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May 25, 2022

Chair Randolph and Members of the Board
California Air Resources Board

1001 I Street
Sacramento, CA 95814

Re: Advanced Clean Cars II Regulation

Dear Chair Randolph and Members of the Board,

The Advanced Clean Cars II (ACC II) regulation is one of the most critical steps our state can take in the next few years to ensure an equitable and accelerated transition from combustion vehicles to non-polluting ones. On behalf of our constituents, we urge the Air Resources Board (CARB) to strengthen the ACC II rule to require zero emission vehicle (ZEV) sales and equity provisions to be consistent with the demands of the climate and environmental justice crises and to support access to clean, healthy air for all residents.

The [latest IPCC report](#) says we are running out of time to take bold action on the climate crisis that is already harming California today with unprecedented drought, wildfires, high heat days and exacerbated air pollution. The American Lung Association's 2021 State of the Air [report](#) found seven of the ten smoggiest cities in America are in California, including many of the communities we represent. The toxic air pollution disproportionately harms frontline communities and communities of color. Fortunately, zero-emission vehicle technology has matured and is ready to be fully deployed to dramatically reduce pollution in California communities.

However, the current ACC II proposal is not strong enough to fully achieve these opportunities by rapidly and equitably transforming the passenger vehicle market to zero-emissions. Furthermore, we are deeply concerned that under the proposed rule our constituents in Disadvantaged Communities will continue to bear an unfair burden of [fuel costs](#) and [harmful pollution](#). Families on a budget spend as much as [20% of their income on fuel](#), and that's likely more with gasoline still [hovering above \\$5 a gallon](#) in the state. Ensuring car manufacturers accelerate their production of pollution-free cars and making sure they're placed in frontline communities is the only way to achieve environmental justice.

Critical to achieving Governor Newsom's target of 100% pollution-free electric car sales by 2035 are strong, interim, year-over-year sales requirements that overcome loopholes and credits that will leave hundreds of thousands of polluting vehicles on the road for decades. **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.**

Our constituents have benefitted from decades of bold CARB actions to clean our air, but there is still more work to do to ensure clean air is equally enjoyed in low-income communities and communities of color. Driving ZEVs reduces emissions of reactive organic gasses and nitrogen oxides that lead to the formation of fine particulate matter, which is associated with the greatest proportion of adverse health effects related to air pollution in the US. CARB must ensure that reducing the transportation pollution impacts on our most vulnerable populations is central to the ambition of the ACC II regulation. Therefore, we urge CARB to **strengthen interim sales targets for electric cars to 75% in 2030 and include mandatory equity provisions that ensure car-makers increase affordability and access to pollution-free cars in frontline communities.**

The CARB has a history and a responsibility of leadership in setting bold environmental standards that improve our health and quality of life. The ACC II rule is one of the most significant opportunities California has to address the state's number one source of dangerous air and climate pollutants and make us less reliant on expensive and volatile fossil fuels that wreak havoc on our family's budgets and economy. CARB's failure to meet this moment with aggressive action to cut climate-warming emissions will slow the transition to clean vehicles for everyone in the country. Please restore your leadership and put us all on a faster, more equitable path to 100 percent zero emission vehicles, breathable air, and a livable climate.

Sincerely,



Coleen Mackin
Mayor, City of Brisbane