



November 5, 2021

Chair Liane Randolph and California Air Resources Board Members
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Cars II Regulation

Dear Chair Randolph and Board Members,

The proposed Advanced Clean Cars II (ACC II) regulation is one of the most critical steps our state can take in the next few years to ensure the transition from combustion vehicles to non-polluting ones. We urge the Air Resources Board (ARB) to use your authority under the federal Clean Air Act to require zero emission vehicle (ZEV) sales consistent with the demands of the climate crisis and to support clean, healthy air for all residents.

Governor Gavin Newsom's September 2020 executive order (N-79-20) called for a target of 100 percent ZEV sales by 2035 for light-duty cars and trucks, recognizing that clean transportation is critical to reducing climate change and pollution in overburdened communities. When upstream emissions from oil drilling and refining are included, transportation is responsible for about 50% of California's total heat-trapping emissions and is responsible for more greenhouse gases than any other sector. Within the transportation sector, more than 70% of climate-forcing emissions come from passenger vehicles. Analysis prepared for ARB stated that to achieve the state's net-zero emissions by 2045 goal no new gasoline-powered passenger vehicles should be sold after 2035. In addition, according to ARB's own Mobile Source Strategy, the State's air quality and greenhouse gas targets require interim ZEV sales shares of roughly 40% and 70% in 2025 and 2030, respectively.

Climate change, driven by human-caused emissions, is a clear threat to California, with the greatest negative impacts felt first by fence line and low-income communities of color. The latest assessment by the Intergovernmental Panel on Climate Change (IPCC) lays out in stark detail the dangerous path we are on to much higher temperatures and long-term disruption of key natural systems. We need to lower emissions immediately to avoid even worse and more disastrous outcomes. Californians are acutely aware of the evidence of climate change as we experience heat waves, drought, and wildfire affecting virtually everyone in the state.

The American Lung Association's 2021 State of the Air report found seven of the ten smoggiest cities in America are in California, including many of the communities we represent. Our constituents have benefitted from decades of bold ARB actions to clean our air, but there is still

more work to do to ensure clean air is equally enjoyed in low-income communities and communities of color. Driving ZEVs will reduce emissions of reactive organic gases and nitrogen oxides that lead to the formation of fine particulate matter, which is associated with the greatest proportion of adverse health effects related to air pollution in the US. In California, while all will benefit from reduced exposure to air pollution from cars and trucks, moving to ZEVs could help address existing inequities in exposure. ARB must ensure that reducing the transportation pollution impacts on our most vulnerable populations is central to the ambition of the ACC II regulations. Establishing a stronger, more equity-focused ACC II rule is needed to meet federal air quality standards and to ensure all communities experience the critical clean air benefits of more immediate and sustained electric vehicle deployment.

ARB needs to set an ambitious but achievable start point for the ZEV regulation; ARB's proposal, released earlier this year, requires about 25 percent of model year 2026 cars to be qualifying zero emission vehicles. This falls far short of the 40 percent level identified by ARB's Mobile Source Strategy as necessary for meeting urgent air pollution and greenhouse gas reduction targets. Such inadequate near-term requirements will allow far too many gasoline-powered vehicles to be sold between 2025 and 2030, ensuring significant emissions well past 2035. A low target also will fail to push existing manufacturers to move as quickly as they are in places with higher environmental standards (such as the European Union). **ARB should strongly consider revising the proposed ACC II regulations to require more ZEV sales earlier to protect the health and safety of all Californians and to regain the state's leadership role in the US and abroad on climate action.**

The California ARB has a history and a responsibility of leadership in setting bold environmental standards that improve our health and quality of life. Only California has the power to set vehicle standards that other ambitious states can adopt. ARB's failure to meet this moment with aggressive action to cut climate-warming emissions will slow the transition to clean vehicles for everyone in the country. Please restore your leadership and put us all on a faster path to 100 percent zero emission vehicles, breathable air, and a livable climate.

Sincerely,



Assemblymember Laura Friedman,
43rd Assembly District



Senator Lena A. Gonzalez,
33rd Senate District



Assemblymember Luz Rivas,
39th Assembly District



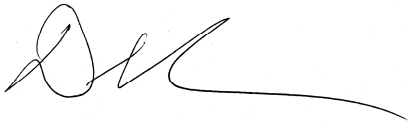
Senator Ben Allen,
26th Senate District



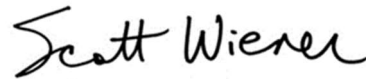
Assemblymember Phil Ting,
19th Assembly District



Senator Monique Limón,
19th Senate District



Senator David Min,
37th Senate District



Senator Scott Wiener,
11th Senate District



Senator Henry Stern,
27th Senate District