



May 31, 2022

Chair Liane Randolph
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

RE: Public Health Comments on Advanced Clean Cars II Proposed Rule

Dear Chair Randolph and Board Members:

The undersigned members of California’s public health and medical community urge the California Air Resources Board (CARB) to strengthen and approve the Advanced Clean Cars II (ACC II) rule to improve air quality for all Californians. The final ACC II rule must have clear and near-term goals for transitioning from combustion to zero-emission technology while also improving emission controls for combustion engines.

The transportation sector is the leading source of air and climate pollutants in California. According to the American Lung Association’s *State of the Air* 2022 report six of the top ten most ozone-polluted American cities are in California as are the eight American cities with the highest number of unhealthy particle pollution days. People of color are 3.6 times more likely than white people to live in a county with failing

grades for ozone, short-term particles, and annual particle levels that fail to meet national standards.¹ The health of Californians – and especially our most disadvantaged communities – is negatively impacted by these pollutants and requires strong actions by CARB to curb pollution from the passenger vehicle fleet.

The ACC II rule represents a crucial step toward healthier air for all Californians through strong policies to reduce harmful emissions from the combustion vehicle fleet while accelerating the complete transition to zero-emission technologies. As proposed, the ACC II would require cleaner combustion engines and set the trajectory to full zero-emission vehicle sales by 2035. These proposals will have significant public health benefits and save over 1,200 lives.² Still, we know that the proposed rule leaves greater public health benefits unrealized and encourage the board to strengthen the policy and capture additional health benefits by increasing the zero-emission vehicle requirements in the earlier years on the pathway to full zero-emission vehicle sales by 2035. This will create greater certainty for the zero-emission vehicle market, increase the supply of non-polluting vehicles in the secondary market and more significant health benefits. Further, CARB must continue to work toward firm strategies to ensure the benefits of zero-emission technologies accrue in communities most impacted today by unhealthy air. Therefore, we urge CARB to set the most stringent possible ACC II rule and to approve as soon as possible. Our comments and recommendations on key elements of the proposals follow:

Ensuring Real-World Clean Up of Combustion Vehicles: Throughout the process, the health and medical community has provided comments urging CARB to ensure real-world emission reductions follow the new standards. The proposal provides strong policies to reduce pollution by setting more stringent emission controls, eliminating the balancing of zero-emission vehicles against higher-polluting combustion vehicles, improvements to test procedures and limiting prior flexibilities in the program that have generated excess emissions. The proposal establishes stronger combustion vehicle standards that will reduce harmful pollution in California communities.

Ensuring an Equitable Transition to Zero-Emissions to Cut Air and Climate Pollution:

The ACC II rule must have more stringent zero-emission vehicle sale goals for early years of the rule to help expand the new- and used-ZEV markets earlier than the proposal envisions. We appreciate that the proposal has evolved and become more stringent over time but urge the board to strengthen requirements for the early years of the program. CARB should align the trajectory with the 2020 Mobile Source Strategy and a 75 percent sales requirement in 2030. Alignment with the Mobile Source Strategy would reduce more harmful pollution overall and earlier, save more lives, and yield hundreds of millions more in public health benefits than the proposed rule.³ CARB must also ensure the benefits of zero-emission transportation are directed to our most disadvantaged communities through stronger equity standards.

In the *Zeroing in on Healthy Air* report the Lung Association found that California has the most to gain from transitioning to zero-emission vehicle technologies and that California cities rank among the cities with the most to gain from this transition.⁴ Transitioning all vehicle classes, from passenger to medium and heavy-duty trucks, paired with a non-combustion electric grid could generate \$169 billion in public health benefits between now and 2050 in California, and over \$1.2 trillion nationally. In California, this translates to over

¹ American Lung Association. State of the Air 2022. April 21, 2022. www.lung.org/sota

² California Air Resources Board. Initial Statement of Reasons at page 140. April 2022. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/isor.pdf>

³ CARB ISOR at pages 176-77. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2022/accii/isor.pdf>

⁴ American Lung Association. Zeroing in on Healthy Air: A National Assessment of Health and Climate Benefits of Zero-Emission Transportation and Electricity. March 30, 2022. www.lung.org/ev

15,000 avoided premature deaths, over 440,000 avoided asthma attacks and over 2.1 million avoided lost workdays avoided. The report further notes that these benefits could be concentrated in communities with the highest percentage populations of color, indicating the strong need for policies and investments to be designed with equitable distribution of zero-emission technologies and benefits at their core.

We thank the staff for making updates to the rule and ask that you continue to strengthen the rule even further to advance greater early deployments of zero-emission vehicles and ensure health benefits accrue in communities most impacted by harmful pollution today. We look forward to continuing the conservation of this critical public health rule. Please contact Will Barrett at the American Lung Association with any questions at William.Barrett@Lung.org.

Sincerely,

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