

May 31, 2022
Liane Randolph, Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95814

Dear Chair Randolph:

We write as California nears completion of its critical Advanced Clean Cars II Rule, which guides the state through an electric vehicle transition until the last gas-powered car is sold. With another summer of wildfires, drought and deadly heat waves on the horizon, this is a pivotal moment for the state to slash auto emissions at the scale and urgency needed to truly address the climate crisis while protecting communities hit first and worst by fossil fuel pollution. You and the California Air Resources Board (CARB) are about to decide whether California will effectively address the state's single-biggest source of climate pollution for years to come.

As conservation, environmental justice, community, health, faith, and civic organizations representing millions of Californians, we call on you to take more aggressive action to clean up the California passenger-vehicle fleet. The rule should ensure an equitable transition to electric vehicles while promoting clean, public mobility options in line with zero-emission transportation. CARB's current proposal for the ACC II regulation, however, is not nearly strong enough to push California to meet its climate targets as mandated by SB 32 or to ensure equitable access to electric vehicles. We urge you to fix these serious shortcomings, and specifically to:

- Reach 100% electric vehicle (EV) sales by 2030 and require strong EV targets in earlier years to drive the market forward, rather than rely on progress in later years
- Pursue mandatory measures that ensure low-income communities of color have greater and more equitable access to electric vehicles as well as other clean mobility options and their associated benefits, including access to family-supporting jobs in the clean transportation sector.
- Adopt standards that include significant pollution reductions from all gas-powered cars and light trucks sold over the next decade — including a minimum 7% annual decrease in greenhouse gas emissions.
- Ensure that materials for EVs are responsibly-sourced through environmental and human rights due diligence assessments on supply chains.

CARB's Proposal Should Require Stronger EV Targets in Earlier Years

California needs to achieve 100% EV sales sooner than 2035 to save millions of tons of carbon pollution, improve health outcomes across the state, and spur the industry to evolve faster both in California and in other states. Research shows that achieving 100% EV sales by 2035 is insufficient for California to reach its mandates under SB 32 and its carbon neutrality goal by 2045, and it puts President Biden's climate goals in jeopardy as well. California can only meet its climate targets if all new cars and light-duty trucks sold in the state in 2030 and beyond produce zero emissions.¹

The Rule Should Prioritize Equity

In speeding EV adoption, CARB must ensure low-income communities and communities of color have greater access to electric vehicles. These communities have been worst hit by on-road, drilling, and refinery pollution, and emphasis should be placed on ensuring that these same communities benefit from new zero-emission technology first and foremost. Accordingly, this rule should secure **mandatory** equity commitments while promoting purchase incentives, charging infrastructure, and practical and accessible shared mobility in environmental justice communities. These commitments should not be countable against the rule's other stringency targets. Finally, CARB should work with other state agencies to promote a transportation system that is less dependent on passenger cars. Strong investments in public transit and other clean mobility options like active transportation would also ease many of the burdens low-income communities of color face and are crucial to advance a more equitable transportation system.

The transition to 100% clean vehicles is also a tremendous opportunity to create family-supporting, high-road jobs. High-road jobs are those which provide family-sustaining wages and benefits, a free and fair opportunity for workers to form unions, training and advancement opportunities and hiring opportunities for historically disadvantaged workers. CARB should work with the Labor and Workforce Development Agency as well as other agencies, community groups, and labor partners to expand high quality job opportunities for communities of color and low-income communities.

The Next Clean Cars Rule Must Require a Minimum of 7% Annual Emissions Reductions from New Gas-Powered Cars and Trucks

The next car standards must ensure that the remaining fossil-fuel vehicles sold this decade are cleaner. Most vehicles that are sold in the next few years will be gas-powered vehicles, and these light duty trucks and cars will remain in operation for as long as 20 years. Therefore, CARB

¹ Fleming, John, [All-Electric Drive: How California's Climate Success Depends on Zero-emission Vehicles](#), Center for Biological Diversity (2020).

should mandate a 7% annual improvement in emissions, up from the roughly 5% annual improvement of the Obama standards. Because this 5% annual improvement has already been declared achievable by CARB and others, and because CARB itself has stated that this 5% could be strengthened, a slight increase to 7% is eminently feasible, especially because many auto companies are not fully using technology that already exists to make petroleum cars less polluting.

California's Clean Vehicle Fleet Cannot be Built with Dirty Mining

Metals mining is one of the world's dirtiest industries, responsible for at least 10% of greenhouse gas emissions. Mining is linked to environmental destruction, freshwater contamination and depletion, human rights abuses, forced displacement, loss of livelihood, violent conflict, unsafe working conditions, and illicit financial flows in many parts of the world. As California leads the way to a clean energy future, we can reduce the risk of harm from metals mining by requiring EV manufacturers to maximize recyclability, minimize toxicity, conduct mandatory due diligence on their supply chains, and where new mining is necessary, require that it be done following the best standards for environmental protection and respect for human rights via independent, third-party verification.

With the climate emergency worsening each day, there is no time for delay. This new rulemaking will be critical locally, nationally, and globally. As the world's fifth-largest economy, California must continue to lead the way to decarbonize the passenger-vehicle fleet at the speed required by science and justice. We can and must accelerate the transition to a zero-emission fleet of vehicles, and mandate cleaner gas-powered vehicles in the meantime. At this pivotal moment such an effort will require strong leadership from you to regulate with the true urgency of climate change and equity in mind.

Sincerely,

1. 350 Bay Area
2. 350 Conejo / San Fernando Valley
3. 350 Humboldt
4. 350 Sacramento
5. 350 Santa Barbara
6. 350 Silicon Valley
7. Acterra: Action for a Healthy Planet
8. Active San Gabriel Valley
9. Albany Climate Action Committee

10. Alliance of Nurses for Healthy Environments
11. Biofuelwatch
12. California Nurses for Environmental Health and Justice
13. Center for Biological Diversity
14. Center for Community Action and Environmental Justice
15. Center on Race, Poverty & The Environment
16. Central California Asthma Collaborative
17. Central California Environmental Justice Network
18. Clean Power Works
19. CleanEarth4Kids.org
20. Climate First: Replacing Oil & Gas
21. Climate Hawks Vote
22. Climate Health Now
23. Climate Reality Bay Area
24. Code Pink
25. Coltura
26. Community Environmental Council
27. Earth Action, Inc.
28. Earthworks
29. Elders Climate Action, So Cal Chapters
30. Elders Climate Action, NorCal Chapter
31. Endangered Habitats League
32. Extinction Rebellion America (XRA) - Sacramento
33. Extinction Rebellion SF Bay Area
34. Food & Water Watch
35. Fossil Free California
36. Fresh Air Vallejo
37. Fresnoans against Fracking
38. Friends of the Earth
39. Greenpeace USA
40. Indivisible Ross Valley
41. Let's Green CA!
42. Long Beach 350
43. Long Beach Gray Panthers
44. Marin Interfaith Climate Action
45. Mothers Out Front California
46. Mothers Out Front SF
47. Mothers Out Front Silicon Valley
48. Oil and Gas Action Network
49. Pacific Environment

50. Palms To Pines Democratic Network
51. Resource Renewal Institute
52. Sacramento City College's Sustainability and Environmental Club
53. Sacramento Climate Coalition
54. San Diego 350
55. San Francisco Baykeeper
56. Santa Barbara Standing Rock Coalition
57. Santa Cruz Climate Action Network
58. Stand.earth
59. Sunflower Alliance
60. Sustainable Mill Valley
61. The Climate Center
62. The Climate Reality Project: Los Angeles Chapter
63. ZEV2030