



May 26, 2022

Chair Randolph and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: The Proposed Advanced Clean Cars II Rule

Chair Randolph and Members of the Board,

The Los Angeles Business Council (LABC), would like to encourage the California Air Resources Board (CARB) to further develop the Advanced Clean Cars II program proposal to include stronger pollution-free car sales before the end of the decade. 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 the interim sales targets for electric cars to at least 75% in 2030 to ensure that overall zero-emission vehicle (ZEV) sales requirements meet the emission reduction targets CARB established.

Threatened with the climate crisis, California continues to deal with unprecedented drought, wildfires, high heat days and increasing air pollution, with the transportation sector still the leading driver of emissions. Governor Gavin Newsom's Executive Order N-79-20, directing the state to require sales of all new passenger vehicles to be zero-emission by 2035, puts California on the right path towards dramatically reducing pollution across its communities, while making the state more resilient in the face of a rapidly changing climate. Setting 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 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.

In partnership with the GO-Biz 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 most pollution-burdened communities. LABC strongly supports ACC II standards that are equity-centered and maximize access, affordability, and direct benefits to disadvantaged communities. Currently, the proposed rule has voluntary equity provisions for carmakers, which does 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 strategic long-term infrastructure plan in order to combat the climate crisis and protect the health of all Californians. The average ownership/lease for a new car is about 6 years, this means every time we fail to get someone into a zero emissions vehicle, that's six more years of climate warming emissions and six more years of contributions to harmful air quality. California has the opportunity to eliminate millions of fossil fuel burning cars by increasing the sales of pollution-free vehicles, while also increasing accessibility throughout all communities.

To reiterate, the LABC calls for two critical improvements to the ACC II regulation:

- **Strengthen interim sales targets for zero emission cars to at least 75% new sales by 2030 to ensure that overall ZEV sales requirements meet the emission reduction targets CARB established in their mobile source strategy**
- **Require automakers to either participate in the equity credit incentive program or require them to sell more ZEVs**

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 faster, while transitioning to a clean transportation future. Thank you for accepting our input.

Sincerely,

A handwritten signature in black ink that reads "Mary Leslie". The signature is written in a cursive, flowing style.

Mary Leslie
President
LABC