



May 27, 2022

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

**Clean Transportation
Technologies and Solutions**

www.calstart.org

Dear Chair Randolph and Board Members,

Thank you for the opportunity to submit comments on behalf of CALSTART. The Advanced Clean Cars II (ACC II) proposed regulations represent California's continued leadership in regulating tailpipe emissions and transitioning the manufacturing industry towards 100% sales of zero-emission vehicles. The effort to implement ACC II will result in California communities seeing reductions in tailpipe emissions and increasing the number and quality of zero-emission vehicles (ZEVs) and plug-in hybrid electric vehicles (PHEVs) on the road.

CALSTART is a member-based non-profit dedicated to the acceleration of the clean transportation industry. Our membership consists of over 300 members across the sector including vehicle manufacturers, public and private fleets, electric utilities, electric vehicle charging companies, and a range of other businesses and organizations.

We support the California Air Resources Board (CARB) staff's proposal to require 100% ZEV and PHEV sales by 2035. We believe the timeline takes into consideration what many manufacturers have committed to publicly, while providing a clear market signal to industry to accelerate the ZEV transition.

CALSTART agrees with staff analysis that 80% of the state's vehicles could be electrified by 2030. We encourage staff and board members to allocate the funding and educational resources to accelerate that last 20% of hard-to-reach communities to electrify. This could be accomplished with more funding for zero-emission light-duty trucks or similar vehicles and more outreach to communities about programs that offset costs to transition to ZEVs.

While we support ACC II's schedule and purpose, there is concern over the battery performance and warranty requirements. The deviation from the United Nations Global Technical Regulation's battery degradation standards may cause uncertainty for ZEV and PHEV manufacturers. CALSTART asks CARB staff to work with manufacturers to adopt battery performance requirements that reflect existing international standards to avoid cost increases for ZEVs and PHEVs in California.

ACC II provides a critical opportunity for further reductions nationally via the Section 177 state pooling and transfer of excess ZEVs and PHEVs in the 2026 through 2030 model years. Ideally, this would allow for manufacturers to meet their requirements in multiple states. A concern voiced by some CALSTART members however is that California's ZEV rebates and programs are far greater than other Section 177 states and the investments in other states to grow the market are not as readily available. The proposal states that the ability to pool and transfer can help grow ZEV markets. However, the reality is that

OFFICES IN :

48 S. Chester Ave PASADENA, CA 91106 | 1607 Cole Blvd. LAKEWOOD, CO 80401 | 67 35th St. 5th floor Ste B508 BROOKLYN, NY 11232 |
2600 Tenth Street, Suite 407, BERKELEY, CA 94710 | 200 E. Big Beaver TROY, MI 48083 | 168 Smolian Circle, SANTA ROSA BEACH, FL 32459



excess ZEV and PHEV numbers in others states to help meet the California requirement in years 2026 through 2030 is far from certain.

CALSTART has long supported CARB's continued focus on reducing tailpipe emissions and commitment to driving the market to 100% zero-emissions and remains a strong ally in the push to mitigate transportation's role in climate change. Advanced Clean Cars (ACC), Advanced Clean Trucks (ACT), Advanced Clean Fleets, and supporting policies are standards that CALSTART has promoted in advocacy efforts across the country (ACC and ACT adoption) and around the world (CALSTART'S global Drive to Zero campaign).

CALSTART acknowledges that for regulations like ACC II and others to be effective, industry needs incentives and implementing policy support. CALSTART will continue pursuing opportunities to address the entire ecosystem of policies required to transition to zero and looks forward to working with CARB staff on additional efforts to support the successful transition of the industry to ZEVs.

Thank you for the opportunity to provide comment on this important proposed regulation. If you have any questions or comments, please contact me (jolson@calstart.org) or our State Policy Director, Orville Thomas (othomas@calstart.org).

Sincerely,

Jessica L. Olson
Vice President, Policy
CALSTART