 10 - 15 years after this date (2040-2045). As a result of the scale of the problem and the amount of used cars and trucks which will still be on the road for many years after 2030, one could safely argue that this standard should in fact be 100% by 2030. One additional thing to consider is how PHEV's will fit into your policy. One suggestion would be to allow PHEVs to count towards 85% of a clean vehicle standard quota (or some other percentage), thereby making it easier for manufacturers to meet the policy, and also making it easier for everyday people to transition to electric. Fully electric may not meet the needs of all Californians and until we have a fully developed H2 fueling infrastructure in place, PHEV's may be able to help bridge that gap, but a clean cars regulation will need to specify how they fit into the picture.

Additionally, please consider strong equity standards to ensure that auto companies will increase affordability for ZEV's and access to charging/filling stations in disadvantaged communities.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 13:46:32

No Duplicates.

**Comment 47 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Peter

Last Name: Dorian

Email Address: peterjdorian@yahoo.com

Affiliation:

Subject: electric vehicles

Comment:

75% of All new cars and light duty vehicles  
should be electric by 2030.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 14:35:20

No Duplicates.

**Comment 48 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Narayan  
Last Name: Gopinathan  
Email Address: narayansgopi@gmail.com  
Affiliation:

Subject: Increase standards for vehicle electrification  
Comment:

Dear CARB,  
Thank you for developing a timeline to phaseout sales of light duty combustion vehicles. Due to the climate emergency, and the supply chain shocks in the oil market related to the war in Ukraine, we cannot afford to wait to phase out sales of new gasoline cars. Any new gas cars sold will lock in dependence on fossil fuels and volatile supply chains, leaving at the mercy of dictators like Putin. For that reason, we must increase and accelerate targets for vehicle electrification. We must set policies such that by 2026, 50% of all new light-duty vehicle sales in California are zero-emissions vehicles, and 100% by 2030. The State of Washington has a similar target, and if Washington can do it so can we.  
To address potential side-effects of this policy, we can make exceptions for emergency service vehicles like ambulances. We must pair these policies with investments in EVSE along all of our state highways, including the remote regions, so folks aren't stranded there. We must also make sure that public services such as health care clinics are available in all parts of the state so nobody needs to drive two hours in an emergency, putting them at risk of a depleted EV battery. And we must increase investment in public transit and regional rail services, all across the state.  
Best regards,  
Narayan Gopinathan

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 17:14:36

No Duplicates.

**Comment 49 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Alexia

Last Name: Melendez Martineau

Email Address: amartineau@pluginamerica.org

Affiliation: Plug In America

Subject: Re: Proposed Advanced Clean Cars II Regulations

Comment:

Thank you for the opportunity to comment on the proposed Advanced Clean Cars II program. Please see the attached comments from Plug In America on ACC II.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/313-accii2022-AnIHbVAKBTFSC1M6.pdf>'

Original File Name: Plug In America ACC II Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-05-26 17:32:58

No Duplicates.



**Comment 50 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ralph

Last Name: Bocchetti

Email Address: riverglen2816@yahoo.com

Affiliation:

Subject: clean air EV mandate

Comment:

We need to make at least 75 percent of new cars sold in 2030  
EV!!!! Climate change is here and only getting worse!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-27 08:58:44

No Duplicates.

**Comment 51 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Susan

Last Name: Dwyer

Email Address: Dwyerschico@gmail.com

Affiliation:

Subject: Electric Cars

Comment:

Thank you for your hard work toward having clean air for California. However, forcing electric cars on the population is full of disastrous consequences. Starting with the strain on the electric grid adding that many charging demands. The state is already experiencing serious energy problems with rolling blackouts every summer. Also the environmental costs of no biodegradable batteries will be staggering. I believe your heart is in the right place but until these two environmental issues are resolved it is foolish to push this agenda forward.

My My husband and I are also retired living on a fixed income and can not afford things as they are now including energy bills and inflation. We could never afford the price of an electric car or the accompanying costs to maintain one. This plan is seriously flawed. Do not move forward with it until this issues have been fixed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-23 22:15:32

No Duplicates.

**Comment 52 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Andrew

Last Name: Meredith

Email Address: jsmith@sbctc.org

Affiliation: State Building Trades

Subject: Proposed Advanced Clean Cars II Regulations - Oppose

Comment:

Please see the attached letter from Andrew Meredith, President of the State Building and Construction Trades Council regarding the proposed Advanced Clean Cars II Regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/319-accii2022-AXJVMVAyAiUDZghX.pdf>'

Original File Name: SBCTC Letter - Advanced Clean Cars II Regulations - OPPOSE.pdf

Date and Time Comment Was Submitted: 2022-05-27 10:20:16

No Duplicates.

**Comment 53 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Michael  
Last Name: Gallagher  
Email Address: mikeg685@gmail.com  
Affiliation:

Subject: Prioritize BEVs to clean our air  
Comment:

Hello -

please take action to prioritize and support a faster transition to Electric vehicles. I'm aware not all people will switch, but as we dramatically increase the % of non polluting vehicles on the road, we should have a significant improvement in air quality.  
Thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-26 08:27:34

No Duplicates.

**Comment 54 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Anthony

Last Name: Bento

Email Address: abento@cncda.org

Affiliation: California New Car Dealers Association

Subject: CNCDA Comments on Proposed Advanced Clean Cars II Regulations

Comment:

See attached PDF.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/323-accii2022-VTQAZQNhBQIXOAdu.pdf'

Original File Name: ACC II Comments (Final 5-27-22) PDF.pdf

Date and Time Comment Was Submitted: 2022-05-27 10:43:32

No Duplicates.

**Comment 55 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Fink

Email Address: dfink@labusinesscouncil.org

Affiliation: Los Angeles Business Council

Subject: Comments - Advanced Clean Cars II Rule

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/326-accii2022-BmpcO1c0UGAKU1U2.pdf'

Original File Name: LABC Comments\_ ACC II.pdf

Date and Time Comment Was Submitted: 2022-05-27 11:43:51

No Duplicates.

**Comment 56 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lance

Last Name: Tunick

Email Address: tunick@vsci.net

Affiliation: on behalf of ACCII SVM Group

Subject: ACCII comment of ACCII SVM Group

Comment:

Please see attached comment of the ACCII SVM Group, an ad hoc alliance of the following small volume manufacturers:

.

Aston Martin

.

Bugatti

.

Czinger

.

Gordon Murray

.

Koenigsegg

.

Lotus

.

McLaren

.

Pagani

.

Rimac

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/328-accii2022-VTRWM1EzV21RPIMM.pdf'

Original File Name: ACCII SVM GROUP COMMENT ON CARB PROPOSAL-May 27 2022.pdf

Date and Time Comment Was Submitted: 2022-05-27 12:42:29

No Duplicates.

**Comment 57 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jim

Last Name: Kliesch

Email Address: james\_kliesch@na.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Advanced Clean Cars II

Comment:

Please accept the attached file, "Honda ACC2 Comments.pdf" for submission to the Advanced Clean Cars II docket. Thank you, Jim Kliesch American Honda Motor Co., Inc.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/329-accii2022-WzMGBwFuU2RQNwJd.pdf'

Original File Name: Honda ACC2 Comments.pdf

Date and Time Comment Was Submitted: 2022-05-27 12:53:12

No Duplicates.



## **Comment 58 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Diane

Last Name: Warren

Email Address: warren.diane@gmail.com

Affiliation:

Subject: PuClean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

- 100% zero-emission vehicle sales by 2030.
- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. While you are at it, methane is 44 times more warming than CO<sub>2</sub>. Let's get electric heat pumps that both heat and cool the air in buildings. Electrify public transportation. Other countries are trying out sky trains with many pod cars. Let's start doing kelp farming and Ocean Pasture Restoration to get billions of tons a year out of the atmosphere. This has to be done and the faster the better. There are other innovations laid out in the book "Climate Restoration: the Only Future That Will Sustain

Humanity.&rdquo; Sincerely,Sincerely,Diane WarrenSebastopol, CA 95472

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-27 20:27:29

No Duplicates.

## **Comment 59 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bonnie

Last Name: Lee

Email Address: leebonniek@gmail.com

Affiliation:

Subject: Going Foward with Electric Cars is an Smart Financial Choice

Comment:

CA is all about innovation and one of the next innovation in transportation is to move away from combustion and relying on drilling for oil and instead move towards electrical motors and renewable energy.

Since we have heavily relied on gasoline consumption for over a hundred years, what was once thought as an inexhaustable resource, is now seen as a heavily priced (greater than \$6/gal), highly regulated (causes air pollution, drilling spillages in oceans, & decreases quality of life), and sourced from possibly from questionable regions with questionable human rights principles (Russia, Saudi Arabia).

CA needs to move to the forefront of technology and innovation and encourage industries to create clean-air vehicles by 2030 and increase incentives for individuals as a psycological cue that is encouraging from top-down and bottoms-up approach.

Air pollution will be reduced not just in CA but for industries also involved with this effort of clean-air vehicles by 2030 and its alternatives. Less oil will be drilled to reduced oil spills, crude oil barges won't be shipped from overseas which can save transportation costs, & pollution will be reduced from not selling gasoline vehicles. There is potential to promote clean air and climate changes by encouraging locally generated electricity and from renewable sources (solar, geothermal, hydropower, wind turbines) & creating a better infrastructure (electricity, roads, WIFI) to connect everyone together.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 05:25:39

No Duplicates.

**Comment 60 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: ALASDAIR

Last Name: COYNE

Email Address: sespecoyne@gmail.com

Affiliation:

Subject: hearing on advanced clean car regulations, May 31st

Comment:

I wholeheartedly support you deciding to make sure that 75% or more of new cars in California be zero-emission vehicles by the year 2030. We simply cannot move fast enough to reverse worsening global heating, so every beneficial step becomes vital to follow through on. Making these vehicles affordable fo all is also key.

Thank you,  
Alasdair Coyne, Ojai CA.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 07:39:04

No Duplicates.

**Comment 61 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sharon

Last Name: Geiser

Email Address: sharkgei.2015@gmail.com

Affiliation: Pass Democratic Club

Subject: Proposed Clean Cars II

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/339-accii2022-AW1UN1InWH9WNVIg.docx'

Original File Name: Letter to CARB.docx

Date and Time Comment Was Submitted: 2022-05-28 08:34:57

No Duplicates.

**Comment 62 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Richard

Last Name: Allum

Email Address: rallum297@live.com

Affiliation: CA business owner?former CA res

Subject: proposed clean cars

Comment:

Respectfully

CA has not shown itself sufficiently adept at creating electricity that doesn't involve rolling black outs and brown outs during peak usage times. Now we can't do laundry from 4-9pm to save electricity, BUT mandating electric cars by 3035 just highlights how out of touch with reality the state government is!

PLEASE apply some common sense to the literally unobtainable goal of all electric cars by 2035.

thank you for your time

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 13:29:36

No Duplicates.

**Comment 63 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Louise

Last Name: Johnson

Email Address: lcjsew@aol.com

Affiliation:

Subject: Clean cars are a key to clean air.

Comment:

Please Advance the Clean Cars II Regulations

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 15:11:27

No Duplicates.

**Comment 64 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Linda

Last Name: Reynolds

Email Address: Rnwocnchico@yahoo.com

Affiliation:

Subject: Cars comment

Comment:

Please stop forcing Californians to buy electric cars. There is not enough infrastructure to support this and no foresight for people not living where solar is an option apartment, Mobile home park, section 8 housing etc). Stop trying to regulate everything and forcing this on ca residents. People are leaving the state due to crap like this. Focus on police, public safety and getting the in sheltered off the street. Crime is rediculois and ca residents like me are afraid. THIS is more important that forcing electric cars on people who can't afford them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 19:03:28

No Duplicates.



**Comment 65 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Elizabeth

Last Name: Graser-Lindsey

Email Address: eaglsing@gmail.com

Affiliation:

Subject: It's time for electric vehicles

Comment:

Thanks for rules to have 100% of new car sales electric vehicles by 2035! Thanks for leading the way.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-28 23:00:17

No Duplicates.

## **Comment 66 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Thomas

Last Name: Becker

Email Address: tbeckerpower@gmail.com

Affiliation: T. Becker Power Systems

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

This is the second of 2 comment letter submitted by me for the Advanced Clean Cars II regulations.

I request that CARB staff reply to the itemized comments submitted, as required by CEQA, NEPA and any state or federal rules, regulations or statutes pertaining to responses to public comments.

AA1) The motor vehicle emission standards proposed in the ACC II regulation are stricter than federal EPA standards.

AA2) The state is using its EPA waiver to authorize the implementation of motor vehicle emission standards that are stricter than U.S EPA standards.

AA3) Before the state can implement motor vehicle emission standards that are stricter than U.S EPA standards, the state must show that it has exhausted all other emission reduction options available to the state that can be used to meet the state's goals to reduce atmospheric concentrations of NOX, CO, ROG, ozone and CO2.

AA4) the state has not exhausted all its options to reduce atmospheric concentrations of the afore-mentioned gases.

AA5) the state can achieve its goals without the motor vehicle emission standards proposed in the regulation by using the following methods:

- Reduce statewide VMT by 25% from a 2014 baseline by 2030 and 50% from a 2014 baseline by 2040.
- Implement a renewable fuel standard for liquid motor vehicle fuels of 25% content closed loop renewable fuels by 2030 and 50% content closed loop renewable fuels by 2040.
- Reduce Port of Los Angeles/ Long Beach shipping activity (tonnage) by 75% from a 2019 baseline by 2030.

AA6) The proposed motor vehicle emission standards in this regulation will impact the types of motor vehicles sold in other states by the fact that motor vehicle manufacturers will, due to economics, be forced to design and build all their vehicles to meet the state's emission standard.

AA7) The state is required to exhaust all the emission reduction options available to the state before implementing motor vehicle emission standards that are stricter than U.S EPA standards. The reason for this is to prevent other states from being unnecessarily impacted by motor vehicle designs that are influenced by the State of California's motor vehicle emission standards.

AA8) California residents have for years attempted to require the State of California to implement the strategies listed in comment AA5. The state has resisted those efforts.

Thank you  
T,Becker Power Systems  
Tom Becker  
Buellton, Ca

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-29 09:56:36

No Duplicates.

## **Comment 67 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: JL

Last Name: Angell

Email Address: jangell@earthlink.net

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

- 100% zero-emission vehicle sales by 2030.
- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, JL Angell

Rescue, CA  
95672

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 12:41:17

No Duplicates.

**Comment 68 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dawn

Last Name: Whitney

Email Address: dawnwhitney2015@gmail.com

Affiliation: climate coalition, third act, 350

Subject: Clean Cars by 2030

Comment:

Hello, I am a resident of Sacramento, and am writing personally to urge the Board to adopt regulations to update the Advanced Clean Cars II Regulations. California and the globe are in urgent need of rules requiring 100% EV sales as soon as possible, but in not event later than 2030.

And to make it most useful, communities of color must have equitable access to EVs. I myself drive Gig, and I always see people of color charging at the 6th street charger, but not elsewhere. this appears discriminatory.

I urge you to carefully consider and pursue the goals set forth in the Climate Coaltion letter submitted by Chris Brown.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 13:29:07

No Duplicates.

**Comment 69 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Leah

Last Name: Missik

Email Address: leah.missik@climatesolutions.org

Affiliation: Climate Solutions

Subject: Washington organizations in support of a stronger ACCII

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/348-accii2022-VyAFYlwCADJVMFAz.pdf'

Original File Name: WA ACCII Letter to CARB.pdf

Date and Time Comment Was Submitted: 2022-05-30 13:39:05

No Duplicates.

## **Comment 70 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Karen

Last Name: Jacques

Email Address: threegables1819@gmail.com

Affiliation:

Subject: Need Higher Standards for Advanced Clean Car II Rule

Comment:

California and the world are facing a climate crisis that is worsening at a dramatic pace. As part of responding to this crisis, CARB needs to move forward the date by which all vehicles sold in California must be clean vehicles from 2035 to 2030.

It must also set interim goals for vehicle sales between now and 2030 to assure that we reach net zero green house gas emissions by 2045. It is critical that the transition to clean vehicles in California be equitable. That means making sure that poor communities and communities of color have necessary charging infrastructure, that community members have access to significant financial incentives to help them purchase new and used EV's and that members also have easy access to shared EV's. To achieve climate goals, it is imperative that the materials from which EV's are made and their construction be clean. In the past, dirty mining practices have done terrible damage to the health of adjacent communities and to ecological systems around the world. CARB must develop rules to assure that the materials needed to build EV's are responsibly sourced and that there are recycling programs that allow these materials to be successfully reused. One final point: gas burning vehicles that are sold between now and 2030 must have fuel efficiency standards that increase by 7% or more per year. This is critical because the useful life of these gas burning vehicles is likely to be twenty years or more and California cannot meet its 2045 net zero goal unless they are extremely efficient. Thank-you for this opportunity to comment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 13:16:44

No Duplicates.



## **Comment 71 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jack Lucero  
Last Name: Fleck  
Email Address: lucerofleck@gmail.com  
Affiliation: 350 Bay Area

Subject: Need 8 million EVs by 2030 in accordance with Mobile Source Strategy  
Comment:

The ACC II regulations will be a major component of the CARB's Scoping Plan which was released for public comment on May 10.

Unfortunately, the ACC II rules as proposed will not enable California to achieve its climate goals as proposed in its draft Scoping Plan.

To its credit, the Scoping Plan does provide numbers showing what reductions must be reached to achieve these goals. However, the Scoping Plan must rely on regulations like ACC II to achieve its numbers.

The draft Scoping Plan includes a spreadsheet, based on the PATHWAYS model, which includes numerous tabs showing numbers projected by year through 2045 for numbers of electric vehicles, gasoline and diesel emissions, Vehicle Miles Traveled, and more.

The Scoping Plan/PATHWAYS spreadsheet's ambitious aim is to reduce Transportation emissions from 152 Million Metric Tons (MMT) to 86 MMT by 2030, ie. a cut of 77 MMT. However, based on the calculations shown in this letter, the assumptions of the Scoping Plan and the proposed ACC are only likely to achieve 47 MMT reductions for a likely total of 116 MMT emissions, i.e. 30 MMT short of the goal of 86 MMT.

How many EVs is CARB predicting for 2030?

This is an important question. The ability of CARB to reach its climate goals depends on getting this right.

The Mobile Source Strategy dated October 28, 2021 estimated that there would be 8 million EVs on the road in 2030. (page 95) This number is also shown in the

slides prepared for CARB's presentation on June 10, 2021. I'm not aware that CARB has backed off from that number in any written document.

However, the PATHWAYS spreadsheet for the Scoping Plan is only showing 4.8 million Battery EV (BEV) + Plug in Hybrid EV (PHEV) + Fuel Cell EV (FCEV). And the Scoping Plan itself references the 5 million EVs (page 29), but doesn't specify any goal.

Based on the calculations shown below, California cannot reach its climate goals without reaching 8 million EVs on the road in 2030.

How can the necessary reduction be achieved?

The four ways the 77 MMT reduction could be achieved are

Conversion to Electric Vehicles (EVs) and Zero Emission Vehicles (ZEVs)

Reduction in Vehicle Miles Traveled (VMT),

Biofuels (diesel only)

Fuel Efficiency

Conversion to EVs/ZEVs

The PATHWAYS spreadsheet shows a drop in Internal Combustion Engine Vehicles (ICEVs) by 3 million by 2030 (LDV tab). This would reduce about 13 MMT of GHGs (calculation: 3 million cars x 13000 miles each / 25 mpg x 19lbs CO2/gal / 2200 lbs/MMT = 13 MMT). The MDV and HDV stocks tabs (Medium and Heavy Duty Vehicles) show about 200,000 fewer ICEV trucks. This is about 10% of the 2 million trucks. 10% x 28 MMT emitted by trucks (from the spreadsheet) = 3 MMT reduction.

Total =  
16  
MMT

This number could be increased significantly by increasing adoption of EVs, including required phase out of ICEV sales by 2030. CARB's Mobile Source Strategy estimated 8 million EVs by 2030 compared to the PATHWAYS spreadsheet total of 4.8 million. An extra 3 million EVs replacing ICEVs would add another 13 MMT reduction. This is discussed more below.

Vehicle Miles Traveled (VMT)&ndash;The Scoping Plan assumes, &ldquo;VMT per capita reduced 12% below 2019 levels by 2030&rdquo; &ndash;page 58. If we assume a slow 0.5% per year population growth, (I don&rsquo;t see a number in the Scoping Plan or the PATHWAYS spreadsheet for their estimate of population growth), a 12% per capita VMT reduction over 11 years results in about 6% decrease in total VMT, i.e 6% x 165MMT = 10MMT.

The PATHWAYS spreadsheet shows a more aggressive reduction in VMT for Alternative 3&ndash;17% for light duty vehicles from 2021 - 2030. Again, if we assume about 0.5% population growth for 2021- 2030 , then the actual VMT reduction would be 17-5=12%. This would give a total reduction in GHGs of 165 x 12% = 20 MMT.

What about fuel efficiency?

The Scoping Plan is silent on this topic. However, the federal CAFE standards are proposing that new cars improve MPG by about 10 mpg by 2026. This would bring the average for new cars up to about 36 mpg, but doesn&rsquo;t affect all the existing cars on the road. In other words, even if all new cars average about 36 mpg from now to 2030, that only improves the overall average by about 5 mpg.

If half of the cars average 36 mpg (.028 gal/mile) and the other half average 25 mpg (.04 gal/mi), the overall average would be .034 gal/mi = 29 mpg. This would be a fuel reduction of  $(.04 - .034)/.038 = 16\%$ .  $16\% \times 112 = 18\text{MMT}$

If California is able to adopt stronger fuel efficiency regulations, this number could be improved.

Biofuels--These only apply to MDV and HDV.

According to the Mobile Source Strategy, (page 137),

the Low Carbon Fuel Standard program aims for 20% reduction in Carbon Intensity of truck fuels. Using 28MMT for diesel emissions, this would be 6 MMT reduction, but this includes 3 MMT from the ZEV trucks discussed above, so the biofuels actually contribute 3 MMT reduction.

Also, critics have pointed out that such large scale biofuel production will seriously strain production of soybeans&ndash;is it realistic? And bio-diesel is still a pollution problem&ndash;both in production and combustion.

Here is a summary of these reductions, which are shown in Table 2 above:

Fewer ICEVs (including cars & trucks)

16  
MMT

VMT reductions

10  
MMT

Fuel efficiency

18  
MMT

Biofuels                    3 MMT

Total

47  
MMT

47 MMT in likely reductions is 30 MMT short of the 77 MMT shown in Table 1 for reductions from Transportation. Note that the VMT reduction is based on numbers in the Scoping Plan; the PATHWAYS spreadsheet number is 10MMT more aggressive than the number in the Scoping Plan.

What needs  
to be done?

The intent of this comment is not to say that it is impossible for California to achieve its necessary GHG reductions. Rather, the intent is to urge adoption of concrete plans to achieve the reductions. CARB's ACCII regulations can do just that.  
Here are some of the actions needed in the Transportation sector:

Phase out the sale of ICEVs by 2030. This would mean 8 million EVs on the road in 2030 and would add another 13 MMT in GHG reductions.

Support individuals and companies in working from home, including subsidies for home offices or workspaces near home. 2020 showed that VMT could be seriously reduced if people work from home. This calculation—

<https://docs.google.com/document/d/1IVM6lpiJ13D2-PVgMJm15R9L2vnDRmvPfX3RWWC3cEk/edit&show> that a 10% per capita VMT reduction is possible with continued working from home. Combined with funding for transit and active transportation, this could make the high VMT reduction estimate from the spreadsheet valid&ndash;i.e. 20 MMT reduction instead of 10 MMT as projected by the Scoping Plan..

Incentivize heavy gasoline users to convert to EVs (e.g. AB 2816). This calculation &ndash;<https://docs.google.com/document/d/1ddP2AoVFNN9nz-IArfwUtAIRnWU-jiWT3B0mKhXcFFM/edit&show> that making sure that heavy users receive priority in subsidies to convert to EVs could be the equivalent of 2 million more EVs, i.e. another 9 MMT reduction. Even though AB 2816 stalled this year, CARB could make this regulatory change without legislation.

Make sure that high speed chargers are plentiful along all major highways and in older urban areas near housing without off-street parking. This will eliminate one of the main concerns that deters EV purchases. Caltrans should consider such installations as part of infrastructure improvements, i.e. part of the its \$17 billion budget.

Provide low cost loans, financed by revenue bonds, using Tariff-on-bill-financing (SB 1112) to ensure that anyone buying an EV will have a place to charge at their home, including multi-family dwellings.

Simplify subsidy and incentives delivery (SB 1230) and generally promote EVs in a very public way.

Steps 1 - 3  
would add  $13 + 10 + 9 = 32$  MMT reductions bringing the total for EV plus VMT reductions to 45 MMT

Steps 4 - 6  
and more like them will help spur the market to achieve rapid adoption of EVs, potentially increasing the reductions from steps 1 - 3.

These steps  
would overcome the 30 MMT shortfall in reductions shown in Table 2.

The  
scientific reality is that the 40% reduction by 2030 is too slow to avoid catastrophic climate disruption. The IPCC estimates that we need at least 50% reduction by 2030. And many scientists are calling for 80% reduction by 2030. With this in mind, achieving the 40% goal in the Scoping Plan is only a step in the right direction, not a complete solution.

Conclusion

Calculations based on assumptions from the Scoping Plan

and PATHWAYS show that the Transportation sector will not achieve the reductions needed to achieve California's climate goals. However, accelerating the transition to EVs, along with other measures to reduce Vehicle Miles Traveled can overcome this shortcoming.

The Scoping

Plan is an ambitious and important document. It lays out what California would need to achieve in terms of GHG reductions to meet State goals. What is missing is a concrete plan with calculated projections to achieve the goals. This is where the ACC II regulations need to step up to fill that need.

The

attached file includes graphics and tables that could not be included in this comment form.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/351-accii2022-AXVUIAdnAD0AdVQk.pdf>'

Original File Name: Transportation Advanced Clean Car comment.pdf

Date and Time Comment Was Submitted: 2022-05-30 14:50:13

No Duplicates.

**Comment 72 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Estella

Last Name: Kessler

Email Address: estellack@aol.com

Affiliation: Si Se Puede Central Valley

Subject: public hearing propsed ca regulations

Comment:

Please do not pass ACC II. This rule is going to cost at least 85,000 jobs. How do we replace those jobs? There is nothing in these rules that create new jobs and you can bet these jobs are going to be blue collar ones. People want a higher minimum wage and I support those efforts but what good is a higher wage if the job is eliminated. There should not be any changed until there is a way to keep or grow the jobs, especially here in the Central Valley..

Estella Lorona-Kessler

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 21:46:05

No Duplicates.

**Comment 73 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Doug

Last Name: Kessler

Email Address: dougkesslerlabor@gmail.com

Affiliation: Si Se Puede Central Valley Exec Dir

Subject: public hearing propsed ca regulations

Comment:

This Plan hurts the working men and women of Central Valley. California is not on track to build enough charging stations that will meet the demand of the mandate, especially in low-income communities throughout the Valley. Our region deserves better- the politicians talk about raising economic opportunities for us and then adopt a plan that will mean higher costs for all working families..

. Doug Kessler

Exec Dir. Si Se Puede

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 21:46:05

No Duplicates.



## **Comment 74 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jeffrey  
Last Name: Roe  
Email Address: jeffr@roeoil.com  
Affiliation:

Subject: CARB Proposed Advanced Clean Cars II Regulations - OPPOSE  
Comment:

May 30,  
2022

California  
Air Resources Board  
1001 I  
Street  
Sacramento,  
CA 95814

RE: CARB Proposed  
Advanced Clean Cars II Regulations &ndash; OPPOSE;  
Dear CARB,

Thank you for the  
opportunity to make a written comment on the CARB Proposed Advanced  
Clean Cars II Regulations.

