



A climate justice movement.



May 31, 2022

Liane Randolph, Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95814

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

Dear Chair Randolph and CARB Board Members,

Let's Green CA!, on behalf of the Romero Institute, would like to express our concern about several key components of the recently-released draft Advanced Clean Car II (ACCII) regulations by the Air Resources Board (CARB); namely, that the proposed changes in Staff's preferred Alternative 3 would be insufficient for California to achieve carbon neutrality by 2045, realize 100% clean car sales by 2035, or adequately address the serious equity issues stemming from our continued reliance on fossil fuel-powered vehicles.

The annual zero emission vehicle (ZEV) sales targets laid forth in the ACCII proposal are significantly lower between now and 2030 as compared to the targets CARB has previously established through its Mobile Source Strategy, which CARB has acknowledged is insufficient to take California to net-zero carbon emissions by 2045:

"The light-duty vehicle scenarios reveal that even with extremely aggressive electrification, coupled with aggressive VMT reductions and fuel decarbonization, the sector still cannot achieve its "equal share" of the reductions for NOx and GHG emissions in 2037 and 2045 respectively assumed for this analysis." ([Mobile Source Strategy](#) at p. 98).

Recommending a strategy that will reduce emissions slower than a plan we already know to be a minimum baseline that must be exceeded is a recipe for failure. And when the stakes are as high as climate catastrophe and harm to millions of Californians, the responsible course of action is to pursue the most rapid emissions reductions possible. The draft ACCII regulations do not reflect this responsibility.

Furthermore, because of an excess of banked sales credits from the Advanced Clean Cars I regulations, many vehicle manufacturers will not even need to meet the inadequate ZEV sales targets proposed in ACCII with actual vehicle sales. This will not only again undermine our progress and the progress of other Section 177 states toward 100% ZEV sales, but will continue to most disproportionately detriment low-income and marginalized Californians who may not be able to afford or access ZEVs without the full support of the automotive industry.

Let's Green CA! strenuously urges the Air Resources Board to seriously address these concerns as it continues to develop and revise the ACCII regulations. California is already falling behind other major economies in ZEV adoption, and we no longer have time to waste with plans we know to be insufficient. We call upon CARB to consider accelerating our 100% ZEV sales target from 2035 to 2030 rather than the current draft proposal, which is not significantly different from a "business-as-usual" scenario.

Sincerely,

A handwritten signature in black ink, appearing to read 'BEA', with a long horizontal line extending to the right.

Benjamin Eichert
Let's Green CA! Director