

May 28, 2020

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Informational Update on the Advanced Clean Cars II Regulation

Dear Chair Nichols and Members of the Board,

The Union of Concerned Scientists (UCS) thanks the board and staff for their years of work laying the groundwork for the Advanced Clean Cars II (ACCII) regulation and also for their work defending California's authority to address climate change and air pollution issues that are impacting all Californians.

Moving quickly to implement ACCII is important. Delaying reductions in emissions from vehicles needlessly puts Californians at risk of shorter lives from air pollution exposure and increases the impact of climate change. In addition, UCS research shows that exposure to pollution from current on road sources is both significant and inequitable.¹ California needs to move as fast as possible to protect its people. The state can also send a clear signal to the rest of the US that we can have both mobility and a safe environment by requiring cleaner combustion vehicles and increasing electrification.

CARB's modeling results from the updated Mobile Source Strategy are clear: the transition from combustion to electric drive must be accelerating in the second half of this decade and electric drive needs to be the majority of new car sales by decade's end. Because of this urgency, CARB should make every effort possible to initiate a new standard starting with model year 2026. Any new standards should also take into account continuing improvements in conventional and electric vehicles prior to ACCII's start date.

Thank you for your leadership in developing the ACCII regulations and we look forward to engaging with CARB as this process continues.

Sincerely,



David Reichmuth
Senior Engineer
Union of Concerned Scientists
Oakland, CA

¹ Inequitable Exposure to Air Pollution from Vehicles in California, Union of Concerned Scientists (2019). Online at: <https://www.ucsusa.org/resources/inequitable-exposure-air-pollution-vehicles-california-2019>