I am writing this letter in OPPOSITION to the Proposed  
Advanced Clean Cars II Regulations and include my comments in  
opposition to the overall CARB 2022 Scoping Plan Update dated May  
10, 2022 that is being reviewed for future adoption after the  
appropriate periods of comment as required by  
regulations.

With these proposals CARB is on track to adopt major  
regulations over the next few months that have the potential to  
drive businesses out of California, result in job losses, increase  
the cost of living, and spiked energy prices. I am part of the  
larger business community that has deep concerns with CARB's  
proposed 2022 Climate Change Scoping Plan of which the Advanced  
Clean Cars II Regulations are part of. The result of the adoption of these  
regulations

will have far reaching impacts upon on all Californians, dictating  
how they must run their businesses, what cars they can drive, where  
they can live, and what stove they can cook with. Life as we know  
it in California will be altered going forward. Some of the  
major implications for businesses and individuals in California,  
include:&bull; Increasing costs to businesses, especially  
agricultural and transportation sectors.&bull; Employment/Jobs &ndash;  
despite a growing population, these policies will cost California  
over 85,000 jobs.&bull; Higher utility costs disproportionately impacting  
inland and rural communities.&bull; Eliminating consumer choice by mandating  
electric

vehicles, appliances, residential, and commercial  
buildings.&bull; Worsening our electric grid reliability by pushing  
electrification without infrastructure in place, thus increasing  
the likelihood power outages

RE: CARB Proposed Advanced Clean Cars II  
Regulations & OPPOSE

I believe these implications cannot be overstated and in support of this I refer to the following opening statements in the CARB Draft 2022 Scoping Plan Update dated May 10, 2022 and its Executive Summary (Note the draft summary is 277 pages long). I have highlighted the statements that I believe point to the lack of a comprehensive energy and climate policy that should include ALL the best technologies and best practices available now and, in the future, and to consider that there will be improvements to our existing technologies that will make them very viable as part of a truly comprehensive solution that can realistically be sustained. I remind my fellow Californians that the fossil fuel industry is part of the energy solution that has made the United States of America the greatest nation in the world and one that I believe we all take for granted. This industry has required huge amounts of investment capital and manpower to build and sustain.

Any consideration of change in energy policy of this magnitude must include an "ALL available technologies" and "best practices" approach as well as a thorough evaluation and consideration of national security implications.

Executive  
Summary

The 2022 Scoping Plan, once final, will be a major milestone, laying out how the fifth largest economy in the world can get to carbon neutrality by 2045 or earlier. This is the first Scoping Plan that adds carbon neutrality as a science-based guide and touchstone beyond statutorily established emission reduction targets. It identifies a technologically feasible, cost-effective and equity-focused path to achieve carbon neutrality by 2045, or earlier, while also assessing the progress the state is making toward reducing its greenhouse gas (GHG) emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. Previous plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. Carbon neutrality takes it one step further by expanding actions to capture and store carbon including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time. What this means for California is an ambitious and aggressive approach to squeezing the carbon out of every sector of the economy, setting us on course for a more equitable and sustainable future in the face of the greatest existential threat we face, and ensuring that those who benefit from this transformation include those communities now hardest hit by the ongoing use of fossil fuels. The combustion of these fuels has polluted our air, particularly in low-income communities and communities of color, for far too long, and is the root cause of climate change. This Draft Scoping Plan helps us chart the path to a future where race is no longer a predictor of disproportionate burdens from harmful air pollution and climate impacts.

RE: CARB Proposed Advanced Clean Cars II  
Regulations & OPPOSE;

The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating

carbon reduction programs that have been in place here for a decade and a half. That means rapidly moving to zero-emission transportation, electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution. It also means phasing out the use of fossil gas used for heating our homes and buildings. It means clamping down on chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide (CO2).

It means providing our communities with sustainable options for walking, biking, and public transit so that people do not have to rely on a car. It means continuing to build out the solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation. It also means scaling up new options such as green hydrogen for hard to electrify end uses and renewable gas where needed.

It seems to me in reading this proposal that the "electric vehicle" has been christened the industry of choice to succeed the fossil fuel powered internal combustion engine. Many of the statements of facts I believe are

very subjective and would ask if we have indeed considered all the costs of moving to this scenario as outlined in the draft proposal? California is currently and for some time now unable to provide for and sustain its own electrical grid. I remind my fellow citizens that electricity must be produced and generated by another source or many sources. Many of these sources are under attack because they do not meet the current thinking of "the science." Again I would submit we need to use ALL of the resources that we have at our disposal to generate the energy that a growing and prosperous state needs.

Have we really considered the actual cost of this unprecedented approach? "an ambitious and aggressive approach to squeezing the carbon out of every sector of the economy, setting us on course for a more equitable and sustainable future in the face of the greatest existential threat we face, and ensuring that those who benefit from this transformation include those communities now hardest hit by the ongoing use of fossil fuels." Who decided this is the greatest existential threat we face? California will be impacted by the almost complete removal of fossil fuels as one of the main providers of energy for our state if it is not done carefully and with a more thoughtful approach.

I believe the fossil fuel industry is meeting the challenge to produce new products that will meet the requirements of a more clean energy. We do not need to throw out this technology and form of energy to succeed in our goals for a prosperous and clean California.

RE: CARB Proposed Advanced Clean Cars II Regulations & OPPOSE;  
Has the true life-cycle of CO2 emissions really been calculated properly?

1. Vehicle production which includes CO2 emissions released during all vehicle stages of production processes.

- a. This would include the

extraction of raw materials and include the final vehicle assembly.

b.

Where will we get the raw materials from?

This has national security implications.

c.

This includes the production of the truck and the large lithium-ion battery.

2.

Energy production and consumption which includes CO2 emissions released during the production of energy (e.g. the production of electricity at a power plant, or the refining of diesel fuel or gasoline from crude oil).

a.

This would include the CO2 emissions from fuel consumption of the internal combustion engine.

3.

Vehicle disposal and recycling which includes emissions related to the disposal of or recycling of the truck and all its related parts which would include the recycling of any lithium-ion batteries or other technologies to power the vehicle.

a.

Is there a method to completely recycle a lithium-ion battery now or will some of this end up in a landfill?

Good question.

You have been appointed as the gatekeepers for these regulations but you serve every Californian which means you have a huge responsibility to get this correct and look thoroughly at every aspect, not to pick winners and losers. I respectfully request you give careful consideration to the issues I have raised in my comments.

We look forward to a prosperous California in which all stakeholders are fairly represented and all technologies are given an equitable opportunity to participate in the marketplace of ideas and commerce.

Thank you for your consideration.

Respectfully,

Jeffrey M. Roe  
President  
Roe Oil Company, Inc.

Cc:file

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/357-accii2022-VTZQN1AjU2IEXQI5.docx>'

Original File Name: CARB Proposed Advanced Clean Cars II Regulations OPPOSE Comments

dated 053020220 .docx

Date and Time Comment Was Submitted: 2022-05-30 21:49:57

No Duplicates.

**Comment 75 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: michael

Last Name: garcia

Email Address: kanens79@icloud.com

Affiliation: Si Se Puede Central Valley

Subject: public hearing propsed ca regulations

Comment:

Hello, the new ACC II regulations will hurt my family's pocketbook. Our family doesn't have the ability to buy an expensive electric car. While there may be a few years before gas powered cars are illegal, I don't see any lowering in the price of an electric vehicle, and it seems only the wealthy can afford to make this change.  
Michael  
Garcia  
Si SE puede  
Fresno

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 21:46:05

No Duplicates.

## **Comment 76 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lynne

Last Name: Nittler

Email Address: lnittler@sbcglobal.net

Affiliation: Retired teacher

Subject: Advanced Clean Cars II Rule hearing

Comment:

I am concerned about the Advanced Clean Cars II Rule. We need it to be strong to help us transition immediately away from fossil fuel emissions to clean energy vehicles. Each summer the wildfires, drought, and heat waves increase, alerting us that we have no time to spare in making our transition away from gas-powered vehicles. The ARB has the power to speed the transition to address impending climate change by helping us eliminate one of our largest sources of carbon pollution: vehicle emissions. Please act now to eliminate gas-powered vehicles entirely by 2030! View it as a challenging but essential goal.

This rule must include a transition to electric public transportation, an all-electric CA passenger vehicle fleet, and a major push for electric vehicle adoptions throughout the state transportation system. Climate change demands that the transition must happen this decade. Especially consider how to encourage and make feasible the transition to electric vehicles for individuals of all incomes and backgrounds! Leave no one behind. Let's do this right! There are EJ and contamination issues with batteries especially that must be monitored and solved. This will require our best minds to avoid harming the environment or innocent peoples. Your job is challenging, but so worthwhile, and the end result may save us and show others the way. It's worth the effort. Say goodbye to the era of gas-powered transportation and let us all breathe deeply again! Thank you for your attention and hard work on this critical issue.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-30 22:07:32

No Duplicates.





**Comment 77 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Zhao

Last Name: Minggang

Email Address: tbt@customs.gov.cn; usatbtep@nist.gov

Affiliation: Government of China

Subject: Comments from PRC on Proposed Advanced Clean Cars II Regulations  
Comment:

Attached are comments received by the USA WTO TBT Inquiry Point from the Deputy Director General, PR China WTO/TBT National Notification & Enquiry Center.

This proposed rule was notified to the WTO TBT Committee by the USA TBT Inquiry Point and Notification Authority, and distributed by the TBT Committee on 5/9/2022 under the notification symbol G/TBT/N/USA/1860.

The notification symbol is a reference number, similar to a Docket ID, assigned to this CARB action by the Committee on Technical Barriers to Trade (TBT) at the World Trade Organization (WTO TBT Committee), to which our office is obligated to submit certain U.S. proposed rules and related actions that could affect international trading partners. A basic overview of the notification of certain regulatory actions by the USA to the WTO TBT Committee is available at <https://www.nist.gov/standardsgov/usa-wto-tbt-inquiry-point>. Please contact [usatbtep@nist.gov](mailto:usatbtep@nist.gov) with questions.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/361-accii2022-UzAHaVY5WFQHYlc4.pdf>'

Original File Name: CHN\_Comments\_on\_USA1860.pdf

Date and Time Comment Was Submitted: 2022-05-31 06:21:13

No Duplicates.

**Comment 78 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla, Inc.

Subject: Tesla ACC II Comment Support Document  
Comment:

Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035 (ACC II), Tesla respectfully submits the following document in support of its comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/364-accii2022-VjcGYMwNhBDYGm0d.pdf>'

Original File Name: Tesla Comment ACC II Final Redacted Ver 5-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 06:38:52

No Duplicates.

**Comment 79 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla, Inc.

Subject: Tesla ACC II Comments Support Material  
Comment:

Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035 (ACC II), Tesla respectfully submits the following material in support of its written comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/365-accii2022-AHRVNIwuBzhSNQJd.pdf>'

Original File Name: Tesla 2021 Impact Report Pt 1 5-15-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 06:57:32

No Duplicates.

**Comment 80 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla, Inc.

Subject: Tesla ACC 2 Comment Support Material  
Comment:

Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035 (ACC II), Tesla respectfully submits the following material in support of its written comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/367-accii2022-B3NTMFwuUG8KbQhX.pdf>'

Original File Name: Tesla 2021 Impact Report Pt 2 5-15-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 07:01:25

No Duplicates.

**Comment 81 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla, Inc.

Subject: Tesla ACC 2 Comment Support Material  
Comment:

Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035 (ACC II), Tesla respectfully submits the following material in support of its written comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/370-accii2022-AnZSMQByWWZSNVUK.pdf'

Original File Name: Tesla 2021 Impact Report Pt 3 5-15-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 07:04:11

No Duplicates.

**Comment 82 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla. Inc.

Subject: Tesla ACC II Comments Support Material  
Comment:

Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035 (ACC II), Tesla respectfully submits the following material in support of its written comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/371-accii2022-BXFSMQR2WWZXMFUK.pdf'

Original File Name: Tesla 2021 Impact Report Pt 4 5-15-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 07:05:35

No Duplicates.

**Comment 83 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Daniel

Last Name: Barad

Email Address: daniel.barad@sierraclub.org

Affiliation: Sierra Club California

Subject: Sierra Club Members and Supporters Comments

Comment:

Please find comments from more than 1,400 Californians asking for a stronger Advanced Clean Cars II rule.

Sincerely,

Daniel Barad, Senior Policy Advocate, Sierra Club  
California

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/378-accii2022-UjNVMFMxBwtSPQJr.pdf'

Original File Name: ACC II Comments.pdf

Date and Time Comment Was Submitted: 2022-05-31 08:33:41

No Duplicates.

**Comment 84 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Daniel

Last Name: Barad

Email Address: daniel.barad@sierraclub.org

Affiliation: Sierra Club California

Subject: Sierra Club California ACC II Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/379-accii2022-BXYCbVE1UHEAdAhp.pdf'

Original File Name: Sierra Club CA - ACC II Comments .pdf

Date and Time Comment Was Submitted: 2022-05-31 08:36:55

No Duplicates.



**Comment 85 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ameen

Last Name: Khan

Email Address: ameen@envirovoters.org

Affiliation: California Environmental Voters

Subject: California Environmental Voters Comments on Advanced Clean Cars II  
Comment:

Attached is the PDF copy of the comments from California Environmental Voters on the Advanced Clean Cars II rulemaking. If you have any trouble accessing the document, I can be reached at ameen@envirovoter.org.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/380-accii2022-VTZcOwZYBDJWPgB2.pdf'

Original File Name: CA Environmental Voters ACC II Comments .pdf

Date and Time Comment Was Submitted: 2022-05-31 08:33:24

No Duplicates.

**Comment 86 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Kelly

Last Name: Blynn

Email Address: kelly.blynn@state.co.us

Affiliation: Colorado Energy Office

Subject: Colorado state agencies - Advanced Clean Cars II comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/383-accii2022-VzRVPFc6Um5QJABh.pdf'

Original File Name: Colorado ACC II comments - May 2022.docx.pdf

Date and Time Comment Was Submitted: 2022-05-31 09:21:25

No Duplicates.

**Comment 87 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Aaron

Last Name: Lowe

Email Address: aaron.lowe@autocare.org

Affiliation: Auto Care Association

Subject: Auto Care Commem Initiative II

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/386-accii2022-AWUCdgRkADUBc1AP.pdf'

Original File Name: Draft service information comments 5-26.pdf

Date and Time Comment Was Submitted: 2022-05-31 09:52:45

No Duplicates.

**Comment 88 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sarah

Last Name: Sachs

Email Address: ssachs@ceres.org

Affiliation: Ceres

Subject: Businesses Support a More Ambitious ACC II Standard

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/391-accii2022-UzEHdAZ0V20KYgNm.pdf'

Original File Name: Businesses Support a More Ambitious ACC II Standard.pdf

Date and Time Comment Was Submitted: 2022-05-31 11:13:53

No Duplicates.

**Comment 89 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Victor

Last Name: Lopez

Email Address: heather@qs-pa.com

Affiliation: Central Valley Latino Mayors & Elected O

Subject: Comments - Advanced Clean Cars II Regulations

Comment:

The Central Valley Latino Mayors & Elected Officials Coalition represents the farmers and farmworkers who feed our state and nation. Our residents cannot afford a new costly requirement to purchase an electric vehicle. And, we don't have the infrastructure in our cities to support charging vehicles either. How many of our residents have roof-top solar today? Not very many. CARB forgets the entire state is not the Westside of Los Angeles or San Francisco and the vast majority of Californians will struggle under this plan. CARB talks about equity- but this Plan is the exact opposite. We all want clean air and water but this plan is not realistic for our communities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 11:12:30

No Duplicates.

**Comment 90 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Alexia

Last Name: Melendez Martineau

Email Address: amartineau@pluginamerica.org

Affiliation: Plug In America

Subject: Plug In America Member Comments on ACC II

Comment:

Thank you for the opportunity to submit feedback on the proposed Advanced Clean Cars II program. Over 800 Plug In America members from California and Section 177 States have signed onto the statement below. The attached document offers a full list of signees and additional comments from signers.

--

"I'm calling on the Air Resources Board to make the draft Advanced Clean Cars program standard stronger. We need at least 75% new electric car sales by 2030 to meet our clean air goals. And, because families in frontline communities suffer more from air pollution and high gas prices, we need stronger incentives to make pollution-free vehicles more accessible to them. It's your duty to set strong air pollution standards that will save lives. We need bold action. Thanks for the opportunity to share my concerns."

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/394-accii2022-B3dUPl0pUGQBWFQ9.xlsx'

Original File Name: Plug In America Member Commenters on ACC II.xlsx

Date and Time Comment Was Submitted: 2022-05-31 11:25:56

No Duplicates.

## **Comment 91 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: roger

Last Name: braddy

Email Address: rogerwbraddy@gmail.com

Affiliation:

Subject: clean cars 2

Comment:

it goes without saying we all want cleaner air but the force electric vehicles is not the way to do this.

there is only so much lithium to mine from the earth and when thats is gone it is gone. lithium is also needed in medical , glass / ceramics and an array of other feilds.

the other problem arrises is when the replacement batteries cost more than a new car. if you own a car with a dead

battery, you have no choice but to scrap it do to the cost involved. it should also be noted that

mining the materials for these cars will tear the planet up more than drilling a hole for fossil fuels. all though well meaning this plan lacks intellectual foresight and should be abandoned at all costs. thank you

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 12:15:12

No Duplicates.

**Comment 92 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jackie

Last Name: Yeager

Email Address: jackie.m.yeager@cummins.com

Affiliation: Cummins Inc.

Subject: Cummins Inc. comments to ACC II

Comment:

Cummins Inc.'s comments to CARB's proposed Advanced Clean Cars II regulation are attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/396-accii2022-UDMBcl0xVWsAbwNt.pdf'

Original File Name: Cummins comments to CARB ACC II.pdf

Date and Time Comment Was Submitted: 2022-05-31 12:39:24

No Duplicates.



**Comment 93 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Josh

Last Name: Nassar

Email Address: jnassar@uaw.net

Affiliation: UAW

Subject: UAW Comments to CARB on Proposed ACC II Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/397-accii2022-VSBUM10rBAGCZwZp.pdf'

Original File Name: UAW Comments to CARB on Proposed ACC II Regulations.pdf

Date and Time Comment Was Submitted: 2022-05-31 12:49:40

No Duplicates.

**Comment 94 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Marisa

Last Name: Anderson

Email Address: mander51@ford.com

Affiliation: Ford Motor Company

Subject: Comments on Proposed Advanced Clean Cars II Regulations

Comment:

We appreciate the opportunity to provide comments to the proposed ACC II regulation. Please see the attached for detailed comments. Thank you!

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/398-accii2022-VjdSN1Y0VFgBbgZv.pdf'

Original File Name: ACC II Comments Ford \_ Final \_ May 31 2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 13:08:07

No Duplicates.

**Comment 95 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Nick

Last Name: Tamborra

Email Address: [nick.tamborra@vw.com](mailto:nick.tamborra@vw.com)

Affiliation: Volkswagen Group of America, Inc.

Subject: Advanced Clean Cars II Comments by VWGoA

Comment:

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/400-accii2022-AHZdLANIUW0BZghX.pdf>'

Original File Name: VWGoA Adv Clean Cars II Comments 2022-05-31.pdf

Date and Time Comment Was Submitted: 2022-05-31 13:34:08

No Duplicates.

**Comment 96 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jeff

Last Name: Wuttke

Email Address: jeff.wuttke@stellantis.com

Affiliation: Stellantis

Subject: Stellantis' ACC II Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/401-accii2022-AXIAclE1Um0DaQNi.pdf'

Original File Name: Stellantis ACC2 Comments 5\_31\_2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 13:31:38

No Duplicates.

**Comment 97 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Steven

Last Name: Smith

Email Address: steven.d.smith@p66.com

Affiliation: Phillips 66

Subject: Phillips 66 Comments - ACC II Rulemaking

Comment:

Please see attached Phillips 66 comments on the ACC II rulemaking. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/402-accii2022-AnJcMgdvAD9SOARt.pdf'

Original File Name: Phillips 66 Comments - ACCII 05-31-2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:03:27

No Duplicates.

**Comment 98 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Kathy

Last Name: Harris

Email Address: kharris@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: NRDC Comments on ACCII Regulation

Comment:

Attached, please find NRDC's comments on the Advanced Clean Cars II Regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/403-accii2022-UD4GclcyUGBXDIMy.pdf'

Original File Name: NRDC ACC2 Comments 2022.5.31.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:06:44

No Duplicates.

**Comment 99 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Nic

Last Name: Lutsey

Email Address: nicholas.lutsey@gm.com

Affiliation: General Motors

Subject: GM comments on proposed ACC2 regulation

Comment:

General Motors appreciates the continued collaboration with California toward our shared vision of a transportation future with zero tailpipe emissions. We appreciate our opportunity here to offer these comments on the California Air Resources Board's proposed Advanced Clean Cars II regulation.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/404-accii2022-Wj1SOVEPBDQEbQRp.pdf'

Original File Name: GM Comments ACC2 2035 ISOR final.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:05:56

No Duplicates.

## **Comment 100 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Moller

Email Address: david@mollers.us

Affiliation:

Subject: Public Comment: Advanced Clean Cars II Rulemaking

Comment:

Dear CA Air Resources Board, I urge you to restore California's leadership on clean cars by accelerating the state's transition to 100% electric vehicles and strengthening requirements on new gas-powered vehicles. Climate pollution from gas-powered cars and trucks makes up 40% of total greenhouse gas emissions in California. These vehicles are a massive driver of the climate emergency, devastating our state with deadlier, more damaging wildfires, heat waves, and drought. Historically, we've led the nation on setting strong auto emissions standards — but the current clean cars proposal falls short of the climate action we need. If we don't reach 100% zero-emission vehicle sales until 2035, it will be too late for California to meet its goal of carbon neutrality by 2045, since many new vehicles last 20 years or longer. Moving that target to 2030 will give our state a better chance of meeting its climate goals and remaining a global leader on clean cars. And until we reach that target in 2030, California can't ignore the climate-damaging emissions from new gas cars. We need to take immediate action to make sure they emit less pollutants as they drive our roads for decades. This action is also critical to protect the health of communities hit hardest by tailpipe pollution. Cancer-causing vehicle exhaust harms people's health and particularly hurts low-income communities of color near congested freeways. California must lead the way with strong policy solutions to end tailpipe pollution and build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles. We urge you to adopt strong clean car rules that

- 100% zero-emission vehicle sales by 2030.
- 7% annual pollution cuts from gas-powered cars in the meantime.
- Mandatory equity commitments to ensure that communities most affected by pollution benefit from electric vehicles first and foremost.

This transition is a tremendous opportunity to create family-supporting, high-road jobs for Californians. We urge you to seize this moment and adopt nation-leading clean car standards that slash climate pollution, ensure equity, and promote good jobs. Sincerely, Sincerely, David Moller

Larkspur, CA 94939

Attachment: "

Original File Name:



Date and Time Comment Was Submitted: 2022-05-31 14:20:57

No Duplicates.

**Comment 101 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Benjamin

Last Name: Eichert

Email Address: benjamin@greencal.org

Affiliation: Romero Institute

Subject: Comments of Let's Green CA! On the Advanced Clean Cars II Initial Statement of Reason

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/406-accii2022-WzdUNVEzUGILUgZn.pdf'

Original File Name: LGCA ACCII Statement Letter\_053122.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:20:24

No Duplicates.

**Comment 102 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Brian

Last Name: Mello

Email Address: mellob@agc-ca.org

Affiliation: Associated General Contractors of Califo

Subject: Comments on Advanced Clean Cars II Regulation

Comment:

Please see the attached PDF for our written comment, thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/407-accii2022-VjBcM1wzWWsHbQhX.pdf'

Original File Name: FINAL ACC II Comment Letter SIGNED.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:36:26

No Duplicates.

**Comment 103 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Anna Bella

Last Name: Korbato

Email Address: annabella@fermataenergy.com

Affiliation: Fermata Energy

Subject: Fermata Energy Comments in Support of Proposed ACC II Regulations (accii2022)

Comment:

Attached please  
find Fermata Energy's comments in support of the  
Proposed  
Advanced Clean Cars II Regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/409-accii2022-AmRSMVMgVWsDZFAk.pdf'

Original File Name: Fermata Energy Comments to CARB on ACC II Regulations & Hearing.docx.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:48:46

No Duplicates.

**Comment 104 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Noah

Last Name: Garcia

Email Address: ngarcia@aee.net

Affiliation: Advanced Energy Economy

Subject: Comments on Proposed Advanced Clean Cars II Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/410-accii2022-VzZQMwdjVVkBZANi.pdf'

Original File Name: AEE CARB ACC II Letter Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:57:33

No Duplicates.

**Comment 105 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dylan

Last Name: Jaff

Email Address: dylan.jaff@consumer.org

Affiliation: Consumer Reports

Subject: Consumer Reports Members and Supporters Comments

Comment:

Please find comments from over 1,800 Californians supporting a strong Advanced Clean Cars II rule.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/411-accii2022-UDMFYIUmBzYCWwhp.pdf'

Original File Name: CARB ACCII petition.pdf

Date and Time Comment Was Submitted: 2022-05-31 14:08:25

No Duplicates.

**Comment 106 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dylan

Last Name: Jaff

Email Address: dylan.jaff@consumer.org

Affiliation: Consumer Reports

Subject: Consumer Reports CARB ACC II Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/412-accii2022-UjNSN1Q2Ag4GaVI7.pdf'

Original File Name: ACC II Letter 5.31.22.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:04:47

No Duplicates.

**Comment 107 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dean

Last Name: Taylor

Email Address: Deantaylor1@verizon.net

Affiliation:

Subject: Strong Plug In Hybrid Coalition comments on proposed ACC II

Comment:

Filed on behalf of 11 members of the advocacy team at the Strong PHEV Coalition, see attached letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/413-accii2022-VCdRI1UmU28FbQJl.pdf'

Original File Name: Strong PHEV Coalition letter to CARB on ACC II May 31, 2022 vF.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:04:17

No Duplicates.



**Comment 108 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Paul

Last Name: Miller

Email Address: pmiller@nescaum.org

Affiliation: NESCAUM

Subject: Support for the Proposed Advanced Clean Cars II Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/415-accii2022-VDoAY1EjVWVWMVMm.pdf'

Original File Name: NESCAUM\_ACCII\_Public Comments\_20220531.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:13:11

No Duplicates.

**Comment 109 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Matt

Last Name: Haynie

Email Address: shayla@caliberstrat.com

Affiliation: POET, LLC

Subject: POET's Comments On Advanced Clean Cars II Regulations

Comment:

Please find POET's comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/416-accii2022-VmZcbwQrVzcHMAkn.pdf'

Original File Name: 05.31.2022 ACC II Comments Final (1).pdf

Date and Time Comment Was Submitted: 2022-05-31 14:48:24

No Duplicates.

**Comment 110 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Anthony

Last Name: Martinez

Email Address: amartinez@paramountcity.com

Affiliation: City of Paramount, California

Subject: Support Letter for CARB

Comment:

Greetings,

Enclosed is the support letter for CARB from the City of Paramount.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/417-accii2022-AmFWMQZ1UmMEXQV2.pdf'

Original File Name: CARB Support Letter.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:21:06

No Duplicates.

