

May 31, 2022

Chair Randolph and Members of the Board

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Dear Chair Randolph:

On behalf of the more than 80,000 citizen members and activists of Environment New Jersey across the Garden State, we are writing to thank you for California’s continued leadership to accelerate the transition to zero emission vehicles by setting strong standards that states like ours can also adopt. We join many allies across the nation and across the state, including our long-term partners, the Sierra Club, which these comments are derived from.

New Jersey has had a long history with the Clean Cars program, [becoming the first state to join the program through legislative action in early 2004](https://mde.maryland.gov/programs/air/mobilesources/pages/states.aspx), which helped spark an additional seven states to join the Clean Cars program and then led to federal action by the Obama Administration EPA in 2011.At the time of its original passage, New Jersey air quality was plagued by both particulate matter and ground level ozone. While we have seen improvements in our particulate matter rankings in [the annual American Lung Association State of the Air report](https://www.lung.org/research/sota), mainly because of reduction in out-of-state stationary source pollution, our ground level ozone – and our failing scores in the ALA annual report – have remained constant.

It has been especially painful reminder of the impact of air pollution when Harvard School of Public Health Research showed early in the COVID-19 pandemic that air pollution – especially in urban communities – served as a vector for the spread of the virus. Even [with the passage of New Jersey’s Electric Vehicle omnibus legislation in January 2020](https://www.njleg.state.nj.us/bill-search/2018/S2252/bill-text?f=S2500&n=2252_U2), we still need to do more to jumpstart a fuller transition to an electric vehicle and electric vehicle future.

While the proposed Advanced Clean Cars II rule contains many provisions that we support, we urge you to adopt a stronger and more equitable rule. This regulation is one of the most significant opportunities to address the number one source of dangerous air and climate pollutants in the nationandwill make us less reliant on expensive and volatile fossil fuels that wreak havoc on our family budgets and economy.

Families on a budget spend as much as [20% of their income on fuel](https://www.aceee.org/blog-post/2021/05/analysis-gasoline-costs-consume-nearly-20-some-household-budgets#:~:text=Analysis%3A%20Gasoline%20Costs%20Consume%20Nearly%2020%25%20of%20Some%20Household%20Budgets,-May%2020%2C%202021&text=Many%20of%20the%20lowest%2Dincome,for%20an%20Energy%2DEfficient%20Economy.), and that’s likely more with gasoline still [hovering above $4 a gallon](https://gasprices.aaa.com/?state=CA) nationwide and reaching more than $5 a gallon in many counties across New Jersey currently. And, the [latest IPCC report](https://www.ipcc.ch/report/ar6/wg3/resources/press/press-release/) says we are running out of time to take bold action on the climate crisis that disproportionately impacts frontline communities, including low-level urban communities in Camden, Paterson, Elizabeth, Atlantic City, Newark and Jersey City which have been especially hit hard [by extreme weather events like the flooding from Hurricane Ida last fall, which led to the deaths of 30 people across the state, especially in urban communities](https://www.nytimes.com/live/2021/09/02/nyregion/nyc-storm).

The strongest possible Advanced Clean Cars II program is the best tool states like New Jersey have for slashing emissions from the transportation sector, which in many states is the greatest source of climate emissions. In New Jersey, [more than 40% of our climate pollutants coming from our transportation sector](file:///C%3A%5CUsers%5COwner%5CDesktop%5Cmore%20than%2040%25%20of%20our%20climate%20pollutants%20coming%20from%20our%20transportation%20sector). Within the overall transportation sector, over 70% of climate pollution comes from passenger cars and trucks; in New Jersey, it reaches to more than 75%.

Our state needs an Advanced Clean Car II program with strong, interim, year-over-year Zero Emission Vehicle (ZEV) sales requirements that overcome loopholes and credits that will leave hundreds of thousands of polluting vehicles on the road for decades. **However, the current proposed Advanced Clean Car program update falls short on those interim sales targets and leaves under-resourced communities without strong policy considerations that would deliver more affordable, pollution-free transportation options.**

You can save lives, help us cut ties with volatile fossil fuel prices and fight the climate crisis by:

* **Strengthening interim ZEV sales requirements for electric cars.**
* **Including stronger equity provisions that ensure car-makers increase affordability and access to pollution-free cars in frontline communities.**

We cannot afford the health and climate costs associated with burning fossil fuels[. The New Jersey Department of Environmental Protection and Rutgers University estimate that we could see sea-level rise of up to 1 foot by the end of this decade and more than 2 feet by 2050](https://www.nj.gov/dep/newsrel/2019/19_0098.htm), with upper estimates reaching more than 6 feet of sea level rise by the end of this century in our coastal communities. This will alter the cultural, economic and human face of the state in a way that we are only starting to imagine; we owe it to future generations to act boldly to cut climate pollution from cars and trucks. If we don’t significantly cut our climate pollution, the [average 6-year-old](https://www.washingtonpost.com/climate-environment/2021/09/26/change-disasters-kids-science-study/) will live through roughly three times as many climate disasters as their grandparents and will see twice as many wildfires.

Note, last November, Gov. Phil Murphy issued [Executive Order 274](https://nj.gov/infobank/eo/056murphy/pdf/EO-274.pdf) ordering the state to reduce climate pollution by 50% by 2030, a goal [which matches the U.S. Climate Alliance](http://www.usclimatealliance.org/publications/2021/11/7/us-climate-alliance-states-commit-to-new-high-impact-actions-to-achieve-climate-goals-and-go-further-faster-together#:~:text=Governors%20in%20the%20Alliance%20commit,and%20no%20later%20than%202050.) and [the Biden Administration’s own goals](https://www.whitehouse.gov/briefing-room/statements-releases/2021/04/22/fact-sheet-president-biden-sets-2030-greenhouse-gas-pollution-reduction-target-aimed-at-creating-good-paying-union-jobs-and-securing-u-s-leadership-on-clean-energy-technologies/). The only way we can achieve these necessary goals is by drastically reducing our carbon pollution from the cars and trucks we drive. New Jersey is counting on you to set strong air pollution standards so that we can follow suit. We need bold action that matches this moment of crisis. Don’t pass up this historic opportunity to create a healthier, more just and vibrant economic future.

Sincerely,



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