



November 5, 2021

Joshua Cunningham, Chief
Advanced Clean Cars Branch
California Air Resource Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Advanced Clean Cars II Workshop

Dear Mr. Cunningham:

On behalf of the American Lung Association, we are writing in response to the Advanced Clean Cars II (ACC II) workshop hosted by the California Air Resources Board (CARB) on October 12, 2021. Our comments follow earlier letters from health partners supporting the overall approach to delivering real-world emission reductions to Californians, and point to the need for greater near-term zero-emission vehicle deployments.

California's vehicle emissions and technologies standards have been at the global forefront of transitioning to cleaner engines and zero-emission technologies and must continue to set the pace. The ACC II program must set a clear, near-term pathway for combustion engines and accelerating Zero Emission Vehicle (ZEVs) deployments.

California continues to experience the worst air pollution in the nation, with millions of residents living in areas that do not meet health-protective air quality standards for ozone and/or particulate matter. In fact, the American Lung Association's *State of the Air 2021* report found that seven of the ten most ozone-polluted cities in the United States are in California, as are six of the most polluted by fine particles. A strong ACC II regulation that ensures emissions benefits through stronger controls on combustion engines and accelerated deployment of ZEVs on the pathway to 100 percent ZEV sales is critical to achieving clean air for all Californians.

Zero-Emission Vehicles

We support CARB's overall goal for ZEV standards consistent with Governor Newsom's Executive Order N-79-20, which calls for 100 percent ZEV sales in California by 2035. We also support CARB in ensuring ongoing performance of ZEVs and increasing range requirements for plug-in hybrid electric vehicle credits. Crediting structures must not allow for reduced stringency, and must ensure a more equitable distribution of the clean air benefits of ZEVs.

We remain concerned that the proposed ramp is not sufficient to accelerate early ZEV deployments and emission reduction benefits. CARB should model and establish more ambitious ZEV standards within the ACC II regulatory process that align at a minimum with the new sales fractions modeled for the recently completed 2020 Mobile Source

Strategy (approximately 40% by 2025 and 70 percent by 2030). Ultimately, we restate our workshop comment that CARB should develop sales targets that meet or exceed the MSS assumptions to accelerate the transition in the early years and ensure California remains a leader in clean air solutions.

Criteria Emission Standards

We restate our support for CARB's approach to delivering emissions benefits through the updated criteria emissions standards. The proposed regulations aim to reduce opportunities for engines to emit more harmful pollution in real-world driving conditions. This is an important step to ensuring that as combustion engines are certified, the likelihood of more durable emissions controls provide the anticipated benefits to community health.

Within the proposal, we support removing ZEVs from the fleet average for ozone-forming pollutants and tightening the standards to at most 0.03 grams per mile for ozone-forming emissions to ensure zero-emission vehicle benefits are not balanced against high-polluting combustion vehicles. We also support CARB strengthening the particle pollution standard measurement (US06) to 3 milligrams per mile to control in-use emissions. Finally, we strongly support the proposed tightening of certification testing requirements and the phaseout of higher-emitting vehicle certification bins. Updating the standards to reduce excess emissions from previous program flexibilities and compliance options will provide meaningful health benefits for Californians.

In closing, the policy should deliver true emission reductions and near-term deployment of ZEVs to meet our air quality standards and protect health. We look forward to continued conversations with CARB staff to develop a more stringent ACC II rule that maximizes health benefits for all Californians. Please contact Will Barrett at William.Barrett@Lung.org for any questions or more information.

Sincerely,

Will Barrett
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Mariela Ruacho
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