**Comment 111 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sharon

Last Name: Ethridge Chavarria

Email Address: sherryDDC2018@gmail.com

Affiliation: Dinuba Democratic Club

Subject: Clean Cars

Comment:

I live in a farmworker community and I can tell you my family and my neighbors cannot afford this change. Even if we can keep our cars, gas will probably be more expensive with these rules and I worry our jobs will be threatened if farmers have to cut backs to pay for these new rules. I want clean air for my family but I also need to provide for them too and these rules may cost me the ability to do so. I think you should give more time so that electric cars are not so expensive and more jobs can be saved or new ones developed. If not, farmworkers are going to be hurt by this rule.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 15:25:09

1 Duplicates.

**Comment 112 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lindsey

Last Name: Mendelson

Email Address: lindsey.mendelson@mdsierra.org

Affiliation:

Subject: Adopt a Stronger and More Equitable Rule

Comment:

Dear Chair Randolph:

While the proposed Advanced Clean Cars II rule contains many provisions that we support, we urge you to adopt a stronger and more equitable rule. Please find comments from Maryland organizations on the Advanced Clean Cars II Regulation attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/420-accii2022-VTgGZFYIWWsBZARn.pdf'

Original File Name: MD ACCII S.177 letter to send to CARB.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:20:11

No Duplicates.

**Comment 113 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Miranda

Last Name: Chavarria

Email Address: Cmirandapanda@aol.com

Affiliation:

Subject: Clean Cars

Comment:

Thank you for taking the time to read my concerns for the new regulations. As a working parent, I am very concerned about the adoption of the ACC II regulations and what it will mean to my family and other families in the Central Valley. These changes will lead to thousands of lost jobs and billions of dollar to the local economy- I didn't make up these numbers, your own report lists these figures. I think you need to give more time to families like mine who can't afford this change and who are in danger of losing their livelihood at the same time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 15:28:56

No Duplicates.

**Comment 114 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Robert

Last Name: O'Koniewski

Email Address: rokoniewski@msada.org

Affiliation: Mass. State Auto Dealers Assoc.

Subject: CARB's Proposed Advanced Clean Cars II Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/422-accii2022-VzRRNgR3U2IAWQBh.pdf'

Original File Name: CARB ACC II Regs - MSADA Comments - 5-31-22 final.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:32:08

No Duplicates.

## **Comment 115 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: kristine

Last Name: garcia

Email Address: k.garcia199727@gmail.com

Affiliation: Si Se Puede Central Valley

Subject: proposed clean cars regs

Comment:

<u style="color: #222222; font-family: Calibri, sans-serif; font-size: 14.6667px; background-color: #ffffff;">Hello, the new ACC II regulations will hurt my family's pocketbook. Our family doesn't have the ability to buy an expensive electric car. While there may be a few years before gas powered cars are illegal, I don't see any lowering in the price of an electric vehicle, and it seems only the wealthy can afford to make this change.  
Kristine  
Garcia  
Si Se  
Puede

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 15:33:19

No Duplicates.



**Comment 116 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Mariela

Last Name: Ruacho

Email Address: mariela.ruacho@lung.org

Affiliation:

Subject: Comments on ACC II from state lung health advocates

Comment:

Please see the attached letter on behalf of the American Lung Association's state advocates across the US calling on CARB to strengthen and adopt the ACC II rules to improve air quality and health.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/424-accii2022-WjsFblQwBCUFalU2.pdf'

Original File Name: American Lung Assn State Advocacy Staff re ACC2 5.31.22.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:36:59

No Duplicates.

**Comment 117 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Laurel

Last Name: Moorhead

Email Address: lmoorhead@transferflow.com

Affiliation: Transfer Flow, Inc.

Subject: ACCII should be technology neutral.

Comment:

Transfer Flow, Inc. would like to thank CARB for the opportunity to provide public comment. Please see the attached PDF.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/425-accii2022-WjcGYQR8UV0LPldm.pdf'

Original File Name: May 31st, 2022 Advanced Clean Cars 2 Public Comment Signed.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:39:52

No Duplicates.

**Comment 118 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Alexander  
Last Name: Aruj  
Email Address: alex.aruj@gmail.com  
Affiliation:

Subject: The Writing is On the Wall - Support Cleaner Vehicles  
Comment:

Hello, writing from District 4 in Sacramento, I support the advancement of cleaner vehicle technologies, for the reason of public health benefits and the unpredictability of the world oil markets at present.  
As written in the report, the less we can predict, the less we can control.  
We can better control our energy future by controlling the means we use to get around.  
Thanks,

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 15:46:35

No Duplicates.

## **Comment 119 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Robert  
Last Name: Lapsley  
Email Address: brooke@cbrt.org  
Affiliation: California Business Roundtable

Subject: RE: Advanced Clean Cars II Regulation  
Comment:

May 31, 2022

Chair Laine Randolph and Members  
California Air Resources Board  
1011 I Street  
Sacramento, CA 95814

RE: Advanced Clean Cars II Regulation

Working Californians continue to struggle with a cost-of-living crisis that is driving our worst-in-the-nation poverty rate and denying a generation of residents the opportunity of upward economic mobility. Much of the increased costs facing families comes directly from increased energy and transportation costs, especially electricity and gasoline prices. We strongly support the state's climate change goals and are proud of the leadership California businesses have demonstrated in moving forward a national and international dialogue on reducing greenhouse gas emissions. However, it is important as we work toward achieving these goals, we do not do so on the backs of California's working families and those who can least afford it.

Unfortunately, in reviewing the Advanced Clean Cars II Regulation, this proposal will do just that—force those who can least afford it to pay the most, creating a de facto regressive tax. It will also do economic harm, further erode economic upward mobility, and cost the state well-paying jobs. If other states are going to follow California's ambitious lead on these regulations to address climate change, we must lead in a way that shows we can balance economic growth, create jobs, drive economic opportunity, and control costs for working families. The Advance Clean Car II Regulation does not accomplish these goals.

A Regressive Tax on Working Families

The Advanced Clean Cars II Regulation would further drive-up energy and transportation costs, which disproportionately affect those who can least afford them. The Advanced Clean Cars II Regulation would be a de facto regressive tax on working families.

According to the Center for Jobs and the

Economy's April 2022, State Progress on Zero Emissions Vehicle Goals: Q4 2021, "Using data points from the state's recent announcement of the one millionth ZEV sold in the state, direct state and federal subsidies have enabled only 3% of these ZEVs (broadly defined) to be purchased by low income households, while all households—low, medium, and high income—pay for those subsidies directly through higher costs of energy and other goods subject to the greenhouse gas credits, the cost of tax credits and other subsidies, and indirectly through higher vehicle prices (new and used) incorporating the cost of the state and federal regulatory credits."

Beyond the direct cost of ZEV vehicle purchases, the Advanced Clean Car II Regulation fails to recognize the diverse needs of the state and its residents. Due to the state's housing crisis, lower-income families have been forced farther and farther away from their workplace to find affordable housing. These families pay higher transportation costs and higher electricity costs—up to 70 percent higher than affluent coastal residents who can afford to live in more temperate climates and closer to work hubs.

The Advanced Clean Cars II Regulation will impact lower-wage workers in two ways: first, the Regulation ignores the transportation demands on working families by eliminating vehicle options with higher travel ranges; second, it will drive up the cost of ZEVs further out of reach. In fact, the California Department of Finance found that, "the regulations are expected to increase the cost of vehicle ownership by an average of just under \$6,000 per car between 2026 and 2035," largely driven by the higher purchase price of ZEVs and by increased power consumption. Forcing these families to remain in affordable traditional vehicles while gas prices rise even higher will drive up their cost-of-living even higher.

#### A Significant Loss of Jobs and Economic Output

The Advanced Clean Car II Regulation will likely cost California more than 85,000 jobs and result in lower household incomes. Given the myriad other regulations and barriers to business investment in this state, ZEV component manufacturing is not sitting or growing in our state. There will be little to no replacement "green jobs" to account for this significant economic loss. Again, according to the recent Center for Jobs report:

California does have the original Tesla plant, but Tesla chose that location because the closure of NUMMI spun off a vacant automotive plant capable of quick retrofitting, thereby avoiding the state's long and litigious approval processes that otherwise could have delayed the company for years. As the company has expanded, greenfield facilities instead have gone to Nevada, China, Germany, and Texas. Faraday Future continues activities related to opening production at another former automotive parts plant in Hanford, but the company has been proposing capacity in California or Nevada since at least 2014 and continues to encounter both financial issues and turnover in its key management. The company instead now appears to be

pursuing high volume production through a subcontractor in South

Korea. Karma Automotive continues to produce luxury electric vehicles in California, but its overall volume is small compared to other producers and even former Karma executives seeking to launch their own company by resurrecting the DeLorean as a ZEV have chosen to build in Texas instead.

Other California-based companies while maintaining their headquarters here for now, have placed the production side of their operations and its far more numerous jobs and larger tax base elsewhere, including Lucid (Arizona), Mullen (Tennessee), Rivian (Illinois and Georgia), VinFast (Kentucky), Battle Motors (Ohio), Xos (Tennessee), and Fisker (Austria and India) as are suppliers such as CellLink (Texas) and Simwon America (Texas) as they expand to be near the new electric vehicle production centers in the Southeastern and Southwestern states. Others have moved their full operations, including Canoo (Texas and Oklahoma), Noodoe EV (Houston), REE Automotive (Austin), and Envirotech (Arkansas). Still other manufacturers are bypassing California altogether, including Ford (Tennessee and Mexico), GM (Michigan), Hyundai (Alabama), Honda (Ontario, Canada), and Arrival Automotive (North Carolina), along with related facilities such as the Tritium DCFC Ltd. charging station factory (Tennessee) recently showcased by the White House and ZEV parts manufacturers TEKLAS (Georgia) and GEDIA Automotive Group (Georgia). Even electric tugboats intended to comply with the electrification mandates on the state's ports are now being produced in Alabama.

The anywhere-but-California trend extends as well to the batteries that constitute a third or more of the total ZEV cost base. Other than Tesla's Gigafactory in Nevada, current battery pack production is heavily concentrated in China, while battery cell production is heavily concentrated in Japan and South Korea along with China. In 2021, the top three producers—CATL (China), LG Energy Solution (South Korea), and Panasonic (Japan)—accounted for 68.7% of global electric vehicle battery production, while all producers within these three countries produced 93.9%.

This situation is about to change as a number of new battery plants are now being completed (Tesla in Texas) or have been recently announced in the North American market. In addition, Mullen just announced it will begin battery pack assembly at its California facility in Monrovia to fulfill its own needs, but its most recent 10-K filing

also states that it intends to eventually consolidate all manufacturing at its Tennessee facility after that expansion is complete.

As California continues to transform its economy through energy policy, we must ensure that the state is investing in helping employers grow wage-comparable jobs. For example, we cannot replace high-wage energy sector jobs with lower-wage and short-term solar installation jobs. Otherwise, we are eliminating important rungs in the economic ladder, further eroding middle-wage jobs and creating even more instability in our economic outlook.

#### Further Exacerbates Reliance on Foreign Energy Sources

Lastly, the mandate for electric-only vehicles will further increase the state's reliance on foreign countries and a destabilized supply chain structure. The shift to ZEVs not only eliminates a domestic jobs base, it substantially increases dependence on minerals mostly produced in other countries, not only those needed for ZEV batteries but as well for expansion of generation, transmission, and charging capacity to keep them running. As recently acknowledged by President Biden, "China controls most of the global market of these minerals, and the fact is that we can't build a future that's made in America if we ourselves are dependent on China for the materials, the power, the products."

China by itself produces few of these energy-critical minerals other than rare earths and graphite, but mining production currently is concentrated within a few countries to the point that, with the primary exception of nickel, it has been possible for Chinese companies to centralize access to a large portion of current global exported supplies. More critically, processing of those ores consequently is even more concentrated within China.

As stated in the Center for Jobs report:

The key minerals [for ZEVs] are far more concentrated and consequently carry an elevated risk stemming from future trade disruptions, problems arising at the centralized mining and processing locations, and supply chain interruptions such as the current war in Ukraine. As an example, the collapse of a single cobalt mine (Kobato mine in Democratic Republic of the Congo (DRC)) in 1990 as the result of corruption caused prices to nearly double, moderated only by recession in that period. Cobalt prices again nearly doubled in 1992 as riots and looting affected a larger cobalt mining region in the DRC. The risk from centralized commodities is both that prices can rise and that supplies will not flow.

...

The current strained supply conditions from clean energy shifts exacerbated by supply disruptions stemming from pandemic shutdowns in China and from Russian sanctions due to its war on Ukraine have already sent prices soaring for the affected materials. These price spikes in turn have already caused Tesla,

other ZEV producers, and vehicle producers overall to add to inflationary pressures through higher prices. The more narrowly traded but battery critical graphite alone has risen more than a third so far this year. And while recent rises in gasoline prices have renewed concerns over national energy policies, the inflation potential from materials prices—which have ranged up to 10 times higher for lithium than for crude oil—has so far been moderated only by the low national and global market share to date for ZEVs and related vehicles.

The world is feeling the ripple effects of supply chain disruptions that will likely last for years. Beyond the backlog at our ports, shutdowns in China have left hundreds of ships waiting to offload raw materials needed for the production of critical component parts and batteries needed to meet the mandates in the Advance Clean Cars II. This uncertainty and long-term inability to predict market conditions and raw material supply have already caused some ZEV manufacturers to reduce 2022 production projections. We have all seen the impact of supply chain disruptions and the ongoing war in Ukraine have had on inflation and the cost of living. Mandating transportation options that are acutely vulnerable to this short- and long-term instability will only create future unpredictability in the cost, availability and feasibility of ZEV vehicles and supporting technologies and infrastructure.

These risks are all exacerbated by the fact that both the mining and processing of materials essential to the fulfillment of the proposed regulation are concentrated to an extraordinary degree in only a few nations, including copper, class 1 nickel, lithium, cobalt, graphite, rare earth elements, and others. This situation is in sharp contrast to the current environment, in which fuels for the state's overall transportation fleet considered as a whole are far more diversified and to a far greater extent are produced from more stable and more reliant domestic sources.

Adding to these risks, California is not the only entity pursuing these changes. Consequently, there are considerable uncertainties over whether the required materials will be available and at what cost. The International Energy Agency in their May 2021 report *The Role of Critical Minerals in Clean Energy Transitions*, anticipates that demand just from their lower range projections will exceed production from both current mining operations and those now under construction by 2028 for lithium and cobalt, and by 2026 for copper. Other assessments expect nickel demand to exceed supply in 2026 as well. Another recent analysis from BloombergNEF expects cumulative demand to exceed known reserves for lithium, cobalt, and nickel by 2045 under their Net Zero scenario.

If California is going to lead, we have to ensure we are allowing employers to create not just green jobs, but a green job ladder that allows for economic upward mobility seen in the traditional energy, manufacturing and other industry sectors.

For these reasons, we strongly encourage you and



your colleagues to re-evaluate the Advanced Clean Cars II Regulation, which, as written, will drive up the cost of living and force those who can least afford it to pay the most for the state's climate change policies.

Thank you,  
ROBERT C. LAPSLEY  
President

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/428-accii2022-UDNVMQFyByAFXAVm.pdf>'

Original File Name: CBRT Comment Letter ACC II.pdf

Date and Time Comment Was Submitted: 2022-05-31 15:47:55

No Duplicates.

**Comment 120 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jennifer

Last Name: Hernandez

Email Address: jennifer.hernandez@hklaw.com

Affiliation:

Subject: Civil Rights, Equity, and Electric Vehicle Mandates (ACT II)

Comment:

Please see attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/429-accii2022-UydcMIA0BQIVYVJi.pdf>'

Original File Name: The 200 CARB ACT II.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:03:03

No Duplicates.

**Comment 121 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Michael

Last Name: Saragosa

Email Address: michael@qs-pa.com

Affiliation: Vice Mayor- City of Placerville

Subject: ACC II regulations public comments

Comment:

The State's energy agencies just issued a warning our electrical grid lacks sufficient capacity to keep the light on this summer. El Dorado County already is victim to capricious "PSPS" events, and this Plan will only exacerbate our region's blackouts and bring more suffering to residents. Also, we are not close to having the infrastructure necessary to support an all electric future especially when PG&E has failed to upcome infrastructure over decades.

Its simply not realistic to think rural areas have the ability to make this transition in such a short time without massive state investment in hardening and upgrading the grid.

Thank you reading my comments.

Sincerely,

Michael Saragosa- Vice Mayor, City of Placerville

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 16:06:42

No Duplicates.

**Comment 122 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sarah

Last Name: Somorai

Email Address: ssomorai@hmausa.com

Affiliation: Hyundai

Subject: ACC II Comments

Comment:

Thank you for the opportunity to comment on the Advanced Clean Cars II proposal. Please see Hyundai's comments attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/431-accii2022-AmpVKl0pADlSMANi.pdf'

Original File Name: Hyundai ACC II Comments.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:09:06

No Duplicates.

**Comment 123 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Emily

Last Name: Green

Email Address: [egreen@clf.org](mailto:egreen@clf.org)

Affiliation: Conservation Law Foundation

Subject: Joint Comment Letter from New England Groups

Comment:

Please find attached the Joint Comment Letter from New England Groups regarding the Advanced Clean Cars II Regulations. Please contact Emily Green at [egreen@clf.org](mailto:egreen@clf.org) with any questions. Thank you for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/432-accii2022-UD4HZFYgWVUAY1A+.pdf>'

Original File Name: New England States ACCII S.177 letter.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:14:13

No Duplicates.

**Comment 124 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jennifer

Last Name: Hernandez

Email Address: jennifer.hernandez@hklaw.com

Affiliation:

Subject: Civil Rights, Equity, and Electric Vehicle Mandates (ACT II)

Comment:

Please see attached letter, resent with attachment included.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/434-accii2022-UDMHaAdwU2kGbARb.pdf'

Original File Name: Civil Rights, Equity, and Electric Vehicle Mandates (ACT II).pdf

Date and Time Comment Was Submitted: 2022-05-31 16:03:03

No Duplicates.

**Comment 125 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Zoe

Last Name: Bultman

Email Address: zbultman@rivian.com

Affiliation: Rivian

Subject: ACCII Comments - Rivian

Comment:

Please see attached for Rivian's ACC II comments.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/435-accii2022-AXMGaQRzBT9SNQJs.pdf'

Original File Name: Rivian\_ACC2\_ISOR\_Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:21:29

No Duplicates.

**Comment 126 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Amy

Last Name: Lilly

Email Address: amy.lilly@mercedes-benz.com

Affiliation: Mercedes-Benz R&D North America

Subject: Mercedes-Benz AG Comments on ACC II ISOR

Comment:

Dear Chair Randolph,

Mercedes-Benz AG is pleased to submit comments on the Advanced Clean Cars 2 (ACC II) Initial Statement of Reasons (ISOR).

Along with these comments, we are attaching the comments we filed on the FHWA's Development of Guidance for Electric Vehicle Charging Infrastructure Deployment which are referenced in our ACC II ISOR comments.

We look forward to sharing some of what was discussed in our comments during our testimony at the Board hearing. Thank you for your leadership and consideration of our comments.

Amy Lilly

Mercedes-Benz R&D North America

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/436-accii2022-Uz5cP1MgAjIKaQlt.pdf'

Original File Name: Mercedes-Benz ACCII ISOR Comments.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:01:26

No Duplicates.



**Comment 127 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Patty

Last Name: Poire

Email Address: kcfb@kerncfb.com

Affiliation: Kern County Farm Bureau

Subject: Comments Re: ACCII

Comment:

Please accept attached letter as public comments from Kern County Farm Bureau.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/437-accii2022-BWZUMwFyVmdQCVU0.pdf'

Original File Name: CARB\_ACCII Comment Letter Final Signed Draft\_05312022.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:26:09

No Duplicates.

**Comment 128 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Janet

Last Name: Cox

Email Address: janet@350siliconvalley.org

Affiliation: 350 Silicon Valley

Subject: Petition urging accelerated action on ACCII

Comment:

Please review the attached petition, and the comments appended following the names of signers.

Thank you!

Janet Cox  
Legislation/Policy Director  
350 Silicon Valley

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/438-accii2022-BmcAZVEzU2kBbgZZ.pdf'

Original File Name: ACCII\_Petition to CARB.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:24:07

No Duplicates.

## **Comment 129 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Michael  
Last Name: Chiacos  
Email Address: mchiacos@cecmail.org  
Affiliation: Community Environmental Council

Subject: 100% ZEVs by 2030 needed to meet our climate goals and provide ZEV equity  
Comment:

Dear Chair Randolph and CARB  
Board Members,

Community Environmental Council is generally supportive of the Advanced Clean Cars II proposal. However, the Clean Cars II staff proposal does not sufficiently accelerate the ZEV market in California. Please review our attached analysis that provides evidence for the following points:

CARB should set a standard of 100% ZEVs by 2030. This is needed to reach 8 million ZEVs, which are needed to achieve California's 40% reduction in GHGs by 2030 goal.

The staff proposal of 68% ZEVs by 2030 leads to only 5 million ZEVs. This jeopardizes California reaching our climate goals, and may trail automaker ZEV commitments, risking oversupply of credits, as is occurring now. This could reward ZEV laggards and punish ZEV leaders.

Accelerated ZEV targets would yield higher equity results for low-moderate income Californians, who are severely burdened by the high cost of gasoline. They would also more quickly reduce air pollution in Disadvantaged Communities. Lower income Californians need higher ZEV targets so affordable used and leased ZEVs are more quickly available, giving them an alternative to high gasoline prices.

CARB has the power to set ZEV targets beyond what the market is already doing. California is trailing Europe and China in ZEV adoption, and many automakers have already set 100% ZEVs by 2030 goals. Tesla and other ZEV-only automakers are already there. Norway has gone from 5.6% ZEV

sales in  
2013 to 92% ZEV sales in  
2022.

California has 34-ZEV  
related manufacturers and 360 ZEV-related companies ZEVs have grown from zero  
exports to in eight years being  
California's largest export, according to the  
Governor's Office at \$5.6 billion in value in  
2020. California should take a leading stance and set a 100% ZEV by  
2030  
goal.

Sincerely,

Michael  
Chiacos  
Director of Climate  
Policy  
Community Environmental  
Council  
Santa Barbara,  
CA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/439-accii2022-AGNVNgRmV1sKb1U6.pdf>'

Original File Name: CEC comments on Advanced Clean Cars II Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:19:12

No Duplicates.

**Comment 130 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Andy

Last Name: Wunder

Email Address: Awunder@e2.org

Affiliation: E2 (Environmental Entrepreneurs)

Subject: Business Support for an Ambitious Advanced Clean Cars II Program

Comment:

Please see support letter attached.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 16:32:43

No Duplicates.

**Comment 131 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Coreen

Last Name: Weintraub

Email Address: cweintraub@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Petition to Strengthen and Adopt ACCII

Comment:

Thank you for your hard work and the opportunity to comment on the ACCII proposal. We submit this petition signed by 1470 Californians in support of strengthening and adopting the ZEV proposal in ACCII.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/441-accii2022-WzpdOAN2UWsAcFc+.pdf'

Original File Name: Activist Petition ACCII 5-31-2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:39:16

No Duplicates.

**Comment 132 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Coreen

Last Name: Weintraub

Email Address: cweintraub@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Expert Petition to Strengthen and Adopt ACCII

Comment:

Thank you for your hard work and the opportunity to comment on the ACCII proposal. We submit this petition to strengthen and adopt the ZEV proposal on behalf of the 60 California-based scientists and experts who signed it.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/442-accii2022-VDFWKf0sV2EEcA19.pdf'

Original File Name: Expert Petition ACCII 5-31-2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:45:26

No Duplicates.

**Comment 133 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: California Electric Transportation Coali

Subject: Support for ACCII

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/443-accii2022-B2RRNIU4UmQFd1Ix.pdf'

Original File Name: CalETC ACCII June Board Meeting Comments Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:50:41

No Duplicates.



**Comment 134 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Linda

Last Name: White

Email Address: linda.white@bmwna.com

Affiliation: BMW of North America

Subject: ACCII Comments

Comment:

Please find attached BMW of North America's comments on CA ACCII.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/444-accii2022-AGJTOFEnWGUGYQdY.pdf>'

Original File Name: BMWNA ACCII Comments 2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:50:31

No Duplicates.

**Comment 135 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Andy  
Last Name: Wunder  
Email Address: Awunder@e2.org  
Affiliation: E2

Subject: Biz Support for Strong ACC II standard  
Comment:

Please see attachment

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/445-accii2022-BWBVYVULUGIEYVIx.pdf>'

Original File Name: E2\_ACC2\_Biz Support\_May 2022\_Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:52:35

No Duplicates.

**Comment 136 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Chris

Last Name: Bliley

Email Address: cbliley@growthenergy.org

Affiliation: Growth Energy

Subject: Growth Energy Comment

Comment:

Please see the attached comment from Growth Energy.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/446-accii2022-VjUAZ1EiUWBQCQVk.pdf'

Original File Name: CARB\_ACC05312022Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:54:52

No Duplicates.

**Comment 137 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bahram  
Last Name: Fazeli  
Email Address: bfazeli@cbeal.org  
Affiliation: Communities for a Better Environment

Subject: Equity Comments  
Comment:

Hi,  
Attached please find the comments from the equity community on  
ACC II and ACF.  
Regards,  
Bahram Fazeli  
Policy Director, CBE

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/447-accii2022-VD5UPVI6WWQKeAZZ.pdf'

Original File Name: Joint ACC II and ACF Sign-on Letter 5-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:53:11

No Duplicates.

**Comment 138 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Catherine

Last Name: Boland

Email Address: cboland@mema.org

Affiliation: MEMA

Subject: MEMA Comments on Proposed Advanced Clean Cars II Regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/448-accii2022-B2EAb1c4V2VVPwVa.pdf'

Original File Name: Final MEMA Comments to CARB ACC-II Proposal May 31 2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 17:00:39

No Duplicates.

**Comment 139 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Angela  
Last Name: Dykema  
Email Address: angie.dykema@gmail.com  
Affiliation: Nevada Clean Cars Coalition

Subject: Advanced Clean Cars II Regulations  
Comment:

Please accept the attached letter from the Nevada Clean Cars Coalition regarding the Advanced Clean Cars II Regulations.

Thank you,  
Angie Dykema  
Nevada Clean Cars Coalition  
angie.dykema@gmail.com

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/449-accii2022-BWsBYlQjUWMAYgJj.pdf'

Original File Name: Nevada Clean Car Coalition ACCII S.177 letter.pdf

Date and Time Comment Was Submitted: 2022-05-31 16:57:14

No Duplicates.

**Comment 140 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Valero

Subject: Valero Comments on proposed ACC II rule

Comment:

Please find attached comments submitted on behalf of the Valero family of companies.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/450-accii2022-AHYCaAZoUI4HYAhr.zip'

Original File Name: VLO ACC II Comments 05-31-2022.zip

Date and Time Comment Was Submitted: 2022-05-31 17:09:52

No Duplicates.

**Comment 141 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Julie

Last Name: Tighe

Email Address: jtighe@nylcv.org

Affiliation: NY League of Conservation Voters

Subject: ACC II Clean Cars rule

Comment:

See attached letter on the Advanced Clean Cars II rule from the New York League of Conservation Voters and Sierra Club Atlantic Chapter.

Thank you -

Julie

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/452-accii2022-UjwCfVYIADIKb1Mw.pdf'

Original File Name: NY ACCII S.177 letter to send to CARB.pdf

Date and Time Comment Was Submitted: 2022-05-31 17:15:00

No Duplicates.



