



July 27, 2022

Chair Liane Randolph, Members of the California Air Resources Board and Staff
1001 I Street
Sacramento, CA 95814

Re: 15-Day Change Order for the Advanced Clean Cars II Rule

Dear Chair Randolph, Board members and staff,

Environmental Defense Fund respectfully submits these comments in response to the proposed 15-day changes to the Advanced Clean Cars II (ACC II) regulation. Timely adoption of the proposed ACC II regulation is critical to secure deep reductions in the climate and air pollution from light-duty vehicles that harms the health of communities across California and threatens our planet. ACC II is a historic and important step in responding to the dual crises of climate change and air pollution and will likewise help to support the development of protective national standards. We urge the Board to adopt the ACC II regulation, with the 15-day changes, without delay.

We are also disappointed that the 15-day changes fail to include stronger equity provisions that adequately address the significant and disproportionate impact that vehicle pollution has on communities of color and low-income communities. EDF and numerous other health, community, equity and environmental organizations provided extensive recommendations to ARB staff and Board members on how the ACC II program could be strengthened to better meet the serious needs of frontline communities, including ways to ensure that any equity provisions be utilized by manufacturers. While a few of these recommendations were incorporated, the 15-day changes fall short of any meaningful provisions to ensure that zero-emitting cars make their way into the communities that need them most.

We recognize that advocating a stronger equity program within the ACC II program at this time would further delay finalization of the regulation. Therefore, we ask that you adopt the revised regulation, including the 15-day changes, at your August hearing. However, we also ask the Board to take immediate steps outside of the regulation to further the equity of cleaner air across California.

At the June hearing, Chair Randolph acknowledged that much more than the ACC II regulation will be needed to deliver clean car equity to all Californians. Thus, in adopting the revised regulation, including the 15-day changes, we ask you to include in the resolution direction to staff to strengthen CARB's commitment to equity in all actions outside of this regulation, and to

continue to work with OEMs and equity stakeholders to do so. EDF supports the specific resolution language recommended by the California Clean Cars Coalition in a letter also submitted on July 28, 2022 to the ACC II docket regarding the 15-day changes.

EDF asks the Board to approve the ACC II regulation, as amended, without delay to ensure that more zero-emitting cars and light trucks hit our roads as soon as possible, delivering significant economic, health and environmental benefits, while also helping to support and grow domestic jobs. We also urge you to pass a resolution that directs ARB staff to take swift and meaningful action to provide greater clean car equity to all Californians – at the same time providing reporting and transparency on the progress made.

Sincerely,

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