

May 31, 2022

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

RE: Support for a Strong Advanced Clean Cars II

Dear Chair Randolph and Board Members,

On behalf of the American Lung Association, we write as state lung health advocates representing all 50 states and the District of Columbia to call on the California Air Resources Board (CARB) to strengthen and approve the Advanced Clean Cars II (ACC2) rule. While Californians need CARB to establish the strongest possible ACC II rule to achieve health-protective clean air standards under the Clean Air Act, we also look to CARB to set the strongest possible standards to bring critical lung health benefits to our communities.

In the American Lung Association's [State of the Air](#) 2022 report, we found that more than 40 percent of all Americans – 137 million people – live in communities impacted by unhealthy air. We also note that the impacts of poor air quality are not equally shared: a person of color in the United States is 61 percent more likely to live in a community with a failing grade for air quality. Unfortunately, we know the climate crisis is making the job of protecting hard-fought clean air gains more difficult and more must be done to protect public health. We call on CARB to continue its longstanding leadership on clean air and climate issues and set the strongest possible ACC II standards to achieve our shared public health mission.

We call on CARB to build upon the staff proposals and set final rules that:

- Require greater near-term deployment of zero-emission vehicles on the path to 100 percent sales by 2035 to accelerate health benefits and reductions in harmful air and climate pollutants;
- Ensure the benefits of the transition to zero-emission vehicles are experienced more equitably in lower-income communities and communities of color; and
- Adopt the more stringent proposals for combustion vehicles that ensure real-world emission reductions and eliminate excess credits, averaging and other past program flexibilities that allowed for excess on-road pollution.

Earlier this year, the American Lung Association released our [Zeroing in on Healthy Air](#) report to illustrate the benefits of a widespread shift to zero-emission transportation and electricity. We found that this transition could result in \$1.2 trillion in public health benefits nationally between 2020 and 2050, with an additional \$1.7 trillion in cumulative global climate benefits. In human health terms, this translated to 110,000 premature deaths avoided, 2.8 million in asthma attacks avoided, and 13.4 million

in lost workdays avoided. By designing strong, equitable zero-emission vehicle programs, CARB can lead the way to protecting health at home and throughout the nation. Our report noted that such an approach could help to concentrate public health benefits in communities with higher populations of people of color.

We thank the staff for their work on this rule and we look forward to the Board's leadership in adopting the strongest possible final rules so that we can work to support adoption in our states. Please contact Mariela.Ruacho@Lung.org with any questions or for more information.

Sincerely,

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Senior Director of Advocacy
**Alabama, Florida, Georgia, Louisiana,
Mississippi, North Carolina and South Carolina**

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