## **Comment 142 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Tricia

Last Name: Stever Blattler

Email Address: pstever@tulcofb.org

Affiliation: Tulare County Farm Bureau

Subject: Oppose Electrification of all Vehicles

Comment:

Tulare County Farm Bureau represents approximately 1100 farms and ranches, and member families in Tulare County. We are very concerned about the CARB's proposal to advance electrification of all vehicles in the coming years, we believe it will come at great expense to the rural communities and farm economy of California and hinder the safe distribution of food and farm products across the nation and globe. These rules deepen inequality, particularly in rural and farm regions of California where electric infrastructure is already substandard, and grid capacity is not set up to support every farm, ranch, home, and business utilizing electric vehicles.

As California tries to recover from the impacts of COVID-19, we are now met with another challenge &ndash; unprecedented energy costs. Californians are paying for all forms of energy because of the climate design of our state. It is no doubt that climate change needs to be addressed, but the Advanced Clean Cars II (ACC II) rulemaking will only make our energy problems worse. Families and businesses are affected by inflation, and ACC II will increase rising costs for necessities that produce and ship our food.

We all want

to do our part to lower emissions, but this is the wrong way to go about it. Bans and mandates aren't feasible for most of California, especially farmers who will have to make a drastic shift in all their equipment needed to grow and transport food safely and in a timely manner.

Farmers have

already made their pledge to address the climate crisis by adjusting such as growing more with less water and reducing greenhouse gases. They've also made changes to using better soil that increases carbon capture, thus reducing emissions. ACC II will make the agriculture community collateral damage instead of joining forces.

Rural towns

do not have the infrastructure to support drastic electrical changes, and in the end the small farms will eventually be cut out. The state wants to reduce "vehicle miles travelled" by 22% by 2045 and would hit people living and working in rural areas harder &ndash; especially agricultural workers, who would need to some place to charge EVs.

Californians

are already feeling the burden of inflation with higher grocery bills. Not only will this mandate raise inflation, but it could add to food insecurity all over the state. The California grid can

barely support our current energy usage. Forcing farmers to rely on that grid for transportation will increase energy usage and power outages. Power outages would mean transportation will be interrupted, and most food is perishable. These factors ultimately raise the cost of food to pay for higher energy consumption and food scarcity.

#### Public Safety

Power shutoffs during times of emergencies, forest fires, and other catastrophic disasters could mean that Californians would not have access to charge their electric vehicles to escape and evacuate from areas of disaster. Low income communities, many situated here in the San Joaquin Valley could be impacted disproportionately by these changes.

#### Commerce

between states, and trucks taking California ag (perishable) commodities to out of state distribution centers would be adversely impacted by the lack of charging stations across other states, the onerous rules governing Electronic Driver Logs, and hours drivers can log each day, and could make perishable shipments face countless delays that could cause crops to be damaged or harmed in shipment.

We urge you to

consider whether: consumers will be able to buy the cars they need, and can afford, on the schedule outlined to get to where they need to go; whether car manufacturers can build the cars and offer them for an affordable price given supply chain constraints; how increasing utility rates across the state (and at different) rates will affect affordability; how the build-out of EV charging will be done equitably, especially in rural areas; and how California's electric grid can reliably meet the energy demands expected.

#### Climate

polices need to be technology neutral and cost-effective for everyone to be able to participate in the fight against climate change. The protection of California's agriculture community is a necessity, as they are a key element for the wellbeing and survival of Californians.

A coalition of groups & individuals known as Energy IDEAS states: the regulation could potentially reduce personal income by \$15 billion dollars, car ownership would increase by \$6,000 per car, economic output could be reduced by as much as \$22.7 billion, and low income communities will carry a disproportionate burden of these costs. Food security and affordability will be negatively impacted, and small businesses will pay a huge price along with 85,000 jobs that could be impacted or eliminated by a shift to electrification of all motor vehicles.

We urge you to think about the impact to farms in California, rural Californians, low income and elderly who cannot and will not be able to afford electric cars in the next two decades.

This is not a workable solution for many reasons outlined above.

Thank you,

Tricia Stever Blattler

Executive Director

Tulare County Farm Bureau

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 17:04:44

No Duplicates.

**Comment 143 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Andy

Last Name: Su

Email Address: [asu@edf.org](mailto:asu@edf.org)

Affiliation: Environmental Defense Fund

Subject: EDF Comments on ACCII

Comment:

Attached, please find EDF's  
comments and supporting  
attachments on the Advanced Clean  
Cars  
II Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/454-accii2022-BWBVNwdgU19RNIMw.zip>'

Original File Name: EDF ACCII comments and attachments.zip

Date and Time Comment Was Submitted: 2022-05-31 17:14:55

No Duplicates.

**Comment 144 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Clean Fuels Developm

Last Name: (CFDC)

Email Address: cfdcinc@aol.com

Affiliation:

Subject: Comments of Clean Fuels Development Coalition on ACC II Proposal

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/455-accii2022-UjFXN1UwBDRSCwhp.pdf'

Original File Name: CFDC ACC II Comments (FINAL).pdf

Date and Time Comment Was Submitted: 2022-05-31 17:26:19

No Duplicates.

**Comment 145 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ruben

Last Name: Aronin

Email Address: rubenaronin@gmail.com

Affiliation: CA Business Alliance for a Clean Economy

Subject: CA Business and Labor Groups Support Strong Equitable ACC II

Comment:

On behalf of the Los Angeles Business Council, Cleantech San Diego, Jobs to Move America, Coalition for Economic Survival, Long Beach Sustainable Business Network and the California Business Alliance for a Clean Economy, and the members we represent, we submit the following comments. We applaud the 100% ZEV sales requirement in 2035 but urge CARB to strengthen its proposal to accelerate the creation of hundreds of thousands of good paying job by increasing ZEV sales to at least 75% in 2030 and by ensuring equitable deployment of zero emission vehicles into frontline communities most impacted by air pollution from vehicles.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/456-accii2022-VDZQIwd1AzlSOgNm.pdf>'

Original File Name: Business ACC II Sign-on Letter.pdf

Date and Time Comment Was Submitted: 2022-05-31 17:23:55

No Duplicates.

**Comment 146 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Manuel

Last Name: Cunha, Jr.

Email Address: mcunha@niseifarmersleague.com

Affiliation: Nisei Farmers League

Subject: Proposed Vehicle Emissions and Zero Emission Vehicles

Comment:

Nisei

Farmers League strongly opposes the proposed CARB Emission Standards and the zero emission vehicle standards being proposed. This plan puts our food security at risk. Farmers and Californians can't afford energy shutdowns if they are forced to rely on electric vehicles and equipment. Californians rely on farmers to transport food and get them to market in the most efficient way. This plan increases food costs when Californians are already dealing with record inflation. The last thing farmers, ranchers and California's agriculture workers need are new energy rules and unrealistic mandates that don't fit with rural communities. We strongly urge you to reconsider this proposal.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 17:39:07

No Duplicates.

**Comment 147 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autosinnovate.org

Affiliation:

Subject: EV Manufacturers Letter on Battery Durability

Comment:

Please find the attached letter signed by 15 automakers (EV-only and those transitioning) on the proposed ACC II Battery Durability requirements.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/459-accii2022-BmMBcVQKVWtQNwVr.pdf>'

Original File Name: EV Manufacturers Letter to CARB on Battery Durability.pdf

Date and Time Comment Was Submitted: 2022-05-31 17:51:44

No Duplicates.



## **Comment 148 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Josue  
Last Name: Aguilar  
Email Address: jaguilar@nrdc.org  
Affiliation: Natural Resources Defense Council

Subject: NRDC Public Comment Submission  
Comment:

Dear California Air Resources  
Board:

Please accept these 2,238 public comments from members and online activists of the Natural Resources Defense Council (NRDC) supporting you to adopt the Advanced Clean Cars II Rule (ACCII), requiring 100% of new vehicle sales be electric by 2035. Transportation is the largest source of emissions contributing to climate change, and this rule is one of the best ways to tackle this problem.

As California residents, we support adopting the Advanced Clean Cars II Rule (ACCII), requiring 100% of new vehicle sales be electric by 2035. Transportation is the largest source of emissions contributing to climate change, and this rule is one of the best ways to tackle this problem.

We're already seeing more extreme wildfires and heat waves and they're only expected to get worse unless we take immediate action. Californians can't wait as our health, safety, communities, and environment are all jeopardized.

ACCII will also create new jobs, improve our air quality, and protect Californians from the volatility of gas prices at the pump. It's a win for our environment, health, and economy.

We urge you to ensure that the state moves to adopt these critical standards as soon as possible.  
Thank you!

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/460-accii2022-UT8GcgFkU2MAWQR0.xlsx'

Original File Name: NRDC Public Comments.xlsx

Date and Time Comment Was Submitted: 2022-05-31 17:50:35

No Duplicates.

**Comment 149 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Pete

Last Name: Slowik

Email Address: peter.slowik@theicct.org

Affiliation: ICCT

Subject: ICCT comments on proposed ACC II regulations

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/461-accii2022-BWxcOQZkUnVXDgJy.pdf'

Original File Name: ICCT public comments on ACC II 5.31.2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 18:02:18

No Duplicates.

**Comment 150 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Michael

Last Name: Lord

Email Address: michael.lord@toyota.com

Affiliation: Toyota Motor North America

Subject: Toyota's ACC2 Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/463-accii2022-UDECZ1AyWDlRCFIm.pdf'

Original File Name: ACC2 Toyota Comments.pdf

Date and Time Comment Was Submitted: 2022-05-31 18:21:50

No Duplicates.

**Comment 151 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sara

Last Name: Wright

Email Address: saraw@oeonline.org

Affiliation:

Subject: Oregon NGOs letter to CARB on Advanced Clean Cars II

Comment:

Please find attached a joint letter from Oregon organizations concerned about climate and air quality.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/464-accii2022-VTpWlgBkUWUKYwZo.pdf>'

Original File Name: Oregon ACCII S.177 letter to CARB.pdf

Date and Time Comment Was Submitted: 2022-05-31 18:27:47

No Duplicates.

**Comment 152 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Neil

Last Name: Koehler

Email Address: neil.koehler@kbe-llc.com

Affiliation: Renewable Fuels Association

Subject: RFA comments on ACC II Proposed Regulation

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/465-accii2022-UiBXNwdnBwtSNQJh.pdf'

Original File Name: RFA ACCII Regulation Comment Letter 05-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 18:38:59

No Duplicates.

**Comment 153 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Dr. Kuldip

Last Name: Thusu

Email Address: kthusu@gmail.com

Affiliation: Dinuba City council memeber

Subject: proposed clean cars regs

Comment:

CARB's latest ACC II proposed regulations hurt Central Valley families by forcing underserved communities into electric cars they cannot afford, and our region seriously lacks the infrastructure for an electric future. These regulations will also fallow thousands of acres of farmland and cost the local economy over a \$1 billion. Those impacts will mean job losses for those who can least afford it: our farmworker community. These ACT II regulations should be rejected and a new process be put in place that doesn't create an economic nightmare for the Valley.

Dr Kuldip

Thusu

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 19:24:44

No Duplicates.

**Comment 154 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Daniel

Last Name: Witt

Email Address: danielwitt@lucidmotors.com

Affiliation: Lucid Group, Inc.

Subject: Lucid Motors CA ACCII Comments

Comment:

Please see the attached file for comments from Lucid Motors on California's ACCII Rulemaking.  
Daniel Witt

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/468-accii2022-UDxSIVMxBz0DYVMM.pdf>'

Original File Name: Lucid\_ACCII\_Comments\_5.19.22 FINAL.pdf

Date and Time Comment Was Submitted: 2022-05-31 19:31:26

No Duplicates.

**Comment 155 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autosinnovate.org

Affiliation: Alliance for Automotive Innovation

Subject: Auto Innovators Comments on ACC II

Comment:

Attached are our comments on the ACC II regulatory package.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/469-accii2022-BmdcL1UgADwBWAVs.zip'

Original File Name: Auto Innovators ACC II Comments.zip

Date and Time Comment Was Submitted: 2022-05-31 19:40:36

No Duplicates.



**Comment 156 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Bahram

Last Name: Fazeli

Email Address: bfazeli@cbeal.org

Affiliation: Communities for a Better Environment

Subject: Equity and EJ Comments on ACC II

Comment:

Make the regulation stronger for Equity and Environmental Justice

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/470-accii2022-Vz1SO1U9WGUAcgRb.pdf'

Original File Name: Joint ACC II and ACF Sign-on Letter 5-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 20:16:23

No Duplicates.

**Comment 157 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jason

Last Name: Pfeifle

Email Address: jpfeifle@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: California Needs a Stronger & Equitable Clean Cars Rule

Comment:

To Whom It May Concern,

I'd like to submit the attached comments from 4,099 individuals calling for a stronger and equitable clean cars rule. Thank you for your consideration.

Sincerely,

Jason Pfeifle

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/471-accii2022-BWZUM1c6WGRMQdo.xlsx'

Original File Name: California Needs Strong Clean Car Rules (5.31.22).xlsx

Date and Time Comment Was Submitted: 2022-05-31 20:42:33

No Duplicates.

**Comment 158 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Justin

Last Name: Wilson

Email Address: justin.wilson@chargepoint.com

Affiliation: ChargePoint, Inc.

Subject: ChargePoint, Inc. Comments on Proposed Advanced Clean Cars II Regulations  
Comment:

Please see attached.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/472-accii2022-ATNVYwQ3VDUANgQx.pdf'

Original File Name: 20220531 ACCII Comments Final.pdf

Date and Time Comment Was Submitted: 2022-05-31 20:45:33

No Duplicates.

**Comment 159 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jason

Last Name: Pfeifle

Email Address: [jpfeifle@biologicaldiversity.org](mailto:jpfeifle@biologicaldiversity.org)

Affiliation: Center for Biological Diversity

Subject: California Needs a Faster, Equitable Shift to 100% EVs

Comment:

To Whom It May Concern,

On behalf of the 63 undersigned organizations, I'm submitting the attached letter for public comment regarding the proposed ACC II rule. Thank you for your consideration.

Sincerely,

Jason Pfeifle

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/474-accii2022-WjkCaFczWGoHbwRb.pdf'

Original File Name: Clean Cars Letter to CARB re ACC II (May 2022).pdf

Date and Time Comment Was Submitted: 2022-05-31 20:49:26

No Duplicates.

**Comment 160 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: John

Last Name: Truillo

Email Address: JohnT@cityof selma.com

Affiliation: selma city council

Subject: clean car regs

Comment:

The  
working families in the Central Valley deserve better than the  
current plan recommends. As a local elected official, I know  
first-hand the struggles of my residents and the underserved  
families of the region Our region deserves better- the politicians  
talk about raising economic opportunities for us and then adopt a  
plan that will mean higher costs for all working  
families. We can do better- lets protect Valley  
residents and adopt a plan that doesn't hurt the very people  
it purports to help.

John

Trujillo

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 20:25:52

No Duplicates.

**Comment 161 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Daniel

Last Name: Parra

Email Address: dparra@gmail.com

Affiliation: Fowler City council

Subject: public hearing proposed ca regulations

Comment:

The working families in the Central Valley deserve better than the current plan recommends. As a local elected official, I know first-hand the struggles of my residents and the underserved families of the region Our region deserves better- the politicians talk about raising economic opportunities for us and then adopt a plan that will mean higher costs for all working families. We can do better- lets protect Valley residents and adopt a plan that doesn't hurt the very people it purports to help.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 21:12:33

No Duplicates.

**Comment 162 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jim

Last Name: Verburg

Email Address: jverburg@wspa.org

Affiliation: WSPA

Subject: WSPA-AFPM-CIPA Joint Comments on ACCI Regulation ISOR

Comment:

The Western States Petroleum Association (WSPA), American Fuel & Petrochemical Manufacturers (AFPM) and California Independent Petroleum Association (CIPA) are pleased to provide comments on the Advanced Clean Cars II Regulation (ACC II) Initial Statement of Reasons (ISOR). As stated in our cover letter, please reach out if you have any questions about any of our comments.

Sincerely,

Jim Verburg

WSPA

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/477-accii2022-AHcAdQBxBDZSeVc2.pdf'

Original File Name: WSPA-AFPM-CIPA\_ACC II ISOR Comment Letter\_05-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 21:10:14

No Duplicates.

**Comment 163 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ruben

Last Name: Guerra

Email Address: rguerra@lbausa.com

Affiliation: Chairman & CEO Latin Business Assoc

Subject: ACC II regulations public comments

Comment:

The LBA has a long history of supporting California's green economy. We are disappointed CARB did not take a more measured approach in their Scoping Plan. We represent small Latino businesses throughout the state and this plan does not provide a realistic bridge for those we can least afford transitioning to a ZEV. We call on the CARB Board to provide more time and more resources so communities of color can have the just transition they deserve.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 21:19:41

No Duplicates.



**Comment 164 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Elise

Last Name: Oliver

Email Address: eoliver@calapple.org

Affiliation:

Subject: Comments on ACC II

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/479-accii2022-AW1WNQB1AyQFZIIg.docx'

Original File Name: Letter to CARB Board.docx

Date and Time Comment Was Submitted: 2022-05-31 22:00:25

No Duplicates.

## **Comment 165 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Tim

Last Name: Allison

Email Address: t.allison83@gmail.com

Affiliation:

Subject: Comments on Advanced Clean Cars II Regulation

Comment:

I strongly encourage a shift on how we are approaching this move to the elimination of tail pipe emissions. California's don't need more mandates and regulation; we need encouragement and incentive. To truly solve this problem, it needs to be the choice of the consumer to purchase in a manner that will achieve the goal of this proposed regulation. The two biggest factors in this decision are financial and uncertainty. When choices/competition is eliminated, price goes up. If this regulation passes, in the 13 years when it takes effect, the state will have a decrease in gas tax revenue that will likely lead to two uncertain outcomes. First, an increase in the gas tax therefore further burdening low-income family as most can't afford an EV alternative or second, another tax to compensate for the lost revenue. There are other drawbacks to such a hasty implementation such as: overwhelming the fragile and vulnerable power grid, lack of a feasible network of charging stations to travel beyond the vehicles range (keep in mind that Californians will want to travel outside of the state), supply chain issues which again will limit the manufacture's ability to offer more choices and the sharp increase for the demand of electric vehicles will obliterate the supply chain of rare metals for the batteries, and a lack of utilitarian choices (i.e. Trucks, SUV's, vans). The regulation as it stands has its environmental benefits, but it strips Californians of their choices and forces them into something they may not desire so therefore I would encourage a different approach to achieve the goal of this regulation. Thank you for your time and consideration.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 21:42:51

No Duplicates.

**Comment 166 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Ed

Last Name: Burgess

Email Address: [vgicregulatory@vgicouncil.org](mailto:vgicregulatory@vgicouncil.org)

Affiliation: Vehicle Grid Integration Council

Subject: Comments of Vehicle Grid Integration Council

Comment:

Attachment: "

Original File Name: Comments of VGIC on Final Proposed ACC II Regulations.pdf

Date and Time Comment Was Submitted: 2022-05-31 22:19:28

No Duplicates.

**Comment 167 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Madeline

Last Name: Oliver

Email Address: madeline@betterworldgroup.com

Affiliation: Better World Group

Subject: Comments from the California Clean Cars Coalition

Comment:

On behalf of more than 45 California environmental justice, health, labor, scientific, business, faith and environmental organizations, please find our comments on the historic Advanced Clean Cars II rule. While we applaud the 100% ZEV sales requirement in 2035, we urge CARB to fully realize the health, environmental, equity and economic benefits of accelerating the ZEV requirements to at least 75% of new sales by 2030 and by ensuring automakers participate in the equity credit incentive program without creating trade-offs between ZEV access and air quality and climate benefits.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/482-accii2022-AWBTNlw+BQlSPVQ9.pdf>'

Original File Name: ACC II Coalition Sign-on Letter 5-31-22.pdf

Date and Time Comment Was Submitted: 2022-05-31 22:16:21

No Duplicates.

**Comment 168 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Suzanne

Last Name: Hume

Email Address: s@cleaneearth4kids.org

Affiliation: CleanEarth4Kids.org

Subject: Comment on Advanced Clean Cars II Regulations

Comment:

Our comment is attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/483-accii2022-AWIBawNnBDYGblM2.pdf'

Original File Name: CleanEarth4Kids.org CARB Clean Cars Comment May 31 2022.pdf

Date and Time Comment Was Submitted: 2022-05-31 22:42:00

No Duplicates.

## **Comment 169 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Joyce  
Last Name: Dillard  
Email Address: dillardjoyce@yahoo.com  
Affiliation:

Subject: Advanced.Clean Car Proposed Regulations due 5.31.2022  
Comment:

We cannot comprehend the Economic Impact, Infrastructure Requirements, and Bond Requirements for implementation.

What Capitalization would be needed for both private and public.

What model is being used for the timeline. How is the GDP Gross Domestic Product being overlaid. What demographics are used. Are you using Census data. What is the impact on the manufacturers. What is the projected retail cost to the consumer.

What are other state's requirements-now and proposed. How does this effect the power industry-instate and outstate.

From where is the generation of resources derived for power supplies to implement these regulations. Is the timeframe realistic to the costs and to the implementation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 22:29:16

No Duplicates.

**Comment 170 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Christina

Last Name: Heartquist

Email Address: christina@sunstonestrategies.org

Affiliation:

Subject: Comments from Public to CARB on Draft ACCII

Comment:

More than 25 people reached out through the Clean Cars Campaign website to support the strongest possible EV sales targets and mandatory equity provisions in the Advanced Clean Cars program update.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/486-accii2022-BTNAWwNhQIRZrp1.pdf'

Original File Name: ACCII CleanCarStates.org Submissions.pdf

Date and Time Comment Was Submitted: 2022-05-31 22:50:30

No Duplicates.

**Comment 171 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS comments on the proposed ACCII Regulations

Comment:

Thank you for the opportunity to comment on the proposed ACCII regulations. Please see the attached document for detailed comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/487-accii2022-BWRWMwNhBGUHXgVw.pdf>'

Original File Name: ACC2 UCS Comments.pdf

Date and Time Comment Was Submitted: 2022-05-31 22:48:17

No Duplicates.



**Comment 172 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Comments on the proposed ACC II regulations

Comment:

Please see the attached comments on the proposed ACC II regulations from the Union of Concerned Scientists.  
Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/488-accii2022-VjcGYwNhWTgLUIUg.pdf'

Original File Name: ACC2 UCS Comments - corrected.pdf

Date and Time Comment Was Submitted: 2022-05-31 23:12:11

No Duplicates.

## **Comment 173 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Brian

Last Name: Kalina

Email Address: brian.kalina@gmail.com

Affiliation:

Subject: Renewable fuel ICE can and should play a key role in attaining net zero emissions

Comment:

Dear Board,

First, let me say thank you

for your much appreciated efforts to minimize both greenhouse gas (GHG) and criteria pollutant emissions from the transportation sector. Future generations stand to reap ample benefit from your work.

I am aligned with your

mission to attain net zero / near net zero emissions from the transportation sector. I however strongly encourage you to include renewable fuel internal combustion engine vehicle (ICEV) technology as an important enabler for your goals. In my own personal and professional studies of the last 15 years, I continue to come across increasing evidence that pursuing a mix of clean transportation solutions and not just battery-electric alone will lead to greatest environmental, economic, and geopolitical sustainability. I am concerned that mandating battery-electric vehicles (BEV) sales to a near all-encompassing extent will create a host of issues, which include:

- Increase in adverse

environmental impact during vehicle manufacturing, especially for battery manufacturing

- Stressing beyond capacity

aspects of the environment which are adversely impacted by battery raw materials extraction

- Political conflict which

may arise from overreliance on battery raw materials which can only be sourced from certain world regions

- Permanent reduction in the

portion of the workforce which depends on automobile production and servicing; here I will note that because BEVs do not use as many parts as ICEVs, and because these parts power jobs, a net reduction in jobs tied to the auto industry will prove inevitable if a near full transition to BEV is mandated

- The decimation of the U.S.

biofuels industry, an industry which would otherwise be poised to greatly assist in bringing to fruition your net zero GHG emissions goals

- Exacerbation of personal

financial hardship due to BEV battery degradation and this leading to lower BEV resale value than that of a comparable

ICEV

As a means to help protect

against some of these issues, I strongly encourage you to adopt regulations guided by life cycle assessment (LCA) emissions analysis. Unlike regulations which only consider tailpipe

emissions, LCA based regulations account for the full scope of vehicle environmental impact. To only focus on tailpipe emissions is to discount very important big picture environmental factors such as the carbon net negativity offered by ICE renewable fuels production, adverse environmental impact of BEV and battery production, and adverse environmental impact of electricity production for BEV propulsion.

In considering the net carbon neutrality capabilities offered by the utilization of ICE renewable fuels, the ability of modern ICE emissions controls to attain near zero emittance of criteria pollutants, and the likely underestimated adverse environmental impact of BEV manufacturing and electricity generation required for BEV propulsion, I strongly recommend against broad sweeping BEV mandates which may not adequately anticipate certain consequences of such mandates. I again strongly encourage the Board to empower the use of modern renewable fuel ICE technology for the benefit of our communities.

Thank you for considering my message, and thank you for your continued commitment to protecting so much of what the people of California, CARB states, and the U.S. have come to cherish.

Kind regards,  
Brian Kalina

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-05-31 23:56:13

No Duplicates.

**Comment 174 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: David

Last Name: Patterson

Email Address: patterson@chademo.org

Affiliation:

Subject: CHAdEMO Association comment regarding ACC II ISOR

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/490-accii2022-UTxRNIQsBQIRZVNk.pdf'

Original File Name: May 27 2022 CHAdEMO ISOR Comments dnp .pdf

Date and Time Comment Was Submitted: 2022-05-31 23:52:57

No Duplicates.

## **Comment 175 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Doug  
Last Name: O'Malley  
Email Address: domalley@environmentnewjersey.org  
Affiliation: Environment New Jersey

Subject: Advanced Clean Cars II Comments Environment New Jersey  
Comment:

May 31, 2022

Chair Randolph and Members of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph: On behalf of the more than 80,000 citizen members and activists of Environment New Jersey across the Garden State, we are writing to thank you for California's continued leadership to accelerate the transition to zero emission vehicles by setting strong standards that states like ours can also adopt. We join many allies across the nation and across the state, including our long-term partners, the Sierra Club, which these comments are derived from.

New Jersey has had a long history with the Clean Cars program, becoming the first state to join the program through legislative action in early 2004, which helped spark an additional seven states to join the Clean Cars program and then led to federal action by the Obama Administration EPA in 2011. At the time of its original passage, New Jersey air quality was plagued by both particulate matter and ground level ozone. While we have seen improvements in our particulate matter rankings in the annual American Lung Association State of the Air report, mainly because of reduction in out-of-state stationary source pollution, our ground level ozone — and our failing scores in the ALA annual report — have remained constant.

It has been especially painful reminder of the impact of air pollution when Harvard School of Public Health Research showed early in the COVID-19 pandemic that air pollution — especially in urban communities — served as a vector for the spread of the virus. Even with the passage of New Jersey's Electric Vehicle omnibus legislation in January 2020, we still need to do more to jumpstart a fuller transition to an electric vehicle and electric vehicle future.

While the proposed Advanced Clean Cars II rule contains many provisions that we support, we urge you to adopt a stronger and more equitable rule. This regulation is one of the

most significant opportunities to address the number one source of dangerous air and climate pollutants in the nation and will make us less reliant on expensive and volatile fossil fuels that wreak havoc on our family budgets and economy.

Families on a budget spend as much as 20% of their income on fuel, and that's likely more with gasoline still hovering above \$4 a gallon nationwide and reaching more than \$5 a gallon in many counties across New Jersey currently. And, the latest IPCC report says we are running out of time to take bold action on the climate crisis that disproportionately impacts frontline communities, including low-level urban communities in Camden, Paterson, Elizabeth, Atlantic City, Newark and Jersey City which have been especially hit hard by extreme weather events like the flooding from Hurricane Ida last fall, which led to the deaths of 30 people across the state, especially in urban communities.

