

July 28, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chair Randolph and Members of the Board,

On behalf of our over 500,000 supporters, the Union of Concerned Scientists (UCS) urges the Air Resources Board (ARB) to adopt the Advanced Clean Cars II (ACCII) standards. The ACCII standards are one the most important air and climate pollution regulations to come before this board and the rules are the culmination of decades of ARB action on clean cars and zero emission vehicles (ZEVs).

Adoption of ACCII standards is important not only for ensuring cleaner air and lower climate-changing emissions in California, but also for other states that rely on California to set emissions standards equal to or more stringent than federal standards. California needs to continue to show leadership on protecting health and minimizing climate change damage.

Action on climate and air quality is needed as quickly as possible. According to the American Lung Association, 98 percent of Californians live in a county impacted by poor air quality and six California cities were in the top ten in the United States for days with unhealthy ozone levels.¹ Transportation, including light-duty vehicles, is a significant source of air pollution in the state and reducing or eliminating tailpipe air pollution is needed to reduce harmful exposures. Light-duty vehicles not only contribute to unhealthy air quality, but they are also the single largest source of climate-changing emissions in our state. ARB estimates that passenger vehicles are responsible for over 28 percent of total human-caused climate-changing emissions, more than the residential, commercial, and agricultural sectors combined.² In order to address these concerns, ARB should act as quickly as possible. By adopting ACCII now, ARB can set standards for vehicles starting with model year 2026 and allow other states to adopt in time to also impact model year 2026 vehicles.

ARB's own analysis shows the need for deep reductions in passenger car emissions. The Mobile Source Strategy is ARB's strategy "identifying the technology trajectories and programmatic concepts to meet our criteria pollutant, greenhouse gas, and toxic air

¹ American Lung Association. 2022. State of the Air. Online at <https://www.lung.org/research/sota>

² California Air Resources Board. 2021. "California Greenhouse Gas Emissions for 2000 to 2019: Trends of Emissions and Other Indicators" Online at https://ww2.arb.ca.gov/sites/default/files/classic/cc/inventory/2000_2019_ghg_inventory_trends_20220516.pdf

contaminant reduction goals from mobile sources.”³ In the Mobile Source Strategy, ARB’s primary scenario shows 46 percent ZEV sales in 2026 and 70 percent ZEV sales in 2030 as needed to meet emissions targets. This is but one sales scenario possible, but it shows the magnitude of new ZEV sales needed to protect health and address climate change. The ACCII regulation will help achieve much of the required emissions reductions, however ARB will need to identify additional reductions to meet the difference from the Mobile Source Strategy and the requirements of the ACCII regulation. ARB should also take actions in addition to the ACCII regulations to ensure that clean air benefits of ZEVs reach the communities most impacted by air pollution, including increasing ZEVs available through the Clean Cars For All and Clean Vehicle Assistance Program.

In addition to being more protective of health and having greater emissions reductions than the existing Advanced Clean Car regulations, ACCII will mean more ZEV choices for buyers and include warranty requirements to ensure ZEVs are available in the used vehicle market. Automakers will need to address the entire vehicle market and make ZEVs available in a range of vehicle sizes, from small sedans to pick-up trucks and SUVs. The ACCII regulations will also ensure that automakers have certainty in vehicle emissions rules and encourage more research and development.

We urge the board to adopt the ACCII regulations as the timely adoption of ACCII is critical to avoid the worst impacts of climate change and ensure cleaner air for all in the state.

Sincerely,

A handwritten signature in black ink that reads "David Reichmuth". The signature is written in a cursive style with a large, stylized "D" and "R".

David Reichmuth, Ph.D.
Senior Engineer
Clean Transportation Program
Union of Concerned Scientists

³ California Air Resources Board. 2021. “2020 Mobile Source Strategy” Online at <https://ww2.arb.ca.gov/resources/documents/2020-mobile-source-strategy>