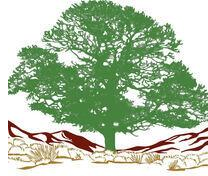




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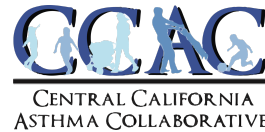


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May 31, 2022

Chair Randolph and Members of the Board
California Air Resources Board

1001 I Street
Sacramento, CA 95814

Re: The Proposed Advanced Clean Cars II and Advanced Clean Fleets Rules

The signatory groups below provide the following comments on the most recent iterations of two critical regulations for accelerating transportation electrification - the Advanced Clean Cars II and Advanced Clean Fleets rules.

The climate crisis is harming California today with unprecedented drought, wildfires, high heat days and exacerbated air pollution. Today, [6 of the top 10 most polluted cities in the country](#) are in California and this toxic air pollution disproportionately harms frontline communities and communities of color. Ensuring fleet operators are electrifying their medium- and heavy- truck fleets, that car manufacturers accelerate their production of pollution-free cars and that the placement of electric trucks and cars are prioritized in frontline communities is the only way to achieve environmental justice. Fortunately, zero-emission vehicle technology has matured and is ready to be fully deployed to dramatically reduce pollution in California communities.

However, the current proposed ACC II and ACF regulations are not strong enough to fully achieve these opportunities by rapidly and equitably transitioning California's transportation system to zero-emissions. The proposed rules fall short of meeting California's climate and environmental justice goals and leave under-resourced communities without strong policy considerations that would deliver access to cleaner air and more affordable, pollution-free transportation options. The Air Resources Board (CARB) must go further to develop regulations that prioritize equitable outcomes that will support and create [hundreds of thousands of good paying jobs](#), keep California competitive with the growing global ZEV marketplace, and dramatically drive down health costs by billions of dollars, improve access and affordability for low-income households, all while significantly reducing and ultimately eliminating tailpipe pollution.

We strongly urge CARB to make the following improvements to the ACC II and ACF regulations:

- **Strengthen interim sales targets for zero emission cars in the ACC II rule to at least 75% new sales by 2030 and ensure that overall ZEV sales requirements meet the emission reduction targets CARB established in their mobile source strategy**
- **Include equity provisions in the ACC II rule that ensure car-makers increase affordability and access to pollution-free cars in frontline communities.**
- **Strengthen the ACF sales mandate to require 100% ZEV sales by 2036 to accelerate the number of zero-emission trucks driving through environmental justice communities.**
- **Expand the number of fleets covered by the ACF rule by reducing the priority fleet threshold from 50 or more trucks to 10 or more for Class 7 and 8 tractors to maximize air quality benefits for the most environmentally burdened communities.**

- **Add strong language in the State Implementation Plan to require CARB to complete a new rulemaking that would require the retirement of combustion engine medium and heavy-duty vehicles once they reach the end of their minimum useful life.**

CARB's current ACC II and ACF proposals do not come close to achieving the pollution reductions from cars that CARB's own mobile source strategy says are needed to meet the state's air quality and climate goals. The current proposal leaves Californians stuck with hundreds of thousands of more polluting cars and trucks on the road that will continue to spew climate warming and lung-damaging pollution.

Furthermore, the current rules risks having California fall [further beyond markets like Europe and China](#) that are dramatically accelerating ZEV adoption. Automakers are already shifting resources to countries where there are stronger policies, [driving up investment and jobs in these regions](#). In terms of [bringing cars to market](#), automakers have introduced more than twice as many electric models in Europe compared to the U.S., and more than five times as many models in China.

Low-income communities of color have been disproportionately impacted and have suffered from adverse impacts of fossil fuel operations including tailpipe emissions for decades. Households and families that live in Disadvantaged Communities have earned the right to directly access and benefit from all forms of clean mobility options in a more comprehensive way. ACC II and ACF standards must center equity to maximize the direct benefits of zero-emission vehicle deployment to Disadvantaged Communities.

It's your duty to set strong air pollution standards that will save lives. We need bolder action that matches this moment of crisis. Don't pass up this opportunity to create a healthier, more just and vibrant economic future for California.

Thank you for your consideration.

Sincerely,

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Green Latinos

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