The strongest possible Advanced Clean Cars II program is the best tool states like New Jersey have for slashing emissions from the transportation sector, which in many states is the greatest source of climate emissions. In New Jersey, more than 40% of our climate pollutants coming from our transportation sector. Within the overall transportation sector, over 70% of climate pollution comes from passenger cars and trucks; in New Jersey, it reaches to more than 75%.

Our state needs an Advanced Clean Car II program with strong, interim, year-over-year Zero Emission Vehicle (ZEV) sales requirements that overcome loopholes and credits that will leave hundreds of thousands of polluting vehicles on the road for decades. However, the current proposed Advanced Clean Car program update falls short on those interim sales targets and leaves under-resourced communities without strong policy considerations that would deliver more affordable, pollution-free transportation options.

You can save lives, help us cut ties with volatile fossil fuel prices and fight the climate crisis by:

¶  
Strengthening interim  
ZEV sales requirements for electric cars.

¶  
Including stronger  
equity provisions that ensure car-makers increase affordability and access to pollution-free cars in frontline communities.  
We cannot afford the health and climate costs associated with burning fossil fuels. The New Jersey Department of Environmental Protection and Rutgers University estimate that we could see sea-level rise of up to 1 foot by the end of this decade and more than 2 feet by 2050, with upper estimates reaching more than 6 feet of sea level rise by the end of this century in our coastal communities. This will alter the cultural, economic and human face of the state in a way that we are only starting to imagine; we owe it to future generations to act boldly to cut climate pollution from cars and trucks. If we

don't significantly cut our climate pollution, the average 6-year-old will live through roughly three times as many climate disasters as their grandparents and will see twice as many wildfires.

Note, last November, Gov. Phil Murphy issued Executive Order 274 ordering the state to reduce climate pollution by 50% by 2030, a goal which matches the U.S. Climate Alliance and the Biden Administration's own goals. The only way we can achieve these necessary goals is by drastically reducing our carbon pollution from the cars and trucks we drive. New Jersey is counting on you to set strong air pollution standards so that we can follow suit. We need bold action that matches this moment of crisis. Don't pass up this historic opportunity to create a healthier, more just and vibrant economic future.

Sincerely,

Doug  
O'Malley  
Director,  
Environment New Jersey  
domalley@environmentnewjersey.org  
Cell:  
917-449-6812

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/491-accii2022-UDVTO1c8U19WMQJh.docx'

Original File Name: ENJ ACCII S.177 CARB Letter 5.31.22.docx

Date and Time Comment Was Submitted: 2022-05-31 23:57:42

No Duplicates.

**Comment 176 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Orville

Last Name: Thomas

Email Address: othomas@calstart.org

Affiliation: CALSTART

Subject: CALSTART Public Comment Re: ACC II

Comment:

Please see attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/492-accii2022-WzhSNVM+VHQHdVAx.pdf'

Original File Name: CALSTART ACC II Comment Letter 052722.pdf

Date and Time Comment Was Submitted: 2022-06-01 15:43:12

No Duplicates.



**Comment 177 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Jeannine

Last Name: Pearce

Email Address: jeannine@fiercecourageconsulting.com

Affiliation:

Subject: Local Elected Officials ACC II Sign On Letter

Comment:

Please see attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/493-accii2022-AWBTawNnzWoANm0d.pdf'

Original File Name: Local Elected Officials ACC II Sign-on Letter.pdf

Date and Time Comment Was Submitted: 2022-06-01 16:23:43

No Duplicates.

**Comment 178 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: William

Last Name: Barrett

Email Address: Non-web submitted comment

Affiliation:

Subject: ACCII Health Community Comments

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/494-accii2022-VDxXNABgBDtXJVM7.pdf'

Original File Name: Health Community ACC II Emailed Comments.pdf

Date and Time Comment Was Submitted: 2022-06-01 17:02:39

No Duplicates.

**Comment 179 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Richard

Last Name: Parker

Email Address: Non-web submitted comment

Affiliation:

Subject: Final EV100 ACCII Public Comment

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/495-accii2022-VjAGaVwzUmAEbgJd.pdf>'

Original File Name: Final EV100 ACCII Public Comment.pdf

Date and Time Comment Was Submitted: 2022-06-01 17:48:49

No Duplicates.

**Comment 180 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Sylvia

Last Name: Regan

Email Address: Non-web submitted comment

Affiliation:

Subject: ACC II Comments from Center for Biological Diversity

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/496-accii2022-WzhSN1IwB2ZwFM0d.zip'

Original File Name: CBD Comment Letter and Attachments.zip

Date and Time Comment Was Submitted: 2022-06-02 09:16:57

No Duplicates.

**Comment 181 for Proposed Advanced Clean Cars II Regulations (accii2022) - 45 Day.**

First Name: Lindsay

Last Name: Garcia

Email Address: Non-web submitted comment

Affiliation: Montclair Presbyterian Church

Subject: ACCII Comment from Congregants of Montclair Presbyterian Church

Comment:

Please see attached comment.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/542-accii2022-VjdUMQZkUmhXOAZZ.pdf'

Original File Name: ACCII Comment\_MontclairChurch.pdf

Date and Time Comment Was Submitted: 2022-07-12 15:01:52

No Duplicates.

**Comment 1 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Kevin

Last Name: Brown

Email Address: kbrown@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on ACC II

Comment:

<p>Please find the MECA Comments on ACC II in the attached  
file.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/497-accii2022-AG1QM1IwBDYFXFc2.pdf>

Original File Name: MECA ACC II Comments 06092022 FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:10:05

No Duplicates.

**Comment 2 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Kevin

Last Name: Curley

Email Address: KCurley@mazdausa.com

Affiliation:

Subject: Advanced Clean Cars II Testimony - Mazda 6/9/22

Comment:

<p>Please see the attached comment. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/498-accii2022-VDdVPFU5UW8HZAhm.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:25:40

No Duplicates.

**Comment 3 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: John  
Last Name: Shears  
Email Address: Shears@ceert.org  
Affiliation: CEERT

Subject: CEERT Supplemental Comments on ACC II April 12 ISOR  
Comment:

<p>Please Accept CEERT's supplementary comment letter on the ACCII  
ISOR.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/499-accii2022-VjdQNQdlUmgGaQNc.pdf>

Original File Name: ACCII CEERT Supplementary ISOR Comment Letter 20220609Final.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:22:08

No Duplicates.



**Comment 4 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: John  
Last Name: Shears  
Email Address: Shears@ceert.org  
Affiliation: CEERT

Subject: CEERT Supplemental Comments on ACC II April 12 ISOR  
Comment:

<p>June 8th AP News article on proposed EU car regulations  
requiring zero tailpipe carbon emissions from passenger vehicles by  
2035.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/500-accii2022-BWQCdABeAj8GZQB3.pdf>

Original File Name: AP News EU lawmakers endorse ban on combustion-engine cars in 2035  
20220608.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:22:08

No Duplicates.

**Comment 5 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Jeff

Last Name: Wuttke

Email Address: jeff.wuttke@stellantis.com

Affiliation:

Subject: Statement by Stellantis

Comment:

<p>Please see the attached comment. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/501-accii2022-WzhXPIU5UG4LaARq.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:39:24

No Duplicates.

**Comment 6 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation: NRDC

Subject: Comments on ACC II - Supplementary

Comment:

<p>Please find additional written comments supplementing our  
earlier comments submitted 5/31/2022.</p>

<p>Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/502-accii2022-AG5UIARhBTUFXFUn.pdf>

Original File Name: NRDC\_Response Comments\_ACCII\_6-9-22.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:45:30

No Duplicates.

**Comment 7 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Regina

Last Name: Hsu

Email Address: rhsu@earthjustice.org

Affiliation: Earthjustice

Subject: Comments on Proposed ACC II Regulation

Comment:

<p>Please find attached comments from Earthjustice on the proposed  
ACC II regulation.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/503-accii2022-VmBSeVBoVCpQZFdl.pdf>

Original File Name: 6-9-22 Earthjustice ACC II Letter.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:24:06

No Duplicates.

**Comment 8 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: Hearing on California Air Resources Board: Advanced Clean Cars II Staff Proposal  
Comment:

<p>Please see the attached comment. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/504-accii2022-UDNWP1U5BDoHZFU7.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-06-09 08:58:34

No Duplicates.

**Comment 9 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Dana

Last Name: Hargitt

Email Address: dana.hargitt@havalus.com

Affiliation: American Haval Motor Technology

Subject: treatment of PHEV credits

Comment:

<p>in the May workshop, it was proposed that there would be  
seperate tracking of PHEV credits and limit credit useage to only  
the portion allowed to be met by PHEVs which is 20%/year, but in  
the propsed rule, this is somewhat ambiguous.&nbsp; Could you  
please clarify CARB's position on this?</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 08:56:23

No Duplicates.

**Comment 10 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive, LLC

Subject: Comments on Proposed Advanced Clean Cars II Regulations

Comment:

<p>Rivian Automotive, LLC, is pleased to comment on the proposed ACCII regulations and thanks CARB for this opportunity. The attached comments represent a corrected version of our previous written comment submission, correcting minor errata in the original letter.&nbsp;  </p>

<p>Thank you again for this opportunity to comment on this important regulation.&nbsp;  </p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/506-accii2022-BXdVOIUiADoAZwVr.pdf>

Original File Name: Rivian\_ACC2\_ISOR\_Comments\_FINAL\_CORRECTED.pdf

Date and Time Comment Was Submitted: 2022-06-09 09:13:24

No Duplicates.

**Comment 11 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Kathy  
Last Name: Bergren  
Email Address: Bergren@ncga.com  
Affiliation: NCGA

Subject: NCGA Comments on the Proposed ACC II Regulation  
Comment:

<p>Attached please find our comments. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/507-accii2022-AGFTNIU3UmgHaABf.pdf>

Original File Name: ACCII Comments\_National Corn Growers Association\_June 9 2022.pdf

Date and Time Comment Was Submitted: 2022-06-09 09:09:49

No Duplicates.



**Comment 12 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: David

Last Name: Patterson

Email Address: patterson@chademo.org

Affiliation: CHAdEMO Association

Subject: Board Presentation of the CHAdEMO Association

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/508-accii2022-AWIFawNjBDMGZVA9.pdf>

Original File Name: CHAdEMO ACC II CARB Presentation 06092022.pdf

Date and Time Comment Was Submitted: 2022-06-09 09:15:58

No Duplicates.

**Comment 13 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Bob  
Last Name: Yuhnke  
Email Address: bob.yuhnke@outlook.com  
Affiliation: Elders Climate Action

Subject: Advanced Clean Cars II  
Comment:

<p>Elders Climate Action submits written comments requesting that the Board revise the ACC II rule to achieve the emission reductions needed for attainment of the ozone NAAQS in California's ozone nonattainment areas designated as "extreme" under the CAA. The proposed rule is not adequate for attainment. We ask that the rule be revised by 1) advancing full implementation of the 100% sales requirement from 2035 to 2030, and 2) adopting a rule to require the gradual phase-out of internal combustion engine vehicles in extreme nonattainment areas by 2035.</p>  
<p>Modeling results of NOx emission reductions to support this request and a legal analysis showing that the phaseout of ICEVs is required under the CAA are included in the written comments submitted today.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/509-accii2022-UWNVYVRIWTxRegg4.pdf>

Original File Name: 2206-09 Elders Climate Action COMMENTS ON ACC II.pdf

Date and Time Comment Was Submitted: 2022-06-09 09:15:53

No Duplicates.

**Comment 14 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Marcus

Last Name: Gomez

Email Address: marcus@californiaclothing.net

Affiliation:

Subject: Written Submission

Comment:

<p>Please see the attached PDF.&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/511-accii2022-UTIGb1A8UG4GZVQ6.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-06-09 09:45:12

No Duplicates.

## Comment 15 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Mary

Last Name: Leslie

Email Address: mleslie@labusinesscouncil.org

Affiliation:

Subject: LABC Support ACC II

Comment:

<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: 'Times New Roman', serif;"><span style="font-size: 11pt; font-family: Calibri, sans-serif;">On behalf of the Los Angeles Business Council (LABC), we would like to encourage The Air Resources Board (CARB) to further develop the Advanced Clean Cars II program to include stronger pollution-free car sales before the end of the decade. &nbsp;The proposed update to the Advanced Clean Cars program has targets for pollution-free car sales that are far below what the Air Resources Board stated was needed to reach our state's air quality and climate goals. The LABC strongly supports strengthening interim sales targets for electric cars to at least 75% in 2030 to ensure that overall ZEV sales requirements meet the emission reduction targets CARB established.</span></p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: 'Times New Roman', serif;">&nbsp;</p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: 'Times New Roman', serif;"><span style="font-size: 11pt; font-family: Calibri, sans-serif;">Threatened with the climate crisis, California continues to deal with unprecedented drought, wildfires, high heat days and increasing air pollution. Gavin Newsom's </span><span lang="EN" style="font-size: 11pt; font-family: Calibri, sans-serif;">executive order </span><span style="font-size: 11pt; font-family: Calibri, sans-serif;">N-79-20, </span><span lang="EN" style="font-size: 11pt; font-family: Calibri, sans-serif;">directing the state to require sales of all new passenger vehicles to be zero-emission by 2035</span><span style="font-size: 11pt; font-family: Calibri, sans-serif;">, puts California on the right path towards dramatically reducing pollution across its communities while making the state more resilient when faced with a changing climate. S<span style="color: #201f1e; border: 1pt none windowtext; padding: 0in; background: white;">etting an interim target of 75% of all new passenger vehicles to be zero-emission by 2030, will not only help California reach its 2035 zero-emission car sale goals but will also </span>reinforce California as the nation's leader in reducing our carbon output and advancing policies that lay the groundwork for a more vibrant, inclusive green economy.</span></p>  
<p class="MsoNormal" style="margin: 0in; font-size: 12pt; font-family: 'Times New Roman', serif;"><span style="font-size: 11pt; font-family: Calibri, sans-serif;">&nbsp;</span></p>  
<p style="margin: 0in; font-size: 12pt; font-family: 'Times New Roman', serif;"><span style="font-size: 11pt; font-family: Calibri, sans-serif;">In partnership with the GOBiz ZEV Team and the UCLA Luskin Center for Innovation, the LABC Institute conducted a study called "An Agenda for Equity-Centered Clean

Transportation" which found that California cannot achieve its goal of transitioning every vehicle to zero-emissions technologies without proactively creating policies that make clean transportation options truly accessible and practical for priority communities. For this reason, the LABC would also like to encourage that the Advanced Clean Cars II program also include equity provisions that will prioritize California's pollution-burdened communities. LABC strongly supports ACC II standards that are equity centered and that maximize access, affordability, and direct benefits to Disadvantaged Communities. Currently, the proposed rule has voluntary equity provisions for carmakers, which in turn do not guarantee emissions reductions in communities historically overburdened with transportation pollution. The most effective way to ensure ZEV deliveries to overburdened communities within the rule is to make these provisions mandatory.

According to the American Lung Association, California has 6 out of the 10 most polluted cities in the country, with Los Angeles being dead last. It is crucial to implement an equitable statewide electric vehicle infrastructure plan that will help California dramatically improve its air quality. With the average ownership/lease for a new car being about 6 years, California has the opportunity of eliminating millions of fossil fuel burning cars by increasing the sales of pollution-free vehicles while also increasing accessibility to these pollution-free vehicles throughout all communities.

We strongly encourage the Air Resources Board to set stronger air pollution standards throughout California. With stronger zero-emission sale targets that prioritize Disadvantaged Communities, California will be able to reach its air quality and climate goals while transitioning to a clean transportation future.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/512-accii2022-VDgCZVMwAzMGXwR3.docx>

Original File Name: LABC Support\_ ACC II.docx

Date and Time Comment Was Submitted: 2022-06-09 10:03:18

No Duplicates.

**Comment 16 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Manuel

Last Name: Cunha, Jr.

Email Address: [mcunha@niseifarmersleague.com](mailto:mcunha@niseifarmersleague.com)

Affiliation: Nisei Farmers League

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

 CARB's ACC II regulations are a misguided, rushed attempt to oversimplify a solution, and do not consider impacts outside of California's large cities. We do not currently have the infrastructure nor is our industry set up to support this rapid shift. We rely on workers who get to and from work in their own gas-powered cars and trucks. 2035 is right around the corner and mass transit and a middling charging infrastructure is not going to work and is going to cause real economic pain for growers and farmworkers alike.

 We know that our industry has a central role in addressing the climate crisis. We’re creating large-scale projects like methane digesters. We’re using new water practices that protect our supply. We are already part of the solution. But in this case, these rushed regulations will only hurt the workers in the Valley.     I invite all of you to join me in the fields, talk to the workers and drive through Mendota, Orange Cove, San Joaquin and yes even Fresno and get a first-hand look at a region that is not remotely ready for this type of transition.        

 I believe in our uniquely Californian way; we will face this challenge with ingenuity and innovation. But we cannot accept false solutions that ignore and leave behind California's agricultural industry. We want to be a part of the solution &ndash; but we can't be a part of that solution if we can't get to work. Thank you for listening to my testimony today. 

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 10:25:43

No Duplicates.

**Comment 17 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Will

Last Name: Scott, Jr.

Email Address: willscott2110@comcast.net

Affiliation: African American Farmers of California

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

<p class="MsoNormal"><span style="font-size: 11.0pt; font-family: 'Calibri', sans-serif; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">This mandate will increase costs for vehicles and utilities, so it will ultimately increase the cost of food because it will be much more expensive for farmers to produce and transport it. Especially for a small grower like myself, who travels to different farmers markets to sell specialty crops.&nbsp; &nbsp;How do we compete against growers in other states or across our southern borders when they do not have to adhere to there CA standards and drive home-grown companies out of business or to another state.&nbsp;&nbsp;&nbsp; CA is not an island and I hope you all consider these rules put us at a disadvantage to other out of state competitors.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 10:29:20

No Duplicates.

**Comment 18 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Shirley

Last Name: Rowe

Email Address: rshirleyann@aol.com

Affiliation: African American Farmers of California

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

<p class="MsoNormal">On behalf of the African American Farmers of California we respectfully urge this Board to go back to the drawing board on ACC II to lessen the harm to growers already struggling in this state.&nbsp; Our members operate small farms, &nbsp;a few acres and these regulations pose a real threat to the viability of small black farms throughout the state. &nbsp;These new rules, ironically will lead to what some proponents purport to oppose- large agri-business. Only large, corporate agriculture companies can withstand these changes and survive.&nbsp; Smaller farms, many which are brown and black growers may have to sell to larger corporations or simply shut down.&nbsp;&nbsp; Please consider farmers like myself before you adopt the rules before you today.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 10:33:52

No Duplicates.



**Comment 19 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 20 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 21 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Steven

Last Name: Sander

Email Address: steven.p.sander@gmail.com

Affiliation:

Subject: Please consider the following

Comment:

<p>CARB should promote the use of swappable batteries in EVs to reduce the amount of time that vehicles need to stop to get more energy before continuing. Much like the J1772 standard, CARB should develop a standard for swappable batteries to facilitate the adoption of this technology. CARB should speed the transition to 100% EVs as soon as possible--by 2025 for passenger vehicles.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 11:20:25

No Duplicates.

**Comment 22 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: David  
Last Name: Barker  
Email Address: dbarker@subaru.com  
Affiliation: North American Subaru

Subject: ACCII Testimony  
Comment:

<p>Please find this written copy of Subaru's testimony at the  
hearing for Advance Clean Cars II regulations.</p>  
<p>&nbsp;</p>  
<p>Thank you</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/519-accii2022-AWAFYFc1WGJQPwEs.pdf>

Original File Name: ACCII-ISORtestimony-Subaru-060922.pdf

Date and Time Comment Was Submitted: 2022-06-09 11:30:04

No Duplicates.

## Comment 23 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Chip

Last Name: Sharpe

Email Address: chipsharpe@sbcglobal.net

Affiliation:

Subject: text of my prepared message

Comment:

<p>(Written for 3 minutes; pared to 2 minutes when read at c. 1130 today)</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp; &nbsp; &nbsp; Thank you for this chance to speak with you on behalf of my entire family. My name is Chip Sharpe. I&rsquo;m a 76-year-old, 40-year resident of Northern California.&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp;&nbsp;&nbsp; &nbsp;&nbsp;&nbsp; &nbsp;&nbsp;&nbsp; Thank you for your exemplary work to advance clean cars.&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp; &nbsp; &nbsp; &nbsp;&nbsp; My wife and I purchased our first EV in 2014, the first new car that either of us had ever wanted, because we were excited by this way of protecting our planet. We bought our second EV in 2016 and will never again purchase anything with an internal combustion engine. We felt blessed to be able toride in such a comfortable, safe, and responsive car. In 2018, we drove to North Carolina and back, impressed by ease and abundance of charging opportunities throughout the 8,000 mile trip.&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp; &nbsp; &nbsp; &nbsp;&nbsp; We also felt blessed to have had enough money to buy two expensive cars that we could plug in at home, ready to roll each morning. We have become vocal advocates for all-electric vehicles, eager to see the day when everyone could enjoy similar safety, cost-savings, and convenience. To several acquaintances, we offered to share \$500 or more of the California rebate we&rsquo;d received, if they would

purchase a new or used EV.&nbsp; However, at that time, the cost was still out of their reach.&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp; &nbsp; &nbsp; Even with today&rsquo;s advent of more affordable models, widespread adoption of EVs is going to require government and community support. This includes requiring manufacturing and infrastructure corporations to focus on providing EVs in low-income neighborhoods that suffer the most from tailpipe emissions.&nbsp; For those living near poverty levels, larger rebates, manufacturer discounts, and low or no interest loans will be necessary. Home charging must be facilitated for apartment dwellers and those without a garage.&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;"><span style="font-kerning: none;">&nbsp;</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp;&nbsp; &nbsp; To assuage range anxiety, outlets should be provided at workplaces, shopping areas, and along city streets, such as at bases of lampposts.</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;"><span class="Apple-tab-span" style="white-space: pre;"> </span>This is a matter of life and death, putting safer vehicles on our roadways and preventing the thousands of deaths that now occur every year as a result of polluted air.</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000; min-height: 16px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 14px; line-height: normal; font-family: 'Times New Roman'; -webkit-text-stroke-width: initial; -webkit-text-stroke-color: #000000;"><span style="font-kerning: none;">&nbsp;&nbsp; &nbsp; Thank you for enlisting, and requiring, the assistance of major corporations, especially vehicle manufacturers, in achieving our goal of making EVs accessible to everyone. We&rsquo;ll be doing our best to reach 100% zero-emission sales BEFORE 2035.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 11:53:59

No Duplicates.

**Comment 24 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: John

Last Name: Shears

Email Address: Shears@ceert.org

Affiliation: CEERT

Subject: Joint Statement on the new Canada-California Climate Action and Nature Protection Partners

Comment:

<p>Canada is another partner beyond the section 177 states in the development of a North American ZEV market and on clean transportation and climate action.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/521-accii2022-UDMFYgNsV2VSMAFg.pdf>

Original File Name: Canada-California Climate Action and Nature Protection Partnership PMO Statement 20220609.pdf

Date and Time Comment Was Submitted: 2022-06-09 12:09:22

No Duplicates.



**Comment 25 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Angela

Last Name: Casler

Email Address: acasler@sustainabilityma.org

Affiliation: Sustainability Management Association

Subject: Infrastructure First and Forced Labor Issues

Comment:

<p>The carrying capacity of the planet's precious metals needed to be mined by forced slave and child labor cannot sustain America or even just California moving toward all EVs. The electrical grid cannot sustain high heat temperatures without brownouts seen in 2021. How can each city or town create the demand load needed for everyone to get a permit to double the electricity needs? Who is responsible for the GHG on Scope 2? The life cycle assessment of the manufacturing of parts for these vehicles far exceed the climate impacts that we hope to negate. Please consider delaying this action until we can triple the supply of power to charge these vehicles, an excellent supply chain and infrastructure to recycle the batteries in the state of CA to be responsible with our own hazardous waste, and to improve the ability to purchase sustainable materials and products that are not bourne off the backs of forced labor.&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 12:56:30

No Duplicates.

## **Comment 26 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)**

First Name: Manuel

Last Name: Cunha, Jr.

Email Address: clehn@niseifarmersleague.com

Affiliation: Nisei Farmers League

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

**CARB's ACC II regulations are a misguided, rushed attempt to oversimplify a solution, and do not consider impacts outside of California's large cities. We do not currently have the infrastructure nor is our industry set up to support this rapid shift. We rely on workers who get to and from work in their own gas-powered cars and trucks. 2035 is right around the corner and mass transit and a middling charging infrastructure is not going to work and is going to cause real economic pain for growers and farmworkers alike.**

**We know that our industry has a central role in addressing the climate crisis. We're creating large-scale projects like methane digesters. We're using new water practices that protect our supply. We are already part of the solution. But in this case, these rushed regulations will only hurt the workers in the Valley. I invite all of you to join me in the fields, talk to the workers and drive through Mendota, Orange Cove, San Joaquin and yes even Fresno and get a first-hand look at a region that is not remotely ready for this type of transition.**

**I believe in our uniquely Californian way; we will face this challenge with ingenuity and innovation. But we cannot accept false solutions that ignore and leave behind California's agricultural industry. We want to be a part of the solution — but we can't be a part of that solution if we can't get to work. Thank you for listening to my testimony today.**

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 13:21:57

No Duplicates.

**Comment 27 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Laura

Last Name: Deehan

Email Address: LDeehan@environmentcalifornia.org

Affiliation:

Subject: Written Submission

Comment:

<p>Please see the attached written submission.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/524-accii2022-AGNXPgdrBTsAY1U7.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-06-09 13:25:18

No Duplicates.

**Comment 28 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Laura  
Last Name: Berland  
Email Address: lbshane@mac.com  
Affiliation: E2

Subject: Business Support for an Ambitious Advanced Clean Cars II Program  
Comment:

<p>I was excited to provide testimony today at the hearing but had to leave since I wasn't called on before lunch.&nbsp; Please see my testimony attached.</p>  
<p>I appreciate the board's leadership on ambitious policy that is good for the economy and good for the environment.</p>  
<p>Best,</p>  
<p>Andy</p>  
<p>&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/525-accii2022-AGUANANdU2oLeFc5.pdf>

Original File Name: E2\_June 9\_ARB ACC2\_Testimony\_LBS.pdf

Date and Time Comment Was Submitted: 2022-06-09 13:23:50

No Duplicates.

**Comment 29 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Will

Last Name: Scott

Email Address: willscott2110@comcast.net

Affiliation: African American Farmers of California

Subject: Statement Regarding the Public Hearing to Consider Proposed Advanced Clean Cars II  
Reg

Comment:

**Statement: This mandate will increase costs for vehicles and utilities, so it will ultimately increase the cost of food because it will be much more expensive for farmers to produce and transport it. Especially for small grower like myself, who travel to different farmers markets to sell our specialty crops. And how do we compete against growers in other states or across our southern borders when they do not have to adhere to their CA standards and drive home-grown companies out of business or to another state. CA is not an island and I hope you all consider these rules put us at a disadvantage to other out of state competitors.**

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 13:28:08

No Duplicates.

**Comment 30 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Shirley

Last Name: Rowe

Email Address: clehn@niseifarmersleague.com

Affiliation: African American Farmers of California

Subject: Statement re: the Public Hearing to Consider Proposed Advanced Clean Cars II Regulations

Comment:

<p class="MsoNormal"><strong><span style="font-size: 14.0pt;">Statement: On behalf of the African American Farmers of California we respectfully urge this Board to go back to the drawing board on ACC II to lessen the harm to growers already struggling in this state.&nbsp; Our members operate small farms, &nbsp;a few acres and these regulations pose a real threat to the viability of small black farms throughout the state. &nbsp;These new rules, ironically will lead to what some proponents purport to oppose- large agri-business. Only large, corporate agriculture companies can withstand these changes and survive.&nbsp; Smaller farms, many which are brown and black growers may have to sell to larger corporations or simply shut down.&nbsp;&nbsp; Please consider farmers like myself before you adopt the rules before you today. </span></strong></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 13:32:39

No Duplicates.

**Comment 31 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Michael

Last Name: Lord

Email Address: michael.lord@toyota.com

Affiliation:

Subject: Light Duty Fuel Cell Market Development in California

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/528-accii2022-Uj5XJQFyVSsFYAJj.pdf>

Original File Name: Ltr-CARB-FC Travel Final.pdf

Date and Time Comment Was Submitted: 2022-06-09 13:24:28

No Duplicates.

## Comment 32 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Stephanie

Last Name: Brown

Email Address: citizenbrown1@gmail.com

Affiliation: Indivisible Los Gatos, Orchard City Ind.

Subject: 22-8-1: Public Hearing to Consider Proposed Advanced Clean Cars II Regulations  
Comment:

```
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica,
sans-serif; font-size: small; background-color: #ffffff;
line-height: 1.38; margin-top: 0pt; margin-bottom: 12pt;"><span
style="font-size: 11pt; font-family: Arial; color: #000000;
background-color: transparent; font-variant-numeric: normal;
font-variant-east-asian: normal; vertical-align: baseline;
white-space: pre-wrap;">Dear California Air Resources
Board,</span></p>
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica,
sans-serif; font-size: small; background-color: #ffffff;
line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span
style="font-size: 11pt; font-family: Arial; color: #000000;
background-color: transparent; font-variant-numeric: normal;
font-variant-east-asian: normal; vertical-align: baseline;
white-space: pre-wrap;">On behalf of myself, Orchard City
Indivisible and Together We Will Indivisible Los Gatos, both groups
based in Silicon Valley, we urge you to restore California's
state, national, and global leadership in the climate crisis
response by accelerating the transition to 100% electric vehicles
and strengthening requirements on new gas-powered
vehicles.</span></p>
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica,
sans-serif; font-size: small; background-color: #ffffff;
line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span
style="font-size: 11pt; font-family: Arial; color: #000000;
background-color: transparent; font-variant-numeric: normal;
font-variant-east-asian: normal; vertical-align: baseline;
white-space: pre-wrap;">&nbsp;</span></p>
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica,
sans-serif; font-size: small; background-color: #ffffff;
line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span
style="font-size: 11pt; font-family: Arial; color: #000000;
background-color: transparent; font-variant-numeric: normal;
font-variant-east-asian: normal; vertical-align: baseline;
white-space: pre-wrap;">Climate pollution from gas-powered cars and
trucks makes up 40 percent of total greenhouse gas emissions in
California. These vehicles are a massive driver of the climate
emergency.&#8239;</span><span style="font-size: 11pt; font-family:
Arial; color: #000000; background-color: transparent;
font-variant-numeric: normal; font-variant-east-asian: normal;
vertical-align: baseline; white-space: pre-wrap;">Historically,
we've led the nation on setting strong auto emissions
standards &mdash; but the current clean cars proposal falls short
of the climate action we need.</span></p>
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica,
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sans-serif; font-size: small; background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">&nbsp;</span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-family: Arial; font-size: 11pt; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">the 2035 timeline for </span><span style="color: #222222; font-family: Arial; font-size: 14.6667px; white-space: pre-wrap;">100% zero-emission vehicle sales will delay </span><span style="font-family: Arial; font-size: 11pt; background-color: transparent; white-space: pre-wrap;">California meeting its goal of carbon neutrality by 2045 because many new fossil fuel powered vehicles will last 20 years or longer. We urge you to move that target to 2030 to give our state a fighting chance in meeting its 2045 climate goals and remaining a global leader on clean car adoption. </span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-family: Arial; font-size: 11pt; background-color: transparent; white-space: pre-wrap;">We draw your attention to the April 4, 2022 IPCC "Sixth Assessment Report, <em>Climate Change 2022: Mitigation of Climate Change" </em>key finding: </span><strong style="font-family: Arial; font-size: 14.6667px; white-space: pre-wrap;">The world must decrease global oil and gas production and consumption by 30 percent between now and 2030. </strong>California must join the world to<span style="font-family: Arial; font-size: 11pt; background-color: transparent; white-space: pre-wrap;"> act immediately to transition to a low-carbon economy or it is likely we will face a global rise in temperature between 2.4 degrees C and 3.5 degrees C by 2100.</span></p>  
<p dir="ltr" style="background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-family: Arial;"><span style="font-size: 14.6667px; white-space: pre-wrap;">https://www.ipcc.ch/report/sixth-assessment-report-working-group-3/</span></span></p>  
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">&nbsp;</span></p>  
<p dir="ltr" style="color: #222222; font-family: Arial, Helvetica, sans-serif; font-size: small; background-color: #ffffff; line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">Meanwhile, CARB cannot ignore the climate-damaging emissions from new gas-powered cars. We need to take immediate action to assure those cars emit less pollutants for decades. </span><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-variant-numeric: normal; font-variant-east-asian: normal; vertical-align: baseline; white-space: pre-wrap;">This action is also critical to protect the health of communities hit hardest by

tailpipe pollution. Cancer-causing vehicle exhaust harms Californian's health -- particularly low-income communities of color living near congested freeways.

California must lead the way with strong policy solutions to build an environmentally just transportation system. New clean car standards must ensure equitable access to electric vehicles.

We urge you to adopt strong clean car rules that require:

- 
- 100 percent zero-emission vehicle sales by 2030
- 
- 7 percent annual pollution cuts from fossil fuel powered cars during their lifetime
- 
- Mandatory equity commitments to ensure that communities most negatively affected by pollution will reap the benefits, first

and foremost, from California's electric vehicle conversion

- 

This transition is a tremendous opportunity for CARB to adopt nation-leading clean car standards that address greenhouse gas emissions, slash climate pollution and ensures equity.

Sincerely,

Stephanie Brown  
Member  
Orchard City Indivisible  
Together We Will Indivisible Los Gatos

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 13:44:45

No Duplicates.

## **Comment 33 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)**

First Name: Richard

Last Name: Bode

Email Address: rcbode@sbcglobal.net

Affiliation: Davis Electric Vehicle Association

Subject: Support of ACC II

Comment:

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Georgia',serif;">I am a member of the Davis Electric Vehicle Association. I support the adoption of the Advanced Clean Cars II regulation to achieve greater carbon pollution reductions, which will reduce the deleterious effects of Climate Change. In addition, earlier acceptance of electric vehicles will lead to better improvements to air quality and public health in California. However, I think California can do much better than these requirements and easily achieve the goals of the ACC II regulation faster than proposed. To achieve those greater goals, CARB needs to continue to work with other state agencies to improve infrastructure supporting electric vehicles, including better charging opportunities, throughout the state. The benefits of driving an electric vehicle are obvious and demonstrative. The auto manufacturers know electric vehicles benefit their bottom line, through lower manufacturing as well as operation costs. Manufacturers are moving ahead strongly with new EV models hitting the market place in just the next year or two. However, the general public still needs better information to overcome initial reservations of EVs. The best ambassadors to put out the "good word" on EVs are the EV drivers participating in the many Electric Vehicle Associations in California. </span></p>

<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Georgia',serif;">CARB staff and other California agencies need to reach out and work with these non-governmental groups to promote EVs throughout California. Californians enjoy talking to individuals in these associations since they represent "real people" who drive EVs daily in their lives. Californians need to hear about real issues related to EV driving and hear the stories of association members about how they are rewarded in lower costs of operation and maintenance, and features available only to EVs. They need to hear ordinary individuals dispel the many detrimental EV myths hindering acceptance. We cannot get to higher EV sales and acceptance by regulation alone. I've heard the impact members of my Association have in dispelling EV myths and misinformation. They can talk candidly with the people who attend our electric vehicle fairs about benefits and fun in driving an electric vehicle. This regulation may be step #1. Acceptance will require promotion by California's million EV drivers. CARB and other state agencies need to work with the EV associations and provide them with the information and materials necessary to promote electric vehicles benefits to California's residents. Outreach by these non-governmental associations and individuals, with real world credibility on EV issues, will greatly spur EV adoption

necessary to meet and surpass your ACC II goals.</span></p>  
<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Georgia',serif;">High gas prices have brought the benefits of electric vehicles to the attention of all Californians. Manufacturers are working hard to provide the new EV models for everyone's needs. CARB needs to work with the non-government EV associations and their members to close the gap in EV acceptance. I strongly encourage CARB to create a liaison office to work directly with California's Electric Vehicle Associations in order to create electric vehicle promotion events throughout California. </span></p>  
<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Georgia',serif;">Richard Bode</span></p>  
<p class="MsoNormal"><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Georgia',serif;">Davis Electric Vehicle Association, Leadership Board</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 13:52:52

No Duplicates.

## Comment 34 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Leana

Last Name: Zang-Rosetti

Email Address: leana\_r@yahoo.com

Affiliation: Extinction Rebellion SF Bay

Subject: Strengthen the ACCII Rule

Comment:

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<p><strong
id="docs-internal-guid-5be9671d-7fff-a072-076a-6c2ed8b310dc"
style="font-weight: normal;">&nbsp;</strong></p>
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margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 12pt;
font-family: Arial; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space:
pre-wrap;">My name is Leana Rosetti and I represent Extinction
Rebellion SF Bay. </span></p>
<p dir="ltr" style="line-height: 1.38; margin-left: 36pt;
margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:
48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;
font-family: Arial; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space: pre;"
aria-level="1">
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;
margin-bottom: 0pt;" role="presentation"><span style="font-size:
12pt; font-family: Arial; color: #000000; background-color:
transparent; font-weight: 400; font-style: normal; font-variant:
normal; text-decoration: none; vertical-align: baseline;
white-space: pre-wrap;">We ask that you make the voluntary equity
requirements mandatory. Otherwise it is likely that automakers will
not need to do any of them, and frontline communities get left
behind with little access to ZEVs once again, all while being
exposed to the most air pollution. CARB has the authority to do
this, and it is especially justified considering that </span><span
style="font-size: 11.5pt; font-family: Arial; color: #000000;
background-color: transparent; font-weight: 400; font-style:
normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">the greatest
emissions gains would likely be seen in low-income communities. A
2020 study focused on older vehicles found that those vehicles
produce more NOx and other pollutants, and that these vehicles are
disproportionately located in low-wealth communities throughout
California. Or, a</span><span style="font-family: arial, helvetica,
sans-serif; font-size: 12pt;"><span style="white-space: normal;">s
a fallback to a mandatory approach, CARB&rsquo;s next-best option
would be to condition the use of certain credits on participation
in the equity programs.</span><span class="Apple-converted-space"
style="white-space: normal;">&nbsp;</span></span></p>
</li>
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</ul>
<p>&nbsp;</p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span style="font-size: 12pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">We urge you to require that all vehicles be ZEV by 2030. 2035 is too late; scientists have repeatedly warned us that we no longer have time for incremental change; a rapid transition is necessary to avoid climate catastrophe, and there is no room for new fossil fuel infrastructure. Cars stay on the road for at least 15-20 years, which if still sold through 2035, will make it impossible for CA to reach its state and federal emissions goals. </span><span style="font-size: 11.5pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Roughly 2 million additional gas vehicles would be sold between 2030 and 2034, emitting an estimated 69 million metric tons of CO</span><span style="font-size: 9pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">2 </span><span style="font-size: 11.5pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">over their lifetimes.</span><span style="font-size: 12pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;"> A 2019 study showed that even if we were to immediately phase out gas cars and other fossil fuel technology, we would only have a 64% chance of limiting global temperature to 1.5 degrees. Even 2030 may be too late.&nbsp;</span></p>
</li>
</ul>
<p><strong style="font-weight: normal;">&nbsp;</strong></p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 12pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
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</ul>
<p><strong style="font-weight: normal;">&nbsp;</strong></p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:
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font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space: pre;"
aria-level="1">
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt;
margin-bottom: 0pt;" role="presentation"><span style="font-size:
12pt; font-family: Arial; color: #000000; background-color:
transparent; font-weight: 400; font-style: normal; font-variant:
normal; text-decoration: none; vertical-align: baseline;
white-space: pre-wrap;">Car companies, the oil industry, and other
industries will resist change and claim that portions of the rule
are too aggressive. That is why it must be required by the
government: to force innovation and make things happen faster than
they would if left up to industry. We did not reach the moon
without challenging ourselves, and there is too much at stake here
to be sympathetic to complaints of how difficult it will
be.&nbsp;</span></p>
</li>
</ul>
<p><strong style="font-weight: normal;">&nbsp;</strong></p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:
48px;">
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text-decoration: none; vertical-align: baseline; white-space: pre;"
aria-level="1">
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margin-bottom: 0pt;" role="presentation"><span style="font-size:
12pt; font-family: Arial; color: #000000; background-color:
transparent; font-weight: 400; font-style: normal; font-variant:
normal; text-decoration: none; vertical-align: baseline;
white-space: pre-wrap;">This rule must also be accompanied by large
investments in clean public transportation. This will lessen the
demand on ZEV cars and parts, meeting the concern expressed by
manufacturers being able to meet it. Our dependence on cars,
whether ICE or ZEVs, is inequitable and lowers everyone's
standard of life. </span></p>
</li>
</ul>
<p>&nbsp;</p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:
48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 12pt;
font-family: Arial; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space: pre;"
aria-level="1"><span style="font-size: 12pt; font-family: Arial;
color: #000000; background-color: transparent; font-weight: 400;
font-style: normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">Our state has
already been impacted in tragic and extreme ways due to the climate
crisis. Massive and destructive wildfires happen every year.
Droughts get more extreme and threaten our ecosystems and water
supply. We must endure months of toxic air quality from wildfire
smoke, if we are not actually fleeing the fire itself. And it is

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scientifically proven that these effects are not only locked in, but will continue to get worse. However, we can control how much worse. No one wants to breathe the polluted air from our cars's tailpipes; no one wants to destroy our planet while we transport ourselves from one place to another. We are tired of allowing oil companies to pollute, forcing us to pollute, solely for their own profit, leaving disaster in their wake. A strong clean car rule is necessary to speed the transition so that our children have a fighting chance for a more stable climate, and a crucial way for CA to lead in addressing the climate crisis. 10 million people already die every year due to fossil fuel air pollution, and this is before all of the deaths that will continue as climate catastrophes worsen. We need to stop the madness.

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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 14:16:19

No Duplicates.

**Comment 35 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Subject: ACC2

Comment:

<p>Please find the attaced comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/532-accii2022-VDUGY1MxVjcLUgZl.pdf>

Original File Name: ACC2 Comments CARB 6.9.22.pdf

Date and Time Comment Was Submitted: 2022-06-09 14:42:00

No Duplicates.

## Comment 36 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Andrea

Last Name: Marpillero Colomina

Email Address: andreacolomina@greenlatinos.org

Affiliation: GreenLatinos

Subject: Support of a stronger, equitable Advanced Clean Cars program

Comment:

<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">My name is Andrea Marpillero-Colomina and I represent GreenLatinos, a&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; text-align: justify; margin-top: 0pt; margin-bottom: 0.4pt;"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">comunidad of Latino/a/x environmental and conservation champions fighting against climate change and environmental degradation that intensifies systematic social, health, and economic injustices in our communities.&nbsp;</span><strong id="docs-internal-guid-974097fb-7fff-2173-3d12-8cd91cefbddf" style="font-weight: normal;"></strong></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">I&rsquo;m writing in support of a stronger, equitable Advanced Clean Cars program. The proposed standard as written is too weak to make a difference in hard-hit communities and will not deliver the pollution cuts we need.</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Our communities are still breathing the most polluted air in the country. It&rsquo;s your responsibility to do what&rsquo;s right to relieve the suffering caused by these realities.&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt;

font-family: Arial; color: #222222; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">The disproportionate impact of air pollution from cars and trucks is the clearest example of environmental racism in California.

Consider that Latino children are three times more likely than non-hispanic white children to live in counties where air quality standards are exceeded (31.4% vs. 10.6%), and nearly one third of Latino children live in counties where hazardous air pollutant concentrations exceed a 1 in 10,000 cancer risk level.

Low-income communities and communities of color shoulder biggest burden of fuel costs and harmful pollution, <https://www.npr.org/2022/03/10/1085882933/redlining-pollution-racism> having suffered generations of systematic marginalization

We urge you not to bow to the pressure of greedy oil companies, carmakers, polluting companies and out of state interests. We need you to prioritize the health of well-being of all Californians who need affordable, pollution free cars as quickly as possible.

pre-wrap;">We urge you to strengthen the program so that it meets our climate and clean air crises, creates good jobs and ensures that priority communities reap the benefits of pollution-free, gas free cars by achieving at least 75% EV sales by 2030 and including equity provisions that is what will actually make a difference!</span></p>  
<p dir="ltr" style="line-height: 1.38; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 11pt; font-family: Arial; color: #222222; background-color: #ffffff; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">That is why I&rsquo;m joining other advocates in calling on you, the CA Air Resources Board, to do your duty and protect us from the devastating impact of expensive and polluting cars and trucks. Thank you for your time.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 14:43:03

No Duplicates.

**Comment 37 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Amy

Last Name: Lilly

Email Address: amy.lilly@mercedes-benz.com

Affiliation:

Subject: Mercedes-Benz Testimony on ACC II

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/534-accii2022-VDkCZIEPWWMKf1c4.pdf>

Original File Name: MB ISOR Testimony Final.pdf

Date and Time Comment Was Submitted: 2022-06-09 14:57:55

No Duplicates.

**Comment 38 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: James

Last Name: Fahy

Email Address: james.fahy@mercedes-benz.com

Affiliation:

Subject: Mercedes-Benz Comment on MDV PEMs for ACC II

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/535-accii2022-Uj9SNGFfBT8LflI9.pdf>

Original File Name: MB ISOR Testimony MDV PEMS Fahy 06092022.pdf

Date and Time Comment Was Submitted: 2022-06-09 15:01:19

No Duplicates.

**Comment 39 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Jamie

Last Name: Dow

Email Address: jamie@electrek.co

Affiliation:

Subject: ACC2 must be made much stronger, CA should not be a global laggard

Comment:

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">This is a written copy of my comments submitted during the meeting's public comment period.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">_____</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Hi, I'm Jameson Dow, lifelong California resident, EV journalist and i've had asthma my whole life like the 2 million kids who get it every year globally from traffic pollution - and whose lifetime of health costs are not paid by those polluters.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Automakers say it will be hard to reach the 2035 target.&nbsp;  They've made excuses, and have touted their insufficient actions to fight climate change.&nbsp;  They've questioned this regulation from every angle to slow down implementation because "this will be too hard, we can't do it fast enough."</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">But, none of this matters.&nbsp;  In this negotiation, the automakers' adversary is not CARB, California voters, or the courts.&nbsp;  Their adversary is physics.&nbsp;  And physics does not care about your mundane complaints, it only cares how much carbon is in the atmosphere.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">_____</span></p>`



line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">A study just came out which shows we can stop climate change with immediate action.&nbsp; But even if we lower emissions to zero TODAY - not in 2035, or 2050 - we have a chance to go over 1.5&ordm;C of warming, which is a target we should not exceed and we must lower that chance.</span></p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">So, again, in the face of physics, which does not negotiate, nothing the automakers have said matters at all.&nbsp; We must stop emissions not just as fast as possible, but faster than these automakers claim is possible.&nbsp; They have to pick up the pace and if they can't, then try harder. All hands on deck, figure it out or go bankrupt, and why not also pay for all the pollution you've caused in the last century by the way?</span></p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">The 2035 requirement is not enough.&nbsp; California shouldn't be selling gasoline today, much less 20, 30 years in the future, as 2034 gas cars will still pollute for decades down the road.&nbsp; And California, with our US and global leadership, can make automakers pick up the pace by choosing a stronger target than ACC2.</span></p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">I call on the board to implement a stronger regulation, pulling forward targets to 100% all-EV by 2030 or even earlier, and further work to reduce car usage in general and shift people from cars to cleaner transport methods.&nbsp; This is what Norway is doing, which is nearing its 2025 EV-only sales requirement already in 2022, and the biggest auto company in the world by market cap has been all EV since 2008.&nbsp; So these targets can be met, and California shouldn't be a global laggard on this issue.</span></p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p><p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Thank you very much for your time.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 14:57:31

No Duplicates.



**Comment 40 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Thomas  
Last Name: Newman  
Email Address: thomas@newman.ca  
Affiliation:

Subject: Test  
Comment:

<p>Test</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 15:24:11

No Duplicates.

## **Comment 41 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)**

First Name: Guy

Last Name: Hall

Email Address: Guy.Hall@SacEV.org

Affiliation: Electric Auto Association

Subject: Comments on the ACC2 by the Electric Vehicle Association

Comment:

<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 3pt;"><span style="font-size: 26pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">EVA Comments for the CA ACCII review</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">&nbsp;Thank you Chair Randolph and the Board for the opportunity comment today. I am Guy Hall, Policy Lead for the Electric Vehicle Association.&nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">The EVA has thousands of members participating in over 100 chapters across the US with many of them in California.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">While we would like to see much more aggressive interim goals, we support CARB's 100% goal of clean vehicle adoption.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">We are concerned however, that California will not be able to achieve high levels of adoption without including all communities.&nbsp;Over a quarter our families reside in apartments and condos, without access to charging at their home.</span></p>

<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Even as EVs come down in price and substantial individual incentives are provided, lack of MUD home charging infrastructure in underserved communities is an impediment that locks out EV adoption by most of these residents.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">The EVA holds hundreds of EV showcases and test drive events each year.&nbsp;  We hear consistently from apartment residents that as much as they would like to get an EV with all the economic, reliability and environmental benefits, the lack of home charging is a deal breaker.&nbsp; &nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">This is what we hear again and again.&nbsp;  This message is re-enforced in discussions with auto sales reps who know how hard it is to sell an EV (new or used) to an apartment resident without home charging.</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">This is not part of the Advanced Clean Cars II rules.&nbsp; &nbsp;</span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">To repeat, this is not part of the Advanced Clean Cars II rules, but it is a critical parallel multiyear effort necessary for the ACC2 to successfully lead us to 100% adoption.&nbsp;  Retrofitting is crazy expensive, so we urge the first immediate step must be for CARB to aggressively support building code changes to stop creating new MFH developments that inhibit ACC2&rsquo;s targets.&nbsp; </span></p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;">&nbsp;</p>  
<p dir="ltr" style="line-height: 1.38; margin-top: 0pt; margin-bottom: 0pt;"><span style="font-size: 13.99999999999998pt; font-family: Arial; color: #000000; background-color: transparent;

font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space:  
pre-wrap;">Thank you to the staff in developing ACCI and for the  
opportunity to speak.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 15:27:32

No Duplicates.

## Comment 42 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)

First Name: Ellie

Last Name: Peichel

Email Address: epeichel@pluginamerica.org

Affiliation: Plug in America

Subject: ACC II

Comment:

```
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.2; margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">Hello all. My name is Ellie Peichel, and I am a representative for Plug In America, a nonprofit organization that represents the voice of the EV consumer. Thank you for the opportunity to comment today on the proposed Advanced Clean Cars II program.&nbsp;</span></p>
</li>
</ul>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre;" aria-level="1">
<p dir="ltr" style="line-height: 1.2; background-color: #ffffff; margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span style="font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal; text-decoration: none; vertical-align: baseline; white-space: pre-wrap;">As a key mechanism to increase EV uptake, address the climate crisis, and improve air quality, especially in historically underserved communities, it is imperative that ACC II be as strong as possible and designed with overburdened communities in mind. In pursuit of the most effective program possible, Plug In America offers three recommendations.&nbsp;</span></p>
</li>
</ul>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start: 48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 11pt; font-family: Arial; color: #000000; background-color: transparent; font-weight: 400; font-style: normal; font-variant: normal;
```

text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.2; background-color: #ffffff;  
margin-top: 0pt; margin-bottom: 0pt;" role="presentation"><span  
style="font-size: 11pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space: pre-wrap;">We recommend that  
the Board raise the interim sales target for electric cars from 68  
to 75% in 2030. Raising the ZEV requirement to 75% in 2030 is  
consistent with CARB's own Mobile Source  
Strategy.&nbsp;  </span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top:  
0pt; margin-bottom: 0pt;" role="presentation"><span  
style="font-size: 11pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space: pre-wrap;">Strong, interim  
sales requirements are critical to achieving Governor  
Newsom's target of 100% electric car sales by 2035 and key  
emissions reductions goals.</span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 11pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top:  
0pt; margin-bottom: 0pt;" role="presentation"><span  
style="font-size: 11pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space: pre-wrap;">We also recommend  
that the board include mandatory equity provisions that ensure  
automakers increase affordability and access to pollution-free cars  
in frontline communities. </span><span style="font-size: 10pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space:  
pre-wrap;">If equity provisions are optional, it can result in less  
EVs on the road specifically in frontline communities that bear the  
burden of climate and poor air quality impacts.</span></p>  
</li>  
<li dir="ltr" style="list-style-type: disc; font-size: 10pt;  
font-family: Arial; color: #000000; background-color: transparent;  
font-weight: 400; font-style: normal; font-variant: normal;  
text-decoration: none; vertical-align: baseline; white-space: pre;"  
aria-level="1">  
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top:  
0pt; margin-bottom: 0pt;" role="presentation"><span  
style="font-size: 10pt; font-family: Arial; color: #000000;  
background-color: transparent; font-weight: 400; font-style:  
normal; font-variant: normal; text-decoration: none;  
vertical-align: baseline; white-space: pre-wrap;">Our last  
recommendation is to direct staff in </span><span style="font-size:  
11pt; font-family: Arial; color: #000000; background-color:



```
transparent; font-weight: 400; font-style: normal; font-variant:
normal; text-decoration: none; vertical-align: baseline;
white-space: pre-wrap;">the Board Resolution to return in 2-3 years
with a technical review and recommendations on the regulation for
BEVs, strong plug-in hybrids and bidirectional charging in
accordance with overall industry growth.</span></p>
</li>
</ul>
<p><span
id="docs-internal-guid-76f89d4c-7fff-3438-b5f3-70781b59c177"></span></p>
<ul style="margin-top: 0; margin-bottom: 0; padding-inline-start:
48px;">
<li dir="ltr" style="list-style-type: disc; font-size: 10pt;
font-family: Arial; color: #000000; background-color: transparent;
font-weight: 400; font-style: normal; font-variant: normal;
text-decoration: none; vertical-align: baseline; white-space: pre;"
aria-level="1">
<p dir="ltr" style="line-height: 1.3800000000000001; margin-top:
0pt; margin-bottom: 0pt;" role="presentation"><span
style="font-size: 10pt; font-family: Arial; color: #000000;
background-color: transparent; font-weight: 400; font-style:
normal; font-variant: normal; text-decoration: none;
vertical-align: baseline; white-space: pre-wrap;">We thank the
board for considering our recommendations to help create the most
effective rule possible. We have the opportunity to make a huge
impact in our local and global communities.. We have to take
advantage of it. </span></p>
</li>
</ul>
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-06-09 15:30:52

No Duplicates.

**Comment 43 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Ellie

Last Name: Peichel

Email Address: epeichel@pluginamerica.org

Affiliation: Plug in America

Subject: ACC II

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/540-accii2022-B2RSO1Q1WXMCW1Q7.pdf>

Original File Name: Copy of Talking points for June 9 hearing.pdf

Date and Time Comment Was Submitted: 2022-06-09 15:30:52

No Duplicates.

**Comment 44 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Samantha

Last Name: Ortega

Email Address: Samantha@chargerhelp.com

Affiliation:

Subject: Comments on Advanced Clean Car II - ChargerHelp!

Comment:

<p>Please see attached</p>

Attachment:

Original File Name: Comments CARB ACC II- ChargerHelp! .pdf

Date and Time Comment Was Submitted: 2022-06-09 15:46:10

No Duplicates.

**Comment 45 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Matthew

Last Name: Tilley

Email Address: mt111912@gmail.com

Affiliation:

Subject: Gasoline Cars

Comment:

<p>Please do not ban the sale of gasoline powered  
automobiles.&nbsp; This is a move that consumers should make, not a  
regulator.</p>  
<p>&nbsp;</p>  
<p>Regards,</p>  
<p>Matt Tilley</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 08:20:17

No Duplicates.

## **Comment 46 for Proposed Advanced Clean Cars II Regulations (accii2022). (At Hearing)**

First Name: Tommy

Last Name: Lee

Email Address: x94583x@hotmail.com

Affiliation:

Subject: Utility Company Regulations

Comment:

I think majority of CA residents are not opposed to this push for environmental reasons. With all these goals and initiative when is CA going to put regulations/laws on PGE and hold them accountable? Clearly this pertains to Northern CA.

Have you done case studies on the costs that PGE puts on businesses to install electrical vaults that is necessary to supply the 480v to each DC fast charger?

The second part to that is PGE will take up to 1 year to install after you sign on the dotted lines for a \$150k+ project. How do you expect small businesses to supply charging stations? Grants are great but they expire by the time PGE starts. A possible business strategy? I bet it is.

Third part, PGE infrastructure can't even keep up with the current electrical demands now, how do they expect to keep up with the demand by 2035? Solar right? Well, again, PGE is able to charge astronomical transmission fees etc that does not justify going electric. This needs to end and is big reason why public will push back.

A great idea but a major stakeholder in the success of this is PGE and CA is not doing

anything to these modern day thieves.&nbsp;We have the highest cost per Kw hr in the country and yet PGE will win again.</span></p>  
<p style="font-variant-ligatures: normal; font-variant-caps: normal; orphans: 2; text-align: start; widows: 2; -webkit-text-stroke-width: 0px; text-decoration-thickness: initial; text-decoration-style: initial; text-decoration-color: initial; word-spacing: 0px;"><span style="font-size: 13.5pt; font-family: 'Segoe UI',sans-serif; color: black;">The State needs to make this equitable for all</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 08:13:25

No Duplicates.

**Comment 47 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: David

Last Name: Patterson

Email Address: patterson@chademo.org

Affiliation: CHAdEMO Association

Subject: CHAdEMO Association Comments regarding ACCII 2022

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/589-accii2022-AGMAblc3ADcAY1M+.pdf>

Original File Name: CHAdEMO Association - Comments.pdf

Date and Time Comment Was Submitted: 2022-08-25 08:49:34

No Duplicates.

**Comment 48 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Thomas

Last Name: Bradley

Email Address: thomas.bradley@colostate.edu

Affiliation: Colorado State University

Subject: SUPPORT Proposed Advanced Clean Cars II Regulations

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/590-accii2022-B2NUIAdnAzYLeQNc.pdf>

Original File Name: Draft Strong PHEV Coalition letter to CARB Board August 25  
v1\_THB.pdf

Date and Time Comment Was Submitted: 2022-08-25 09:15:17

No Duplicates.



**Comment 49 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Christina

Last Name: McFarland

Email Address: snowgirl92365@yahoo.com

Affiliation:

Subject: As a Hispanic I decline to states stature.

Comment:

<p>Taxation without representation.</p>

<p>given history of party politicians, despite our Constitutional Republic, we are denied to follow our Constitution to uphold We the People to govern. It is our fault and The People allowed this through ignorant voting encouraged through politicians. Former President Adams expressed that well.&nbsp;<br /><br /></p>

<p>However, you pay no attention to any citizen who doesn't have a piece of paper to distinguish professionalism regardless of knowing such parchment is not defined to the owners intelligence.</p>

<p>&nbsp;</p>

<p>I decline to this states idealism. For illegals, as much as your words lack any backing, would hurt them. This action goes against your support for them. To include, working class, welfare government dependent class, and rich. Despite the rich denial, it must be true that no humans actually agrees with this stature. Unless 1, their is another agenda, such as personal, political, and or corporate gain.&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 09:27:57

No Duplicates.

**Comment 50 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Amy

Last Name: Lilly

Email Address: amy.lilly@mercedes-benz.com

Affiliation: Mercedes-Benz R&D North America

Subject: Mercedes-Benz Testimony at the 2nd ACC II Board Meeting

Comment:

<p>Thank you for the opportunity to provide the attached testimony  
at the 2nd ACC II Board meeting.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/592-accii2022-BWhUMAFfVzUGNVIN.pdf>

Original File Name: MB 15 Day Change Testimony.pdf

Date and Time Comment Was Submitted: 2022-08-25 09:18:56

No Duplicates.

**Comment 51 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Roman

Last Name: Vogelsang

Email Address: rvogelsang@apreamicheli.com

Affiliation: obo ChargePoint Inc.

Subject: Comment on Proposed Advanced Clean Cars II Regulations

Comment:

<p>Please see the attached PDF.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/593-accii2022-W2lQZl1uUjNQZgY+.pdf>

Original File Name: 20220825 ACCII Hearing Comments.pdf

Date and Time Comment Was Submitted: 2022-08-25 09:50:29

No Duplicates.

**Comment 52 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Gary

Last Name: Lupo

Email Address: garylupo@gmail.com

Affiliation: none

Subject: the stopping of selling of gas car in california in 2035

Comment:

<p>You&nbsp; guys want to stop selling gas car in california and have only Electric car. Flex elerts daily we (the public) hear about them. Flex elerts and we may have to cut out power usage.&nbsp; You guys want to get rid of gas power car in favor of electric cars. GREAT where are going to get the electrical power to service all of these new Electric cars ??&nbsp;</p>

<p>I think you guys are jump two steps forward&nbsp; only to be pushed back by 3 steps backwards. I believe we can get to move of hybread of cars. Not all the way electric cars. The Governor is out of dreaming of the perfect world and it does not exist.&nbsp; I think we can get to all electric cars but not by 2035 maybe by 2060.&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 09:53:39

No Duplicates.

**Comment 53 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: David

Last Name: Patterson

Email Address: patterson@chademo.org

Affiliation: CHAdEMO Association

Subject: CHAdEMO Association Comments for ACC II - August 25, 2022

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/595-accii2022-AWJTPQZmUGcAY1M+.pdf>

Original File Name: CHAdEMO Letter to the CARB Board August 25 2022.pdf

Date and Time Comment Was Submitted: 2022-08-25 10:22:01

No Duplicates.

**Comment 54 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: William

Last Name: Becker

Email Address: becker49@att.net

Affiliation:

Subject: Elimination of gas powered automobiles

Comment:

**I strongly object to your plan to eliminate gas powered vehicles.**

<p>The cost for these vehicles will unduly punish those in the lower income brackets of California.</p>

[illegible]

I assume your anal rententive thinking has no plan to solve this problem.&nbsp; Your solution seems to be let other states provide that energy and your conscience is clear.

<p>If California was required to provide all of its own enrgry for EV's, you would all be riding horses again.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 10:59:57

No Duplicates.

**Comment 55 for Proposed Advanced Clean Cars II Regulations (accii2022).  
(At Hearing)**

First Name: Anna Bella

Last Name: Korbatov

Email Address: annabella@fermataenergy.com

Affiliation: Fermata Energy

Subject: Fermata Energy Letter to CARB Board Re Support for ACCII Regulations

Comment:

<p>Attached please find Fermata Energy's comments in support of  
CARB's<span style="font-size: 12pt; font-family: Calibri,  
sans-serif; font-variant-numeric: normal; font-variant-east-asian:  
normal; vertical-align: baseline; white-space: pre-wrap;">  
</span><span style="font-size: 12pt; font-family: Calibri,  
sans-serif; color: #2d333d; font-variant-numeric: normal;  
font-variant-east-asian: normal; vertical-align: baseline;  
white-space: pre-wrap;">Proposed Advanced Clean Cars II  
Regulations.</span></p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/597-accii2022-VjAFZlwvBzkCZQJ2.pdf>

Original File Name: Fermata Energy Letter to CARB Board Re ACCII\_August 25,  
2022.docx.pdf

Date and Time Comment Was Submitted: 2022-08-25 11:16:19

No Duplicates.

## Comment 1 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.

First Name: Jamie

Last Name: Dow

Email Address: jamie@electrek.co

Affiliation:

Subject: California must not be a global laggard. Improve these rules.

Comment:

<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Hi, I'm Jameson Dow, lifelong California resident, EV journalist and i've had asthma my whole life like the 2 million kids who get it every year globally from traffic pollution - and whose lifetime of health costs are not paid by those polluters.</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Automakers say it will be hard to reach the 2035 target.&nbsp; They've made excuses, and have touted their insufficient actions to fight climate change.&nbsp; They've questioned this regulation from every angle to slow down implementation because "this will be too hard, we can't do it fast enough."</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">But, none of this matters.&nbsp; In this negotiation, the automakers' adversary is not CARB, California voters, or the courts.&nbsp; Their adversary is physics.&nbsp; And physics does not care about your mundane complaints, it only cares how much carbon is in the atmosphere.</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">A study just came out which shows we can stop climate change with immediate action.&nbsp; But even if we lower emissions to zero TODAY - not in 2035, or 2050 - we have a chance to go over 1.5&ordm;C of warming, which is a target we should not exceed and we must lower that chance.</span></p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>  
<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">So, again, in the face of physics, which does not negotiate, nothing the automakers have said matters



at all.&nbsp; We must stop emissions not just as fast as possible, but faster than these automakers claim is possible.&nbsp; They have to pick up the pace and if they can't, then try harder. All hands on deck, figure it out or go bankrupt, and why not also pay for all the pollution you've caused in the last century by the way?

&nbsp;

The 2035 requirement is not enough.&nbsp; California shouldn't be selling gasoline today, much less 20, 30 years in the future, as 2034 gas cars will still pollute for decades down the road.&nbsp; And California, with our US and global leadership, can make automakers pick up the pace by choosing a stronger target than ACC2.

&nbsp;

I call on the board to implement a stronger regulation, pulling forward targets to 100% all-EV by 2030 or even earlier, and further work to reduce car usage in general and shift people from cars to cleaner transport methods.&nbsp; This is what Norway is doing, which is nearing its 2025 EV-only sales requirement already in 2022, and the biggest auto company in the world by market cap has been all EV since 2008.&nbsp; So these targets can be met, and California shouldn't be a global laggard on this issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-12 21:05:48

No Duplicates.

## Comment 2 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.

First Name: Kenneth

Last Name: Johnson

Email Address: kjinnovation@comcast.net

Affiliation:

Subject: EV conversion kits?

Comment:

<p>Has CARB given any consideration to EV conversion kits, which GM and Ford are now selling [1,2]? Probably other manufacturers would also enter the EV retrofit market if&nbsp; regulatory incentives encourage them to do so.<br /><br />An EV conversion upgrade of an ICE vehicle could provide the same environmental benefit as a new EV, and should be given the same regulatory credit. That would be the case even if the converted vehicle has limited remaining lifecycle VMT because the EV motor and batteries would probably far outlast the vehicle and could be sold for reuse in another car.<br /><br />CARB's Clean Cars program seems to be limited in scope to new vehicles, but EV conversion kits could facilitate accelerated retirement of existing ICE engines. Moreover, EV conversion kits could enable low-income drivers, who cannot afford a new car, to share in the economic benefits of EV technology. Government subsidies and financing for EV vehicles might have a much bigger environmental impact, and could better serve less affluent drivers, if they are applied to EV conversions rather than being limited exclusively to new vehicle sales.<br /><br />[1] Retrofitting Older Cars with Electric Motors Could Transform Transport, Discovery, by Robin Fearon, November 01, 2021<br /><a href="https://www.discovery.com/motor/retrofitting-older-cars-with-electric-motors-could-transform-tra">https://www.discovery.com/motor/retrofitting-older-cars-with-electric-motors-could-transform-tra<br /><br />[2] Converting Your Gas-Powered Car to Electric, Treehugger, by Justin Thomas, May 22, 2022<br /><a href="https://www.treehugger.com/converting-your-car-to-an-electric-vehicle-4858603">https://www.treehugger.com/converting-your-car-to-an-electric-vehicle-4858603</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-13 20:30:33

No Duplicates.

### **Comment 3 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Kwan Kok

Last Name: Ko

Email Address: conradko@gmail.com

Affiliation:

Subject: Please Advance ICE Ban Date

Comment:

<p>Currently, the regulation by the state is to ban all new internal combustion engine ("ICE") vehicles by 2035. Existing vehicles will be allowed to continue to operate. However, due to how long modern cars last, a ban by that date will not make meeting the mandate of carbon neutrality by 2050 under the Paris Climate Agreement possible. Most modern cars last around 250,000 miles before needing replacement, which is just under 18 years with the normal annual mileage. So, it is recommended that the ICE ban for new vehicles be pushed forward to no later than 2032, preferably 2030, in order to be able to meet the target of net zero emissions by 2050 under the Paris Climate Accord.<br /><br />This is an extremely vital mandate to comply with because anthropogenic climate change ("AGCC") is an existential threat to the human species, which will do so by drastically worsening droughts and increasing wildfires by an unimaginably huge amount, consequently severely dwindling food supplies all over the globe. We've already seen the unprecedented string of wildfires and heat waves since 2017, and even that (the present) is still nothing compared to what will come if society continues on pumping out greenhouse gases at the current rate. This means that the worst is still yet to come. As a result, I strongly urge CARB under CalEPA to take urgent drastic action by banning all new combustion engines starting by 2030. Even the State of Washington is doing so by that date, so the State of California, which has historically lead on environmental protection regulations, should not let itself fall behind other states.<br /><br />I would appreciate feedback.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-14 16:32:57

No Duplicates.

## **Comment 4 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Gail

Last Name: Kharidia

Email Address: gail.kharidia@gmail.com

Affiliation: Elders for Climate Action

Subject: Strengthen the Proposed Advanced Clean Cars II Regulation

Comment:

```
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">Please strengthen the proposed Advanced Clean Cars
II</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">regulation:&nbsp;</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">1) Advance the deadline for 100% sale of zero emission
Light Duty vehicles from</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">2035 to 2030; and</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">2) Establish limitations on the operation of internal
combustion engine vehicles</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">(ICEVs) that progressively reduce the vehicle miles
traveled by ICEVs to zero by&nbsp;2035</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">in areas designated &ldquo;severe&rdquo; and
&ldquo;extreme&rdquo; under the Clean Air Act.</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;">&nbsp;</div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">California has more vehicles than any other state. It
needs to take action. Also it will be a model for the rest of the
country with pliciiies and regulations that can be
emulated.&nbsp;</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;">&nbsp;</div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">Thank you,</span></div>
<div style="font-family: Arial, Verdana, Helvetica, sans-serif;
font-size: 14px; background-color: #ffffff;"><span style="color:
#222222;">Gail Kharidia</span></div>
```

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-18 14:39:53

No Duplicates.

**Comment 5 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Peter

Last Name: Treydte

Email Address: petert@sema.org

Affiliation: Specialty Equipment Market Association

Subject: SEMA Comments regarding ACC2

Comment:

<p>Thank you for the opportunity to comment. Please see formal letter attached.</p>  
<p>&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/547-accii2022-UiFUN1wwV2UEXQJj.pdf>

Original File Name: SEMA ACC2 Comment Letter 2022.07.21.pdf

Date and Time Comment Was Submitted: 2022-07-21 10:28:42

No Duplicates.

## **Comment 6 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Mark

Last Name: Bauhaus

Email Address: Mabpatriot@gmail.com

Affiliation: Voter, taxpayer, resident, business exec

Subject: CARB carbon free fuel standard & end of gas cars

Comment:

<p>CARB team,</p>

<p>I urge you to accelerate the timeline for ending gasoline car sales in California. &nbsp;I switched to EV's over a decade ago... they are now available, affordable, cheaper to operate, quieter, safer, and more fun than fossil fuel vehicles. &nbsp;With the climate emergency accelerating with climate emergency costs escalation wildly... its time for a 2030 or 2035 deadline to stop all gas vehicle sales in California. &nbsp;This will give industry, consumers, and policy makers ample time to adjust & switch to non-fossil fuel vehicles. &nbsp;We're out of time for multi-decade soft landings... I urge you to set an aggressive deadline to stop fossil fuel vehicle sales in our state.</p>

<p>Best regards,</p>

<p>Mark Bauhaus, Tuolumne county resident and voter and taxpayer.&nbsp;</p>

<p>&nbsp;</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-21 10:58:31

No Duplicates.

**Comment 7 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: John

Last Name: Wait

Email Address: mattw@knock.la

Affiliation:

Subject: Please support and accelerate ACCII

Comment:

<p>Please do not give in to automakers asking for relaxed standards. The EU is already moving in this direction. They will have to deal. Please accelerate the transition deadline to 2030. Please provide more access to charging infrastructure in rural areas. Please ensure the public understands the rules will only apply to new car sales, especially those in the central valley. Please provide support for transitioning away from cars to people who rent (majority of people in LA) and likely cannot access at-home charging.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-21 11:21:12

No Duplicates.



## **Comment 8 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Joseph  
Last Name: Mendelson  
Email Address: jmendelson@tesla.com  
Affiliation: Tesla, Inc.

Subject: Tesla - Comments on ACC II 15-Day Proposed Regs  
Comment:

<p class="MsoNormal"><span style="font-size: 11.0pt; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-theme-font: minor-latin; color: windowtext;">Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: 15-day Proposed Amendments (15-day), Tesla respectfully submits the following comments.<span style="mso-spacerun: yes;">&nbsp; </span>Tesla incorporates by reference its written comments in response to previous ACC II workshops, presentations, and comments periods. </span></p>  
<div style="mso-element: footnote-list;">&nbsp;</div>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/550-accii2022-UydcPwNxBTpSNVcI.pdf>

Original File Name: Tesla Comment ACC 2 15 Day Proposed Regs Final Submitted 7-26-22.pdf

Date and Time Comment Was Submitted: 2022-07-26 10:44:00

No Duplicates.

## **Comment 9 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Stephen

Last Name: Markley

Email Address: stephen.markley@gmail.com

Affiliation:

Subject: CARB's 2022 Scoping Plan

Comment:

<p>I'm deeply concerned that CARB's five-year scoping plan for climate mitigation is widely insufficient to reach its 2030 goals. The cap-and-trade program continues to have way too many allowances to do the heavy lifting of decarbonization, it ignores local air pollution that effects marginalized communities, and overall does not appear capable of reaching California's climate targets. Furthermore, the heavy reliance on carbon direct capture--while I believe in the necessity of the technology--seems like a lot of hand-waiving when it should be focused on hard and fast goals to mitigate. If this plan gets locked in for five more years, it's going to become even more difficult to reform. Please, use every effort to go back to the drawing board with this and devise a plan that can actually demonstrate a clear path to those 2030 targets.</p>  
<p>Thank you for your time,</p>  
<p>Steve Markley</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-26 14:57:01

No Duplicates.

**Comment 10 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Anh

Last Name: Bui

Email Address: a.bui@theicct.org

Affiliation: The ICCT

Subject: The ICCT's public comment on ACCII proposal modifications

Comment:

<p>We support and recommend the proposed modifications to the proposed ACCII regulation</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/552-accii2022-WzIBZFU3AiUHXlAg.pdf>

Original File Name: ICCT public comments on ACC II proposal modifications 7.27.2022.pdf

Date and Time Comment Was Submitted: 2022-07-27 09:32:00

No Duplicates.

## **Comment 11 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Betty

Last Name: Ball

Email Address: b.ball1@cox.net

Affiliation:

Subject: Climate Plan

Comment:

<p class="MsoPlainText">Dear Carb Members,</p>  
<p class="MsoPlainText">Your present plan is too little too late.<span style="mso-spacerun: yes;">&nbsp;</span>We are seeing the effects of climate change now and need to act now working to eliminate fossil fuels immediately with a deadline of 2035.<span style="mso-spacerun: yes;">&nbsp;</span>Instead of sending rebates to all drivers so they can drive more, that money could be invested in public (maybe free) transportation.</p>  
<p class="MsoPlainText">&nbsp;</p>  
<p class="MsoPlainText">Sincerely,</p>  
<p class="MsoPlainText">Betty Ball</p>  
<p>[Note: This comment was received through Community Air email address.]</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-27 09:51:58

No Duplicates.

**Comment 12 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Paul

Last Name: Miller

Email Address: pmiller@nescaum.org

Affiliation: NESCAUM

Subject: Comments on Proposed 15-Day Changes to ACC II

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/554-accii2022-AmxTMFclUGAEYwRx.pdf>

Original File Name: NESCAUM\_ACC II\_15-Day Comments\_20220727.pdf

Date and Time Comment Was Submitted: 2022-07-27 11:19:06

No Duplicates.

## Comment 13 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.

First Name: Phillip

Last Name: Kobernick

Email Address: pkobernich@peninsulacleanenergy.com

Affiliation:

Subject: Peninsula Clean Energy ACC2 Comments –Require 16 Amp Level 1 Charging Capabilities

Comment:

<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span><span style="color: #222222;">July 22, 2022&shy;&shy;&shy;&shy;</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif;">Liane M. Randolph, Chair</p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif;">California Air Resources Board</p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif;">1001 "I&rdquo; Street</p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif;">Sacramento, CA 95814</p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><strong><span style="color: #222222;">&nbsp;</span></strong></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><strong><span style="color: #222222;">&nbsp;</span></strong></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><strong><span style="color: #222222;">RE: Peninsula Clean Energy Advanced Clean Cars II Comments &ndash; Require 16 Amp Level 1 Charging Capability</span></strong></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">Dear Chair Randolph and Members of the Board,</span></p>

Peninsula Clean Energy authority ("PCE") submits these comments to the California Air Resource Board ("CARB") in regards to the Advanced Clean Cars II ("ACC II") draft regulations.

PCE, a community choice aggregator ("CCA"), is the official electricity provider for San Mateo County and the City of Los Banos in Merced County. Founded in 2016 with a mission to reduce community greenhouse gas emissions, the agency serves 315,000 customers by providing more than 3,500 gigawatt hours annually of carbon-free energy. As a community-led, not-for-profit agency, PCE makes significant investments in our communities to expand access to sustainable and affordable energy solutions. PCE is on track to deliver electricity that is 100% renewable by 2025. PCE's EV Ready Program is a \$28 million electric vehicle ("EV") charging infrastructure program seeking to install 3,500 charging ports at public and multi-unit dwelling sites in our community over four years.

In general, PCE applauds CARB staff in its efforts to accelerate electric vehicle ("EV") adoption and provide more equitable access to EVs in California and joins other commenters in support of increased annual EV targets, increased ranges for all-electric and plug-in hybrid vehicles, improving charging cords to dual-voltages and longer lengths, more affordable (low MSRP) EVs, etc.

We reserve our comments to focus on one Level 1 charging as a means to further improve access to a convenient and accessible place to plug in at home and has otherwise not been addressed in the draft regulations. **We encourage CARB to include regulations that mandate that automakers allow EV drivers to set the charge level of their Level 1 charging, with a maximum of 16 amps when drivers are using dedicated 20-amp circuit for their Level 1 charger.**

0.5in; background: white;"><span style="color: #222222;">As noted in the Initial Statement of Reasons, Level 1 charging provides significant convenience and cost avoidance benefits to EV drivers by allowing them to &ldquo;make use of the supplied cord with existing residence circuits and no additional costs to either modify the home wiring or buy a different charger.&rdquo;<a style="color: #0563c1;" title="" href="#\_ftn1" name="\_ftnref1"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 11pt; line-height: 15.6933px; color: #222222;">[1]</span></span></span></a> PCE agrees. Level 1 is a commonly used, &ldquo;out of the box&rdquo; charging solution that meets the daily needs of most EV drivers<a style="color: #0563c1;" title="" href="#\_ftn2" name="\_ftnref2"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 11pt; line-height: 15.6933px; color: #222222;">[2]</span></span></span></a> with no installation costs. Allowing drivers to control their Level 1 charge rates in the vehicle and letting drivers charge at 16 amps if they have a dedicated 20-amp circuit will improve the Level 1 charging experience for the many EV drivers that charge this way.&nbsp;</span></p><p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span></p><p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; text-indent: 0.5in; background: white;"><span style="color: #222222;">Several vehicles already have the capability to change Level 1 power levels, demonstrating its benefit to customers and that automakers are capable of implementing this feature. The draft regulations note that several automakers such as BMW and Hyundai allow drivers to set their charging level between 8 &ndash; 12 amps.<a style="color: #0563c1;" title="" href="#\_ftn3" name="\_ftnref3"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 11pt; line-height: 15.6933px; color: #222222;">[3]</span></span></span></a> Tesla also allows drivers to set their Level 1 charging rate up to 16 amps.</span></p><p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">&nbsp;</span></p><p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; text-indent: 0.5in; background: white;"><span style="color: #222222;">The practical benefit of this proposal is that drivers would be able to get more range on an overnight charge with Level 1 charging thereby improving their overall EV driving experience. An EV that limits Level 1 charging at 12 amps (or 1.4 kW), provides approximately 60 miles of range<a style="color: #0563c1;" title="" href="#\_ftn4" name="\_ftnref4"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 11pt; line-height: 15.6933px; color: #222222;">[4]</span></span></span></a> over a 12-hour overnight charge<a style="color: #0563c1;" title="" href="#\_ftn5" name="\_ftnref5"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 11pt; line-height: 15.6933px; color: #222222;">[5]</span></span></span></a>



line-height: 15.6933px; color: #222222;">[5]

Allowing an EV driver to charge up to 16 amps on their Level 1 charger would increase the power to 1.9 kW, yielding over 80 miles of range overnight, a considerable difference.

&nbsp;

In PCE's EV Ready charging rebate program,[\[6\]](#) we offer free technical assistance to multi-family property owners and other EV charging site hosts to help them install as many charging ports as possible. For sites with significant parking dwell times, such as multi-family housing, which averages over 12 hours of parking times, Level 1 is often the ideal solution to contain costs and provide maximum access without incurring major electrical service upgrades. In these projects, PCE designs Level 1 charging receptacles on dedicated 20-amp circuits[\[7\]](#), since Teslas, as the most common EV make in California, already offer the option charge at 16 amps. Our hope is that other automakers will follow suit and these Level 1 receptacles can be used to their maximum potential and provide greater overnight charging across other vehicle brands.

&nbsp;

In summary, allowing EV drivers to control their power level when charging on a Level 1 charger, including the ability to charge up to 16 amps, will improve the charging experience for many EV drivers and would be straightforward to implement, particularly since Tesla has already done so. PCE encourages CARB to utilize the ACC II regulations to improve Level 1 EV charging by requiring automakers to implement this capability for the benefit of EV drivers.

&nbsp;

Thank you for your consideration of these comments and please don't hesitate to contact me if you have any additional questions.

&nbsp;

font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">Phillip Kobernick</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: 22px; font-size: 11pt; font-family: Arial, sans-serif; background: white;"><span style="color: #222222;">Programs Manager, Peninsula Clean Energy</span></p>  
<p class="MsoNormal" style="margin: 0in; line-height: normal; font-size: 11pt; font-family: Arial, sans-serif;">&nbsp;</p>  
<div><br clear="all" /><hr align="left" size="1" width="33%" />  
<div id="ftn1">  
<p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref1" name="\_ftn1"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[1]</span></span></span></a> California Air Resources Board, Advanced Clean Cars II Regulations, Initial Statement of Reasons, <span style="color: #222222;">Section 3.d Dual Voltage Capability, page 52.</span></p>  
</div>  
<div id="ftn2">  
<p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref2" name="\_ftn2"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[2]</span></span></span></a> See Peninsula Clean Energy and CLEAResult research, demonstrating that a 1.65 kWh overnight charge satisfies that daily energy needs of 94+% of drivers. <a style="color: #0563c1;" href="https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf">https://www.peninsulacleanenergy.com/wp-content/uploads/2021/09/Determining-the-Appropriate-Level-of-Power-Sharing-for-EV-Charging-in-Multifamily-Properties.pdf</a><span class="MsoHyperlink" style="color: #0563c1; text-decoration-line: underline;">.</span>&nbsp;</p>  
</div>  
<div id="ftn3">  
<p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref3" name="\_ftn3"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[3]</span></span></span></a> <em>Supra</em> note 1.</p>  
</div>  
<div id="ftn4">  
<p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref4" name="\_ftn4"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[4]</span></span></span></a> Assumes an EV efficiency of 3.5 miles/kWh</p>  
</div>  
<div id="ftn5">

<p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref5" name="\_ftn5"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[5]</span></span></span></a> See Center for Sustainable Energy and Forth Mobility study, demonstrating average plug times of 12+ hours by multi-family housing residents, <a style="color: #0563c1;" href="https://www.peninsulacleanenergy.com/wp-content/uploads/2022/07/CSE-Report-on-MUD-Charging-Incl-Average-Plug-In-Times.pdf">https://www.peninsulacleanenergy.com/wp-content/uploads/2022/07/CSE-Report-on-MUD-Charging-Incl-Average-Plug-In-Times.pdf</a></p>

<div id="ftn6">
 <p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref6" name="\_ftn6"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[6]</span></span></span></a> <a style="color: #0563c1;" href="https://www.peninsulacleanenergy.com/ev-ready/">https://www.peninsulacleanenergy.com/ev-ready/</a><span class="MsoHyperlink" style="color: #0563c1; text-decoration-line: underline;">.</span></p>
 </div>

<div id="ftn7">
 <p class="MsoFootnoteText" style="margin: 0in; font-size: 10pt; font-family: Arial, sans-serif;"><a style="color: #0563c1;" title="" href="#\_ftnref7" name="\_ftn7"><span class="MsoFootnoteReference" style="vertical-align: super;"><span class="MsoFootnoteReference" style="vertical-align: super;"><span style="font-size: 10pt; line-height: 14.2667px;">[7]</span></span></span></a> For details on how Peninsula Clean Energy designs Level 1 and power-managed Level 2 EV charging installation projects, please see EV Ready Design Guidelines, <a style="color: #0563c1;" href="https://www.peninsulacleanenergy.com/wp-content/uploads/2021/05/PCE-EV-Ready-Design-Guidance.pdf">https://www.peninsulacleanenergy.com/wp-content/uploads/2021/05/PCE-EV-Ready-Design-Guidance.pdf</a>&nbsp;</p>
 </div>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/555-accii2022-U2RddQY1AmlVfQIw.docx>

Original File Name: 7.28.22 Peninsula Clean Energy Comments on AC2.docx

Date and Time Comment Was Submitted: 2022-07-27 16:44:48

No Duplicates.

**Comment 14 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Kevin

Last Name: Brown

Email Address: kbrown@meca.org

Affiliation: Manufacturers of Emission Controls Assoc

Subject: MECA Comments on ACC-II 15 day changes

Comment:

<p>see attached comment</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/556-accii2022-UD0CYVw+UWNRCFdm.pdf>

Original File Name: MECA 15DAY ACC II COMMENTS 072722.pdf

Date and Time Comment Was Submitted: 2022-07-27 17:26:44

No Duplicates.

**Comment 15 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Tracy

Last Name: Woodard

Email Address: tracy.woodard@Nissan-Usa.com

Affiliation: Nissan

Subject: Nissan - Comments on ACC II 15-Day Proposed Regs

Comment:

<p>Pursuant to the California Air Resources Board's (CARB's) Proposed Advanced Clean Cars II Regulations: 15-day Proposed Amendments (15-day), Nissan respectfully submits the following attached comments.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/557-accii2022-VzkCbQNxACADZAJs.pdf>

Original File Name: Nissan North America ACC2 Comments (15 Day Notice).pdf

Date and Time Comment Was Submitted: 2022-07-28 09:17:16

No Duplicates.

## Comment 16 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.

First Name: Sarah  
Last Name: Sachs  
Email Address: ssachs@ceres.org  
Affiliation: Ceres

Subject: Major Businesses and Institutions Support an Ambitious ACC II Standard  
Comment:

```
<p><strong><span style="font-family: arial, helvetica, sans-serif;
font-size: 12pt;">On behalf of 42 businesses and institutions
representing footprints in 36 states, I'm pleased to submit a
comment letter in support of the most ambitious standards for the
Advanced Clean Cars II (ACC II) program. Signatories include:
Dignity Health, IKEA USA, Lyft, Lime, Sierra Nevada Brewing Co,
Clif Bar, Ben & Jerry's, and more.</span></strong></p>
<p><span style="font-family: arial, helvetica, sans-serif;
font-size: 12pt;"> </span></p>
<div class="page" title="Page 3"><span style="font-family: arial,
helvetica, sans-serif; font-size: 12pt;"> </span>
<div class="layoutArea"><span style="font-family: arial, helvetica,
sans-serif; font-size: 12pt;"> </span>
<div class="column"><span style="font-family: arial, helvetica,
sans-serif; font-size: 12pt;"> </span>
<p><span style="font-size: 12pt; font-family: arial, helvetica,
sans-serif;">These businesses and institutions are making
significant commitments to reduce their GHG emissions and protect
the health and economic well-being of the communities in which they
live and operate. However, these commitments alone will not be
enough to meet their shared climate goals. With no equivalent
federal policy at this time, expeditious and ambitious state action
is imperative. In fact, for Section 177 states, policies such as
ACC II are the primary path for achieving their climate and clean
air goals. These entities are counting on bold action by state
leaders to cut deadly climate and air pollution, unlock a
zero-emission and low-emission vehicle market, create good jobs,
and ensure the global competitiveness of the U.S.
economy.&nbsp;</span></p>
</div>
</div>
</div>
```

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/558-accii2022-VjsAZwNoVmoGclIN.pdf>

Original File Name: Major Businesses and Institutions Support an Ambitious ACC II Standard.pdf

Date and Time Comment Was Submitted: 2022-07-28 10:39:50

No Duplicates.

**Comment 17 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Amy

Last Name: Lilly

Email Address: amy.lilly@mercedes-benz.com

Affiliation: Mercedes-Benz R&D North America

Subject: Mercedes Comment on ACC II 15 Day Change

Comment:

<p>Mercedes-Benz is pleased to provide comments on CARB's ACC II 15 Day Change Notification.&nbsp; Rather than creating a zip file, our previous comments on the ISOR, which are referenced in the comments, are included within the pdf document.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/559-accii2022-WzYGZVAjAjlLaAVh.pdf>

Original File Name: Mercedes ACC2 15 Day Change.pdf

Date and Time Comment Was Submitted: 2022-07-28 11:16:56

No Duplicates.



**Comment 18 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Tom  
Last Name: Van Heeke  
Email Address: tvanheeke@rivian.com  
Affiliation: Rivian Automotive, LLC

Subject: Comments on CARB's 15-Day Changes to the Proposed ACCII Regulations  
Comment:

<p>Rivian is pleased to submit the attached comments in response to CARB's 15-days changes to the proposed ACCII regulations. We appreciate the hard work of staff in developing the regulation and this opportunity to comment.&nbsp;<br /><br />Please reach out to me with any questions.<br /><br />Tom Van Heeke<br />Senior Policy Advisor<br />Rivian Automotive, LLC</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/560-accii2022-VCZQPwRzBz0BZghm.pdf>

Original File Name: Rivian\_ACC2\_15DayChanges\_Comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-07-28 13:12:57

No Duplicates.

**Comment 19 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Noah

Last Name: Garcia

Email Address: ngarcia@aee.net

Affiliation: Advanced Energy Economy

Subject: 15-Day Notice on Proposed Modifications to the Advanced Clean Cars II Regulation  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/561-accii2022-UTBcPwBkVFhXMghp.pdf>

Original File Name: AEE CARB ACCII 15-Day Notice Comment Final.pdf

Date and Time Comment Was Submitted: 2022-07-28 14:06:17

No Duplicates.

**Comment 20 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Kathy

Last Name: Harris

Email Address: kharris@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: NRDC Comments on ACCII 15-Day Changes

Comment:

<p>Attached, please find NRDC's comments on the Advanced Clean Cars 15-day changes.&nbsp;  </p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/562-accii2022-BmhRJQBIU2NXDIRl.pdf>

Original File Name: NRDC 15-Day Changes Response 2022.7.28.pdf

Date and Time Comment Was Submitted: 2022-07-28 14:11:00

No Duplicates.

**Comment 21 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Dylan

Last Name: Jaff

Email Address: dylan.jaff@consumer.org

Affiliation: Consumer Reports

Subject: Consumer Reports Comments - ACC II 15-day Change

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/563-accii2022-AGNdKVQKBDQAaQVo.pdf>

Original File Name: CR Comments on ACC II 15-day 7.28.22.pdf

Date and Time Comment Was Submitted: 2022-07-28 15:54:43

No Duplicates.

**Comment 22 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Michael

Last Name: Lord

Email Address: michael.lord@toyota.com

Affiliation:

Subject: Toyota Comment on ACC2 15 Day Changes

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/564-accii2022-UydcNVYyBDgLeQBh.pdf>

Original File Name: Toyota Comment on ACC2 15 Day Changes.pdf

Date and Time Comment Was Submitted: 2022-07-28 16:36:27

No Duplicates.

**Comment 23 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: James

Last Name: Enstrom

Email Address: [jenstrom@ucla.edu](mailto:jenstrom@ucla.edu)

Affiliation: UCLA (Retired Prof) and Scientific Integ

Subject: Enstrom Comment Opposing CARB ACC II & Scoping Plan

Comment:

<p>Please read and respond to the attached Enstrom Comment Opposing  
CARB ACC II & Scoping Plan 072822.</p>

James E. Enstrom, PhD, MPH, FFACE  
jenstrom@ucla.edu

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/565-accii2022-AWRdNVMhByAGcgVq.pdf>

Original File Name: Enstrom Comment Opposing CARB ACC II & Scoping Plan 072822.pdf

Date and Time Comment Was Submitted: 2022-07-28 16:34:08

**No Duplicates.**

**Comment 24 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autosinnovate.org

Affiliation: Alliance for Automotive Innovation

Subject: Alliance for Automotive Innovation 15-Day Comments

Comment:

<p>Please see attached.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/566-accii2022-AGFWM1IwUl5SPQlg.zip>

Original File Name: ACC II 15-Day Notice - Auto Innovators Comment.zip

Date and Time Comment Was Submitted: 2022-07-28 16:58:22

No Duplicates.

## Comment 25 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.

First Name: Madeline

Last Name: Oliver

Email Address: madeline@betterworldgroup.com

Affiliation: Better World Group

Subject: Comments from the California Clean Cars Coalition

Comment:

```
<p><span
id="docs-internal-guid-fa2cddab-7fff-4574-84b3-45a36c18f0ba"><span
style="font-size: 11pt; font-family: Calibri, sans-serif; color:
#201f1e; font-variant-numeric: normal; font-variant-east-asian:
normal; vertical-align: baseline; white-space:
pre-wrap;">Hello,</span></span></p>
<p><span
id="docs-internal-guid-fa2cddab-7fff-4574-84b3-45a36c18f0ba"><span
style="font-size: 11pt; font-family: Calibri, sans-serif; color:
#201f1e; font-variant-numeric: normal; font-variant-east-asian:
normal; vertical-align: baseline; white-space: pre-wrap;">Please
see attached the California Clean Cars Coalition's comments on the
proposed 15-day changes to the Advanced Clean Cars II (ACC II)
regulation. Thank you for your consideration. </span></span></p>
<p><span
id="docs-internal-guid-fa2cddab-7fff-4574-84b3-45a36c18f0ba"><span
style="font-size: 11pt; font-family: Calibri, sans-serif; color:
#201f1e; font-variant-numeric: normal; font-variant-east-asian:
normal; vertical-align: baseline; white-space: pre-wrap;">Best,
</span></span></p>
<p><span
id="docs-internal-guid-fa2cddab-7fff-4574-84b3-45a36c18f0ba"><span
style="font-size: 11pt; font-family: Calibri, sans-serif; color:
#201f1e; font-variant-numeric: normal; font-variant-east-asian:
normal; vertical-align: baseline; white-space:
pre-wrap;">Madeline</span></span></p>
```

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/567-accii2022-VTZRNIPEVPGQCaAdi.pdf>

Original File Name: CA Clean Cars Campaign ACC II letter July 28th.pdf

Date and Time Comment Was Submitted: 2022-07-28 17:05:35

No Duplicates.



**Comment 26 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Justin

Last Name: Wilson

Email Address: justin.wilson@chargepoint.com

Affiliation: ChargePoint, Inc.

Subject: ChargePoint, Inc. 15 Day Notice Comments on Proposed Advanced Clean Cars II Regulations

Comment:

<p>Comments Attached</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/568-accii2022-VmRTZVVmVDVWYAA3.pdf>

Original File Name: 20220720 ACCII 15 Day Modification Comments.pdf

Date and Time Comment Was Submitted: 2022-07-28 17:26:04

No Duplicates.

**Comment 27 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: California Electric Transportation Coali

Subject: SUPPORT

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/569-accii2022-VjUGYQNuWW8LeVU2.pdf>

Original File Name: CalETC ACCII Aug Board Meeting Comments Final.pdf

Date and Time Comment Was Submitted: 2022-07-28 17:41:11

No Duplicates.

**Comment 28 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: ACCII regulations

Comment:

<p>The Union of Concerned Scientists supports the adoption of the ACCII regulations.</p>

<p>Please see the attached comment lettter.</p>

<p>&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/570-accii2022-VTRXMLAyVzZXDgg5.pdf>

Original File Name: ACC2 15 day UCS Comments.pdf

Date and Time Comment Was Submitted: 2022-07-28 18:00:30

No Duplicates.

**Comment 29 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Mark

Last Name: Watts

Email Address: mark@whstrat.com

Affiliation: Transportation California

Subject: ACC II Comments

Comment:

<p>Thank yu for the opportunity to comment.&nbsp;  </p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/571-accii2022-B3NdOANdBzUKbwFi.pdf>

Original File Name: TC ACC II Comment Letter (final 07 28 2022).pdf

Date and Time Comment Was Submitted: 2022-07-28 18:42:11

No Duplicates.

**Comment 30 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Steve

Last Name: Henderson

Email Address: shenders@ford.com

Affiliation: Ford Motor Co.

Subject: Ford Motor Company Comments on ACC-II 15-Day Notice

Comment:

<p>Please find attached Ford's comments on the 15-Day Notice&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/572-accii2022-WjxROFIhV2AFXAZl.pdf>

Original File Name: Ford Comments ACC II 15 day notice 28 July 2022.pdf

Date and Time Comment Was Submitted: 2022-07-28 19:12:55

No Duplicates.

**Comment 31 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Hilary

Last Name: Sinnamon

Email Address: [hilary@redmtngroup.com](mailto:hilary@redmtngroup.com)

Affiliation: Environmental Defense Fund

Subject: EDF comments on 15-day changes to ACCII

Comment:

<p><span style="font-size: 12.0pt; line-height: 107%; font-family: 'Calibri', sans-serif; mso-ascii-theme-font: minor-latin; mso-fareast-font-family: Calibri; mso-fareast-theme-font: minor-latin; mso-hansi-theme-font: minor-latin; mso-bidi-font-family: 'Times New Roman'; mso-bidi-theme-font: minor-bidi; color: black; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">Environmental Defense Fund respectfully submits these comments in response to the proposed 15-day changes to the Advanced Clean Cars II (ACC II) regulation. </span></p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/573-accii2022-BmAFAlc4BTcCaAJd.pdf>

Original File Name: FINAL EDF 15 day comments 7.28.22 .pdf

Date and Time Comment Was Submitted: 2022-07-28 20:15:03

No Duplicates.

**Comment 32 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Sasan

Last Name: Saadat

Email Address: ssaadat@earthjustice.org

Affiliation: Earthjustice

Subject: Earthjustice Final Comments on ACC II Rule

Comment:

<p>Please find attached Earthjustice's final comments on the ACC II rule. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/574-accii2022-VTBVMI0uVnEKZAFr.pdf>

Original File Name: Earthjustice Final ACC II Comments.pdf

Date and Time Comment Was Submitted: 2022-07-28 21:54:34

No Duplicates.

**Comment 33 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Adam

Last Name: Sykes

Email Address: adam.sykes@bmwna.com

Affiliation:

Subject: ACC2 Comments

Comment:

<p>Dear Chain Randolph and Members of the Board,<br /><br />Please find attached the comments of the BMW BMW Group regarding Advanced Clean Cars 2.</p>

<p>Best regards,<br />Adam Sykes</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/575-accii2022-WzkBalQiBThSNQhX.pdf>

Original File Name: BMWNA\_ACCII Comments\_August 2022.pdf

Date and Time Comment Was Submitted: 2022-07-28 22:52:45

No Duplicates.



**Comment 34 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-1.**

First Name: Gary

Last Name: Gregerson

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Advanced Clean Cars II Regulations

Comment:

<p>Please see attached.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/578-accii2022-UTdXJgZYWVUHfFc0.pdf>

Original File Name: FW\_ ACCII Comment -- FW\_ Proposed Advanced Clean Cars II Regulations.pdf

Date and Time Comment Was Submitted: 2022-08-17 11:29:34

No Duplicates.

## Comment 1 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.

First Name: Jamie

Last Name: Dow

Email Address: jamiedow@gmail.com

Affiliation:

Subject: California must not be a laggard on clean cars

Comment:

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Hi, I'm a lifelong California resident, EV journalist and I've had asthma my whole life like the 2 million kids who get it every year globally from traffic pollution - and whose lifetime of health costs are not paid by those polluters.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">Automakers say it will be hard to reach the 2035 target.&nbsp; They've made excuses, and have touted their insufficient actions to fight climate change.&nbsp; They've questioned this regulation from every angle to slow down implementation because "this will be too hard, we can't do it fast enough."</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">But, none of this matters.&nbsp; In this negotiation, the automakers' adversary is not CARB, California voters, or the courts.&nbsp; Their adversary is physics.&nbsp; And physics does not care about your mundane complaints, it only cares how much carbon is in the atmosphere.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">A study just came out which shows we can stop climate change with immediate action.&nbsp; But even if we lower emissions to zero TODAY - not in 2035, or 2050 - we have a chance to go over 1.5&ordm;C of warming, which is a target we should not exceed and we must lower that chance.</span></p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica; min-height: 14px;">&nbsp;</p>`

`<p style="margin: 0px; font-stretch: normal; font-size: 12px; line-height: normal; font-family: Helvetica;"><span style="font-kerning: none;">So, again, in the face of physics, which does not negotiate, nothing the automakers have said matters`

at all.&nbsp; We must stop emissions not just as fast as possible, but faster than these automakers claim is possible.&nbsp; They have to pick up the pace and if they can't, then try harder. All hands on deck, figure it out or go bankrupt, and why not also pay for all the pollution you've caused in the last century by the way?

&nbsp;

The 2035 requirement is not enough.&nbsp; California shouldn't be selling gasoline today, much less 20, 30 years in the future, as 2034 gas cars will still pollute for decades down the road.&nbsp; And California, with our US and global leadership, can make automakers pick up the pace by choosing a stronger target than ACC2.

&nbsp;

I call on the board to implement a stronger regulation, pulling forward targets to 100% all-EV by 2030 or even earlier, and further work to reduce car usage in general and shift people from cars to cleaner transport methods.&nbsp; This is what Norway is doing, which is nearing its 2025 EV-only sales requirement already in 2022, and the biggest auto company in the world by market cap has been all EV since 2008.&nbsp; So these targets can be met, and California shouldn't be a global laggard on this issue.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-08 20:13:08

No Duplicates.

## **Comment 2 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Jennifer

Last Name: Hernandez

Email Address: jennifer.hernandez@hklaw.com

Affiliation: The Two Hundred for Homeownership

Subject: Civil Rights and Green Jim Crow: Advanced Clean Cars II Regulations Requiring All New Pas

Comment:

<p>Please find the attached letter on behalf of our client,&nbsp;<a name="OLE\_LINK5"></a><span style="font-size: 11.0pt; font-family: 'Times New Roman', serif; mso-fareast-font-family: 'Times New Roman'; mso-ansi-language: EN-US; mso-fareast-language: EN-US; mso-bidi-language: AR-SA;">The Two Hundred for Homeownership.&nbsp;</span></p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/577-accii2022-VDcAZ1wvU2JQCQFg.pdf>

Original File Name: CARB ACC II.pdf

Date and Time Comment Was Submitted: 2022-08-16 14:55:54

No Duplicates.

## **Comment 3 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Thomas

Last Name: Becker

Email Address: tbeckerpower@gmail.com

Affiliation: T. Becker Power Systems

Subject: ACC II regulation

Comment:

<p>This comment is for the proposed ACC II Regulation.</p>  
<p>&nbsp;</p>  
<p>- Alternatives to the proposed regulation were submitted to CARB in a timely manner.</p>  
<p>- Those alternatives, if implemented, would achieve reductions in atmospheric "pollutants" far greater than the reductions achievable by the proposed regulation.</p>  
<p>- If the proposed alternatives were implemented in lieu of the proposed ACC II regulation, the reduction in atmospheric "pollutants" would be so great that the entire California EPA motor vehicle emission waiver system would no longer be required.</p>  
<p>- CARB staff is required by CEQA to analyze all environmentally superior alternatives submitted for the proposed ACC II regulation, and CARB staff is required to compare the environmental benefits of the proposed alternatives to the environmental benefits of the proposed regulation.</p>  
<p>- It would be unlawful for EPA to grant a waiver to California for the ACC II regulation if the state failed to analyze environmentally superior alternatives to the proposed regulation, or the state prepared a misleading/fraudulent analysis.</p>  
<p>&nbsp;</p>  
<p>Tom Becker</p>  
<p>Buellton, CA</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-20 09:32:20

No Duplicates.

**Comment 4 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Doug

Last Name: Peterson

Email Address: dougpeterston789@yahoo.com

Affiliation: Pro-ZEV Journalist

Subject: Extend Rulemaking to Consider Impact of New EV Tax Credit

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/580-accii2022-UTBdOFAYU18AbwRt.docx>

Original File Name: ACC II Comment.docx

Date and Time Comment Was Submitted: 2022-08-20 14:48:42

No Duplicates.

## **Comment 5 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Manuel

Last Name: Cunha, Jr.

Email Address: clehn@niseifarmersleague.com

Affiliation: Nisei Farmers League

Subject: Proposed CARB Advanced Clean Cars II Regulations

Comment:

Nisei Farmers League strongly opposes the proposed CARB Advanced Clean Cars II Regulations. The proposed 2035 target date for 100-percent of light-duty vehicle sales to be zero emission vehicles (ZEV) and plug-in hybrid electric vehicles (PHEV) puts California's food security at risk. Agricultural workers need affordable, reliable cars to get themselves to and from the job site in rural areas. Many used ZEV are currently selling above their original list price. Will the used ZEV market be at a price that is affordable to California farm workers? For those used ZEV and PHEV that are affordable, will they be reliable or require expensive repairs such as a new battery. Current ZEV and PHEV are mainly owned by white collar workers, will they withstand the dirt roads and neglected roads that California farmworkers drive to reach job sites?

Further, the plan puts California's food security at risk by asking farmers and farmworkers to rely on a grid that is prone to blackouts and power outages. The plan disproportionately impacts rural communities who lack the infrastructure of charging stations. It also disproportionately impacts migrant farm workers because they may travel out of state to communities that lack charging stations.

This plan creates inequities because it will increase costs for utilities, food and other necessities. The last thing farmers and farmworkers need are new energy rules and unrealistic mandates that do not fit with our rural communities. We strongly urge you to reconsider this proposal.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-23 09:04:40

No Duplicates.

## **Comment 6 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Will

Last Name: Scott, Jr.

Email Address: willscott2110@comcast.net

Affiliation: African American Farmers of California

Subject: Proposed CARB Advanced Clean Cars II Regulations

Comment:

<p>My comments are in regard to the 2022 Scoping Plan.&nbsp; It is an aggressive plan to not only reduce greenhouse gas emissions, but it threatens every agricultural operation, every small business and small city, rural town and many of the underserved communities.&nbsp; It seems there are better ways to reach environmental goals without threatening the livelihoods of all Californians.&nbsp; CARB policies should be a reflection of all the affected stakeholders.&nbsp; Vehicle miles traveled will hurt individual mobility and hurt the goods movement ability, especially in agriculture.&nbsp; The phase-out of natural gas, diesel and petroleum will result in higher costs for consumers and higher costs for small farmers like me to replace with electric, which I cannot afford.&nbsp; I am a small farmer.&nbsp; I deliver vegetables to farmers's markets throughout the state.&nbsp; I worry about how I will be able to move my products in a timely manner without the worry of spoilage.&nbsp; Please consider taking more time to make these decisions especially for the rural communities and small cities.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-23 09:13:51

No Duplicates.



## **Comment 7 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Shirley

Last Name: Rowe

Email Address: rshirleyann@aol.com

Affiliation: African American Farmers of California

Subject: Proposed CARB Advanced Clean Cars II Regulations

Comment:

<p>The message is clear.&nbsp; These proposed regulations will only hurt those that can least afford higher energy costs.&nbsp; We cannot afford higher vehicle prices.&nbsp; Our underserved communities are already suffering in this economic climate.&nbsp; By focusing on ONE technology, ELECTRIFICATION, it will be costly and less reliable, especially in our rural communities.&nbsp; The California grid is outdasted and cannot support our current energy needs, even now.&nbsp; Where will these charging stations be located?&nbsp; In the cities?&nbsp; How will those of us in low-income communities get to those stations?&nbsp; I am a small farmer.&nbsp; I cannot afford to replace all my equipment including trucks and tractors.&nbsp; I use a variety of fuels including diesel.&nbsp; I cannot afford to replace all that would be necessary under your proposed Scoping Plan.&nbsp; Please consider those of us in areas of economic hardship.</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-23 09:44:44

No Duplicates.

**Comment 8 for Proposed Advanced Clean Cars II Regulations (accii2022) - 15-2.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation: California Clean Cars Coalition

Subject: Suggested edits to ACC II Board Resolution

Comment:

<p>Please find enclosed suggested edits to the Board resolution from the California Clean Cars coalition.</p>

<p class="MsoNormal" style="mso-margin-top-alt: auto; margin-right: .5in; mso-margin-bottom-alt: auto;">&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/586-accii2022-B2YAZQBiBAhRPIU8.pdf>

Original File Name: ACC II Resolution suggested edits final 082322.pdf

Date and Time Comment Was Submitted: 2022-08-23 23:43:33

No Duplicates.